

Kyle Smith

From: Julie Patterson-Hunter
Sent: Monday, October 9, 2023 12:09 PM
To: Walt; bdofsupervisors; Idaho MMEIR; Idaho MMEIR
Cc: James Bair; Tim Ogburn; John Vaughan; Tony Powell; Marion Blair; Joan Staffen; Paul Berger
Subject: RE: Rise Gold's petition for vesting rights to IMM and Rise Gold's IMM Fault Line

Thank you – your email has been received



From: Walt <walt@patentalchemy.com>
Sent: Thursday, September 28, 2023 4:07 PM
To: bdofsupervisors <bdofsupervisors@nevadacountyca.gov>; Idaho MMEIR <Idaho.MMEIR@nevadacountyca.gov>; Idaho MMEIR <Idaho.MMEIR@nevadacountyca.gov>
Cc: James Bair <aristotle2001@gmail.com>; Tim Ogburn <tim240z@gmail.com>; John Vaughan <jvaughan1946@gmail.com>; Tony Powell <tonypowellvw@gmail.com>; Marion Blair <mbhomechef@comcast.net>; Joan Staffen <joan@joanrosettaffen.com>; Paul Berger <paulsberger@outlook.com>
Subject: Rise Gold's petition for vesting rights to IMM and Rise Gold's IMM Fault Line

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Nevada County Supervisors and Planning Department

Eric Rood Administrative Center
950 Maidu Avenue
Nevada City, CA 95959

To: Nevada County Board of Supervisors and California Attorney General

bdofsupervisors@nevadacountyca.gov, Idaho.MMEIR@nevadacountyca.gov

bdofsupervisors@nevadacountyca.gov

Idaho.MMEIR@nevadacountyca.gov

Re: Rise Gold's petition for vesting rights to IMM and Rise Gold's IMM Fault Line

At the last Idaho Maryland Mine (IMM) town hall meeting last month a hero emerged. Newly anointed Planning Commissioner Terry McAteer showed amazing tenacity in delving into and understanding the deep issues of the Rise Gold proposed project. Commissioner McAteer's research revealed that Rise Gold was attempting to disappear the fault line that runs through the property shown on the IMM County legal property description. Yes, none of us knew that a big fault line even ran through the middle of the IMM so any effort to make it disappear was not noticed. Furthermore it's a little surprising that nothing was done about this after the Planning Commission's decision 5 – 0 against the Rise Gold IMM. Rise Gold was incensed and launched attacks on the County and Commissioner McAteer personally. I was left asking myself, *Why is this fault line disappearance of such import to Rise Gold, and why they would risk this kind of exposure?*

The answer can be found and is well known in the mining business — dewatering and flooding a mine can with high probability trigger severe earthquakes along fault lines. The issue of mine operations triggering earthquakes should have been analyzed in an EIR but wasn't, another reason that nobody believed anything the EIR did cover. It is important that we understand this, that an operational IMM would pose a grave danger and threat to the entire Nevada county community health and safety, as the mine tunnels run all through the town of Grass Valley underground. There are no “mitigating measures” against mine watering and dewatering-caused earthquakes. According to the 200 studies referenced world wide in the paper cited below watering and dewatering a crack in the earth lubricates the fracture or fault to cause an earthquake of “seismic magnitudes of up to M=7 on the Richter scale”.

This brings clarity to the top and reveals the controlling issue, that man-induced earthquakes are not an economic or legal or political or business issue. There is no vested right to kill a community. The danger and risk to public health and safety is primary, and the issue Rise Gold fears exposed the most. From a reference on the subject cited below, “these earthquakes can cause serious socio-economic losses with negative implications for the long-term sustainable development of countries abundant in natural resources and of mining regions”. Why is the County still dithering with the community collateral damage in the balance were the mine to go forward? Mining for gold is a useless endeavor as gold is not a rare earth mineral or some element that we cannot live without or even need. Again, this is not a legal issue about a corporations rights. You could not permit a corporation, even a responsible one, to build atomic bombs on the IMM with vesting or any other kind of rights, too dangerous to the community.

