

From: S. Delgado [revsher@earth-justice.org]
Sent: Sunday, January 18, 2009 11:24 PM
To: Tom Last
Subject: DEIR comments

Dear Tom Last,

Attached are the comments of Earth Justice Ministries related to the DEIR. Please let us know that you received them.

Thank-you.

Sincerely,

Sharon Delgado

Executive Director

Earth Justice Ministries

Statement Opposing the Reopening of the Idaho-Maryland Mine

As people of faith, we view the creation as an expression of the Divine, and we find intrinsic value in all parts of creation. We recognize that as created beings, we are dependent upon the Creator and interdependent with the rest of the created order, and that human well-being depends upon the well-being of the natural world.

After considering Emgold's proposal to reopen the Idaho-Maryland Mine, studying the Draft Environmental Impact Report, and weighing likely impacts on our community, we have prayerfully decided to take a stand in opposition to the project. We respectfully disagree with those who support the reopening of the mine for the following reasons:

The health of children, the elderly, and others vulnerable to asthma and other respiratory diseases would be harmed by worsening air quality. According to the Draft EIR, the negative effects of mine operations on air quality are "significant and unavoidable after mitigation" and do not comply with state air quality mandates. The City of Grass Valley has a wood stove replacement

program for improving air quality which would be negated by the increase in particulate discharge by mine operations.

Mining operations will import and use cyanide and other toxic chemicals, including substances that are known to cause cancer and other illness. Local lands carry a quarter of a million cubic yards of mine tailings, polluted with mercury, arsenic, lead, nickel, and other heavy metals. The 1200 tons (2,400,000 pounds) of mine tailings produced each day may release toxins into the environment. Again, the most vulnerable populations will be at risk.

Water is the most basic requirement of all living things. Regions around the world are facing water pollution and shortages. The health of our local rivers and streams is critical. Local streams already contain mercury, arsenic, and other heavy metals from past mining activities. While the mine is being de-watered, twelve acre-feet of water will be released every day into Wolf Creek, which could cause old sediments, including mercury, to mobilize. Runoff from the mine may contain toxins. Wells are likely to be de-watered and water rights may be questioned because of prescriptive use by the mining operation.

Other concerns include: increased noise, underground vibrations with potential negative effects on existing businesses with sensitive equipment, increased heavy load traffic, and the increased use of natural gas and electricity. Conserving precious energy resources must be our guide, not industries that require such large increases and greater energy demands. We should be exploring means to reduce our carbon footprint rather than increasing it as a community in this time of global climate change.

Finally, we are greatly troubled by the overall viability of the project, both economically and strategically. With the current upheaval in world markets and the reality of global recession, embarking on a project of this magnitude appears to us to be extremely risky at best. Since the mine is only projected to operate for twenty years, the negative consequences down the road for our community could be considerable - in lost jobs, social displacement, and dramatically reduced income from taxes and other revenues. The creation of jobs is vital to our community, but we need to create employment opportunities that offer long-term work in sustainable businesses with positive, not negative, environmental and social consequences.

God has entrusted the earth to us as a blessing for all creatures and for all generations. Our life and health depend on living and working in right relationship with the earth. In this light, we have carefully weighed the pros and cons of the reopening of the mine, and come to the conclusion that the many risks inherent in this project far outweigh any potential benefits to our community. We encourage all Nevada County residents to study this issue and to actively work to protect and defend our community and ecosystems. We therefore urge the Grass Valley City Council, the Grass Valley Planning Commission, and all responsible parties involved in the decision-making process to reject Emgold's request for a permit to reopen the Idaho-Maryland Mine.