

Appendix H
FORM LETTER 6 AND VARIANTS

Dear Sir,

Please consider my following comments regarding the SEIR and Proposed Regulations for suction dredge mining in California:

SEIR Baseline is wrong: I take strong exception to the Department using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious economic and social impacts to Americans which would result from your proposed regulations. You should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed.

Mercury is not a problem: Your SEIR relies unreasonably upon the unfounded conclusions of Charles Alpers' who has allowed his personal political agenda get in the way of real science. The SEIR does not give enough weight to the discovery by Rick Humphries Report of California Water Resources Control Board that normal gold dredges are effective at recovering at least 98% of the mercury from the bottom of California's waterways. The SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations! Adoption of the SEIR position would be fundamentally unreasonable in a context where the mercury is inevitably migrating downstream to areas where it is believed to be potentially harmful.

Since California State agencies are doing nothing to remove mercury from California's active waterways, it is grossly irresponsible to point the finger at suction dredgers who are the only ones that are removing the mercury, at no cost to the taxpayers! Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredgeminers for collecting and turning in mercury.

Identification requirement: The proposed regulations should allow visitors from other countries to use a foreign passport or driver's license as identification so they can apply for nonresident suction dredge permits. Otherwise, California will be discouraging the many visitors which we already receive that like to do their gold prospecting here.

DFG should not limit the number of suction dredging permits: There is no evidence presented in the SEIR that 14 years of dredging under the 1994 regulations ever harmed a single fish, much less threatened the viability of an entire species. What if I want to operate a dredge in some part of California where there would not be a deleterious impact? A limit on permits may prohibit me or someone else from using a suction dredge without a viable reason.

Allowing additional dredge permits after site inspection: In the event that DFG decides to impose (reasonable) limits in a blanket statewide permit program that will allow for most suction dredgers, I do not believe DFG has the authority to declare a wholesale prohibition to dredge mining in the other vast areas which exist on the public lands that would not be covered by the blanket permit. DFG has a site inspection mechanism allowing you to consider more individualized

impacts in areas, and during time periods, when and where dredging would not be allowed in a statewide program.

Onsite inspections should be immediately signed off when approved: There should not be a delay in signing off on a site inspection in cases where DFG officials cannot identify a deleterious impact. There should be a time limit in the regulations in which the application will be approved or disapproved. Due process should be allowed if I desire to appeal an application which has been disapproved.

Prior existing rights on permit acquisition: There must be an allowance for prior existing rights on a limited permit program. Otherwise, dredge-miners who have already invested in property and equipment could potentially lose our prior existing right to work our mining claims or other mining opportunities (belonging to an association that provides access to mining property).

Statewide permits, if limited, should be transferable: Permits should be transferable if there is going to be a limit on the number allowed under a statewide program. Otherwise, miners will make the substantial investment into developing a viable mine and then not be able to transfer ownership to someone new who will be able to dredge it, therefore losing some or most of the value.

DFG should not further-limit the size of dredges under the statewide permitting program: I do not believe that DFG has the authority to step onto the public lands and impose a permit restriction upon the productive capacity of my dredge without also coming up with specific reasons why existing capacities under the 1994 regulations are creating a deleterious impact upon fish. Please leave nozzle restriction sizes as they were in the 1994 regulations. The regulations should also allow a wear tolerance factor on nozzle restrictor rings. I suggest 3/8 of an inch (diameter) is reasonable.

Allowing larger-sized nozzles after site inspection: If a dredger wants to operate a dredge having a larger nozzle than is allowed under a statewide permitting scheme, the Department should allow the activity as long as no deleterious impact can be determined through a site inspection.

DFG should not further-limit the places where dredging is allowed: This proposal is just supported by your “precautionary approach.” Except for those areas where you can demonstrate that a deleterious impact has been created under the existing regulations, please leave our seasons as they have been since 1994.

Gold miners should be afforded due process, and should be allowed to proceed in areas which are not allowed under a statewide permit, as long as a site inspection cannot turn up evidence of a deleterious impact.

Reduction of our existing dredging seasons is unreasonable: I do not see that the SEIR contains evidence of a deleterious impact upon fish to support the reduction of existing dredging seasons that are in the 1994 regulations. This proposal is only supported by your “precautionary approach.” Except for those time periods where you can demonstrate that a deleterious impact has been created under the existing regulations, you leave our seasons as they have been since 1994.

The proposed 3-foot rule is unreasonable: The SEIR has not presented any real evidence that dredging within three feet of the streambank has ever harmed a single fish. This prohibition would prevent beginners, non-swimmers or children from starting closer to the shore where water is shallower and more safe. Prohibiting dredging within three feet of the edge of the river will eliminate a significant portion of the operational value (perhaps even all of it) on some dredging properties.

It would be more productive to provide better language describing what the “bank” is in relation to dredge mining. For example, is there a “bank” in relationship to a gravel bar out in the waterway that is partially out of the water? What about a bar alongside the waterway that is submerged during the spring, but emerges more and more out of the water as the dry season evolves? Existing language is not clear enough. The proper answer is to clear that up, rather than impose an additional buffer zone which reduces our mining opportunities.

Suction dredge regulations should not impose the requirement of Section 1600

Agreements: Fish & Game Section 5600 already allows a site inspection mechanism for the Department to determine if a dredging program is deleterious to fish. Therefore, also imposing a Section 1600 requirement upon dredgers who wish to mine at a time or location that is otherwise closed, or to use larger nozzle than is allowed under a statewide permit, when there is little or no chance the dredge project will create a substantial impact upon the bed or bank of the waterway, would be an unreasonable imposition upon dredge-miners. Nobody else in California is required to pursue a Section 1600 permit until their activity rises to the level of requiring one. It should not be any different for suction dredgers.

This also applies to the use of power winches, which provide the only safe and efficient means of progressing when some rocks are too heavy to move by hand, or they cannot be rolled over other rocks that are in the way. You should not impose a 1600 Agreement requirement upon a gold dredger unless the surface disturbance rises to the level which triggers Section 1600 of the Fish & Game Code.

Imposition of the 3/32-inch intake requirement on pumps is unreasonable: The 1994 regulations already prohibit dredge operation at times when fish may be too small to swim away from pump intakes as they are already being manufactured.

Most dredges today are being produced using 3/16th inch or 15/64th inch holes for the pump intakes. To avoid conflict, you should adopt something larger than the two hole sizes which are already being used on most dredges in California.

Allowance of permit locations must be more broad: Since existing regulations already set the times and places where dredging is not deleterious to fish, I do not see any practical reason to force dredge-miners to inform DFG exactly where they are dredging – and then hold them to the location unless the permit is amended. Since I intend to prospect, I will not know the exact locations where I will be dredging at the time I apply for my permit. You should broaden the location requirement in your permit application to naming the waterways where I intend to work. This will allow me some flexibility to move around in search of gold without having to make an expensive trip to the closest Department license sales office to amend my permit.

The proposed dredge marking system is not workable: There is no practical way of attaching a sign to a small dredge! What does this have to do with preventing a deleterious impact upon fish?

If you must have an identification number on my dredge, you should eliminate the requirement of 3-inch number and allow the numbers to be marked either on the pontoons or the sluice box, but only if it is possible to do so. This would allow smaller numbers in the case of smaller dredges.

Fuel should be allowed within 100 feet of the waterway if kept within a water-tight container or a boat: I question your authority on placing any requirement upon suction dredgers in this matter, other than to prohibit the spillage of fuel. Millions of boaters all over California are allowed to keep fuel safely in their boats. Your proposed regulations would prohibit suction dredgers from doing the very same thing!

There are plenty of effective ways to prevent fuel from leaking into the waterway without making a dredgeminer hike 100 feet up the embankment. At the very least, fuel can be placed inside of a boat, or inside a sealed catch tub of some kind up on the embankment to prevent leakage. These catch tubs are already routinely part of a dredge program to assist with cleanup of concentrates.

Disturbance of mussel beds: It is unreasonable to propose that every suction dredger must now do a survey before dredging to make certain that there is no place within 30 feet downriver where more than 40 mussels per square yard exist before dropping tailings! Some rivers are so inundated with mussels; this imposition would amount to a suction dredge prohibition in a large part of the waterway! And why, since there are so many? How does the protection of mussels from dredge-miners conform to the language of Section 5653? Please drop this silly mussel idea from final regulations.

Returning the site to the pre-mining grade to the greatest extent possible: Since it is impossible to move tailings and rocks upstream against a swift current, the requirement to fill in our holes and level off our tailings is unrealistic.