Put another way, the misdirection's from Rise Gold would have you believe its about providing a “comparable water supply” or “not running out of water” or even flooding our "Wolf Creek with clean water". The truth is it's not about money, it is about earthquake damage to the community and infrastructure, people's homes, and people's lives if the mine goes live. Its about “serious socio-economic losses with negative implications for the long-term sustainable development”. Its about disrupting an entire community like a Fukushima.

The Planning Department vociferously pushed to “certify” the EIR they were peddling. Something is very wrong there, when corporations come to town to exploit the rich county history and our Planning Department which is supposed to protect us has gone south. Thank god and three cheers for Commissioner Terry McAteer, without which we would still be in the dark as to the real issues regarding IMM and any mine that happens to be on or near a fault line in the county. Routine underground blasting, watering and dewatering a mine on a fault line is not conducive to a community nearby, and its not even close. It's a slam dunk in the vernacular, and you shouldn't be stressing over this issue. Don't wait til October, just say NO now and move on, you've wasted enough taxpayer time and resource.

A brief technical description and citation of severe earthquakes from mine watering-dewatering is provided below:


Mine Water Discharge and Flooding: A Cause of Severe Earthquakes

Abstract:

Severe earthquakes can be triggered by dewatering and flooding of mines, as these activities alter the loading of the Earth's crust and tectonic stresses in its interior. Worldwide, more than 200 studies have noted sites where human-induced stresses could have reactivated preexisting faults, triggering earthquakes with seismic moment magnitudes of up to M=7 on the Richter scale. This can only occur where faults are already under high tectonic stresses that have built up over

many years. Stable continental regions are seismically less active than unstable regions (e.g. California, Japan, and Turkey). Consequently, faults in stable continental regions can be more earthquake-trigger sensitive, since accumulated stresses have not reached failure conditions. This paper provides an overview of officially recognized mining-triggered earthquakes with magnitudes $M \geq 5.0$. The article illuminates that these earthquakes can cause serious socio-economic losses with negative implications for the long-term sustainable development of countries abundant in natural resources and of mining regions, in particular. Historic data suggest that regional geological conditions (e.g. structural geology and tectonic in-situ stress states) are more important in forecasting the potential of earthquake triggering than the scale of the mining activities. Overall, such forecasts should be made to estimate and mitigate potential socio-economic earthquake risks associated with geoenvironmental operations of extractive industries such as mining.

[Mine Water Discharge and Flooding: A Cause of Severe Earthquakes](#)



Mine Water Discharge and Flooding: A Cause of Severe Earthquakes

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Mine Water Discharge and Flooding: A Cause of Severe Earthquakes

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Walt Froloff
Concerned citizen
Grass Valley CA

Nevada County Supervisors
Eric Rood Administrative Center
950 Maidu Avenue
Nevada City, CA 95959
bdofsupervisors@nevadacountyca.gov
Idaho.MMEIR@nevadacountyca.gov

Re: Rise Gold Vested Rights

Dear Nevada County Supervisors,

Wolf Creek Community Alliance has been monitoring stream quality, watershed habitats, and developments impacting the Wolf Creek watershed since 2004. We have seen no gold mining activity at the sites included in the proposal by Rise Gold / Rise Grass Valley, including during the time Rise Gold acquired the properties and pursued exploratory work. No actual mining has been pursued since 1956. The historic Idaho-Maryland Mine, based on all manner of pertinent data, ceased to exist as a mining operation at that time, declaring bankruptcy, and selling much of their mining equipment.

An active mining operation requires daily transportation to and from the mine. We observed only very occasional vehicle visits to the property, and only in relation to exploratory concerns. The local Senior Firewood program has used parts of the Brunswick Site, and the county has also used part of it for a green waste collection site. These activities of course have nothing to do with mining. An active mining operation produces sound and vibration through the use of blasting, crushing, and heavy equipment use. We observed none of that. An active underground mine requires dewatering, creating significant changes to water downstream involving increased flow and changes in chemical composition. Our monthly data over 18 years shows no such changes in flow or chemistry. Rise Gold's own EIR documents discussing hydrology confirm as much, as the documents rely only on HISTORICAL data documenting increased discharge due to dewatering, nothing in the way of operations after the 1950s.

As a scientific organization charged with monitoring the watershed within which this mining proposal resides, we find no merit in the claims by Rise Gold that they possess a vested right for mine operation. Their claim is false in every ordinary sense of the word. Their appeals to complicated technicalities strain logic and good reason, as legal opinions no doubt will confirm.

