GOLDEN QUEEN MINING COMPANY, INC.

SOLEDAD MOUNTAIN PROJECT

MOJAVE, KERN COUNTY, CALIFORNIA

DRAFT
ENVIRONMENTAL IMPACT REPORT /
ENVIRONMENTAL IMPACT STATEMENT

VOLUME 2

(Appendices I and II)

MAY 1997



COUNTY OF KERN PLANNING DEPARTMENT BAKERSFIELD, CALIFORNIA



BUREAU OF LAND MANAGEMENT RIDGECREST RESOURCE AREA RIDGECREST, CALIFORNIA

PLANNING DEPARTMENT

RESOURCE MANAGEMENT AGENCY

JOEL HEINRICHS, AGENCY DIRECTOR

TED JAMES, A.I.C.P., Director

2700 "M" STREET, SUITE 100 BAKERSFIELD, CA 93301 Phone: (805) 861-2615 AX: (805) 861-2061



Air Pollution Control District
Airports Department
Engineering & Survey Services Department

Engineering & Survey Services Department
Planning Department
Transportation Management Department
Waste Management Department

June 13, 1994

TO THE BOARD OF SUPERVISORS

RE: Memorandum of Understanding, Kern County and the Bureau of Land Management; Surface Mining and Reclamation Plan Coordination

Funding: No Fiscal Impact

Dear Members of the Board of Supervisors:

In 1990, the State of California Department of Conservation and the Bureau of Land Management (BLM) entered into a State-wide Memorandum of Understanding wherein the BLM acknowledged that surface mining activities conducted on BLM administered lands will be subject to the State Surface Mining and Reclamation Act of 1975 (SMARA). As part of this agreement the BLM acknowledged that counties (or cities) have lead agency responsibility to approve reclamation plans on BLM administered land, while the BLM would retain operational permit authority. Since 1990, the County has been processing reclamation plans on BLM administered land through the conditional use permit process. The adopted Memorandum of Understanding between the State and the BLM also encourages the adoption of similar agreements between local regional BLM offices and the responsible county. To this end, the Caliente Resource Area and Ridgecrest Resource Area BLM offices, have requested that the County enter into the attached Memorandum of Understanding.

The primary purpose of the recommended Memorandum of Understanding is to encourage coordination between the BLM and the County related to the processing of surface mining permits and reclamation plans on BLM administered lands. A related objective is to encourage the joint preparation of environmental documents and to reduce the overall processing time that would typically be required for an applicant to independently secure all necessary approvals from each agency. Another benefit of the recommended MOU will be to establish coordinated enforcement responsibilities between the two agencies and to acknowledge that County personnel have the right to enter onto BLM administered lands for the purpose of determining reclamation plan compliance. Nothing in the proposed MOU will pre-empt the County from the normal exercise of its land use authority over reclamation plans.

IT IS RECOMMENDED that your Board approve the proposed Memorandum of Understanding and authorize the Chairman to sign.

Very truly yours,

TED JAMES, AICP, Director

Planning Department

TJ:JEE:jb L1.BOS Enclosures

County Administrative Officer
County Counsel
State Mining and Geology Board
BLM - Caliente Resource Area
BLM - Ridgecrest Resource Area
Resource Management Agency
Grand Jury
Colleen Gallo, Senior Planner
Scott Denney, Associate Planner
Aaron Leicht, Engineering & Survey Services

MEMORANDUM OF UNDERSTANDING

Concerning Surface Mining and Reclamation in the County of Kern, State of California in accordance with California's Surface Mining and Reclamation Act (SMARA) of 1975, as amended,

by and between the

COUNTY of KERN

and the

U. S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

Bakersfield District, Caliente Resource Area, California Desert District, Ridgecrest Resource Area

I. PURPOSE

THIS MEMORANDUM OF UNDERSTANDING (MOU) is made and entered into by and between Kern County, a political subdivision of the State of California (County) and the U.S. Department of the Interior, Bureau of Land Management, Bakersfield District, Caliente Resource Area, and California Desert District, Ridgecrest Resource Area (BLM) for the purposes of:

- (A) Providing for the consistent application of an adequate and appropriate mining and reclamation policy throughout Kern County; and
- (B) Regulating surface mining and reclamation activities related to mining, mineral material sales, mineral leasing, under the General Mining Laws of 1872, as amended, Mineral Materials Sales Act of 1947, as amended, and Mineral Leasing Act of 1920, as amended, which are located on lands and/ or mineral estate under BLM jurisdiction within Kern County: in so far as those surface mining and reclamation activities are subject to state and local environmental regulations (ref. California Coastal Comm. v. Granite Rock Co., 480 U.S. 572, 1987); and
- (C) Coordinating and simplifying the administration and processing of applicable NEPA, CEQA, FLPMA, and SMARA documents.