Ample evidence shows that salmon are less likely to place their redds in a heaped tailing pile, than they are on a pre-mining grade which is inundated with unstable gravel; so your proposal will actually create more harm than good! The dredge holes which I leave behind create cool water refuges where salmon and other fish hold up during the warm summer months. My piled cobbles create protected habitat where fingerlings can hide from predators. It would be better for the fish if we just allow Mother Nature to settle things out in the next storm event.

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Thank you very much for giving careful consideration to my comments and suggestions!

Form Letter 6
VARIANTS

Dear Sir:

I am sending a note along with the form letter, because, I don't have time to re-write a whole letter.

I just wanted to say, that, as a 1st year dredger (the year we were shut down), being mentored by a more experienced dredger, I was impressed by the effort put forth to not affect the environment - they all know it would shut them down faster than anything else.

It cost me over \$1500⁰⁰ to obtain \$100⁰⁰ worth of gold - cost of equipment repair, new wet suit, etc.

My mentor probably got a few hundred bucks worth - he's been doing this for 20+ yrs. He also had expenses, involving equipment, camping supplies, groceries, etc., which he purchased a lot of in Ureka - as I'm sure other miners did, thus, putting money into a sluggish economy.

Just some of my observations - Thank,
Warren Bagley

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

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Sincerely,

WARREN C BAGLEY 7406 WILLET WAY, MONTAGUE, CA. 96064 4-25-11
Name and Address Date


Mark Stopher

California Department of Fish and Game

601 Locust Street

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Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

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Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely, *The Reason I use Dave's Letter is I CAN'T
THINK OF ANY BETTER WAY TO SAY THIS.*

Montine Blewins *PO Box 151 Happy Camp* *4-13-11*
Name and Address *CA 96039* Date

*P.S. OPEN ALL RIVERS + CREEKS IN
CALIFORNIA.*

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

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Monty Colby 7686 5th St Yreka, OR 97592 4-15-11
Name and Address Date

I agree with everything above. I would add that when we are dredging, the fish of all sizes are right there waiting for us to kick something edible loose. The smaller fish close in, as they have no fear. The larger trout etc. farther out at the edge of my vision. After all the tons of material that's gone thru. my dredge, I have never saw one fish of any size get sucked in my nozzle. We are actually feeding the fish.
Thank you

Dear Mr. Stopher
 I know this is just another
 form letter and you probably won't
 pay much attention to it, but
 I believe what it says completely.

I have been a miner
 and dredger for 50 years and I
 have never seen a fish harmed by
 my activities. On the ~~contrary~~
 contrary the fish love to feed
 behind my dredge and in the
 holes I make.

I am 66 years old and
 I supplement my income from
 Social Security with my dredging,
 without it I would have to get
 food stamps.

So, would you please
 reconsider the changes in the
 dredging regulations.

Thank You.
 A very ~~concerned~~
 concerned
 miner
 Floyd R. Creson

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Name and Address P.O. B. 719
Brentwood, Ca -
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4/24/2011
Date

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Dredge mining between one half hour after sunrise to sunset: Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs. we aren't babies - This doesn't need to be a rule

Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

Daniel Franks 6347 Santa Cruz Corning, CA

Name and Address

5-13-11

Date

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Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

Jasper D. Glas

Name and Address

PO Box 183
Harpogland
CA 96039

4-15-11

Date

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

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The SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations! Adoption of the SEIR position would be fundamentally unreasonable in a context where the mercury is inevitably migrating downstream to areas where it is believed to be potentially harmful.

Since California State agencies are doing nothing to remove mercury from California's active waterways, it is grossly irresponsible to point the finger at suction dredgers who are the only ones that are removing the mercury, at no cost to the taxpayers!

Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredge-miners for collecting and turning in mercury.

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Sincerely, *Richard Haynes*

Richard Haynes 7916 Cold Creek Ct., BAKERSFIELD, CA 93313 4-30-11
Name and Address Date

*I Retired Early in Life just so I could dredge on my claim
Reinstate the 1994 Regulations.*

Subject: unfair dredge regulations.

Date: Sunday, May 8, 2011 11:38:16 PM PT

From: Mr Dennis lee Hinckley

To: dfgsuctiondredge@dfg.ca.gov

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

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And in the future please add to your regulations you will refund my dredge permit fees if you cancel the permit during dredge season, as you stole my \$184.00 last time.

Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

Dennis Hinckley
737 Fernwood drive

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

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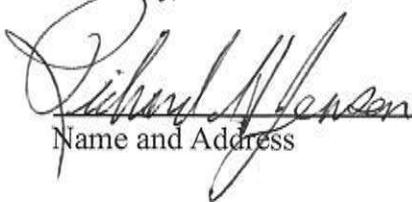
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8130-164ST SE Sno. Wa 98296

5/19/11
Date

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*ALL
OPEN UP ALL RIVERS & CREEKS - YEAR AROUND.*

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WE DON'T HURT THE FISH SO DON'T PUNISH US BY

PUTTING TIME LIMITS ON OUR DREDGING.

Sincerely,

Myrna Karns

Name and Address

4-14-11

Date

MYRNA KARNs

PO Box 802

HAPPY CAMP CA 96039

5-3-11

JAMES MOIR
43 CASCADE RD.
W. HENRIETTA, NY 14586

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There are plenty of effective ways to prevent fuel from leaking into the waterway without making a dredge-miner hike 100 feet up the embankment. At the very least, fuel can be placed inside of a boat, or inside a sealed catch tub of some kind up on the embankment to prevent leakage. These catch tubs are already routinely part of a dredge program to assist with cleanup of concentrates.

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Dredge mining between one half hour after sunrise to sunset: Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs.

Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

JAMES G. MORR  5-3-11
Name and Address Date



State of California—The Resources Agency
DEPARTMENT OF FISH AND GAME

2005 SUCTION DREDGE PERMIT APPLICAT

TO OPERATE VACUUM OR SUCTION DREDGE

DEPT. OF FISH & GAME

601 LOCUST STREET
REDDING, CA 96001
Phone: (530)225-2300

VALID JANUARY
(*Subject to seasonal restrict

Trans: 130245 Reg: 002 07/27/05 08:24
Cashier: 2 Clerk: 19

2005 NRES SUCTION DREDGE \$149.50

FEES: RESIDENT—\$38.00 (No inspection required) NONRESIDENT—\$
RESIDENT—\$156.50 (Additional if inspection required) NONRESIDENT—\$

YES, I QUALIFY FOR AN ASSISTANT SUCTION DREDGE PERMIT (NO ADDITIONAL FEE)
(Disabled applicants must apply and pay fees for resident or nonresident permit)
SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY.

FIRST NAME: JAMES M.I.: G LAST NAME: MOIR

MAILING ADDRESS: 93 CASCADE RD.

CITY: WEST HENRIETTA STATE: NY ZIP CODE: 14586

DRIVER'S LICENSE NUMBER OR DMV I.D. NUMBER: NY 296 535 313 SEX: MALE FEMALE HAIR COLOR: BRN EYE COLOR: BRN

I HAVE RESIDED IN CALIFORNIA CONTINUOUSLY FOR THE LAST SIX MONTHS YES NO

("Resident" means any person who has resided continuously in the State of California for six months or more immediately prior to the date of his/her applica a license or permit, or any person on active military duty with the Armed Forces of the United States or auxiliary branch thereof, or any person enrolled in t Corps established pursuant to Section 2883 of Title 29 of the United State Code. (Fish & G. Code, § 70.)

TYPE OF OPERATION (Check one): GOLD MINING SAND & GRAVEL OTHER (Explain)

SIZE OF AREA TO BE DREDGED: small sample holes, as I only have 3 weeks to visit

TYPE OF EQUIPMENT		
NAME AND MODEL NUMBER	NAME AND MODEL NUMBER	NAME AND MODEL NUMBER
HOME MADE		
NOZZLE SIZE: 5"	NOZZLE SIZE	NOZZLE SIZE
HORSEPOWER: 11 HONDA	HORSEPOWER	HORSEPOWER
POWER SOURCE: GAS	POWER SOURCE	POWER SOURCE

When a permit stamp has been affixed below, the applicant is authorized to operate a vacuum or suction dredge in accordance with Sections 228 and 228 14, of the California Code of Regulations. Nothing in this permit shall authorize the permittee to trespass or use a dredge in waters passing over private lands the permission of the landowner. The listing of waters open to dredging does not mean that such waters are open to the public. The permittee shall com all applicable federal, state, and local laws. Suction or vacuum dredges shall not be used where dredging is prohibited by such laws. I hereby certify that I have read the provisions of California Fish and Game Code Section 5653 and Sections 228 and 228.5, Title 14, of the California Regulations (see reverse side), and that I understand and agree to be bound by all the terms and restrictions set forth in this permit and in the above provisions. I hereby certify that all information contained on this application, and/or submitted to meet the requirements for issuance of this permit, is t correct. I understand that in the event this information is found to be untrue or incorrect, the permit issued will be invalid and must be surrenderec purchased, and that I may be subject to criminal prosecution. I understand the Department of Fish and Game may suspend or revoke this permit pur Section 228(c), Title 14, of the California Code of Regulations.