Previous comment and testimony offered by WCCA detailed serious concerns about environmental impacts regarding the proposed opening of this mine. These concerns caused us to ask that the EIR for the project NOT be certified and the project NOT be approved. The 5-0 vote of the Planning Commission, recommending that the project be denied, validated those concerns.

That Rise Gold only raised the issue of vested rights AFTER that Planning Commission decision shows that they had no sense previously of any actual vested rights, and made such a petition only as a "last-ditch" effort to somehow move forward with their project. This lack of integrity only undermines any trust we might otherwise have in their ability to act as a good neighbor in the community. We urge you to follow your staff's recommendation to deny this frivolous request for vested rights. Following that, the county should move quickly to finally resolve Rise Gold's mining proposal by denying it. We have many pressing needs in our good community, and we should not be unduly waylaid by the disingenuous efforts of Rise Gold. They have had their due process. We have given years of attention to their proposal.

It's time to move forward - deny the vested rights petition, and deny the mine proposal.

Sincerely yours,

Gary Griffith, President, Wolf Creek Community Alliance



WOLF CREEK COMMUNITY ALLIANCE

PO Box 477, Grass Valley, CA 95945 / wolfcreekalliance.org

Kyle Smith

From: Karen Mate <kmate123456@gmail.com>
Sent: Tuesday, December 12, 2023 2:35 PM
To: Idaho MMEIR
Subject: Hi Matt :)

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Is there a link to view the meeting tomorrow?

The Meeting with Rise Gold and The Board of Supervisors?

I can't afford to get there to watch, but I hope they allow the mine to give the honest hard working guys at the County jobs.

Some guys and gals are lucky to have jobs - but won't be a pretty Christmas for some of us.

Rise Gold new CEO is the real deal. I heard Joe speak. He has a great reputation when it comes to mining responsibly and so does their Board.

He's gonna be so responsible and really cares for people and to make it over the top environmentally friendly.

I'm gonna pray that the right thing happens.

Warmest Regards and Happy Holidays!
Kate

Kyle Smith

From: Francis Coats <fecoats@msn.com>
Sent: Wednesday, December 13, 2023 9:17 AM
To: Idaho MMEIR
Subject: Idaho Maryland Mine permissible scope of comments

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Re-opening a hard rock mine predictably will have effects on water quality, including surface and underground bodies, navigable and non-navigable bodies. Under the Public Trust Doctrine, the decision making-body must consider these effects prior to making a decision, avoiding so far as feasible impairing the public trust interests, and provide this consideration in a public process facilitating public participation in the decision-making process. This is a constitutionally imposed obligation - arguments that is beyond your Agency's authority to consider won't fly.

Sent from my Verizon, Samsung Galaxy smartphone
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Kyle Smith

From: Kenny Smith <starshipncc1800@gmail.com>
Sent: Thursday, December 14, 2023 5:53 PM
To: Idaho MMEIR
Subject: I may need to help you with your mine you want to reopen to get the gold from under ground

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My name is Kenny Smith and I need to ask you this question it may help you?, you need to try to understand what I am going to tell you about the area of Grass valley CA. I need you to look around the rivers by the gold mine is at to see any water is going into the river area in that area, and then go to the office of bero of mine in Sacramento CA and look up on there maps of the area where they told the old owners of the mine to close it up, for any of the quicksilver going into the river from the year of 1963-1969 after the USA got off the gold standard of the price. I want want you to know that I am on your side to open up the mine. There is about 90% of the gold is underground, need you to know if my cell phone number is working but I do wish I can get your first name and last name and your phone number, do to I have a old cell phone it is a android cell phone. I wish I can help you with your project to get the mine open, go over the heads of Grass valley City council to get it open. I am a person who people need to understand the gold price for 2024 & longer

I don't have no car to come to your office or your place.

My name is Kenny Smith and my
Address is
10460 EL MERCADO DR APT 67
RANCHO CORDOVA CA 95670

My am 73 year old now by dec-28-2023 I will be 74 yrs old

Kyle Smith

From: Tony Lauria <tony@tonylauria.com>
Sent: Tuesday, May 16, 2023 8:27 AM
To: Planning
Subject: Big Thank You

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Hello PC,

Thank you again, for the outstanding support of our community. So much is at stake with this mine proposal, from a not-so-honest company.

