

January 20, 2009

To the City of Grass Valley R
Re: DEIR Comments and Questions

From R.Gauna. P.O.Box 345
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To preface my comments and questions I should say that I am not fully for or against this project as I am truly one to require the **COMPLETE** set facts and **THUROUGH** scientific data, assessment and review. Having worked with this DEIR I should like to suggest that whom ever paid for the DEIR should request that their monies be returned in full. It should have been thorough and completely detailed and it is not. I also read that several state and permitting agencies will utilize this DIER and EIR to **RELY ON for their determinations**. I read it to be a large copy and paste document overall. It doesn't serve the applicant nor the City and residents to the level it should, given the serious type, location, potential impacts of this Mining/ ceramics project.

I am fully comfortable reviewing a document like this as having worked for the Calif. Dept. of Forestry and 4yr college Degree in my past. At the CDF, I was required to set up a small reference library as well as assess the energy consumption of the statewide facilities, equipment and related in order to rehab, renovate, retrofit, or replace with newer technology. I also studied ceramics as well as science in college.

It is my first question and request to City of Grass Valley, is to ask that we contract a review committee of expert advisors and scientists to go through this DEIR with a fine tooth comb as that is the point of this stage of the application process. This would be well worth the costs as our community is in question regarding All of the aspects of this mine proposal. What we have on the table is inadequate and therefore insufficient to go forward at this time. We need specifics in all areas from walking through each method, process and procedure of this mine, to the explicit details of things like which filter and its quality rating (is it a "AAAA" rated filter or an "A" rated filter) being required in the air mitigation applications. There should be no vague, general, misleading descriptions, responses, descriptions etc. given to review and assess.

Onto my reading of the DEIR...

The Asthetics: Not too good a review as it does not address and illustrate the 80's and 50's ft scale of the Large Buildings to scale as these are actually the size of our most mature tress. Only mature tress of which there are few in this area will serve to hide these little. Views of the razor fencing (of which threre is a great deal of)from other vistas, next to and within proximity of the sites will be obvious and likely offensive to attract other commercial and residential growth. This should be a consideration to the

City and real estate experts should talk to this as well. Yes I walked the site for some time and went to various locations to view it from the distance and with luck the topography may block a portion of the scale from most of the city. I would think a computer generated virtual image could be done to imply the likely. This category should not be seen as a minor issue as it is enormously significant to our town value and assets.

Noise: The ambient noise level will likely be greater than stated and this should be truly reviewed as this DEIR is inadequate here. Much of this information is “Paste and Copy” with assumptions based on these; yet there can be actual information and documentation gathering had. Again the city should also ask the real estate experts as to attracting commercial and residential developers who may consider developing next to the mine with this and other aspects which would affect their locating here. There is no true assessment of the insulation level of the bldgs, this should be required and specified in definitive. The data of the DEIR also states that any noise that is closer to a receptor will drown out the noise that is less close to receptor. I have to challenge this from prior reading I have done. It is my understanding their information is only true to a partial extent. A simple example is when you are at a restaurant talking across the table and you must be louder than the ambient other conversations, this is true out on the patio as well if it is crowded. The machinery will add to the noise of the city. Truck transports will add to the noise on 49 which is not addressed and should be. Please have this re-addressed and as last note...one unaccounted disadvantage to the applicant and us are the hills behind which will amplify the noise towards town.

Air Quality; One of the biggest holes in this is the issue of ventilation of the mine activity including blasting. I need to know in specific detail about this procedurally, mechanically, etc. I understand the 3 shafts to be of 20ft. diameter each with a cfm of 125,600 each = exhaust of 377,000 total. These shafts will bring every thing down there up here. Blasting is said to be “watered down” before hand. Meanwhile the rock is drying off by the cfm speed and environment conditions. If I water down a rock faced slope, it will not hold it’s wetness long nor does the water saturate the rock at all. off by the cfm speed and environment conditions The blast will still throw extensive material into the air and watering down afterwards has little effect on the fugitive dust as the blast areas will be vented to clear it. There is also a great deal of activity down below which will stir up dust i.e. moving machinery, equipment, personnel etc. The mine must be constantly watered as well as all of the equipment and machines all of the time, which means there would be mud everywhere to assure all dirt, rock material, all fugitive particulates are not going out to the public via the ventilation systems as the DEIR states that there will be no fugitive dust going out the shafts. This is impossible and should be studied thoroughly. Mitigations are weak and mitigations of the vehicles and equipment exhaust is not specific but general. In that I mean that “filters (and such) where possible” is not sufficient to determine real useful information from this. It’s like saying the mine could use a lesser filters when it wants, if it wishes to, where it feels it might...or might not. **I and the City should want the top of the line filters, measures, systems and the related everywhere at all times, no expense or effort spared. I don’t hear this implied or stated in any way shape or form. If the top of the line(Quality) do not do the job then**

it ends there . Another area not addressed are the stockpiles of material which will be Watered” 2x per day. This as it stands is laughable. Does this say the stockpiles which will be several, can be watered down only twice a day, with what and to what extent...too many holes here greatly concern me.

These stockpiles concern me.