SIGNATURE: *James G. Moir* DATE: 7-10-05

FOR DEPARTMENT OF FISH AND GAME USE ONLY
ISSUED BY: *Malwick* DEG OFFICE: *Reg 1 Rdg* CASH REGISTER TRANSACTION #: 130245 DATA ENTRY: 9/26/05

2005 RESIDENT DREDGE STAMP
No. _____
Date Issued _____
Invalid after December 31, 2005

2005 CALIFORNIA NONRESIDENT STANDARD SUCTION DREDGE PERMIT \$149.50
400267-02
Invalid after December 31, 2005
Date Issued: 7/27

ASSISTANT SUCTION DREDGE PERMIT
Date Issued _____
Invalid after December 31, 2005

2005 INSPECTION
No. _____
Date Issued _____
Invalid after December 31, 2005

2005 DUPLICATE
No. _____
Date Issued _____
Invalid after December 31, 2005

Recd 7/16/05 D

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

Dear Sir,

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SEIR Baseline is wrong: I take strong exception to the Department using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious economic and social impacts to Americans which would result from your proposed regulations. You should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed.

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The SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations! Adoption of the SEIR position would be fundamentally unreasonable in a context where the mercury is inevitably migrating downstream to areas where it is believed to be potentially harmful.

Since California State agencies are doing nothing to remove mercury from California's active waterways, it is grossly irresponsible to point the finger at suction dredgers who are the only ones that are removing the mercury, at no cost to the taxpayers!

Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredge-miners for collecting and turning in mercury.

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Onsite inspections should be immediately signed off when approved: There should not be a delay in signing off on a site inspection in cases where DFG officials cannot identify a deleterious impact. There should be a time limit in the regulations in which the application will be approved or disapproved. Due process should be allowed if I desire to appeal an application which has been disapproved.

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Statewide permits, if limited, should be transferable: Permits should be transferable if there is going to be a limit on the number allowed under a statewide program. Otherwise, miners will make the substantial investment into developing a viable mine and then not be able to transfer ownership to someone new who will be able to dredge it, therefore losing some or most of the value.

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Sincerely,

Daryl H. More

Name and Address

15977 CHIWI Rd.
APPLE VALLEY, CA. 92307

4-14-2011

Date

THIS REALLY SAYS IT ALL.

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

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Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

Charles Panbey P.O. Box 2621 Lapine, Or. 97739 May 2, 2011
Name and Address Date

P.S. Please except this letter as my own words and thoughts.

Mark Stopher
 California Department of Fish and Game
 601 Locust Street
 Redding, CA 96001
 April 18, 2011

Dear Mr. Stopher,

After an extensive review of the proposed regulations regarding 'dredging' in the State of California, I have some very significant concerns and ask you to carefully consider my opinions before adoption! I have never, in many years of dredging in California and other States, killed one fish while dredging! Not one fish!

SEIR Baseline is wrong: I take strong exception to the Department using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious economic and social impacts to Americans which would result from your proposed regulations. You should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed.

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Game Section 5600 already allows a site inspection mechanism for the Department to determine if a dredging program is deleterious to fish. Therefore, also imposing a Section 1600 requirement upon dredgers who wish to mine at a time or location that is otherwise closed, or to use larger nozzle than is allowed under a statewide permit, when there is little or no chance the dredge project will create a substantial impact upon the bed or bank of the waterway, would be an unreasonable imposition upon dredge-miners. Nobody else in California is required to pursue a Section 1600 permit until their activity rises to the level of requiring one. It should not be any different for suction dredgers.

This also applies to the use of power winches, which provide the only safe and efficient means of progressing when some rocks are too heavy to move by hand, or they cannot be rolled over other rocks that are in the way. You should not impose a 1600 Agreement requirement upon a gold dredger unless the surface disturbance rises to the level which triggers Section 1600 of the Fish & Game Code.

Mercury is not a problem: Your SEIR relies unreasonably upon the unfounded conclusions of Charles Alpers' who has allowed his personal political agenda get in the way of real science. The SEIR does not give enough weight to the discovery by Rick Humphries Report of California Water Resources Control Board that normal gold dredges are effective at recovering at least 98% of the mercury from the bottom of California's waterways.

The SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations! Adoption of the SEIR position would be fundamentally unreasonable in a context where the mercury is inevitably migrating downstream to areas where it is believed to be potentially harmful.

Since California State agencies are doing nothing to remove mercury from California's active waterways, it is grossly irresponsible to point the finger at suction dredgers who are the only ones

that are removing the mercury, at no cost to the taxpayers!

Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredgeminers for collecting and turning in mercury.

Identification requirement: The proposed regulations should allow visitors from other countries to use a foreign passport or driver's license as identification so they can apply for nonresident suction dredge permits. Otherwise, California will be discouraging the many visitors which we already receive that like to do their gold prospecting here.

DFG should not limit the number of suction dredging permits: There is no evidence presented in the

SEIR that 14 years of dredging under the 1994 regulations ever harmed a single fish, much less threatened the viability of an entire species. What if I want to operate a dredge in some part of California where there would not be a deleterious impact? A limit on permits may prohibit me or someone else from using a suction dredge without a viable reason.

Allowing additional dredge permits after site inspection: In the event that DFG decides to impose (reasonable) limits in a blanket statewide permit program that will allow for most suction dredgers, I do not believe DFG has the authority to declare a wholesale prohibition to dredge mining in the other vast areas which exist on the public lands that would not be covered by the blanket permit. DFG has a site inspection mechanism allowing you to consider more individualized impacts in areas, and during time periods, when and where dredging would not be allowed in a statewide program.

Onsite inspections should be immediately signed off when approved: There should not be a delay in

signing off on a site inspection in cases where DFG officials cannot identify a deleterious impact. There should be a time limit in the regulations in which the application will be approved or disapproved. Due process should be allowed if I desire to appeal an application which has been disapproved.

Prior existing rights on permit acquisition: There must be an allowance for prior existing rights on a limited permit program. Otherwise, dredge-miners who have already invested in property and equipment could potentially lose our prior existing right to work our mining claims or other mining opportunities (belonging to an association that provides access to mining property).

Statewide permits, if limited, should be transferable: Permits should be transferable if there is going

to be a limit on the number allowed under a statewide program. Otherwise, miners will make the substantial investment into developing a viable mine and then not be able to transfer ownership to someone new who will be able to dredge it, therefore losing some or most of the value.

DFG should not further-limit the size of dredges under the statewide permitting program: I do not

believe that DFG has the authority to step onto the public lands and impose a permit restriction upon the productive capacity of my dredge without also coming up with specific reasons why existing capacities under the 1994 regulations are creating a deleterious impact upon fish. Please leave nozzle restriction sizes as they were in the 1994 regulations.

The regulations should also allow a wear tolerance factor on nozzle restrictor rings. I suggest 3/8 of an inch (diameter) is reasonable.

Allowing larger-sized nozzles after site inspection: If a dredger wants to operate a dredge having a larger

nozzle than is allowed under a statewide permitting scheme, the Department should allow the activity as long as no deleterious impact can be determined through a site inspection.

DFG should not further-limit the places where dredging is allowed: This proposal is just supported by

your "precautionary approach." Except for those areas where you can demonstrate that a deleterious impact has been created under the existing regulations, please leave our seasons as they have been since 1994.

The proposed dredge marking system is not workable: There is no practical way of attaching a sign to a

small dredge! What does this have to do with preventing a deleterious impact upon fish?

If you must have an identification number on my dredge, you should eliminate the requirement of 3-inch number and allow the numbers to be marked either on the pontoons or the sluice box, but only if it is possible to do so. This would allow smaller numbers in the case of smaller dredges.

Fuel should be allowed within 100 feet of the waterway if kept within a water-tight container or a

boat: I question your authority on placing any requirement upon suction dredgers in this matter, other than to prohibit the spillage of fuel. Millions of boaters all over California are allowed to keep fuel safely in their boats. Your proposed regulations would prohibit suction dredgers from doing the very same thing!