We are closer to knowing we will not lose our water, home values, air, quiet and quality of life. Basically, many of us would be forced to move, if this nightmare succeeded.

We appreciate your acknowledging the severity of the issue and recognizing it has no place in a highly populated urban area.

We hope no one will be fooled by any of the coming Rise schemes to persuade the Board at the final vote.

All the best,

Your Greenhorn Rd fans,

Tony & Lauren Lauria

13784 Greenhorn Rd
Grass Valley, CA 95945
530-273-3106

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01/09/2024 Good morning. My name is John Vaughan. I live in District 3.

JAN 09 2024

First, Happy New Year. I hope you all had great holidays.

I want to focus today on a specific interchange during the December 14th Vested Rights Hearing, between Rise's Attorney, Chris Powell and Supervisor Hall.

NEVADA COUNTY
BOARD OF SUPERVISORS

At approx. 46 minutes into the transcript, Mr. Powell states to this Board: "**You have a duty** today to make [a] finding that vesting did occur on that date. If you avoid that, you are not fulfilling your **duty**..." Notice the carefully crafted use of the word "Duty", a much stronger word than job.

Then 8 minutes later in the transcript, Mr. Powell repeats himself stating: "If you look at that date and don't confirm that, you are not doing the job you are supposed to be doing today."

Soon after that, Supervisor Hall challenged Mr. Powell about his statements.

Mr. Powell's response was first some rambling about the Hansen case followed by "I'm **not** telling you that you are not doing your job..."

Which is **exactly the opposite** of what he just said...**twice!** Mr. Powell's attempt to walk back his comments is clearly not true.

The point in bringing this up today, is that this exchange is just one example of the dozens and dozens and dozens of half-truths and spin that the Supervisors, County Staff and this Community have had to deal with throughout this process.

I've been involved in the details of this project for 2 years now. I started out unbiased, just wanting to understand the numbers and who was saying what. **Not a single week** has gone by when I have not found some detail in Rise's claims that **just makes no sense** and does not stand up to even mild scrutiny.

I am now convinced that **nothing** we hear from Rise can be trusted. Virtually none of their claims about how great the EIR document is, are true. Virtually none of their claims about vested rights and constitutional rights and property rights and County bias and on and on, are true. Virtually none of their claims about being good citizens or reaching out to the Community are true.

I can't image their truthfulness will improve as we go forward.

I respectfully urge you to trust your Planning Commissioners and Just Say NO to all parts of the Rise project.

Thank you.

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JAN 09 2024

NEVADA COUNTY
BOARD OF SUPERVISORS



PO Box 972, Cedar Ridge, CA 95924-0972
www.cea-nc.org / email: info@cea-nc.org

January 9, 2024

Today, we are submitting additional information regarding the contaminated water coming out of the Idaho-Maryland Mine drains along Wolf Creek. We provided some comments regarding the mine water outflows last year. Our concern is that the EIR reliance on testing of mine water at the Brunswick shaft is not valid. This is because the water generally flows into the mine at the Brunswick shaft, finds its way through the tunnels, and then eventually flows out at the Eureka Drains 1 ½ miles away, along Wolf Creek near Centennial Drive. The EIR should have used test values at the drains on Wolf Creek where it flows out after exposure to the mine contaminants, not at the shaft where cleaner water flows in.

Now we have learned that the EIR Hydrology study done by EMKO in 2021 failed to include the US EPA Site Assessment testing done in 2019 at the Centennial site, which also included testing the drain outflows and surrounding areas. **The EPA test results show mine drain outflows into Wolf Creek with high levels of Arsenic, Barium, Chromium, Cobalt, Copper, Lead, Manganese, Nickel, and Zinc.**

Ben Mossman, CEO of Rise at the time, was the primary contact for the 2019 EPA testing. He executed the voluntary cleanup agreement under the DTSC, thereby conditionally deferring a potential superfund classification. Thus, Rise Gold was certainly aware of the test results from the mine drains. **But those tests results were omitted from the EMKO Hydrology study and the EIR.**

Meanwhile, the misinformation campaign by Rise continues. Quoting new Rise CEO Joe Mullin in a recent full page Union ad: "The water in the mine is clean..."