II. RECITALS

- (A) The California State Office of the Bureau of Land Management and the State of California, operating by and through the Department of Conservation, State Mining and Geology Board have entered into a statewide MOU. A copy of the statewide MOU is attached hereto as exhibit "A".
- (B) The statewide MOU encourages the adoption of "specific area agreements" at the local level (including, but not limited to, joint powers agreements and MOUs) between appropriate federal land managing agencies and "lead agencies" under SMARA.

- (C) The County, as "lead agency" under SMARA, and the BLM are desirous to enter into a MOU as such a "specific area agreement" under the provisions of the statewide MOU.
- (D) It is the intent of the parties entering into this MOU, that applicable state and local environmental regulations which do not conflict with federal laws or regulations shall be observed on lands and/ or mineral estate under BLM jurisdiction, within Kern County.
- (E) It is the further intent of the parties entering into this MOU that nothing in the MOU shall interfere or diminish the ultimate authority of the BLM when making land use decisions affecting lands under BLM jurisdiction.

III. EXEMPTIONS

In conformance with SMARA, the following operations are exempt from the provisions of this MOU. (It should be noted that mining operations may be subject to other regulatory requirements related to air and water quality, grading, zoning, etc.)

- (A) Surface mining operations that are required by Federal law in order to hold a mining claim, if such operations are conducted solely for that purpose. (i.e. this is typically defined as "annual assessment work." It does not include development drilling or extraction of minerals for commercial purposes which are not exempted from applicable provisions of SMARA.)
- (B) Prospecting for, or the extraction of, minerals for commercial purposes which does not involve either the removal of more than 1,000 cubic yards of minerals, ores, and overburden, and/or involve more than one acre in any one location.
 - NOTE: For exploratory drilling activity (where it can be demonstrated on a case by case basis that satisfactory concurrent reclamation has occurred) calculations to determine the SMARA threshold limits, shall take into consideration the "net" unreclaimed surface disturbance at any one location.
- (C) Such other surface mining operations the BLM, State or County may determine to be of an infrequent nature and which involve only minor surface disturbances.
- (D) Nothing in this MOU shall be construed as requiring the processing of a County permit or Reclamation Plan for surface mining operations which were in existence but ceased operations, prior to January 1, 1976.

IV. PERMIT PROCESSING

The parties to this MOU understand and agree to the following:

General provisions:

- (A) The County and BLM shall work cooperatively to insure that conditions required of operators to minimize adverse environmental impacts, conform to all applicable local, State and Federal regulations.
- (B) The County and BLM shall review and coordinate Environmental Documents, Operating Plans, Reclamation Plans, Permits and Performance Assurances for those mining operations that include both Federal and a combination of Federal and non-Federal lands. The objective of the review and coordination process shall be to avoid conflicting and duplicative requirements and to keep procedural impacts on the mining operators to the minimum necessary to meet Federal, State, and County lead agency requirements.
- (C) Lead agency permitting responsibilities with respect to surface mining operations which are located on a combination of Federal and non-Federal lands, shall be determined on a case-by-case basis by the parties involved.
- (D) The County agrees to accept as functionally, equivalent documents to meet their requirements under SMARA, CEQA and local ordinances; those operating plans, reclamation plans and environmental studies submitted pursuant to federal regulation, provided such plans and environmental studies submitted pursuant to Federal regulation meet or exceed applicable State and County regulatory requirements.
- (E) The BLM agrees to accept as functionally equivalent documents to meet their requirements under FLPMA, NEPA and other Federal laws and regulations; those permits, reclamation plans and environmental studies submitted to the County when such permits plans and studies meet or exceed applicable BLM regulatory requirements.
- (F) The County and BLM shall, on a site specific basis, agree to guidelines including requirements for performance standards to be used and accepted by both agencies when coordinating and processing Permits, Operating Plans, Reclamation Plans and Environmental Documents through their respective agencies.

For mineral resource development projects located on lands and/ or mineral estate under BLM jurisdiction the following provisions shall be applicable.