There are plenty of effective ways to prevent fuel from leaking into the waterway without making a dredgeminer

hike 100 feet up the embankment. At the very least, fuel can be placed inside of a boat, or inside a sealed catch tub of some kind up on the embankment to prevent leakage. These catch tubs are already routinely part of a dredge program to assist with cleanup of concentrates.

Disturbance of mussel beds: It is unreasonable to propose that every suction dredger must now do a survey before dredging to make certain that there is no place within 30 feet downriver where more than 40 mussels per square yard exist before dropping tailings! Some rivers are so inundated with mussels; this imposition would amount to a suction dredge prohibition in a large part of the waterway! And why, since there are so many? How does the protection of mussels from dredge-miners conform to the language of Section 5653? Please drop this silly mussel idea from final regulations.

Returning the site to the pre-mining grade to the greatest extent possible: Since it is impossible to

move tailings and rocks upstream against a swift current, the requirement to fill in our holes and level off our tailings is unrealistic.

Ample evidence shows that salmon are less likely to place their redds in a heaped tailing pile, than they are on a pre-mining grade which is inundated with unstable gravel; so your proposal will actually create more harm than good! The dredge holes which I leave behind create cool water refuges where salmon and other

fish hold up during the warm summer months. My piled cobbles create protected habitat where fingerlings can hide from predators. It would be better for the fish if we just allow Mother Nature to settle things out in the next storm event.

Dredge mining between one half hour after sunrise to sunset: Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs.

Please give my concerns serious consideration before adopting ANY new regulations beyond the current 1994 EIR adopted regs.

Sincerely,

A handwritten signature in blue ink that reads "Barbara A. Pettigrew". The signature is fluid and cursive, with a long, sweeping horizontal line extending to the right from the end of the name.

Barbara A. Pettigrew
P.O. Box 771 27940 Ten Mile Rd
Gualala, CA 95445
707 882-2645

Proposed Dredging Regulations...!

Mark Stopher

California Department of Fish and Game
601 Locust Street
Redding, CA 96001

Dear Mr. Stopher,

I am writing you to respond to the 'proposed' new regulations regarding dredging in the State of California and ask that you consider my concerns before the final draft is 'imposed' on us miners! I strongly suggest that the 1994 EIR and attendant regulations have done a good job of balancing the Federal rights for miners with the environmental concerns of the State of California. The 1994 EIR addressed all of the current concerns and nothing in scientific review available suggests the 'radical' changes you are proposing based on 'inuendo; or 'personal ' opinions.

SEIR Baseline is wrong: I take strong exception to the Department using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious economic and social impacts to Americans which would result from your proposed regulations. You should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed.

Reduction of our existing dredging seasons is unreasonable: I do not see that the SEIR contains evidence of a deleterious impact upon fish to support the reduction of existing dredging seasons that are in the 1994 regulations. This proposal is only supported by your "precautionary approach." Except for those time periods where you can demonstrate that a deleterious impact has been created under the existing regulations, you leave our seasons as they have been since 1994.

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DFG should not further-limit the places where dredging is allowed: This proposal is just supported by your “precautionary approach.” Except for those areas where you can demonstrate that a deleterious impact has been created under the existing regulations, please leave our seasons as they have been since 1994.

Gold miners should be afforded due process, and should be allowed to proceed in areas which are not allowed under a statewide permit, as long as a site inspection cannot turn up evidence of a deleterious impact.

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Suction dredge regulations should not impose the requirement of Section 1600 Agreements: Fish & Game Section 5600 already allows a site inspection mechanism for the Department to determine if a dredging program is deleterious to fish. Therefore, also imposing a Section 1600 requirement upon dredgers who wish to mine at a time or location that is otherwise closed, or to use larger nozzle than is allowed under a statewide permit, when there is little or no chance the dredge project will create a substantial impact upon the bed or bank of the waterway, would be an unreasonable imposition upon dredge-miners. Nobody else in California is required to pursue a Section 1600 permit until their activity rises to the level of requiring one. It should not be any different for suction dredgers. This also applies to the use of power winches, which provide the only safe and efficient means of progressing when some rocks are too heavy to move by hand, or they cannot be rolled over other rocks that are in the way. You should not impose a 1600 Agreement requirement upon a gold dredger unless the surface disturbance rises to the level which triggers Section 1600 of the Fish & Game Code.

Imposition of the 3/32-inch intake requirement on pumps is unreasonable: The 1994 regulations already prohibit dredge operation at times when fish may be too small to swim away from pump intakes as they are already being manufactured.

Most dredges today are being produced using 3/16th inch or 15/64th inch holes for the pump intakes. To avoid conflict, you should adopt something larger than the two hole sizes which are already being used on most dredges in California.

Allowance of permit locations must be more broad: Since existing regulations already set the times and places where dredging is not deleterious to fish, I do not see any practical reason to force dredge-miners to inform DFG exactly where they are dredging – and then hold them to the location unless the permit is amended.

Since I intend to prospect, I will not know the exact locations where I will be dredging at the time I apply for my permit. You should broaden the location requirement in your permit application to naming the waterways where I intend to work. This will allow me some flexibility to move around in search of gold without having to make an expensive trip to the closest Department license sales office to amend my permit.

The proposed dredge marking system is not workable: There is no practical way of attaching a sign to a

small dredge! What does this have to do with preventing a deleterious impact upon fish?

If you must have an identification number on my dredge, you should eliminate the requirement of 3-inch

number and allow the numbers to be marked either on the pontoons or the sluice box, but only if it is possible to do so. This would allow smaller numbers in the case of smaller dredges.

Fuel should be allowed within 100 feet of the waterway if kept within a water-tight container or a boat: I question your authority on placing any requirement upon suction dredgers in this matter, other than

to prohibit the spillage of fuel. Millions of boaters all over California are allowed to keep fuel safely in their boats. Your proposed regulations would prohibit suction dredgers from doing the very same thing!

There are plenty of effective ways to prevent fuel from leaking into the waterway without making a dredgeminer

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Dredge mining between one half hour after sunrise to sunset: Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs.

I would ask that you carefully consider my comments regarding suction dredging in California!

Best regards,

A handwritten signature in cursive script, reading "William L. Pettigrew". The signature is written in dark ink and is positioned to the right of the typed name.

William L. Pettigrew
27940 Ten Mile Road
P.O. Box 771
Gualala, Ca 95445
707 882-2645

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

Dear Sir,

Please consider my following comments regarding the SEIR and Proposed Regulations for suction dredge mining in California:

SEIR Baseline is wrong: I take strong exception to the Department using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious economic and social impacts to Americans which would result from your proposed regulations. You should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed.

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Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredge-miners for collecting and turning in mercury.

Identification requirement: The proposed regulations should allow visitors from other countries to use a foreign passport or driver's license as identification so they can apply for nonresident suction dredge permits. Otherwise, California will be discouraging the many visitors which we already receive that like to do their gold prospecting here.

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There are plenty of effective ways to prevent fuel from leaking into the waterway without making a dredge-miner hike 100 feet up the embankment. At the very least, fuel can be placed inside of a boat, or inside a sealed catch tub of some kind up on the embankment to prevent leakage. These catch tubs are already routinely part of a dredge program to assist with cleanup of concentrates.

Disturbance of mussel beds: It is unreasonable to propose that every suction dredger must now do a survey before dredging to make certain that there is no place within 30 feet downriver where more than 40 mussels per square yard exist before dropping tailings! Some rivers are so inundated with mussels; this imposition would amount to a suction dredge prohibition in a large part of the waterway! And why, since there are so many? How does the protection of mussels from dredge-miners conform to the language of Section 5653? Please drop this silly mussel idea from final regulations.

Returning the site to the pre-mining grade to the greatest extent possible: Since it is impossible to move tailings and rocks upstream against a swift current, the requirement to fill in our holes and level off our tailings is unrealistic.

Ample evidence shows that salmon are less likely to place their redds in a heaped tailing pile, than they are on a pre-mining grade which is inundated with unstable gravel; so your proposal will actually create more harm than good! The dredge holes which I leave behind create cool water refuges where salmon and other fish hold up during the warm summer months. My piled cobbles create protected habitat where fingerlings can hide from predators. It would be better for the fish if we just allow Mother Nature to settle things out in the next storm event.

Dredge mining between one half hour after sunrise to sunset: Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs.

Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

Daniel B. Pool

Name and Address

4-18-11

Date

Daniel B. Pool
P.O. Box 441
Hayfork Ca. 96041

I purchased a Standard Resident Dredge permit on 7-8-'09, + found out it was revoked on 8-8-'09.
permit # 200198-08

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

Dear Sir,

Please consider my following comments regarding the SEIR and Proposed Regulations for suction dredge mining in California:

SEIR Baseline is wrong: I take strong exception to the Department using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious economic and social impacts to Americans which would result from your proposed regulations. You should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed.

Mercury is not a problem: Your SEIR relies unreasonably upon the unfounded conclusions of Charles Alpers' who has allowed his personal political agenda get in the way of real science. The SEIR does not give enough weight to the discovery by Rick Humphries Report of California Water Resources Control Board that normal gold dredges are effective at recovering at least 98% of the mercury from the bottom of California's waterways.

The SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations! Adoption of the SEIR position would be fundamentally unreasonable in a context where the mercury is inevitably migrating downstream to areas where it is believed to be potentially harmful.

Since California State agencies are doing nothing to remove mercury from California's active waterways, it is grossly irresponsible to point the finger at suction dredgers who are the only ones that are removing the mercury, at no cost to the taxpayers!

Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredge-miners for collecting and turning in mercury.

Identification requirement: The proposed regulations should allow visitors from other countries to use a foreign passport or driver's license as identification so they can apply for nonresident suction dredge permits. Otherwise, California will be discouraging the many visitors which we already receive that like to do their gold prospecting here.

DFG should not limit the number of suction dredging permits: There is no evidence presented in the SEIR that 14 years of dredging under the 1994 regulations ever harmed a single fish, much less threatened the viability of an entire species. What if I want to operate a dredge in some part of California where there would not be a deleterious impact? A limit on permits may prohibit me or someone else from using a suction dredge without a viable reason.

Allowing additional dredge permits after site inspection: In the event that DFG decides to impose (reasonable) limits in a blanket statewide permit program that will allow for most suction dredgers, I do not believe DFG has the authority to declare a wholesale prohibition to dredge mining in the other vast areas which exist on the public lands that would not be covered by the blanket permit. DFG has a site inspection mechanism allowing you to consider more individualized impacts in areas, and during time periods, when and where dredging would not be allowed in a statewide program.

Onsite inspections should be immediately signed off when approved: There should not be a delay in signing off on a site inspection in cases where DFG officials cannot identify a deleterious impact. There should be a time limit in the regulations in which the application will be approved or disapproved. Due process should be allowed if I desire to appeal an application which has been disapproved.

Prior existing rights on permit acquisition: There must be an allowance for prior existing rights on a limited permit program. Otherwise, dredge-miners who have already invested in property and equipment could potentially lose our prior existing right to work our mining claims or other mining opportunities (belonging to an association that provides access to mining property).

Statewide permits, if limited, should be transferable: Permits should be transferable if there is going to be a limit on the number allowed under a statewide program. Otherwise, miners will make the substantial investment into developing a viable mine and then not be able to transfer ownership to someone new who will be able to dredge it, therefore losing some or most of the value.

DFG should not further-limit the size of dredges under the statewide permitting program: I do not believe that DFG has the authority to step onto the public lands and impose a permit restriction upon the productive capacity of my dredge without also coming up with specific reasons why existing capacities under the 1994 regulations are creating a deleterious impact upon fish. Please leave nozzle restriction sizes as they were in the 1994 regulations. The regulations should also allow a wear tolerance factor on nozzle restrictor rings. I suggest 3/8 of an inch (diameter) is reasonable.

Allowing larger-sized nozzles after site inspection: If a dredger wants to operate a dredge having a larger nozzle than is allowed under a statewide permitting scheme, the Department should allow the activity as long as no deleterious impact can be determined through a site inspection.

DFG should not further-limit the places where dredging is allowed: This proposal is just supported by your "precautionary approach." Except for those areas where you can demonstrate that a deleterious impact has been created under the existing regulations, please leave our seasons as they have been since 1994.

Gold miners should be afforded due process, and should be allowed to proceed in areas which are not allowed under a statewide permit, as long as a site inspection cannot turn up evidence of a deleterious impact.

Reduction of our existing dredging seasons is unreasonable: I do not see that the SEIR contains evidence of a deleterious impact upon fish to support the reduction of existing dredging seasons that are in the 1994 regulations. This proposal is only supported by your “precautionary approach.” Except for those time periods where you can demonstrate that a deleterious impact has been created under the existing regulations, you leave our seasons as they have been since 1994.

The proposed 3-foot rule is unreasonable: The SEIR has not presented any real evidence that dredging within three feet of the streambank has ever harmed a single fish. This prohibition would prevent beginners, non-swimmers or children from starting closer to the shore where water is shallower and more safe. Prohibiting dredging within three feet of the edge of the river will eliminate a significant portion of the operational value (perhaps even all of it) on some dredging properties.

It would be more productive to provide better language describing what the “bank” is in relation to dredge mining. For example, is there a “bank” in relationship to a gravel bar out in the waterway that is partially out of the water? What about a bar alongside the waterway that is submerged during the spring, but emerges more and more out of the water as the dry season evolves? Existing language is not clear enough. The proper answer is to clear that up, rather than impose an additional buffer zone which reduces our mining opportunities.

Suction dredge regulations should not impose the requirement of Section 1600 Agreements: Fish & Game Section 5600 already allows a site inspection mechanism for the Department to determine if a dredging program is deleterious to fish. Therefore, also imposing a Section 1600 requirement upon dredgers who wish to mine at a time or location that is otherwise closed, or to use larger nozzle than is allowed under a statewide permit, when there is little or no chance the dredge project will create a substantial impact upon the bed or bank of the waterway, would be an unreasonable imposition upon dredge-miners. Nobody else in California is required to pursue a Section 1600 permit until their activity rises to the level of requiring one. It should not be any different for suction dredgers.

This also applies to the use of power winches, which provide the only safe and efficient means of progressing when some rocks are too heavy to move by hand, or they cannot be rolled over other rocks that are in the way. You should not impose a 1600 Agreement requirement upon a gold dredger unless the surface disturbance rises to the level which triggers Section 1600 of the Fish & Game Code.

Imposition of the 3/32-inch intake requirement on pumps is unreasonable: The 1994 regulations already prohibit dredge operation at times when fish may be too small to swim away from pump intakes as they are already being manufactured.

Most dredges today are being produced using 3/16th inch or 15/64th inch holes for the pump intakes. To avoid conflict, you should adopt something larger than the two hole sizes which are already being used on most dredges in California.

Allowance of permit locations must be more broad: Since existing regulations already set the times and places where dredging is not deleterious to fish, I do not see any practical reason to force dredge-miners to inform DFG exactly where they are dredging – and then hold them to the location unless the permit is amended.

Since I intend to prospect, I will not know the exact locations where I will be dredging at the time I apply for my permit. You should broaden the location requirement in your permit application to naming the waterways where I intend to work. This will allow me some flexibility to move around in search of gold without having to make an expensive trip to the closest Department license sales office to amend my permit.

The proposed dredge marking system is not workable: There is no practical way of attaching a sign to a small dredge! What does this have to do with preventing a deleterious impact upon fish?

If you must have an identification number on my dredge, you should eliminate the requirement of 3-inch number and allow the numbers to be marked either on the pontoons or the sluice box, but only if it is possible to do so. This would allow smaller numbers in the case of smaller dredges.

Fuel should be allowed within 100 feet of the waterway if kept within a water-tight container or a boat: I question your authority on placing any requirement upon suction dredgers in this matter, other than to prohibit the spillage of fuel. Millions of boaters all over California are allowed to keep fuel safely in their boats. Your proposed regulations would prohibit suction dredgers from doing the very same thing!

There are plenty of effective ways to prevent fuel from leaking into the waterway without making a dredge-miner hike 100 feet up the embankment. At the very least, fuel can be placed inside of a boat, or inside a sealed catch tub of some kind up on the embankment to prevent leakage. These catch tubs are already routinely part of a dredge program to assist with cleanup of concentrates.

Disturbance of mussel beds: It is unreasonable to propose that every suction dredger must now do a survey before dredging to make certain that there is no place within 30 feet downriver where more than 40 muscles per square yard exist before dropping tailings! Some rivers are so inundated with muscles; this imposition would amount to a suction dredge prohibition in a large part of the waterway! And why, since there are so many? How does the protection of mussels from dredge-miners conform to the language of Section 5653? Please drop this silly mussel idea from final regulations.