The Mine Final EIR failed to correctly assess the mine water quality and its treatment, nor did it address how the mine discharge would be treated after the mine closes, despite the fact that these defects were identified in the Draft EIR comments that CEA and the Water Board submitted. The EIR is required to provide valid information, to correctly assess impacts, and to provide adequate mitigations. Yet it failed in all three respects.

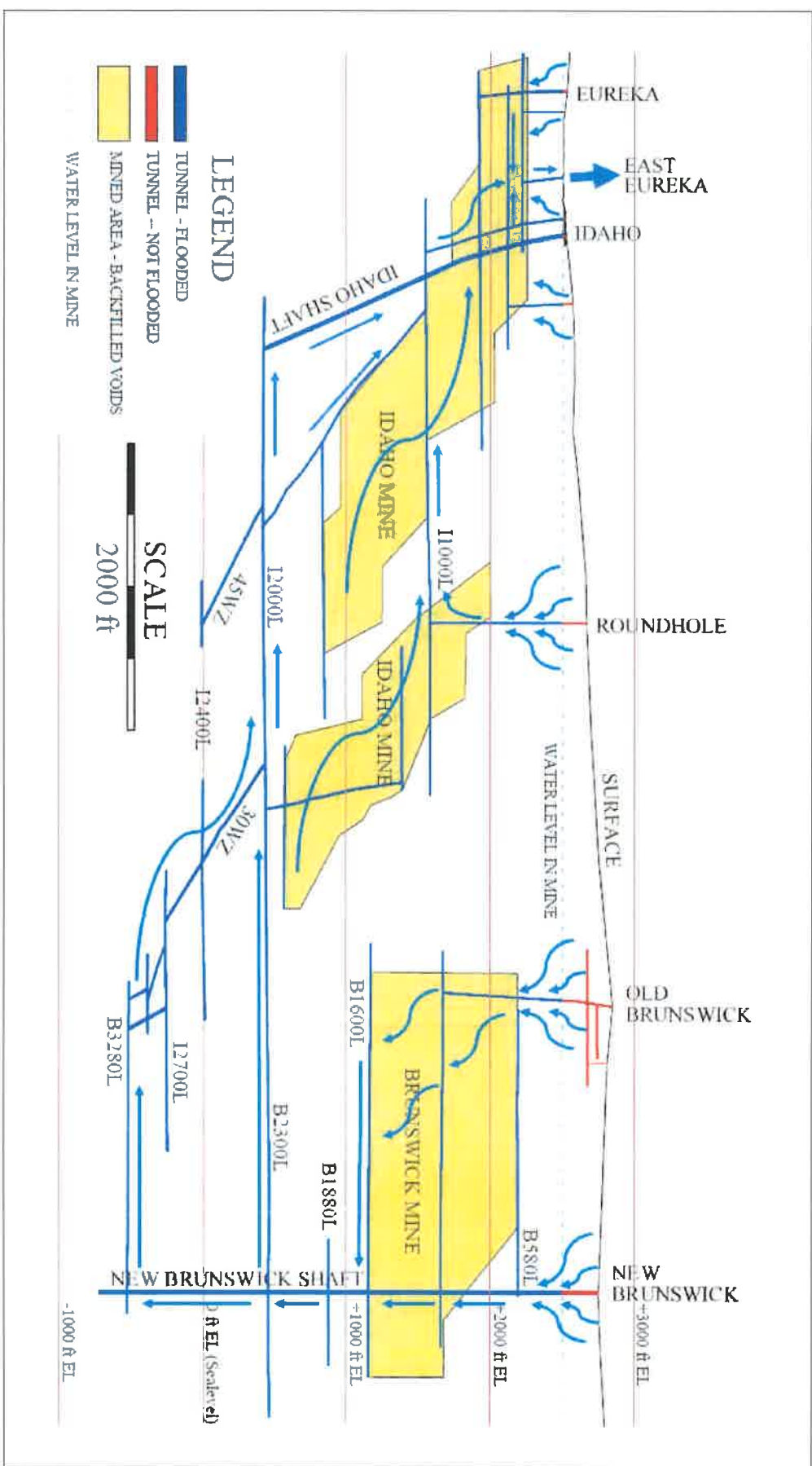
The EIR should not be certified. Just say no.

