

10-6-09
#24

California Department of Fish and Game
Attn: Mark Stopher
Suction Dredge Program Comments
601 Locust Street
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Email: dfgsuctiondredge@dfg.ca.gov
Subject Line: Suction Dredge Program Comments

Personal Background

I have been actively involved in prospecting and mining for the past 30 years. My involvement has ranged from simple panning methods to suction dredge mining to open pit aggregate/placer mining and underground hard rock gold mining. I have also been involved in many other land use activities including camping, fishing, hiking, OHV, Rock Hounding and others. Not a single year has passed where I have not produced at least a couple of ounces of placer gold and in fact, suction dredge mining was my primary source of income for at least 3 of the last 30 years.

In 2003 I purchased land at a cost of \$100,000.00. My major consideration in making this purchase was because of the potential for suction dredge mining. I have also invested tens of thousands of dollars in suction dredge mining equipment and supplies. I have spent over \$5,000.00 in the past two years alone on new equipment and equipment maintenance not to mention the thousands of dollars spent on travel, food and lodging to prospect in other areas of the state and the west.

In the past, I have deployed and currently own suction dredge mining equipment from 2" to 8" in size. For the last five years, the primary equipment I have used has been a five inch suction dredge. I have operated suction dredges in various areas throughout the state but for the last five years, I have operated only on my own private property.

DFG Study Bias

It is obvious from much of the content in this NOP that the Department of Fish and Game has a bias against suction dredge mining and suction dredge miners. Due to this bias, this study has been flawed from the very start. There are numerous places where bias is evident. The following are my comments pertaining to this.

The Department of Fish and Game (DFG) has made statements in the program description and elsewhere in the NOP that are biased against myself and suction dredge miners as a group. I think that it's wrong for a government agency to publish statements that can create a bias against a person or group of people and I feel that I am being "profiled" or "segregated" from the rest of society by these statements.

In section 5.5.7 Processing of Material, you describe chemical processing using mercury and acid. In my 30 years of suction dredge mining, I have seen very little of this type of activity and never have I witnesses miners processing gold in this manner in the field. This portrayal of activity in my opinion is far from accurate and leads people to believe that suction dredge miners are a group of careless, reckless people with no respect for themselves, others or the environment and who commonly use and dump hazardous and toxic materials wherever they are. If these activities actually occur, they are the exception and not the rule.

In section 5.5.10 Encampments, you describe a mess of a camp with human waste and hazardous material strewn around. The last line of the section says "It is unknown whether this behavior is typical of suction dredge miners." This statement implies that this type of behavior may be typical of all suction dredge miners and presents a reason for bias against all suction dredge miners and suction dredge mining. I can assure you that this type of behavior IS NOT TYPICAL of suction dredge miners but instead is typical of a very small section of our society as a whole. The people who behave in this manner should be prosecuted to the full extent of the law instead of using their example to profile all suction dredge miners in this manner. The fact is that most suction dredge miners keep a very clean way and strive to maintain a very low profile and footprint on the land.

Mercury

It appears that mercury is one of the bigger concerns in this study. I don't know why there has not been a CEQA review on the impact of NOT dredging in relation to the removal of mercury and trash from the rivers and streams of California. Suction dredge mining actually reclaims a very large amount of mercury that may be present. To represent that the losses of mercury off the tail of a suction dredge present a greater contamination potential than not removing any mercury at all from the environment is not only irresponsible but also indicates a bias as mention in the prior section of this response. Suction dredge mining is the only commonly performed activity that I know of that has done anything to further the removal of mercury from the streams and rivers of the gold fields.

DFG should not only encourage suction dredge mining to further promote the reclamation of mercury but should also offer a bounty on it. At a minimum, there should be some type of "regular program" to promote mercury reclamation by suction dredge mining and reward those who collect and surrender mercury to DFG. This would not only increase the amount of mercury removed safely from the environment but could also lead to better cataloging of the areas where contamination actually exists thus allowing for more concentration of reclamation efforts where they are most needed. There are many areas where there is very little or no mercury present at all. I do not believe that mercury is commonly used by suction dredge miners today but may be a by-product of the suction dredge mining operation.

Fish

This study should focus on the impact of suction dredge mining on the fish and their habitat. Instead, the study will review many topics that in no way relate to fish. Maybe if you want to promote more fish the DFG should stop issuing fishing licenses. Fishing kills fish, suction dredge mining does not. I cannot count how many areas that I have suction dredge mined over the past 30 years where, if visited today, there would be absolutely no evidence that any suction dredge mining activity ever occurred and that the fish and habitat appear to be healthy.

Comparative Impacts

It's hard to believe that with 211,000 miles of rivers and streams (per swrb web site) and 3000 to 4000 suction dredge miners in the state, most of whom have very little dredge time each year, that the impact of suction dredge mining can be significant in any way at all. With millions of fishing licenses issued annually and millions of people using these same areas for other "recreational" purposes, why is all this time and money being wasted on such a small activity. In my opinion, this again clearly shows that a bias exists at DFG against suction dredge mining and the mining community.

I read on-line that in 2006, there were 1.7 million anglers in California who averaged 11 fishing days per year for a total of ~19 million fishing days in the state that year. Wow, I wonder how many fish they killed or how much trash or pollution they left in or by the water.

Section I talks about aesthetics. Do you think the fish care about this?

Section III talks about air quality. What about the millions of residents and visitors that drive vehicles of all kinds in through and around these areas? The impact of suction dredge mining cannot compare to this in any way to this.

Section IV addresses biological resources. This section goes on and on about all type of impacts that suction dredge mining has on the biological resource. Have you ever seen a watershed after a major flood? Even after normal high water years the amount of material that is moved and the damage to riparian habitat is astronomically greater than what suction dredge mining can do to the environment. It's a wonder there are any fish at all with mother nature to contend with yet they seem to thrive after high water events that "tear up" the environment like the floods of 1986, 1997 and 2005.

Section VII addresses hazards and hazardous materials. Here again suction dredge miners are being profiled as an irresponsible and careless group of individuals who commonly transport, use, store and dispose of dangerous chemicals and materials. This is the "what if" paranoia.

A single watercraft sinking in any lake would likely produce thousands of time the pollution than any fuel spill from any suction dredge miner. How many boats sink every year in the state?

Section VIII, hydrology and water quality. Again there is a bias in this study because the focus is on the tiny fractional portion of mercury that is not recovered instead of focusing on the fact that almost all of the mercury present is actually removed from the environment. It is foolish to think that the mercury as a whole if left in the environment, poses a lesser risk than removing almost all of the mercury by suction dredge mining. If your test shows this, you need to do another test because it just doesn't make any sense at all. Maybe the original test results were flawed.

I can go on and on with this but again I think the study is clearly biased against suction dredge mining. It's like trying to compare a mountain to a mole hill. DFG and the legislative body that passed 670 is out of touch with reality. I also think that a great mistake is being made due to the fact that there will be no actual real-time study of suction dredge mining in California. DFG should be actively involved in studying real mining operations and over a long extended period of time (years) to determine the true impact of this type of activity. I cannot find where any long term study has ever been completed in California.

In closing, I would like to add that as far as I know, prospecting and mining are protected by Federal Law. To me, suction dredge mining is mining and is covered as a granted right in the mining laws. To restrict my rights as a citizen and a property owner from enjoying this activity is wrong and may even be criminal.

Thank you for your consideration and attention.

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