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Dredge mining between one half hour after sunrise to sunset: Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs.

Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

D. Reed, 38729 Hwy. 96, Klamath River, CA 96050

Name and Address

April 21, 2011

Date

Please do not disallow dredging on creeks where it was o.k. in 1994 regs. Your actions have a major impact on my well being and the local economy. Our state does not need any more negative and hurtful things done to the productive people in our society. P.S. I am a 70 year old veteran. Do what is the right thing!!

Subject: Suction Dredging

Date: Thursday, April 14, 2011 10:07:14 PM PT

From: Michelle

To: dfgsuctiondredge@dfg.ca.gov

Mark Stopher
California Department of Fish and Game
601 Locust Street
Redding, CA 96001
Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

Dear Sir,

As an active claim holder, and avid gold miner, I wish to make my opinions known about the SEIR and Proposed Regulations for suction dredge mining in California. In order to be fair, You should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed. I believe the Department is using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious beneficial economic and social impacts to Americans which would result from your proposed regulations.

Further, with regards to mercury, the SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations! The SEIR does not give enough weight to the discovery by Rick Humphries Report of California Water Resources Control Board that normal gold dredges are effective at recovering at least 98% of the mercury from the bottom of California's waterways. Modern gold miners are performing hazardous waste cleanup, free to the taxpayers. The alternative is to leave it there and let it wash down in every flood. Since California State agencies are doing nothing to remove mercury from California's active waterways, it is grossly irresponsible to point the finger at suction dredgers who are the only ones removing the mercury, at no cost to the taxpayers! Your SEIR relies unreasonably upon the unfounded conclusions of Charles Alpers' who has allowed his personal political agenda get in the way of real science. Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredge miners for collecting and turning in mercury.

DFG should not limit the number of suction dredging permits: There is no evidence presented in the SEIR that 14 years of dredging under the 1994 regulations ever harmed a single fish, much less threatened the viability of an entire species. Further, doesn't the DFG issue licenses specifically to kill fish? What if I want to operate a dredge in some

part of California where there would not be a deleterious impact, such as my claim above Bullard Bar dam which destroyed the fish spawn decades ago? A limit on permits may prohibit me or someone else from using a suction dredge without a viable reason.

Onsite inspections should be immediately signed off when approved: There should not be a delay in signing off on a site inspection in cases where DFG officials cannot identify a deleterious impact. There should be a time limit in the regulations in which the application will be approved or disapproved. Due process should be allowed if I desire to appeal an application which has been disapproved.

Prior existing rights on permit acquisition: There must be an allowance for prior existing rights on a limited permit program. Otherwise, dredge-miners who have already invested in property and equipment could potentially lose our prior existing right to work our mining claims or other mining opportunities (belonging to an association that provides access to mining property).

Statewide permits, if limited, should be transferable: Permits shouldn't be arbitrarily limited in numbers, but if they are, they should be transferable. Otherwise, miners will make the substantial investment into developing a viable mine and then not be able to transfer ownership to someone new who will be able to dredge it, therefore losing some or most of the value.

DFG should not further-limit the size of dredges under the statewide permitting program: I do not believe that DFG has the authority to step onto the public lands and impose a permit restriction upon the productive capacity of my dredge without also coming up with specific reasons why existing capacities under the 1994 regulations are creating a deleterious impact upon fish. Please leave nozzle restriction sizes as they were in the 1994 regulations. The regulations should also allow a wear tolerance factor on nozzle restrictor rings. I suggest 3/8 of an inch (diameter) is reasonable.

DFG should not further-limit the places where dredging is allowed: This proposal is just supported by your "precautionary approach." Except for those areas where you can demonstrate that a deleterious impact has been created under the existing regulations, please leave our seasons as they have been since 1994.

Reduction of our existing dredging seasons is unreasonable: I do not see that the SEIR contains evidence of any deleterious impact upon fish to support the reduction of existing dredging seasons. This proposal is only supported by your "precautionary approach." Except for those time periods where you can demonstrate that a deleterious impact has been created under the existing regulations, you should leave our seasons as they have been since 1994.

The proposed 3-foot rule is arbitrary: The SEIR has not presented any

real evidence that dredging within three feet of the streambank has ever harmed a single fish. This prohibition would prevent beginners, non-swimmers or children from starting closer to the shore where water is shallower and more safe. Prohibiting dredging within three feet of the edge of the river will eliminate a significant portion of the operational value (perhaps even all of it) on some dredging properties.

Suction dredge regulations should not impose the requirement of Section 1600 Agreements: Fish & Game Section 5600 already allows a site inspection mechanism for the Department to determine if a dredging program is deleterious to fish. Therefore, also imposing a Section 1600 requirement upon dredgers who wish to mine at a time or location that is otherwise closed, or to use larger nozzle than is allowed under a statewide permit, when there is little or no chance the dredge project will create a substantial impact upon the bed or bank of the waterway, would be an unreasonable imposition upon dredge-miners. Nobody else in California is required to pursue a Section 1600 permit until their activity rises to the level of requiring one. It should not be any different for suction dredgers. This also applies to the use of power winches, which provide the only safe and efficient means of progressing when some rocks are too heavy to move by hand, or they cannot be rolled over other rocks that are in the way. You should not impose a 1600 Agreement requirement upon a gold dredger unless the surface disturbance rises to the level which triggers Section 1600 of the Fish & Game Code.

Imposition of the 3/32-inch intake requirement on pumps is unreasonable: The 1994 regulations already prohibit dredge operation at times when fish may be too small to swim away from pump intakes as they are already being manufactured.

Permits should be valid in any dredgable state water: Since existing regulations already set the times and places where dredging is not deleterious to fish, I do not see any practical reason to force dredge-miners to inform DFG exactly where they are dredging. Indeed, I think this is an intrusive invasion of privacy. Since I intend to prospect, I will not know the exact locations where I will be dredging at the time I apply for my permit. You should broaden the location requirement in your permit application to naming the waterways where I intend to work. This will allow me some flexibility to move around in search of gold without having to make an expensive trip to the closest Department license sales office to amend my permit.

The proposed dredge marking system is not workable: There is no practical way of attaching a sign to a small dredge! What does this have to do with preventing a deleterious impact upon fish? This is just bureaucracy wrapping itself in red tape.

Fuel should be allowed within 100 feet of the waterway if kept within a water-tight container or a boat: I question your authority on placing any requirement upon suction dredgers in this matter, other than to prohibit the spillage of fuel. Millions of boaters all over California

are allowed to keep fuel safely in their boats. Your proposed regulations would prohibit suction dredgers from doing the very same thing!

Disturbance of mussel beds: It is unreasonable to propose that every suction dredger must now do a survey before dredging to make certain that there is no place within 30 feet downriver where more than 40 muscles per square yard exist before dropping tailings! Some rivers are so inundated with muscles; this imposition would amount to a suction dredge prohibition in a large part of the waterway! And since there are so many, why? How does the protection of mussels from dredge-miners conform to the language of Section 5653? Please drop this silly mussel idea from final regulations.

Returning the site to the pre-mining grade to the greatest extent possible: Since it is impossible to move tailings and rocks upstream against any current, the requirement to fill in our holes and level off our tailings is unrealistic. The dredge holes which I leave behind create cool water refuges where salmon and other fish hold up during the warm summer months. My piled cobbles create protected habitat where fingerlings can hide from predators. I have seen many salmon and trout feeding from my tailings as the insects are washed free.

Dredge mining between one half hour after sunrise to sunset: How did this even get proposed? Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs.

Finally, the proposed regulations should allow visitors from other countries to use a foreign passport or driver's license as identification so they can apply for nonresident suction dredge permits. Otherwise, California will be discouraging the many visitors which we already receive that like to do their gold prospecting here. Your non-resident license fee is already sufficiently expensive to discourage many.

Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

Michelle Scott
682 Pine Meadows #1
Sparks, NV 89431

Subject: Proposed Dredge regulations
Date: Thursday, April 14, 2011 7:03:18 PM PT
From: Richard
To: dfgsuctiondredge@dfg.ca.gov

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

Dear Sir,

As an active claim holder, and avid gold miner, I wish to make my opinions known about the SEIR and Proposed Regulations for suction dredge mining in California. In order to be fair, you should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed. I believe the Department is using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious beneficial economic and social impacts to Americans which would result from your proposed regulations.