Thank you.

Ralph Silberstein, CEA Foundation

*Site Inspection Report, Idaho-Maryland Mine, "IMM SI text through App D 9-24-19.pdf," https://www.envirostor.dtsc.ca.gov/public/view_document?docurl=/public/deliverable_documents/6354388177/IMM%20SI%20text%20through%20App%20D%209%2D24%2D19%2Epdf, sampling results "IMM-SW-12-T" and "IMM-SW-13_T," Table 4, Page 33.

Figure 3-20 Groundwater Movement in Mine Workings





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Flawed Analysis Regarding Mine Water Levels in the FEIR

June 13, 2023

Today I'd like to talk about the water levels in the Idaho-Maryland Mine. This simple subject has profound impacts on the mine project.

Current water levels are at about the 2497 foot elevation. The water has been at this level, with minor variations, since the mine refilled after it closed in the 1950s. It doesn't vary much because that is roughly the level of the mine drainages along Wolf Creek near Centennial Drive. About 1.5 miles away, at the Brunswick site, the water in the New Brunswick shaft is at the same elevation.

What is interesting is that the water generally flows in at the New Brunswick shaft and other entry points such as the Old Brunswick mine, and eventually flows out at the drains at Wolf Creek. [Emko hydrology report, DEIR Appendix K.2, Figure 3-20, p68]

So why do I say this subject has profound impacts on the mine project? Two reasons:

1) The hydrology report and the groundwater model both rely on the fact that when you look at the variations in the groundwater levels of the wells near the mine, you see those water levels go up and down seasonally, but when you compare those variations with the level in the mine, you don't see the mine water level go up and down.

From this observation, the hydrology study concluded that there is no noteworthy connectivity of groundwater between the well water levels near the surface and the water level in the mine. [Emko, p31]

But guess what? That argument doesn't hold water. When increased flows go into the mine, it never raises the level much above the mine drains because it just flows out. So a fundamental assumption used in the hydrology studies is false.

2) Rise had numerous tests conducted at the Brunswick shaft and those tests show that the mine water has only iron and manganese contaminants. But those tests were all conducted where the water is flowing into the mine. The test that really matters is the one at the drains, after the water has flowed through the miles of tunnels in the mine.

The water at the drain is much more likely to represent the potential for toxic mine waste drainage. And the only tests included in the EIR for the drains show high values of arsenic, zinc, iron, and manganese. Mine waste with those discharges will definitely not qualify as Group C mine waste and therefore would be too toxic to be sold, given away, or dumped. [Emko, Page 43.]

Unfortunately, the Final EIR failed to recognize either of these crucial points.

Thank you.
Ralph Silberstein

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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

P.O.Box 269, Nevada City, Ca. 95959

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JAN 23 2024
NEVADA COUNTY
BOARD OF SUPERVISORS

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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JAN 23 2024

**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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JAN 23 2024

NEVADA COUNTY
BOARD OF SUPERVISORS

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.

