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1/23/2024 – COMMENTS TO NEVADA COUNTY BOARD OF SUPERVISORS

JAN 23 2024

NEVADA COUNTY
BOARD OF SUPERVISORS

Good Morning. My name is Charlie Brock. I live in Supervisorial District 1. As you all know, it is my studied opinion that Rise Gold's FEIR and Use Permit should not be approved. I'm here today to respectfully request that between now and February 15th you each find the time to review the in depth analysis I personally delivered to each of your inboxes, along with duplicate copies to the Planning Department, on May 8th last year. In this document I point out errors, contradictions, outdated and insufficient technical reports and management plans, as well as erroneous assumptions and unsupported conclusions; providing specific page numbers, and when appropriate copies of salient pages from the Use Permit Application, General Plan, Draft and Final EIR's, all of which support my reasoning. Due to the obviously impossible challenge of parsing these project documents in three minutes, I have tried to create a resource that will allow you to efficiently review the substantial weaknesses, and overall veracity, of Rise Gold's application to reopen the long defunct Idaho Maryland Mine. If your copies of these documents have become buried in the vast piles of research you've undoubtedly accumulated, the Planning Department should be able to provide them to you.

My analysis speaks to, inadequacies and document flaws ranging from General Plan challenges, land use and property value issues, wetland disturbances, near surface collapse, inadequate waste, asbestos and air quality impacts, well production and water quality issues, seismic concerns, and more, while providing you with easy reference to documents and information that speak definitively in support of a NO vote on Rise Gold's FEIR and Use Permit Application.

Since submitting my report last May, I have learned from a senior engineer of the Seismic Hazards Program at the California Geologic Survey that a northerly segment of our Foothill Fault Zone known as the Cleveland Hills fault is identified as an "Alquist-Priolo" fault zone. An Alquist-Priolo designation is the HIGHEST RATING OF EARTHQUAKE RISK designated by the US Geologic Survey. The Rise's Fault Zone Management Plan, Draft and Final EIRs each correctly state that the fault running over 1300 feet through the middle Rise's Brunswick Industrial site is not located within an Alquist-Priolo Earthquake Fault Zone. These documents also emphasize that our Foothill Fault System is a "Type C fault zone, with low seismicity and a low rate of recurrence", and "that the nearest mapped active portion of the Foothills Fault System is approximately 25 miles northwest of the mine site on the Cleveland Hill fault". What all of Rise's crucial planning documents fail to state is that the "active" portion of our Foothills Fault Zone (25 miles to our north) is in fact designated an Alquist-Priolo fault zone, with the HIGHEST RATING OF EARTHQUAKE RISK as designated the US Geologic Survey.

Thank you.



Charles Brock



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About Centennial in 2024

Jan 23, 2024

This morning I'm going to talk a little bit more about the Centennial site. The site has extensive contamination covering much of the 56 acres, which is a health hazard.

The site has a complex history. For decades, tailings were dumped there. Some tailings were processed a second time. Tailings from other mines was also processed. Then after the 1956 shutdown, mine waste was moved around and ground up for aggregate sales, and later, waste rock from other sites was imported for processing.

For the Rise EIR, a batch of samples were taken to supposedly establish that the new mine waste will be Group C, safe for dumping or selling as aggregate. But because of the complex history, those samples really have no value. And complicating things even more, it should be noted that after 70 years, tailings dumped there have leached out much of any contaminants.

Rather, as reported previously, the water coming directly out of the mine is the best indication of the probable classification of the mine waste. And currently, toxic surface water runs into wolf creek via these drains, clearly not Group C.

But regarding the cleanup of Centennial, no progress has been made on completing the Final Remedial Action Plan for two years. We believe that the reason it is stalled is because of the conflict between the EIR and the DTSC cleanup scope. The mine waste would cover 44 of the 56 acres, far more area than was contaminated.

CEA Foundation had commented on the cleanup, expressing concern about the excessive destruction of habitat. Areas that had no contamination were being completely stripped off down to bedrock in order to make way for mine waste and to provide for cover material to put over the sequestered toxic materials.

Therefore we maintained that, under CEQA, the **impact caused by the Mine project should be born by the Mine project, not by the cleanup project.**

So we feel that the DTSC has been waiting to see whether the mine is approved or not. But now, since Rise has asked for Alternative II, there will be no mine waste dumping there. And Alternative II still states that the cleanup will proceed.

Our concern is that Rise will delay, and eventually walk away from the cleanup. Therefore, we feel that requiring a financial guarantee would be appropriate. The cleanup costs will exceed \$3.4 million. Due to the health hazards and the ongoing pollution, the cleanup needs to happen with or without the mine.