Further, with regards to **mercury**, the SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations! The SEIR does not give enough weight to the discovery by Rick Humphries Report of California Water Resources Control Board that normal gold dredges are effective at recovering at least 98% of the mercury from the bottom of California's waterways. Modern gold miners are performing hazardous waste cleanup, free to the taxpayers. The alternative is to leave it there and let it wash down in every flood. **Since California State agencies are doing nothing to remove mercury from California's active waterways, it is grossly irresponsible to point the finger at suction dredgers who are the only ones removing the mercury, at no cost to the taxpayers!** Your SEIR relies unreasonably upon the unfounded conclusions of Charles Alpers' who has allowed his personal political agenda get in the way of real science. Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredge miners for collecting and turning in mercury.

DFG should not limit the number of suction dredging permits: There is no evidence presented in the SEIR that 14 years of dredging under the 1994 regulations **ever** harmed a single fish, much less threatened the viability of an entire species. Further, doesn't the DFG issue licenses specifically to

kill fish? What if I want to operate a dredge in some part of California where there would not be a deleterious impact, such as my claim above Bullard Bar dam which destroyed the fish spawn decades ago? A limit on permits may prohibit me or someone else from using a suction dredge without a viable reason.

Onsite inspections should be immediately signed off when approved: There should not be a delay in signing off on a site inspection in cases where DFG officials cannot identify a deleterious impact. There should be a time limit in the regulations in which the application will be approved or disapproved. Due process should be allowed if I desire to appeal an application which has been disapproved.

Prior existing rights on permit acquisition: There must be an allowance for prior existing rights on a limited permit program. Otherwise, dredge-miners who have already invested in property and equipment could potentially lose our prior existing right to work our mining claims or other mining opportunities (belonging to an association that provides access to mining property).

Statewide permits, if limited, should be transferable: Permits shouldn't be arbitrarily limited in numbers, but if they are, they should be transferable. Otherwise, miners will make the substantial investment into developing a viable mine and then not be able to transfer ownership to someone new who will be able to dredge it, therefore losing some or most of the value.

DFG should not further-limit the size of dredges under the statewide permitting program: I do not believe that DFG has the authority to step onto the public lands and impose a permit restriction upon the productive capacity of my dredge without also coming up with specific reasons why existing capacities under the 1994 regulations are creating a deleterious impact upon fish. Please leave nozzle restriction sizes as they were in the 1994 regulations. The regulations should also allow a wear tolerance factor on nozzle restrictor rings. I suggest 3/8 of an inch (diameter) is reasonable.

DFG should not further-limit the places where dredging is allowed: This proposal is just supported by your "precautionary approach." Except for those areas where you can demonstrate that a deleterious impact has been created under the existing regulations, please leave our seasons as they have been since 1994.

Reduction of our existing dredging seasons is unreasonable: I do not see that the SEIR contains evidence of any deleterious impact upon fish to support the reduction of existing dredging seasons. This proposal is only supported by your "precautionary approach." Except for those time periods where you can demonstrate that a deleterious impact has been created under the existing regulations, you should leave our seasons as they have been since 1994.

The proposed 3-foot rule is arbitrary: The SEIR has not presented any real evidence that dredging within three feet of the streambank has ever harmed a single fish. This prohibition would prevent beginners, non-swimmers or children from starting closer to the shore where water is shallower and more safe. Prohibiting dredging within three feet of the edge of the river will eliminate a significant portion of the operational value (perhaps even all of it) on some dredging properties.

Suction dredge regulations should not impose the requirement of Section 1600 Agreements: Fish & Game Section 5600 already allows a site inspection mechanism for the Department to determine if a dredging program is deleterious to fish. Therefore, also imposing a Section 1600 requirement upon dredgers who wish to mine at a time or location that is otherwise closed, or to use larger nozzle than is allowed under a statewide permit, when there is little or no chance the dredge project will create a substantial impact upon the bed or bank of the waterway, would be an unreasonable imposition upon dredge-miners. Nobody else in California is required to pursue a Section 1600 permit until their activity rises to the level of requiring one. It should not be any different for suction dredgers. This also applies to the use of power winches, which provide the only safe and efficient means of progressing when some rocks are too heavy to move by hand, or they cannot be rolled over other rocks that are in the way. You should not impose a 1600 Agreement requirement upon a gold dredger unless the surface disturbance rises to the level which triggers Section 1600 of the Fish & Game Code.

Imposition of the 3/32-inch intake requirement on pumps is unreasonable: The 1994 regulations already prohibit dredge operation at times when fish may be too small to swim away from pump intakes as they are already being manufactured.

Permits should be valid in any dredgable state water: Since existing regulations already set the times and places where dredging is not deleterious to fish, I do not see any practical reason to force dredge-miners to inform DFG exactly where they are dredging. Indeed, I think this is an intrusive invasion of privacy. Since I intend to prospect, I will not know the exact locations where I will be dredging at the time I apply for my permit. You should broaden the location requirement in your permit application to naming the waterways where I intend to work. This will allow me some flexibility to move around in search of gold without having to make an expensive trip to the closest Department license sales office to amend my permit.

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Returning the site to the pre-mining grade to the greatest extent possible: Since it is impossible to move tailings and rocks upstream against any current, the requirement to fill in our holes and level off

our tailings is unrealistic. The dredge holes which I leave behind create cool water refuges where salmon and other fish hold up during the warm summer months. My piled cobbles create protected habitat where fingerlings can hide from predators. I have seen many salmon and trout feeding from my tailings as the insects are washed free.

Dredge mining between one half hour after sunrise to sunset: How did this even get proposed? Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs.

Finally, the proposed regulations should allow visitors from other countries to use a foreign passport or driver's license as identification so they can apply for nonresident suction dredge permits. Otherwise, California will be discouraging the many visitors which we already receive that like to do their gold prospecting here. Your non-resident license fee is already sufficiently expensive to discourage many.

Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

Richard Scott

Subject: DFG's Proposed Dredge Regulations in California

Date: Wednesday, April 13, 2011 4:40:46 PM PT

From: Henry A Sisler

To: dfgsuctiondredge@dfg.ca.gov

Mark Stopher

Dear Sir,

AS A Impendent Small Weekend Gold dredger in California, for over 12 years now, Please consider my following comments regarding the SEIR

and Proposed Regulations for suction dredge SEIR Baseline is wrong: I take strong exception to the

Department using an arbitrary and misleading(No Proof Study, on the effects of dredging.) baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious economic and social impacts to proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed.

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Water Resources Control Board that normal gold dredges are effective at recovering at least 98% of the mercury from the bottom of California's waterways.

(I myself have collected a lot of Mercury in several different rivers in CA..as well as WA state,)

The SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations!

Adoption of the SEIR position would be fundamentally unreasonable in a context where the mercury is inevitably migrating downstream to areas where it is believed to be potentially harmful.

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What if I want to operate a dredge in some part of California where there would not be a deleterious impact? A limit on permits may prohibit me or someone else from using a suction dredge without a viable reason. Allowing additional dredge permits after site inspection: In the event that DFG decides to impose (reasonable) limits in a blanket statewide permit program that will allow for most suction dredgers, I do not believe DFG has the authority to declare a wholesale prohibition to dredge mining in the other vast areas which exist on the public lands that would not be covered by the blanket permit. DFG has a site inspection mechanism allowing you to consider more individualized impacts in areas, and during time periods, when and where dredging would not be allowed in a

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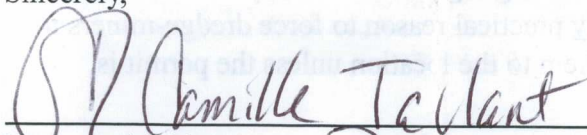
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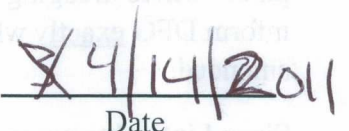
Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,



Name and Address

P.O. Box 183 Happy Camp Ca
96039



Date

We usually stay from Mid-May to Mid-Oct
in N. CA for dredging. We support the local
economy wherever we stay. And yes, we have
never harmed a fish. 050211_Thayer

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

Dear Sir,

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Sincerely, *Sybil Thayer* 3700 S. Westport Ave #1850

Sybil Thayer Sioux Falls, SD 57106 5/2/11
Name and Address Date

4" OR 5" dredge

5" dredge *Mike Thayer* 3700 S. Westport Ave #1850
[Signature] Sioux Falls, SD 57106 5/2/11

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

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Allowing larger-sized nozzles after site inspection: If a dredger wants to operate a dredge having a larger nozzle than is allowed under a statewide permitting scheme, the Department should allow the activity as long as no deleterious impact can be determined through a site inspection.

