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Here are my comments about the IMM DEIR:

\*Concerning 4.9 Noise:

- Measures 4.9-1 a and b

# do not mitigate all items from table 4.9-6 and 4.9-7, such as blasting

# only cover tools and equipment; they do not mitigate actual noise from impacts (drilling, etc)

# do not describe action to be taken in case of complaints about construction, excavations, reclamation or transportation noises; Measure 4.9-2 only cover beepers.

- Measures 4.9-2 a and b

# do not ensure stopping of activities until corrective actions have been put in place

# do not describe any delay to respect to implement the corrective actions

- Measures 4.9-3 a, b and c

# do not cover AJA nor Miners Family Health Center, both closer to the mine than the listed businesses

# do not cover liability in case of failure to follow procedure, leading to economical, physical injury or life threatening impacts

- Tables 4.9-10 and 4.9-11 (Predictions)

Note 1 says: "Noise levels were determined using FHWA Traffic Noise Prediction Model (FHWA RD-77-108) (Barry, T.M. and Regan, J.A., 1978)."

# This model is outdated since the late 90's, the model that should be used instead is the TNM (*see Introduction of TNM, TNM documentation*)

# Truck routes, other than locally around the site (about 1 mile distance) are not listed with their respective noise impact in those areas (e.g. Grass Valley downtown, Auburn along 49, etc.)

- Section 4.9 does not cover any impact of noise on natural habitat and wildlife described in section 4.3:

***Section 4.3 (Biological resources) states (4.3-6) "Ponderosa pine is sometimes a transitional or migratory habitat for mule deer (Odocoileus hemionus) and can be nutritionally important in migration holding areas", (4.3-8) "Riparian habitats are extremely valuable for an abundance of wildlife, providing food, water, migration and dispersal corridors, and escape, nesting, and thermal cover for numerous species"***

- Appendix G (Blasting):

# this section doesn't specify the type of blasting control that is going to be used, radio or wired.

Controlled blasting by radio can be impacted by [Electromagnetic Interferences](#), Noise section doesn't cover that part, nor Blasting

Mining activities generate some electromagnetic noise/pulses; those are not covered either with their impact on the hospital, AJA, Linear Technologies, etc.

Some documentation on the subject: [Time and Amplitude Statistics for Electromagnetic Noise in Mines](#) (esp. check the Grace mine)

- Appendix H, Economic

# this section does not describe negative economical impact from having the mine installed in town, especially in terms of appeal for other businesses that could plan to settle or expand in the area.

# Nevada County has released recently a report: <http://www.ncerc.org/documents/SeifelReport.pdf>

Mining is not listed as primary focus to expand; the DEIR fails to mention this report and its conclusions.