Just say yes to the cleanup, and no to the mine.

Thanks

Ralph Silberstein
CEA Foundation

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**NEVADA COUNTY
BOARD OF SUPERVISORS**

Good morning Board of Supervisors

I'm Cedar from District 1 and I stand before you to express my deep concern regarding GHG emissions of the proposed Idaho-Maryland Mine. I urge you to deny this project and not certify the Final Environmental Impact Report (EIR).

As a 25-year-old individual, the Idaho-Maryland Mine project holds significant personal implications for both my physical and mental well-being and the well being of the people of my generation. The projected GHG emissions from the mine not only contribute to the broader climate crisis but directly affect the air quality I breathe. Additionally, the mental health impacts associated with climate change, such as increased stress and anxiety, are concerns that resonate deeply with my generation, faced with the individual impacts of more fires, drought, air quality, economic impacts, and knowledge of what is happening.

The core issue lies in the inadequate assessment of greenhouse gas (GHG) emissions in the EIR. The report relies on an arbitrary 10,000-ton/year carbon dioxide emission threshold, chosen by some other air districts, without considering the specific context of Nevada County. The correct threshold is net-zero.

As the lead agency, Nevada County is responsible for establishing a threshold of GHG emissions, not merely copying what other districts used without localized substantial evidence. This is problematic because those thresholds were originally established to achieve the 2006 statewide GHG goal, which is no longer consistent with current statewide GHG reduction goals.

In 2017, the California Air Quality Board Climate Change Scoping Plan clearly stated that achieving no net additional increase in GHG emissions is an appropriate overall objective for new development. However, the mine's proposed emissions of 10,000 tons/year should be considered significant and unmitigated. In fact, it seems incongruous to increase emissions at all when we are trying to reduce them.

Thank you

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Good morning. My name is John Vaughan. I live in District 3.

At the 2nd day of the Planning Commission Hearing on May 11th, Commissioner McAteer asked Ben Mossman the following question: "Why not assuage all these well owners and go take out a surety bond for \$14M?"

Mr. Mossman's response included lots of detail about predictions and isopleths but he dodged the question, feigning ignorance, stating:

"I don't know where the \$14M comes from, that wasn't explained."

First, the \$14M comes from Nevada Irrigation District, the local experts on water and their assessment of the cost of 378 new water installations. Rise Gold has the same access to NID as any of us and could have easily asked for a detailed explanation.

But Rise believes NID, like all other experts who commented on the EIR, is wrong. The real answer to Mr. Mossman's question is: "Because that's what NID's decades of experience as a water supplier and their internal and external experts say it will cost."

Later in his response, Mr. Mossman asks: "Why would it be 300 [wells]?"

Actually, it's not 300, it's much higher. Rise identified 378 properties, most of which have wells, but there is a much larger area of impact than Rise identified. Rise slapped 378 properties in the EIR at the last minute hoping nobody would notice the huge issues with their Domestic Well Monitoring Program. The real answer to "Why would it be 300?" is: "Because you identified 378 properties that may be at risk."

Rise chose to include these properties in the EIR, yet they did not bother to meet with any of the property owners. They should not be surprised that property owners want a real plan with readily available funding as identified by the local water experts, NID.

In addition to these risks, well owners are being forced to subsidize the Rise project by providing up to 10% of their available near-surface water supply. Rise is "taking" near-surface water rights without permission or compensation, only empty promises.

Property owners should not have to bear the risks and costs of this project.

I respectfully request you trust your Planning Commissioners and vote no on the Rise project.

