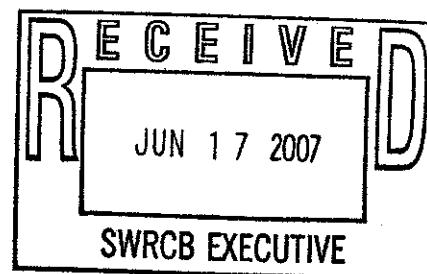


commentletters - Comment Letter - Suction Dredge Mining

From: Tom Chambers <tcplace2go@sbcglobal.net>
To: <commentletters@waterboards.ca.gov>
Date: 6/17/2007 3:09 PM
Subject: Comment Letter - Suction Dredge Mining

To: Song Her, Clerk to the Board
Executive Office
State Water Resources Board
P.O. Box 100
Sacramento, Ca 95812-0100

6/16/2007



Dear Board members,

My name is Tom Chambers. I am an environmentalist who is also a prospector and miner. I love the Earth and would not do anything to hurt it. I have been prospecting, mining and purchasing suction dredge permits from the Ca. Dept. of Fish and Game for 29 years now. My primary tool for extracting gold, when I find some, is a suction dredge.

It has come to my attention that there are some people who have claimed that suction dredges are destroying water quality. This has been going on for some time now, in one form or another, and I can say with confidence, having heard and read many of their assertions, that there is no scientific evidence backing their claims. I would like to present some evidence here that proves that suction dredging is not harmful to water quality and that is backed by scientific studies.

California Department of Fish and Game 1997;

"Suction dredging causes less than significant effects to water quality..."

"There have not been any reported or observed cases of harm to plant or wildlife as a result of oil or gas spills associated with suction dredging."

"Effects from elevated levels of turbidity and suspended sediment normally associated with suction dredging as regulated in the past in California appear to be less than significant with regard to impacts to fish and other river resources because of the level of turbidity created and the short distance downstream of a suction dredge where turbidity levels return to normal."

"...current regulations restrict the maximum nozzle size to 6 inches on most rivers and streams which, in conjunction with riparian habitat protective measures, results in a less than significant impact to channel morphology (The study of the form or structure of a stream channel)."

These are just a few quotes from one study done by our own CDFG in 1997. The fact is suction dredging does not hurt water quality and these people that are claiming it does are wasting your time. Here is my reference and more scientific studies that *prove* that suction dredging is not deleterious to water quality...

CDFG, 1997. draft Environmental Impact Report: Adoption of Amended Regulations for Suction Dredge Mining. State of California, The Resource Agency, Department of Fish and Game

- CDFG, 1997. draft Environmental Impact Report: Adoption of Amended Regulations for Suction Dredge Mining. State of California, The Resource Agency, Department of Fish and Game
- Cooley, M.F. 1995. Forest Service yardage Estimate. U.S. Department of Agriculture, U.S. Forest Service, Siskiyou National Forest, Grants Pass, Oregon.
- Griffith, J.S. and D.A. Andrews. 1981. Effects of a small suction dredge on fishes and aquatic invertebrates in Idaho streams. *North American Journal of Fisheries Management* 1:21- 28.
- Harvey, B.C., K. McCleneghan, J.D. Linn, and C.L. Langley, 1982. Some physical and biological effects of suction dredge mining. Lab Report No. 82-3. California Department of Fish and Game. Sacramento, CA.
- Harvey, B.C. 1986. Effects of suction gold dredging on fish and invertebrates in two California streams. *North American Journal of Fisheries Management* 6:401-409.
- Hassler, T.J., W.L. Somer and G.R. Stern. 1986. Impacts of suction dredge mining on anadromous fish, invertebrates and habitat in Canyon Creek, California. California Cooperative Research Unit, U.S. Fish and Wildlife Service, Humbolt State University. Cooperative Agreement No 14-16-0009-1547.
- Huber and Blanchet, 1992. Water quality cumulative effects of placer mining on the Chugach National Forest, Kenai Peninsula, 1988-1990. Chugach National Forest, U.S. Forest Service, Alaska Region, U.S. Department of Agriculture.
- Lewis, 1962. Results of Gold Suction Dredge Investigation. Memorandum of September 17, 1962. California Department of Fish and Game, Sacramento, CA.
- North, P.A., 1993. A review of the regulations and literature regarding the environmental impacts of suction gold dredging. U.S. Environmental Protection Agency, Region 10, Alaska Operations Office. EP 1.2: G 55/993.
- Prussian, A.M., T.V. Royer and G.W. Minshall, 1999. Impact of suction dredging on water quality, benthic habitat, and biota in the Fortymile River, Resurrection Creek, and Chatanika River, Alaska, FINAL REPORT. US Environmental Protection Agency, Region 10, Seattle, Washington.
- SNF, 2001. Siskiyou National Forest, Draft Environmental Impact Statement: Suction Dredging Activities. U.S. Department of Agriculture, U.S. Forest Service, Siskiyou National Forest, Medford, OR.
- Somer, W.L. and T.J. Hassler. 1992. Effects of suction-dredge gold mining on benthic invertebrates in a northern California stream. *North American Journal of Fisheries Management* 12:244-252
- Stern, 1988. Effects of suction dredge mining on anadromous salmonid habitat in Canyon Creek, Trinity County, California. M.S. Thesis, Humbolt State University, Arcata, CA.
- Thomas, V.G. 1985. Experimentally determined impacts of a small, suction gold dredge on a Montana stream. *North American Journal of Fisheries Management* 5:480-488.
- US EPA, 2001. Mercury Recovery from Recreational Gold Miners.
http://www.epa.gov/region09/cross_pr/innovations/merrec.html
- Wanty, R.B., B. Wang, and J. Vohden. 1997. Studies of suction dredge gold-placer mining operations along the Fortymile River, eastern Alaska. U.S. Geological Survey Fact Sheet FS-154-97.

All of these studies show that for every issue that is raised against suction dredging,

- Elevated Turbidity

- Increased water temperature
- Water chemistry
- Mercury in the water

The evidence shows that suction dredging is either not an issue or actually helps the condition of the stream in regards to vertebrae habitat. Thank you for taking the time to consider my remarks...

Respectfully yours,
Tom Chambers
2126 Franklin Way
Hanford, Ca. 93230