- (G) Operators will be notified by BLM that failure to file and obtain County approved reclamation plan in compliance with SMARA and applicable provisions of County ordinance will be subject to a BLM issued "Notice of Non-Compliance."
- (H) The County shall forward surface mining and reclamation plan applications that may potentially affect BLM administered lands and/ or mineral estate, to BLM for initial review and circulation. The applications will be forwarded no later than 30

days after the application is deemed complete, except where an environmental document pursuant to CEQA will be prepared by the county, in which case BLM shall be treated as a responsible agency, as defined by the CEQA guidelines, in which case BLM shall be included in the "early consultation" phase and all subsequent phases for preparation of that document.

(I) For mining operations requiring a "Plan of Operation," BLM shall provide to the County notice within 30 days after the Plan is deemed by BLM complete, and the opportunity for early participation and consultation.

Within 30 days of receipt of notification, concerning a proposed "Plan of Operations," the County will provide comments to the BLM so that they may be considered and incorporated, where appropriate, as part of the environmental review and proposed federal agency decision.

Public hearings as may be required by the County, in compliance with SMARA, shall be coordinated with the processing of the BLM "Plan of Operations." The County shall correspond directly with BLM concerning SMARA compliance. BLM shall require applicants to comply with applicable provisions of SMARA and the County's Surface Mining Ordinance that do not conflict with Federal law.

- (J) Unless exempt under item III of this MOU, existing "surface mining operations" (as defined in SMARA) which are located on land and/ or mineral estate under BLM jurisdiction shall file Reclamation Plans with the county in compliance with SMARA.
- (K) Where BLM, or a BLM contractor is to be the operator for "surface mining operations" (as defined in SMARA including community pits etc.) reclamation shall be in compliance with Federal regulations and applicable provisions of SMARA.
- (L) The BLM, in consultation with the County, shall be responsible for determining the amount, form and adequacy of performance assurances required for mining permits. BLM approved bonds or assurances may be used to satisfy County assurance requirements when the County and State Mining and Geology Board are added as co-signatories and the approved bonds and assurances meet all County requirements. The County shall be given 30 days written notice, prior to the adjustment or release of any such required performance assurances.

For mining activities that qualify under BLM "Notice" requirements, the County, in consultation with BLM, shall be responsible for determining the amount, form and adequacy of performance assurances with respect to any reclamation plan filed with the County. The BLM shall be given 30 days written notice, prior to the adjustment or release of any such required performance assurances.

(M) The County and BLM agree to coordinate their respective enforcement and monitoring activities in order to provide consistency in the application of mining permit terms and conditions. Operators who fail to meet SMARA or County requirements shall be subject to a BLM issued "Notice of Non-Compliance." The County shall have the right to enter BLM administered land for the purpose of conducting inspections on mine sites approved pursuant to this MOU. The County and BLM are responsible for enforcement of approved combined SMARA/ BLM reclamation plans.

(N) For operations abandoned after the effective date of this agreement, BLM and Kern County will jointly devise a recommended reclamation plan and completion schedule. BLM will apply for reclamation funds in accordance with applicable regulations and funding provisions. Kern County will jointly apply for reclamation funds through its appropriate channels when any mining operation is abandoned for which the county approved a reclamation plan. This Section is not intended to preclude other enforcement actions taken jointly by the BLM and Kern County to compel compliance from any operator found not to be in compliance with an approved reclamation plan.

V. MISCELLANEOUS PROVISIONS

- (A) This MOU may be signed in counterparts and shall become effective on the date last signed by the authorized agent(s) of the County and BLM.
- (B) The terms and conditions of this MOU may be modified upon the initiative of either County or BLM for the purpose of ensuring consistency with County, State or Federal statutes or regulations, or for any other purpose mutually agreed upon by the parties. In order to be effective, any such modification must be in writing, subject to a 30 (thirty) day notice, and must be signed by the County and BLM.
- (C) This MOU shall continue in full force and effect unless terminated by either the County or BLM upon a thirty (30) day written notice.
- (D) Agency contacts related to this agreement shall be:
 - (1) KERN COUNTY

Kern County Planning Department Kern County 2700 M Street, Suite 100 BAKERSFIELD, CA 93301

(2) BUREAU OF LAND MANAGEMENT

Area Manager Caliente Resource Area 3801 Pegasus Drive Bakersfield, CA 93301

Area Manager
Ridgecrest Resource Area
300 South Richmond Road
Ridgecrest, CA 93555

VI. SIGNATURES

This document may be signed in counterparts.

