



SOUTH YUBA RIVER CITIZENS LEAGUE

March 28, 2012

Tod Herman, Senior Planner
Nevada County Community Development Agency
950 Maidu Avenue, Suite 170-CDA
Nevada City, CA 95959

Re: Request full EIR for San Juan Ridge Mine proposal

Dear Mr. Herman:

The San Juan Mining Corporation has submitted an application to the Nevada County Planning Department to re-open the San Juan Ridge Mine. Nevada County must now determine whether to require a full Environmental Impact Report (EIR) for the proposal.

On behalf of the Board of Directors of the South Yuba River Citizens League (SYRCL), which represents over 3500 members and volunteers, we ask that Nevada County require a new EIR to be prepared, and that the EIR receive a full public process.

SYRCL is concerned about the potential significant impacts of the project on water quality and quantity in Spring and Shady Creeks, as well as indirect impacts on the South Yuba River. Our concerns include impacts to wildlife and vegetation associated with affected water bodies, as well as impacts on water quality and sensitive species in the South Yuba River and its tributaries.

Given the proposed and past rates of water usage for this project, significant impacts will be unavoidable. The estimate for water to be pumped from the mine is up to 3.6 million gallons per day if there are no complications. When the past operations in the same mine hit an unknown fault and the mine flooded, millions of gallons per day were pumped from the mine.

While the original project was evaluated in an EIR, the project has changed substantially due to major problems that emerged as excavation and dewatering proceeded in the period of mining between 1994 and 1997. Unanticipated loss of 11 local water wells and the discovery of instability in the mining tunnels have resulted in changes to the operator's plans for the mine, and thus the old EIR is not sufficient to assess the environmental impacts of the mine.

Furthermore, in the nearly 20 years that have passed since the original EIR was prepared, local, State, and Federal laws have changed. The physical environment has also changed over this period. Extensive logging on the mine property has resulted in changes to surface hydrology and erosion characteristics.

Under the California Environmental Quality Act, changes in a proposed action, changes in circumstances, and new information require the preparation of a new EIR.

We ask that all potentially significant impacts to the South Yuba River watershed and its tributaries, including impacts to water quality and quantity, fish and wildlife, and vegetation, be assessed in this EIR. We also ask to be notified of any decisions or notices concerning preparation of an EIR.

Sincerely,



Caleb Dardick
Executive Director

cc: Supervisor Hank Weston
Gary Parsons, President, SJRTA