

Public Comment Card

Idaho-Maryland Mine Project
Draft Environmental Impact Report (DEIR)
SCH No. 2007092017
Comment Period: 10/30/08 to 12/15/08

GRASS VALLEY

DEC 03 2008

Community Dev. Dept.

Comment Card: Name: Bob Wilder (Voluntary)

Address: 14297 Warden's Court, Grass Valley (Voluntary)

Organization (if any): Individual

Comment: All my adult life has been lived in this area. When the mines were running, we had a steady payroll--with that, we had a steady tax base, and thriving cities. This is just one more reason to re-open the Idaho-Maryland Mine. It will create new jobs for out of work trades people.

It will help to keep young people with families here, which will help keep our schools open. At the present time, we are seeing a drop in enrollment that has caused teacher layoffs. Layoffs in any area of a community will eventually effect everyone in the community. Loss of goods and services reflect a slower economy which can lead to poverty.

Poverty does not create jobs--wealth does. As proof during the great depression of the 1930's. This area thrived, all because we had jobs--not just in the mines, but in all kinds of endeavors.



Sierra Nevada Memorial Hospital

A member of CHW

GRASS VALLEY

DEC 12 2008

Community Dev. Dept.

155 Glasson Way
Grass Valley, CA 95945
530 274-6000
530 274-6614 fax

www.snmh.org

December 11, 2008

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

Dear Mr. Last:

Enclosed is Sierra Nevada Memorial Hospital's response to the Environmental Impact Report for the Idaho-Maryland Mine Project in Nevada County. If you need additional information, please don't hesitate to contact Jim Heard, our Vice President of Professional Services, at (530) 274-6038.

Sincerely,

Dagmar DePass
Executive Assistant to the CEO
dagmar.depass@chw.edu

enc

Cc: Jim Heard, Vice President/Professional Services
Osa Aimfusa, CHW Area Manager, Design & Construction
Katherine A. Medeiros, SNMH President/CEO



Sierra Nevada Memorial Hospital

A member of CHW

155 Glasson Way
Grass Valley, CA 95945
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DISCUSSION AND COMMENTS ON IDAHO-MARYLAND MINE DRAFT EIR

Air Quality

Discussion

As discussed during the conference call, the mine, mill and ceramics plant represent a significant industrial process within the city of Grass Valley that is expected to raise county-wide electricity consumption by 26 percent and natural gas consumption by 54 percent. As may be expected from a large industrial process, the emissions levels for certain pollutants (suspended particulate matter, nitrogen oxide compounds and reactive organic gasses) exceed the significance criteria set forth by the Northern Sierra Air Quality Management District. The EIR finds that construction and operation during the projected 20-year service life “would have a cumulatively considerable contribution to the impact of increased criteria air pollutants in the Mountain Counties Air Basin.” This cumulative impact to air quality is considered by the EIR to be significant and unavoidable.

With regard to the quantification of adverse health effects for nearby receptors, the calculated cancer risk values and health hazard indices are less than the cited benchmark values. Cancer risk and non-cancer health effects are discussed below.

The EIR finds that cancer risk would result primarily from emissions of toxic air contaminants related to mine processing operations and ceramics manufacture. The EIR estimates that the lifetime excess cancer risk is 4.6 in one million for nearby residential receptors and 5.4 in one million for commercial workers in nearby businesses. Although the risk values exceed the lower USEPA risk benchmark of one-in-one-million, the EIR considers the cancer risk to be less than significant, as the values are less than the Proposition 65 benchmark of ten-in-one-million. The assessment of cancer risk assumes chronic exposure (20-year duration) to the air pollutants. The risk values were calculated using peak

annual emissions; thus, the actual cancer risk may be lower than the calculated risk. If the Project operates for longer than the projected 20-year service life, the calculated risk values would increase proportionately to the project time span.

The EIR finds that non-cancer health hazards would result primarily from diesel particulate matter from mobile equipment. The acute health hazard index is calculated to be 0.15, and the chronic health hazard index is calculated to be 0.4. Because the calculated indices are less than the benchmark hazard index of 1.0, the EIR considers the impact to be less than significant. Filtration of indoor air at the hospital may tend to reduce indoor air quality impacts at the hospital, although this was not addressed in the EIR.