Does the City realize the size of these? Luckily the 600ft long Bldg x80ft ht will hide the stock area which is the largest. These storage stockpile areas will be holding mined material for years around the clock as I read the data given. These areas are open to the elements and watering 2x per day will not be enough in the summer. They will provide great amounts of fugitive mine dust as materials is deposited, moved about, and transported. Enormous amounts of water will be required to keep fugitive dust to a minimum. THEN if enormous amounts of water ARE used to mitigate this THEN where does this water come from Is It clean water...Then where does this runoff water (– be it the 2x per day water or more to really mitigate dust fully and keep things wet in the summer) run to as these stockpile areas are open ground surfaces. Would not this mined rock material have heavy metals and related which would leach out into the ground? Same questions go to the piles receiving the materials on conveyors, these conveyors and material on them should be receiving a constant watering at all times of operation? THEN there is a runoff issue with this amount of watering of mine material??? Any and all materials should be wet at all times?? What is safe and reasonable for all? But Safety long term first!

Traffic: The turnabout will definitely prove inadequate for these trucks and any other as all you need to do is watch those that are using it currently. I believe that we will have to redesign it in the near future. I am not happy to Hear the number of added truck traffic to the 49 hwy which goes past town and us residents which are adjacent. The wolf creek path and recreation development can be forgotten without a very high soundwall along 49. (A large sound wall should be constructed with the design to curve noise away from town) You see the town is fun to walk about in that’s why we want it charming. The DEIR only addresses traffic/noise in a lesser manner but any growth will bring traffic and that’s a fact. We need to do something with the type of noise sources and air polluting sources as well

Haz. Mats : This I can only study to an extent and would prefer the experts deal with this area of review particularly. I will say that the DEIR states that waste materials (mainly matels) through the gold process may be taken to the ceramics plant to be use in the glazing process. This is not accurate as these heavy metals are extremely limited in use to this technology and glaze technology is a science of chemistry. The volume likely to be produced as gold processing waste will not be used for most of the glazes needed, if there will be glazing of the ceramics. Where does this waste go if not useable?...landfill elsewhere? Sealed containment back into the mine?

Speaking Of Haz. Mats... I would like the DEIR to address accidents in some substantial way. We are humans and a mine can have dangerous accidents and I am aware that there will be various precautions and measures taken ; but the what ifs should be looked at in some fashion. We are upstream of the Sac River, the Delta and a bread basket Valley for the World. We can't just think of our little town and the immediate impacts. We may be guardians in a way to all that's "down hill."

The Mine will likely bring good and bad to our town. We will survive as this town can attract others here. It is not a mining town it is actually a cultural town and a jewel to the State for the Arts. It has a historical past of mining and that is part of the past, history is an attraction but it won't be easy to make a present day mine all that of a cultural attraction so we need to be creative there with the mine if it goes.

A great concern is the selling of this mine once it is permitted. I believe there are wealthy entities which would grab at having a GOLD MINE IN CALIFORNIA. That would be something, especially for a foreign entity. I am being nothing other than realistic here as I have traveled abroad, there is a great deal of mafia wealth out there who would possibly be underhanded in managing/operating a mine and will falsify documents greatly. We as a city do not have the resources (nor as a State) to deal with the legal requirements if the wrong entity were to come in on this mine as a partner or other in any fashion. Don't kid yourself... A Company can do damage and once discovered can disappear in the night and may after they have taken enough of what they wanted.... Once the gorilla is in the door we will be at a loss perhaps to manage him in all aspects of such an undertaking. I don't see the economics of this project working out to our advantage just yet as it reads now. (I have a close relative that is an international CFO to a major company that may be willing to look at this for us.) I encourage the City to consider holding off on the permit until a time when we can put certain measures in place (legal, economic, environmental and others) that would serve our needs more fully.

Other Questions

Are bonds always sufficient for dealing with damages of this sort which can occur?

Are there other ways to tap into the economics of this resource?

The gold will always be there, can we wait as technology, engineering and science are always advancing...there will be a time when machinery, equipment, and vehicles are far less polluting; it will be better done then if we are going to do it at all...Besides in the meantime we can prepare our legislation more in tune to make the opportunity for us, safer and economical on all fronts, more in keeping to the gold resource. We are not losing an opportunity with this company. They or someone else will always be interested in our gold. Some one will always want to mine that gold we have to look at it from that perspective. There is no lost opportunity, just delayed. Presently I will say that I have reservations about the idea of mining given the risks ...for something that is about 70%

used for jewelry in the world, yes there are other uses as with technology and dental, but these are dwarfed by the jewelry industry which is merely a means of trade not like a resource that is truly needed to better or sustain health or life. Any real technological need can take from this large jewelry trade market.

I hope this DEIR does get the analysis by experts that it needs to be of depth and real value as I have only pulled some things from the document.

Thank you for the opportunity to give my concerns on this document. I can not speak in favor of this project until it is proven safe, environmentally sound in the long term and economically advantageous to this town. Yes the Company will do some clean needed and other things but lets give a more detailed look at this entire operation and the potentials on all fronts in order to make the right decision

With great sincerity,
R Gauna