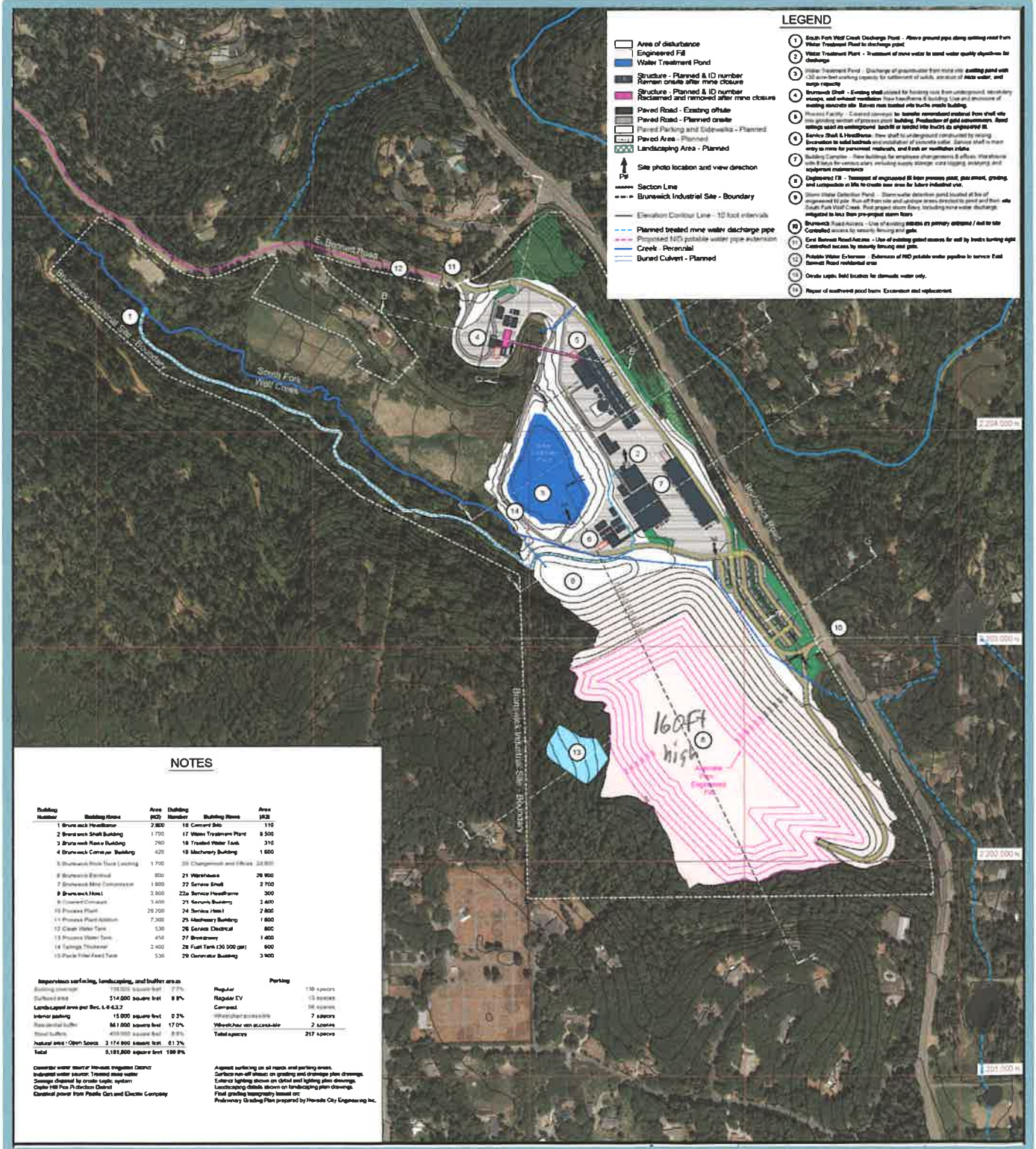
Thank you.

JAN 23 2024

Draft EIR
Idaho-Maryland Mine Project
December 2021

NEVADA COUNTY
BOARD OF SUPERVISORS

Figure 6-2
Alternative 2 Site Plan (Elimination of Centennial Industrial Site)



- LEGEND**
- 1 South Fork West Creek Discharge Pond - Above ground pond along existing road from West Treatment Pond to discharge pond.
 - 2 Water Treatment Pond - Treatment of mine water to meet water quality objectives for discharge.
 - 3 Water Treatment Pond - Discharge of groundwater from mine into existing pond with 120 acre-foot working capacity for settlement of solids, removal of iron water, and sump capacity.
 - 4 Brunswick Shop - Existing steel structure for housing coal from underground, secondary storage, and related ventilation from haultrucks & hauling. Use and structure of existing structure will follow main building with truck wash building.
 - 5 Process Facility - Covered structure to handle secondary material from shaft into existing system of process pond building. Production of gold concentrate. Road through road on underground located at tunnel into facility to underground.
 - 6 Service Shop & Headframe - New shaft to underground constructed by rearing. Structure to hold shaft and headframe. Installation of access shaft. Shaft shaft is main entry to mine for personnel, materials, and shaft or surface vehicle.
 - 7 Building Complex - New buildings for employee changeovers & offices, Warehouse with 100,000 lbs capacity, including storage, crane loading, unloading and equipment maintenance.
 - 8 Engineered Fill - Transport of engineered fill from process plant, gas plant, grinding and leaching to fill to create new area for future industrial use.
 - 9 Storm Water Collection Pond - Storm water detention pond located at base of engineered fill. Run off from site and adjacent areas directed to pond and then into South Fork West Creek. Pond project storm flow, including mine water discharge, designed to last for preproject storm flows.
 - 10 Brunswick Road Access - Use of existing vehicle as primary entrance / exit to site. Controlled access by security fencing and gate.
 - 11 Ore Hauler Road Access - Use of existing gated access for rail by trucks bearing ore. Controlled access by security fencing and gate.
 - 12 Potable Water Extraction - Extraction of H2O potable water supplies to service East Brunswick Road residential area.
 - 13 Orepile Legals - Field locations for domestic water only.
 - 14 Repair of weathered road bays. Excavation and replacement.