Comment

The EIR finds that the Project would generate air pollution that would be significant and unavoidable, despite the mitigation measures discussed in the EIR. The SNMH is considered to be sensitive to poor air quality because the infirm are generally more susceptible to respiratory distress and other air-quality related health problems than the general public, and the hospital is in the vicinity of the emissions source.

The electrification of mine operations and the reduction of ceramics plant operation are identified by the EIR as alternatives that would reduce air quality impacts. However, the air quality impacts remain significant and unavoidable under any of the Project alternatives considered. According to the EIR, the "no project" alternative would be likely to have much lower air quality impact and thus would result in less air pollution than any of the project alternatives. The elimination of the ceramics plant from the Project, which was not considered as a Project alternative, may effectively reduce the air quality impacts associated with the Project to less than significant levels.

Noise and Vibration

Discussion

Pursuant to our conference call, H&K spoke to the contractor who performed the blasting associated with the recent hospital improvements. According to the contractor's records, a maximum charge of 22 pounds per delay resulted in a peak particle velocity of 0.199 inches per second at a monitoring location 200

feet from the blast. This charge weight is less than the anticipated maximum charge of 213 pounds per delay used in the mine, but is similar to a test charge cited in the Colin Gordon & Associates report, where test blasting performed at an unrelated site using a maximum charge of 19.6 pounds per delay was monitored at a distance of 500 feet.

The Colin Gordon & Associates report extrapolated their test blast information to consider the potential vibration impacts at the hospital. Considering a maximum charge of 40 pounds per delay, Colin Gordon & Associates found that the potential vibration impact at a distance of 950 feet was likely to be less than significant.

Comment

The Colin Gordon & Associates vibration study considers a maximum 40-pound-per-delay charge and concludes that the proposed blasting will result in no significant vibration impact at SNMH. The Revey and Associates report, which is appended to the EIR, reported maximum charges of 60 and 213 pounds per delay for development and production, respectively. Revey and Associates suggested that mitigation measures be implemented to reduce the likelihood of adverse impacts at the SNMH.

With regard to the maximum charge (pounds per delay) and distance to the hospital, the assumptions of each of the vibration analyses should be verified, and the conclusions and recommendations should be modified if necessary.

If there is uncertainty regarding potential vibration impact, the mitigation measures suggested by Revey and Associates should be implemented with respect to the hospital:

- Presentation of details regarding design and control measures;
 - Test blasts and associated vibration monitoring at the hospital;
 - Provisions for the cessation of blasting if effects are noticed; and
 - Monitoring of background noise and vibrations at areas of concern.
-

December 11, 2008

CITY OF GRASS VALLEY
PLANNING DIVISION

DEC 15 2008

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

RE: Idaho Maryland Mine Project

Dear Mr. Last,

I would like to comment on the Draft Environmental Impact Report for the Idaho Maryland Mine Project. Please accept my comments in two separate areas of concern.

First, the issue of impact on wells in the vicinity of the mine due to dewatering has been given much discussion. However, there has not yet been a solution or compromise on the part of the Project proponent. *I suggest that the project proponent install a main line loop for domestic water (NID) between the Brunswick / Bennett intersection down Bennett Rd. to at least the facility being built for mine operations. Then loop that trunk line across to the Whispering Pines Business Park domestic water system.* This action by the project proponent in advance to area concerns, rather than putting off a solution until later, will provide homeowners with an opportunity to connect to the NID system when they feel compelled to do so. Many homeowners feel that all the project proponent is doing is to provide empty promises. *If the City determines that this is not a viable solution then the entire system should be designed and approved complete with engineers estimates and the project proponent should provide a cash deposit for the construction costs.* A cash deposit will provide immediate funding to construct the system rather than a bond which is difficult to call in, is costly and typically does not cover full construction expenses due to added legal fees.

Second, it appears that the project proponent is developing this project in the City without annexing the areas between the current City Limits and the Brunswick / Bennett intersection which essentially creates an island. I do not think this is typical annexation procedures according to LAFCO. *I suggest the project proponent annex to the City all the area out to the Brunswick / Bennett intersection along the Bennett corridor that currently abuts Whispering Pines Business Park.* This area is currently in the City's adopted sphere of influence and is scheduled to be annexed in 2011 which is within the time frame of this project being on line. By not considering annexation, the Bennett Rd. area residents only have the County to go to in case of issues with mine impacts, and those impacts could likely be substantial.