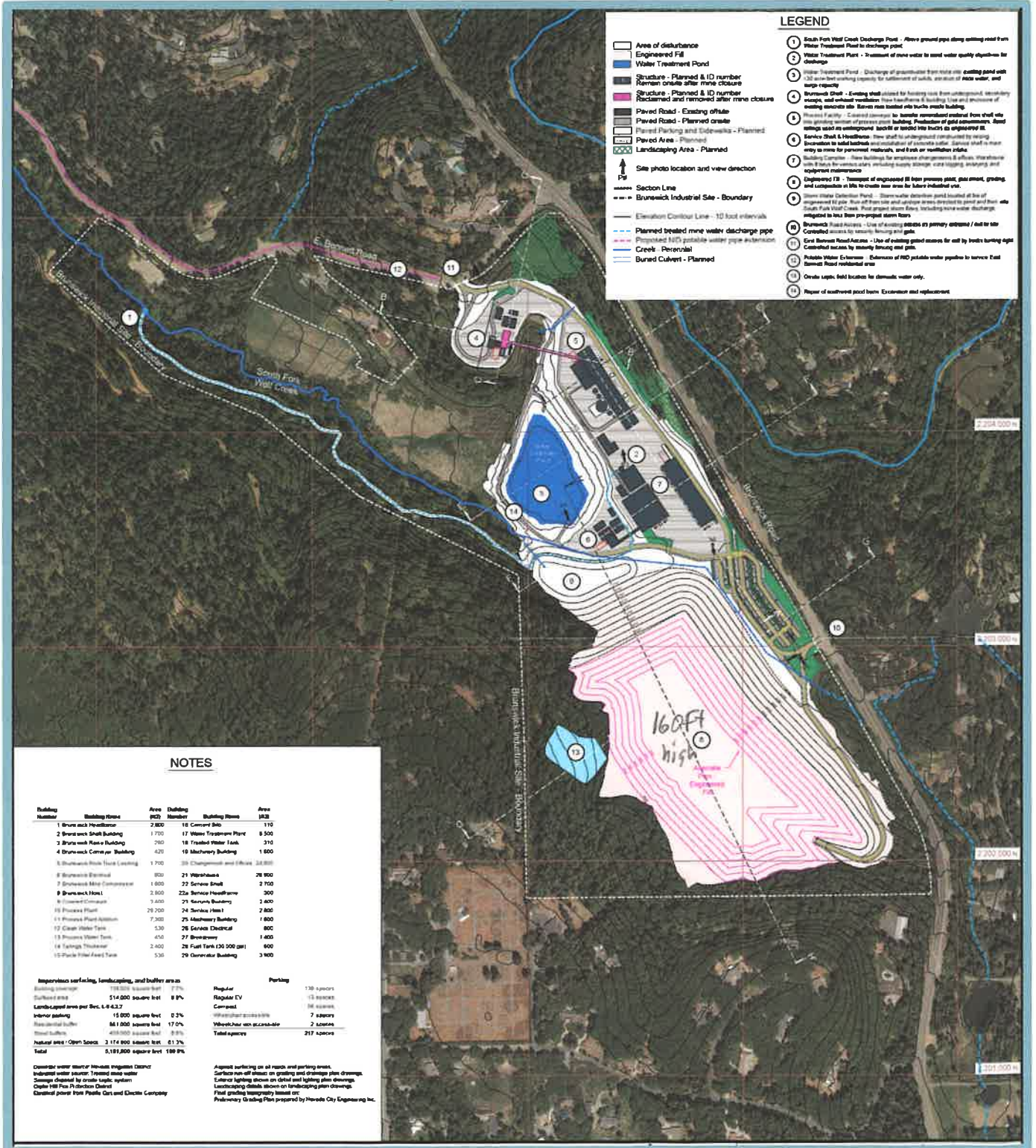
Thank you.

JAN 23 2024

Draft EIR
Idaho-Maryland Mine Project
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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 operations from foundations & building. Use and structure of existing structure will follow main building with North main building.
 - 5 Process Facility - Covered structure to handle secondary material from shaft into existing system of process pipe 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 concrete shaft. Shaft will be used only to mine for personnel, materials, and shaft or equipment vehicle.
 - 7 Building Complex - New buildings for employee changeovers & offices, Warehouse with 100,000 lbs capacity, storage, and equipment storage, 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 pre-project 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 Bin Runoff Road Access - Use of existing gated access for mill by trucks bearing ore. Controlled access by security fencing and gate.
 - 12 Potable Water Extension - Extension of HDPE potable water pipeline to service East Brunswick Road residential area.
 - 13 Orepile Legals - Field locations for domestic water only.
 - 14 Repair of southeast pond basin. 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 Truck Loading	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 Head	2,800	23a	Service Headframe	300
9	Control Building	3,600	24	Service Building	2,400
10	Process Plant	29,200	24	Service Head	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 Truckload	2,400	28	Fuel Tank (20,000 gal)	600
15	Partial Fuel Feed Tank	550	29	Generator Building	3,900

Impervious surfacing, landscaping, and buffer area as Building coverage	Area (sq ft)	Percentage
Impervious surfacing	170,000	17.0%
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	8.0%
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
Weather shelter	7 spaces
Weather shelter accessible	2 spaces
Total spaces	217 spaces

Assess 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 topography based on:
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.

