

November 5, 2014



Via Electronic Mail ([commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)) and Facsimile (916) 341-5620

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 95812-2000

**Re: Comment Letter -- Proposed Revision to Sources of Drinking Water Policy**

Dear Ms. Townsend:

We submit these comments on behalf of Meridian Beartrack Company ("Meridian"), the current owner of the Royal Mountain King Mine Site ("RMKM Site"), which is the location of a former gold mine in Calaveras County. These comments relate to the *Proposed Revision to the Sources of Drinking Water Policy to Establish a Site-Specific Exception for Groundwater at the Royal Mountain King Mine Site, Calaveras County* ("Proposed Revision").

Meridian supports the adoption of the Proposed Revision. This amendment, along with the proposed Basin Plan Amendment to establish a groundwater regulatory framework for the RMKM Site, are the culmination of a ten-year process that resulted from this Board's directives in Order No. WQO 2004-0007. As instructed by that Order, the Regional Water Quality Control Board, Central Valley Region ("Regional Board") has evaluated a full range of alternative paths in formulating a comprehensive plan for closure of the RMKM Site in conformance with law. Over the last ten years, Meridian has provided extensive empirical data, technical studies and scientific analyses to assist the Regional Board in determining the most appropriate path forward for meeting these requirements.


The Proposed Revision is an essential ingredient in facilitating the Title 27 Mine closure process. It ensures that de-designation of the MUN beneficial use for groundwater can occur in limited portions of the RMKM Site. The groundwater underneath the RMKM Site is of very poor quality because of naturally occurring saline deposits and the geology and groundwater quality conditions are heterogeneous. Thus, although a great deal of the groundwater in the areas proposed for de-designation exceeds the 3,000 mg/L total dissolved solids standard in the Sources of Drinking Water Policy, State Board Resolution No. 88-63 ("Policy"), a few areas do not because they are only isolated pockets of better quality groundwater or are under or immediately downgradient from waste management units with restrictions that effectively prevent their use for MUN purposes.

The RMKM Site is a unique site as both the State Board and Regional Board have recognized. The State Board's approval of this Proposed Revision will facilitate a comprehensive closure of the RMKM Site based on the current successful groundwater management strategy. This type of site-specific exception is contemplated by the Policy and is necessary and appropriate here for all the reasons set forth in the staff report and other supporting materials.

Meridian is not aware of any other comments regarding the Proposed Revision that have been submitted to the State Board. Meridian requests the right, as the owner of the RMKM Site which is the subject of the Proposed Revision, to respond in writing to any such comments and to make an oral presentation to the State Board, if necessary, to address any adverse public written or oral comments or to answer any Board member questions.

Please let us know if we can provide any further information to the Board on these subjects.

Very truly yours,



Paul P. "Skip" Spaulding, III

PPS:jl

cc: Mr. Adam Whitman  
Dr. Tom Patterson