In summary, the water system must be in place prior to dewatering and annexation should be considered.

Thank you for your consideration.



Tim Hackworth
11780 E. Bennett Rd.
Grass Valley, CA. 95945
(530) 273-6409
hackshome@sbsglobal.net

CITY OF GRASS VALLEY
PLANNING DIVISION

DEC 15 2008

Tom C.
FYI
Jih

Dear Mayor Johnson,

I would like to address the environmental issues concerning the re-opening of the Idaho-Maryland Mine in Grass Valley. I attended a City Council meeting pertaining to the Mine issue, and was not perfectly satisfied that all the environmental impacts were stressed enough. Before I make a decision about whether I support the re-opening, the environmental issues will have to be brought forward. I live on 40 acres of "landmark oaks" and pines, with several different ecosystems scattered across the land, including a swamp, heavy forests and open fields. I enjoy having this land around me and I enjoy the greenery attached with this community. It was mentioned at the City Council meeting I attended, that much of the proposed Mine area has grown in and filled up. I am concerned that the area that will be cleared for the access roads and new equipment will destroy more of that growth than the original Mine had. I am looking to protect the old historic trees that have stood for many winters and pose no threat. I would also like to address the air quality issue. Comparatively Nevada County has good quality to its air, and I would like to see it kept that way. If the re-opening of the Mine is to cause any damage to our fresh air, it must be brought forward. I understand that this project will bring many jobs and people to our lovely town; however, the quality of our town is more important than its quantity.

Thank You, and Happy Holidays

Kimberly Alt



CITY OF GRASS VALLEY
PLANNING DIVISION

DEC 15 2008

Dear City Council,

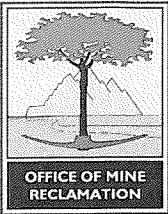
I know these are hard times and I understand we need to "tighten our belts". I've heard about a lot of cities that are going through economic difficulties going as far as declaring bankruptcy.

I have also heard rumors that our own city is getting short on income. I also am concerned with the Idaho-Maryland Mine project. It has been "being considered" for some time now and I was wondering when you will make a decision on it. It would seem that in these difficult economic times we should be looking at ways to generate more income. The Idaho-Maryland Mine would bring in revenue to our city that we desperately need.

During the depression the people of grass valley had the mines to rely on as a source of income. Because of this the city wasn't hit as hard by the depression. I believe that the answer to our current city economic problems is before us. If there is some vital reason as to why this project is not being approved then I would like you to inform me. Otherwise, I believe that this project could be an important part in our survival in these economic times.

Sincerely,





DEPARTMENT OF CONSERVATION

OFFICE OF MINE RECLAMATION

801 K STREET • MS 09-06 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-1230 • FAX 916 / 445-6066 • TDD 916 / 324-2555 • WEBSITE conservation.ca.gov

December 12, 2008

CITY OF GRASS VALLEY
PLANNING DIVISION

DEC 15 2008

SENT VIA EMAIL: toml@cityofgrassvalley.com
ORIGINAL SENT BY MAIL

Thomas Last
City of Grass Valley
Department of Community Development
125 E. Main St.
Grass Valley, CA 95945-6505

Dear Mr. Last:

IDAHO-MARYLAND MINE
DRAFT ENVIRONMENTAL IMPACT REPORT
SCH # 2007092017

The Department of Conservation's Office of Mine Reclamation (OMR) has reviewed the Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine. The applicant is proposing to re-open a historic gold mine. The proposed project site is located approximately 1.5 miles east of downtown Grass Valley. OMR staff conducted a site visit on September 24, 2007 to discuss reclamation issues, and OMR provided comments on the reclamation plan for the mine in a letter dated October 10, 2007 (copy enclosed). The following are OMR's comments on the DEIR.

The reclamation plan previously reviewed by OMR was not included among the documents supporting the DEIR. Under the California Environmental Quality Act (CEQA), the reclamation plan is part of the project and should have been made available as part of the public review process.