COUNTY OF KERN

Ban Cast	Date: 6 - 14-94
Kern County Board of Supervisors	

Approved as	s to Form:
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Duce Divilois	Date:
County Counsel	

Approved as to Content:

_	Fed		Date:6-17-94
Plar	nning D	irector	·

U.S.D.I., BUREAU OF LAND MANAGEMENT:

Caliente Resource Area Manager

But Delawy Date: 5/6/94

Ridgecrest Resource Area Manager

EXHIBIT A

Memorandum of Understanding

Between

The California Department of Conservation

and the

The State Mining and Geology Board

and the

Bureau of Land Management

February 7, 1990

MEMORANDUM OF UNDERSTANDING

Surface Mining and Reclamation Coordination in the State of California in accordance with California's Surface Mining and Reclamation Act (SMARA) of 1975, as amended,

by and between the

STATE OF CALIFORNIA, DEPARTMENT OF CONSERVATION AND THE STATE MINING AND GEOLOGY BOARD

and

the

U. S. DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT, CALIFORNIA

THIS AGREEMENT is made and entered into by and between the State of California, Department of Conservation, through its Director, and the State Mining and Geology Board, through its Chairman (jointly referred to herein as "the State"), and the Bureau of Land Management (BLM), through its State Director, California, for the purposes of: (1) assuring the consistent application of adequate and appropriate reclamation throughout the State of California; (2) simplifying the administration of surface mining and reclamation practice requirements on Federal lands and on a combination of Federal and private lands; (3) achieving coordination of activity governing reclamation; and (4) eliminating duplication among the aforementioned agencies and counties serving as lead agencies ("lead agencies" pursuant to the Surface Mining and Reclamation Act, Public Resources Code Section 2728) in implementing State and Federal requirements.

WITNESSETH:

WHEREAS, local, State, and BLM have certain legal requirements in regulating the effects of surface mining on Federal lands and on combinations of Federal and private lands, it is deemed advisable to develop an understanding between BLM and the State to serve as guidance for

local agencies, BLM and the State in fulfilling their agency regulatory responsibilities in such situations.

WHEREAS, for purposes of this agreement, the following are exempt from SMARA pursuant to Public Resources Code Section 2714:

- (1) Prospecting for, or the extraction of, minerals for commercial purposes and the removal of overburden in total amounts of less than 1,000 cubic yards in any one location of one acre or less;
- (2) Surface mining operations that are required by federal law in order to protect a mining claim (i.e. annual assessment work), if such operations are conducted solely for that purpose; and
- (3) Such other surface mining operations which the State determines to be of an infrequent nature and which involve only minor surface disturbances.

WHEREAS, a Memorandum of Understanding (MOU) between the State, and BLM, governing surface mining and reclamation coordination in the State of California, was signed in 1979 and remains in effect until this new agreement is signed by each party.

WHEREAS, several acts of Congress provide for persons to prospect and mine on Federal lands which are administered by the BLM, and which are open to the operation of the United States mining, mineral leasing and mineral materials laws, providing they comply with the rules and regulations covering the Federal lands involved (applicable regulations include 25 CFR 211, 43 CFR 3802, 3809, 3500, and 3600).

WHEREAS, Federal laws and regulations require that operations authorized under Federal mining, mineral leasing, and mineral material laws shall be conducted so as to minimize adverse environmental impact, or prevent unnecessary or undue degradation caused by such operations, and that the land be reclaimed to a second productive use, where practicable.

WHEREAS, BLM is authorized to work with the State for the purposes of coordinating Federal, State and local regulatory activities for environmental protection [applicable regulations include 43 CFR 3809.3-1(a)-(c)].

WHEREAS, for proposed mineral operations, the purpose of both the National Environmental Protection Act of 1969 (NEPA) and the California Environmental Quality Act (CEQA) is to assure the identification, analysis, and disclosure of significant environmental impacts associated with proposed projects and the incorporation of feasible mitigation to address significant adverse environmental impacts.

WHEREAS, the statutory requirements of the National Environmental Protection Act of 1969 (NEPA) for the BLM and the California Environmental Quality Act (CEQA) for State and local agencies are largely equivalent.

WHEREAS, city and county "lead agencies" have the responsibility under the Surface Mining and Reclamation Act of 1975 (Public Resources Code Sections 2710-2795), as amended, and State policy for surface mining and reclamation practice (California Code of Regulations Sections 3500-3505), to regulate surface mining and reclamation within their jurisdictions to assure that:

- (1) Adverse environmental effects are prevented or minimized and that mined lands are reclaimed to a usable condition which is readily adaptable for alternative land uses;
- (2) The production and conservation of minerals are encouraged, while giving consideration to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment; and
- (3) Residual hazards to the public health and safety are eliminated.

