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January 18, 2009

Mr. Thomas Last
Director of Planning
City of Grass Valley
125 East Main Street
Grass Valley, CA 95945

Re: Comments on Draft Idaho Maryland Mine Project EIR

Dear Mr. Last:

After analyzing the Draft Environmental Impact Report for the Idaho Maryland Mine, we have major concerns about the impacts the proposed mine will have on the Loma Rica development. Our greatest concerns relate to air quality and traffic circulation.

Air Quality

The Sacramento Regional Air Quality Forecast reports hazardous high ozone levels and air pollution in general in the Grass Valley area. Air pollution is a serious problem and has become a major concern for citizens and elected officials. High levels of nitrogen oxides, ozone and airborne particulate matter are associated with asthma and other respiratory illnesses. These illnesses are increasing in Nevada County.

If "bad air" becomes a prevalent condition in Grass Valley, our city will suffer. Tourists will not visit destinations with bad air. Retirees will look elsewhere. Young people will leave to raise their families in places with healthy air. Existing residents will move away. Businesses will suffer. Funding for the arts and other cultural activities will decline. Our future requires that we protect the quality of our air.

We are concerned about unmitigated emissions at the mine. The Loma Rica project is within one-half mile of the mine and the ceramics plant. Bad air would serious damage the project. Loma Rica will add more than 700 permanent jobs within the City of Grass Valley, will provide miles of public trails, will create hundreds of acres of open space, will build workforce and market rate housing, will provide an environment for cultural and recreational amenities and will increase the tax rolls by over \$500 million. We are concerned that unmitigated air pollutants would jeopardize the Loma Rica project.

Therefore we expect that all appropriate technology be employed to mitigate odors, nitrogen oxides, ozone and airborne particulate matter. The EIR consultants must explore all possible ways to eliminate air pollution at the proposed mine project.

Traffic Circulation

Our second major concern is that the Loma Rica commercial center in adjacent to Idaho-Maryland Road. The DEIR states the proposed mine activities would occur seven days per week. These activities would include the use of Idaho Maryland Road. Heavy truck traffic would be detrimental to the Loma Rica project.

Traffic congestion is also one of the biggest issues in our community. It seems particularly injurious to have large trucks travelling around the new Idaho-Maryland roundabout, then down East Main Street, past the Holiday Inn Express, through 'Devil's Triangle' and then on to Highway 49 at the Safeway on ramp. This is an unbelievable poorly selected route which will have a negative impact on the town.

Therefore we expect that these impacts will be mitigated in the final EIR. Mitigations must be investigated: alternative routes, alternative travel times, alternative waste rock disposal methods, etc. The EIR consultants must explore all possible ways to eliminate traffic impacts created by the mine project.

In summary, the DEIR does not adequately mitigate the air quality impacts and traffic impacts. We urge the mitigations be found and included in the final EIR.

Sincerely,

Jennifer Carville

Jennifer Carville
Vice President
Carville Sierra, Inc.