The Biological Resources section of the DEIR does not provide enough detail to evaluate the adequacy of sensitive species surveys. Protocol surveys by qualified professionals are necessary in order to determine whether or not sensitive species are present. Biological surveys were apparently done by ESA and are referenced in the text. However, the survey methods, dates, qualifications of surveyors, and other information is not provided in the DEIR or supporting documents. The biological survey reports and species lists referenced in the text should be included with the supporting appendices.



DEPARTMENT OF CONSERVATION

OFFICE OF MINE RECLAMATION

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October 10, 2007

Thomas Last
City of Grass Valley
Department of Community Development
125 E. Main St.
Grass Valley, CA 95945-6505

Dear Mr. Last:

Idaho-Maryland Mine

The Department of Conservation's Office of Mine Reclamation (OMR) has reviewed the reclamation plan for the Idaho-Maryland Mine. The applicant is proposing to reopen a historic gold mine. The proposed project site is located approximately 1.5 miles east of downtown Grass Valley. OMR staff conducted a site visit on September 24, 2007 to discuss reclamation issues.

The Surface Mining and Reclamation Act of 1975 (SMARA) (Public Resources Code Section 2710 et seq.) and the State Mining and Geology Board Regulations (California Code of Regulations (CCR) Title 14, Division 2, Chapter 8, Subchapter 1) require that specific items be addressed or included in reclamation plans. The following comments prepared by Beth Hendrickson, Restoration Ecologist, and John Wesling, Engineering Geologist, are offered to assist in your review of this project. We recommend that the reclamation plan be supplemented to fully address these items.

Mining Operation and Closure

(Refer to SMARA sections 2770, 2772, 2773, CCR sections 3502, 3709, 3713)

1. Initiation and termination dates are required (SMARA 2772(c)(3)). The reclamation plan must include specific dates, for example an initiation date of January 1, 2009 and termination date of December 31, 2029.
2. CCR Section 3713 requires that all portals, shafts, tunnels, or openings be gated or protected from public entry and allow access for wildlife. The reclamation plan proposes to cap all portals and shafts, including ventilation shafts, with concrete; however, no plans or specifications for the concrete plugs are given in the reclamation plan. Given the location of the mine shafts and incline within the City of Grass Valley, it is important to ensure that all closures/concrete plugs are

*The Department of Conservation's mission is to protect Californians and their environment by:
Protecting lives and property from earthquakes and landslides; Ensuring safe mining and oil and gas drilling;
Conserving California's farmland; and Saving energy and resources through recycling.*

plan indicates that a SWPPP will be obtained for the mining operation. The information and requirements of the SWPPP should be incorporated into the reclamation plan.

Environmental Setting and Protection of Fish and Wildlife Habitat

(Refer to CCR sections 3502, 3503, 3703, 3704, 3705, 3710, 3713)

6. SMARA requires baseline environmental studies documenting species richness, density and cover for each of the habitat types affected. The reclamation plan should include maps of all native vegetation communities on the three sites and the extent of impacts to each, as well as baseline data for those communities. Such baseline data would be required for a reclamation plan if the sites are reclaimed to an open space or wildlife habitat end use rather than the planned industrial use.
7. SMARA requires that sensitive species be conserved or the impacts to them be mitigated (CCR 3703(a)). It appears that biological surveys adequate to assess potential impacts to sensitive species have not been done. Both biological surveys (2004 and 2006) were conducted during the month of February, when many of the sensitive plant and animal species listed in the Master Environmental Assessment (Table 4.4.1) would be dormant or otherwise not detectable. Surveys should be done at the appropriate times to determine the potential impacts to these species.

Resoiling and Revegetation

(Refer to SMARA section 2773, CCR sections 3503, 3704, 3705, 3707, 3711)

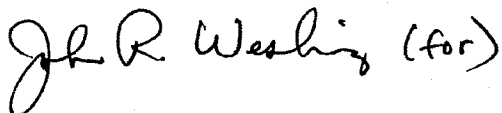
8. The reclamation plan states that topsoil will be obtained on or off-site. Removal of topsoil from off-site areas would constitute an additional impact requiring reclamation. OMR recommends the topsoil be salvaged on-site, as described in later sections of the plan.
9. Topsoil stockpile locations must be shown on the reclamation plan maps (CCR3711(b)). The plan states that topsoil will be salvaged and stockpiled by horizon; while this is a commendable practice OMR notes that it is not a requirement of SMARA, except in the case of prime agricultural lands.
10. Baseline studies and a revegetation plan are part of the reclamation plan. This plan cannot be considered complete until these are done.
11. The reclamation plan states that native species will be used for revegetation as required by CCR 3705(g). However, the tree mitigation described in the Environmental Assessment calls for planting Chinese pistache, Pfizer juniper, giant sequoia, red maple, and liquid amber, none of which are native to the area.