WHEREAS, "lead agencies" are cities, counties, or other agencies designated by the Board which have the principal responsibility for approving a surface mining operation or reclamation plan (as defined by SMARA and other relevant regulations and ordinances) pursuant to the provisions of SMARA, and the use herein of the words "lead agencies" shall signify the Board's approval for lead agencies to use the guidance in this MOU to satisfy the requirements of applicable State laws and regulations for surface mining and reclamation on lands in California.

WHEREAS, lead agency surface mining and reclamation ordinances certified by the Board include and comply with applicable provisions of State laws and regulations for surface mining and reclamation practice.

NOW, THEREFORE BE IT RESOLVED that the parties to this memorandum hereby understand and agree that the following will satisfy the aforesaid requirements of the aforesaid laws and are acceptable to both BLM and the State. It is agreed that in regulation of surface mining of minerals on Federal lands and on combinations of Federal and private lands that:

- (1) Lead agencies and BLM will work cooperatively to insure that conditions required of operators (as defined by Federal law, and by SMARA and any other relevant regulations and ordinances) in minimizing adverse environmental impacts conform to all applicable local, State, and Federal regulations.
- (2) Lead agencies may accept as functionally equivalent documents to meet their requirements under SMARA, operating plans, reclamation plans and environmental studies submitted pursuant to federal regulation provided such plans and studies meet or exceed lead agency requirements as included in the lead agency's State-certified surface mining and reclamation ordinance and any other applicable laws and regulations; and alternatively, BLM may accept as functionally equivalent documents to meet their requirements, operating plans, reclamation plans and environmental studies submitted to the lead agency when such plans and studies meet or exceed requirements set by the BLM.
- (3) Lead agencies may accept as functionally equivalent, documents prepared under NEPA (40 CFR 1500-1508) that meet the requirements of CEQA.
- (4) Lead agencies and BLM will use, insofar as applicable, guidelines and a checklist (upon approval by the parties to this agreement) in the development of appropriate environmental documents and reclamation plans.
- Lead agencies may enter, and in fact are encouraged to enter, into specific area agreements (including, but not limited to, joint powers agreements and MOUs) with BLM for purposes of implementing this agreement, coordinating reviews, avoiding duplication, and facilitating participation by affected agencies. Issues that may be addressed by such agreements include, but are not limited to, the filing, review, and procedures for approval of reclamation plans, fees, public inspection and enforcement activities, and bonding requirements. Such specific area agreements shall be in conformance with the lead agency's certified surface mining and reclamation ordinance and Federal law and regulation. being prepared to be used as guidance for the development of such agreements upon its approval by the parties to this agreement.

- (6) By written agreement BLM may delegate authority to lead agencies to be solely responsible for processing, to approval, all mining operations which are subject to federal mining law in accordance with 43 CFR 3809. A delegation agreement may provide, among other things, for lead agencies to forward copies of submitted exploration and development permit applications to BLM; to provide a 10-day comment period to BLM; and prior to approval, or rejection, to provide BLM 5 working days to comment on proposed reclamation and other requirements.
- (7) For the purposes of this agreement, assessment work required to protect claims under federal law is defined as prospecting or exploration work completed for the purposes of discovering an ore body. It does not include development drilling or extraction of minerals for commercial purposes, which are not exempted from the provisions of SMARA.
- (8) For BLM's Notices (written notification required to be provided to the BLM under 43 CFR 3809.1-3) for those operations of 5 acres in size or less, within 5 days after receipt by BLM of an accepted Notice, BLM will forward a copy of the Notice to the lead agency for appropriate action by the lead agency. The lead agency may correspond directly with the operator for purposes of approval in accordance with SMARA, including any and all additional conditions and requirements, and will send copies of all correspondence and requirements to the BLM.
- (9) For any mining operations requiring a Plan of Operations for projects solely on Federal land, BLM will provide lead agencies notice and the opportunity for early participation, consultation, and submission of information and recommendations for the development of Environmental Assessment Reports and reclamation plans.
- (10) Within 30 days of receipt of notification under paragraph (9) above and copies of relevant informational documents, lead agencies will provide comments and recommendations to BLM so that they may be considered and incorporated, as appropriate, as part of the environmental review and proposed BLM decision.
- (11) BLM will forward the environmental and decision documentation, which includes the reclamation plan requirements, to the lead agency for appropriate consideration. Public hearings for compliance with

SMARA and the certified lead agency SMARA ordinance should be coordinated with BLM. The lead agency will correspond directly with the applicant, and send copies to BLM, regarding adopted conditions of approval which differ from conditions of BLM approval.