NOTES

Building Number	Building Name	Area (sq ft)	Building Number	Building Name	Area (sq ft)
1	Brunswick Headframe	2,800	18	Control Bldg	110
2	Brunswick Shop Building	17,700	17	Water Treatment Plant	8,500
3	Brunswick Runoff Building	750	18	Treated Water Tank	310
4	Brunswick Conveyor Building	420	19	Machinery Building	1,600
5	Brunswick Truck Wash	1,700	20	Changeover and Office	28,800
6	Brunswick Binroom	800	21	Warehouse	26,900
7	Brunswick Mine Compressor	1,800	22	Service Shop	2,700
8	Brunswick Headframe	2,800	23a	Service Headframe	300
9	Control Building	3,600	24	Service Building	2,400
10	Process Plant	29,200	24	Service Headframe	2,800
11	Process Plant Addition	7,300	25	Machinery Building	1,800
12	Clear Water Tank	130	26	Garage District	600
13	Process Water Tank	450	27	Breakroom	1,400
14	Trucking Truckwash	2,400	28	Fuel Tank (20,000 gal)	600
15	Trucking Fuel Tank	550	29	Generator Building	3,900

Impervious surfacing, landscaping, and buffer area as Building coverage	Area (sq ft)	Percentage
Impervious surfacing	170,000	17.7%
Landscaped area per Sec. 1.6-4.3.7	514,000	8.9%
Interior parking	15,000	0.2%
Residential buffer	881,000	17.0%
Wood buffer	400,000	9.8%
Natural area / Open Space	3,174,000	61.3%
Total	5,191,000	100.0%

Regular	Parking
Regular	138 spaces
Regular EV	15 spaces
Compost	86 spaces
Weathered structures	7 spaces
Weathered structures	2 spaces
Total spaces	217 spaces

Overhead water source: Nevada Irrigation District
Industrial water source: Treated mine water
Design: Designed by grade, water system
Chapter 180 Fee: 18 Section District
Contract power from Pacific Gas and Electric Company

Asphalt surfacing on all roads and parking areas.
Surface run-off: shown on grading and drainage plan drawings.
Center lighting shown on detail and lighting plan drawings.
Landscaping details shown on landscaping plan drawings.
Final grading: temporary, lowest cut.
Preliminary Grading Plan prepared by Nevada City Engineering Inc.

**Table 6-1
Comparison of Environmental Impacts for Project Alternatives**

Resource Area	Proposed Project	No Project (No Build) Alternative	Alternative 2: Elimination of Centennial Industrial Site and Expansion of Brunswick Fill Pile	Alternative 3: Expansion of Centennial Engineered Fill Pile and Elimination of Brunswick Engineered Fill Pile	Alternative 4: Reduced Throughput
Aesthetics	Significant and Unavoidable	None	Fewer*	Similar or (Slightly) Fewer*	Similar
Air Quality, Greenhouse Gas Emissions, and Energy	Less-Than-Significant with Mitigation	None	Fewer	Similar	Fewer
Biological Resources	Less-Than-Significant with Mitigation	None	Fewer	Fewer	Similar
Cultural and Tribal Cultural Resources	Less-Than-Significant with Mitigation	None	Fewer	Fewer	Similar
Geology, Soils, and Mineral Resources	Less-Than-Significant with Mitigation	Fewer	Fewer	Fewer	Similar
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	Fewer	Similar	Similar	Fewer
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Fewer	Similar	Greater
Noise and Vibration	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer*	(Slightly) Greater*	(Slightly) Greater*
Transportation	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer*	(Slightly) Greater*	Similar or (Slightly) Fewer*
Wildfire	Less-Than-Significant with Mitigation	Fewer	Fewer	Fewer	Similar
Total Fewer (or None):		10	9	4	2
Total Similar:		0	1	4	6
Total Greater:		0	0	2	2

Note: No Impact = "None"; Less than Proposed Project = "Fewer"; Similar to Proposed Project = "Similar"; Greater than the Proposed Project = "Greater"

* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.