Thomas Last
October 10, 2007
Page 5

17. Recent legislation (Senate Bill 668, Chapter 869, Statutes of 2006) amended PRC section 2774 with respect to lead agency approvals of reclamation plans, plan amendments, and financial assurances. These new requirements are applicable to the reclamation plan. Once OMR has provided comments on the revised reclamation plan, a proposed response to the comments listed above must be submitted to the Department at least 30 days prior to lead agency approval. The proposed response must describe whether you propose to adopt the comments. If you do not propose to adopt the comments, the reason(s) for not doing so must be specified in detail. At least 30 days prior notice must be provided to the Department of the time, place, and date of the hearing at which the revised reclamation plan is scheduled to be approved. If no hearing is required, then at least 30 days notice must be given to the Department prior to its approval. Finally, within 30 days following approval of the revised reclamation plan, a final response to these comments must be sent to the Department. Please ensure that the County allows adequate time in the approval process to meet these new SMARA requirements.

If you have any questions on these comments or require any assistance with other mine reclamation issues, please contact me at (916) 323-8565.

Sincerely,

A handwritten signature in cursive script that reads "J.S. Pompy (for)".

James S. Pompy, Manager
Reclamation Unit

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS – M.S.#40
1120 N STREET
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CITY OF GRASS VALLEY
PLANNING DIVISION

DEC 17 2008



*Flex your power!
Be energy efficient!*

December 12, 2008

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

Dear Mr. Last:

City of Grass Valley's Draft Environmental Impact Report for the Idaho-Maryland Mine Project;
SCH# 2007092017

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports.

The proposal is to reopen the Idaho-Maryland Gold Mine and will include the dewatering of the existing underground mine operations, and aboveground processing of gold, ceramic, and aggregated projects. The proposal will also include occasional blasting. There are three project sites. The Round Hole Site is located approximately 4,580 feet west of the Nevada County Airpark (Airport), directly beneath the extended runway centerline. The New Brunswick Site is located approximately 4,500 feet southwest of the Airport and the Idaho-Maryland Site is located approximately 7,000 feet west of the Airport.

The Round Hole Site is located within Safety Area 4 according to the Foothill Airport Land Use Commission (ALUC) Comprehensive Land Use Plan for Nevada County Airpark. The New Brunswick Site is located within Safety Area 5. The proposal should be submitted to the Foothill ALUC for consideration.

The proposal must not result in hazards to flight, such as:

- Obstructions to the navigable airspace (i.e. Federal Aviation Regulations Part 77 defined primary, approach and transitional surfaces) required for flight to, from, and around an airport
- Visual hazards associated with distracting lights, glare, and sources of smoke
- Electronic hazards that may interfere with aircraft instruments or radio communication

State Public Utilities Code Section 21659 prohibits structural hazards near airports. In accordance with Federal Aviation Regulation, Part 77 "Objects Affecting Navigable Airspace" a Notice of Proposed Construction or Alteration (Form 7460-1) may be required by the Federal Aviation Administration

Mr. Thomas Last
December 12, 2008
Page 2

(FAA). Form 7460-1 is available on-line at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp> and should be submitted electronically to the FAA.

We also recommend that activities such as blasting be coordinated with the airport manager to ensure that appropriate action, such as, Notice to Airmen (NOTAM), are publicized sufficiently in advance.

The protection of airports from incompatible land use encroachment is vital to California's economic future. Nevada County Airpark is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports is both a local and State issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

These comments reflect the areas of concern to the Division with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our Caltrans District 3 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,



SANDY HESNARD
Aviation Environmental Specialist

c: State Clearinghouse, Foothill ALUC, Nevada County Airpark