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It would be more productive to provide better language describing what the “bank” is in relation to dredge mining. For example, is there a “bank” in relationship to a gravel bar out in the waterway that is partially out of the water? What about a bar alongside the waterway that is submerged during the spring, but emerges more and more out of the water as the dry season evolves? Existing language is not clear enough. The proper answer is to clear that up, rather than impose an additional buffer zone which reduces our mining opportunities.

Suction dredge regulations should not impose the requirement of Section 1600 Agreements: Fish & Game Section 5600 already allows a site inspection mechanism for the Department to determine if a dredging program is deleterious to fish. Therefore, also imposing a Section 1600 requirement upon dredgers who wish to mine at a time or location that is otherwise closed, or to use larger nozzle than is allowed under a statewide permit, when there is little or no chance the dredge project will create a substantial impact upon the bed or bank of the waterway, would be an unreasonable imposition upon dredge-miners. Nobody else in California is required to pursue a Section 1600 permit until their activity rises to the level of requiring one. It should not be any different for suction dredgers.

This also applies to the use of power winches, which provide the only safe and efficient means of progressing when some rocks are too heavy to move by hand, or they cannot be rolled over other rocks that are in the way. You should not impose a 1600 Agreement requirement upon a gold dredger unless the surface disturbance rises to the level which triggers Section 1600 of the Fish & Game Code.

Imposition of the 3/32-inch intake requirement on pumps is unreasonable: The 1994 regulations already prohibit dredge operation at times when fish may be too small to swim away from pump intakes as they are already being manufactured.

Most dredges today are being produced using 3/16th inch or 15/64th inch holes for the pump intakes. To avoid conflict, you should adopt something larger than the two hole sizes which are already being used on most dredges in California.

Allowance of permit locations must be more broad: Since existing regulations already set the times and places where dredging is not deleterious to fish, I do not see any practical reason to force dredge-miners to inform DFG exactly where they are dredging – and then hold them to the location unless the permit is amended.

Since I intend to prospect, I will not know the exact locations where I will be dredging at the time I apply for my permit. You should broaden the location requirement in your permit application to naming the waterways where I intend to work. This will allow me some flexibility to move around in search of gold without having to make an expensive trip to the closest Department license sales office to amend my permit.

The proposed dredge marking system is not workable: There is no practical way of attaching a sign to a small dredge! What does this have to do with preventing a deleterious impact upon fish?

If you must have an identification number on my dredge, you should eliminate the requirement of 3-inch number and allow the numbers to be marked either on the pontoons or the sluice box, but only if it is possible to do so. This would allow smaller numbers in the case of smaller dredges.

Fuel should be allowed within 100 feet of the waterway if kept within a water-tight container or a boat: I question your authority on placing any requirement upon suction dredgers in this matter, other than to prohibit the spillage of fuel. Millions of boaters all over California are allowed to keep fuel safely in their boats. Your proposed regulations would prohibit suction dredgers from doing the very same thing!

There are plenty of effective ways to prevent fuel from leaking into the waterway without making a dredge-miner hike 100 feet up the embankment. At the very least, fuel can be placed inside of a boat, or inside a sealed catch tub of some kind up on the embankment to prevent leakage. These catch tubs are already routinely part of a dredge program to assist with cleanup of concentrates.

Disturbance of mussel beds: It is unreasonable to propose that every suction dredger must now do a survey before dredging to make certain that there is no place within 30 feet downriver where more than 40 muscles per square yard exist before dropping tailings! Some rivers are so inundated with muscles; this imposition would amount to a suction dredge prohibition in a large part of the waterway! And why, since there are so many? How does the protection of mussels from dredge-miners conform to the language of Section 5653? Please drop this silly mussel idea from final regulations.

Returning the site to the pre-mining grade to the greatest extent possible: Since it is impossible to move tailings and rocks upstream against a swift current, the requirement to fill in our holes and level off our tailings is unrealistic.

Ample evidence shows that salmon are less likely to place their redds in a heaped tailing pile, than they are on a pre-mining grade which is inundated with unstable gravel; so your proposal will actually create more harm than good! The dredge holes which I leave behind create cool water refuges where salmon and other fish hold up during the warm summer months. My piled cobbles create protected habitat where fingerlings can hide from predators. It would be better for the fish if we just allow Mother Nature to settle things out in the next storm event.

Dredge mining between one half hour after sunrise to sunset: Your authority is limited to preventing a deleterious impact upon fish. Please drop this from proposed regulations and leave this particular concern to local authorities where it belongs.

Thank you very much for giving careful consideration to my comments and suggestions!

Sincerely,

Harry Wright - BOX 220 HAPPY CAMP, CA 96039

Name and Address

Date

*Sir; according to the HR all minerals
were given to the people and also the waters
so that they could prospect for precious
minerals. Please send me your response on
this, please give me the names of all who own on the
(continued.)*

Committee who are trying to restrict
our right to prospect for these precious
minerals.

Gary Wright.

Mark Stopher

California Department of Fish and Game

601 Locust Street

Redding, CA 96001

Fax: (530) 225-2391 E-mail: dfgsuctiondredge@dfg.ca.gov

Dear Sir,

Please consider my following comments regarding the SEIR and Proposed Regulations for suction dredge mining in California:

SEIR Baseline is wrong: I take strong exception to the Department using an arbitrary and misleading baseline within the SEIR in an underhanded attempt to make the impacts from suction dredging appear greater than they really are, and in an attempt to marginalize the serious economic and social impacts to Americans which would result from your proposed regulations. You should use a proper baseline that is based upon existing dredge and small business activity under the 1994 regulations during the season before the moratorium was imposed.

Mercury is not a problem: Your SEIR relies unreasonably upon the unfounded conclusions of Charles Alpers' who has allowed his personal political agenda get in the way of real science. The SEIR does not give enough weight to the discovery by Rick Humphries Report of California Water Resources Control Board that normal gold dredges are effective at recovering at least 98% of the mercury from the bottom of California's waterways.

The SEIR does not acknowledge, based upon your own survey results, that suction dredgers have been removing over 7,000 ounces of mercury or more every year under the 1994 regulations from California's waterways. That amounts to 98,000 ounces during the 14 years we operated under the 1994 regulations! Adoption of the SEIR position would be fundamentally unreasonable in a context where the mercury is inevitably migrating downstream to areas where it is believed to be potentially harmful.

Since California State agencies are doing nothing to remove mercury from California's active waterways, it is grossly irresponsible to point the finger at suction dredgers who are the only ones that are removing the mercury, at no cost to the taxpayers!

Rather than reduce the amount of mercury which we are removing from the ecosystem, the responsible approach for State agencies would be to create a collection system in California which rewards dredge-miners for collecting and turning in mercury.

Identification requirement: The proposed regulations should allow visitors from other countries to use a foreign passport or driver's license as identification so they can apply for nonresident suction dredge permits. Otherwise, California will be discouraging the many visitors which we already receive that like to do their gold prospecting here.

DFG should not limit the number of suction dredging permits: There is no evidence presented in the SEIR that 14 years of dredging under the 1994 regulations ever harmed a single fish, much less threatened the viability of an entire species. What if I want to operate a dredge in some part of California where there would not be a deleterious impact? A limit on permits may prohibit me or someone else from using a suction dredge without a viable reason.

Allowing additional dredge permits after site inspection: In the event that DFG decides to impose (reasonable) limits in a blanket statewide permit program that will allow for most suction dredgers, I do not believe DFG has the authority to declare a wholesale prohibition to dredge mining in the other vast areas which exist on the public lands that would not be covered by the blanket permit. DFG has a site inspection mechanism allowing you to consider more individualized impacts in areas, and during time periods, when and where dredging would not be allowed in a statewide program.

Onsite inspections should be immediately signed off when approved: There should not be a delay in signing off on a site inspection in cases where DFG officials cannot identify a deleterious impact. There should be a time limit in the regulations in which the application will be approved or disapproved. Due process should be allowed if I desire to appeal an application which has been disapproved.

Prior existing rights on permit acquisition: There must be an allowance for prior existing rights on a limited permit program. Otherwise, dredge-miners who have already invested in property and equipment could potentially lose our prior existing right to work our mining claims or other mining opportunities (belonging to an association that provides access to mining property).

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Sincerely,

Bob A. Wells 2022 CRESTWOOD LN 4-29-2011
Name and Address KELSO, WA 98626 Date

THE RULES SHOULD BE COMMON SENSE AND
REAL SINCERE NOT GUESS WORK OR PRESSURE
FROM OUTSIDE NATION'S