- (12) Lead agencies will forward to BLM copies of all surface mining proposals and draft reclamation plans they receive for operations located entirely on BLM lands.
- (13) Implementation of measures to mitigate adverse environmental impacts to off-site, non-federal lands will be authorized, permitted, or otherwise directed by the lead agency or other responsible local or State agency.
- (14) Lead agencies will notify the BLM whenever an application for approval of mining activities is received and a draft reclamation plan is completed for an operation which comes under the purview of SMARA and lead agency requirements on areas adjacent to BLM public lands, and will give the BLM an opportunity to provide information and recommendations for such plans.
- (15) Lead agencies and BLM will review and coordinate Environmental Documents, Operating Plans, Reclamation Plans and Permits for those mining operations that include both BLM lands and private lands. The objective of the review and coordination process is to avoid conflicting and duplicative requirements in Operating Plans and Permits and to keep procedural impacts on the mining operators to a minimum necessary to meet all applicable requirements. Coordination responsibilities for operations encompassing two or more mixed private and BLM ownerships should be determined on a case-by-case basis by the parties involved.
- (16) BLM will approve the Plan of Operations when the operator agrees to the conditions and stipulations, including the appropriate measures to mitigate adverse environmental impacts, incorporated into the plan or permit to meet applicable BLM, State and local reclamation requirements. The operator must also comply with other applicable Federal, State, and local laws and regulations including those pertaining to hazardous substances.

- (17) Where BLM is the operator (i.e., for community pits), and where a Federal agency contractor will be the operator for surface mining activities on Federal lands, requirements for reclamation and any other necessary environmental documentation will be prepared and approved in accordance with the consultation procedures of this MOU to assure that private activities on BLM lands meet all applicable local, State, and Federal requirements.
- (18) To the extent practicable, lead agencies and BLM will coordinate their enforcement and monitoring responsibilities, and will cooperate in the correction and abatement of any violations of the conditions of operation imposed in accordance with the procedures described in this MOU.
- (19) BLM, in consultation with lead agencies, will be responsible for determining whether a reclamation bond or other assurance is needed on Federal land, and if so, the amount and adequacy of the bond or other assurance, making adjustments, and releasing the bond after completion of reclamation. Any federally-required bond or assurance may be used to satisfy local and State surety requirements.

Effective Date of this Agreement:

This agreement shall become effective upon each party by signature of that designated party and shall supersede the previously referenced 1979 MOU when signed by all parties.

Modification of this Agreement:

This agreement may be modified upon the initiative of any of the parties for the purpose of ensuring consistency with state or federal statutes or regulations, or for any other purpose mutually agreed upon. In order to be effective, any such modification must be in writing, subject to 30 days notice, and must be signed by all of the designated parties.

Termination of this Agreement:

This agreement shall continue in force until terminated by any party upon thirty (30) days written notice to the other parties. The parties intend to review this agreement at the end of 12 months, and periodically thereafter, as needed.

STATE OF CALIFORNIA:	BUREAU OF LAND MANAGEMENT:
Director, Department of Conservation	State Director
DATE: 1-19-90	DATE: 2/7/90

Chairman,
State Mining and Geology Board

DATE: 1.25.20

CERTIFICATE OF ADOPTION OF RESOLUTION AUTHORIZING CHAIRMAN TO SIGN INSTRUMENT

The undersigned, Clerk of the Boa Kern, hereby certifies that the following Board of Supervisors at a regular (special statement) and the second statement of the Board of Supervisors at a regular (special statement).	cial) meeting duly convened on the		
"WHEREAS, this Board has determinenter into a certain contract with Bureau of Land Management, Bakersfield I California Desert District, Ridgecrest R	istrict, Caliente Resource Area, and		
NOW, THEREFORE, BE IT RESOLVED by the Board of Supervisors of the County of Kern, State of California, that said instrument be, and it is hereby executed on behalf and in the name of said County of Kern, and the Chairman of this Board is hereby authorized and directed to sign his/her name thereto on behalf of said County."			
The undersigned further certifies person who so signed said instrument chairman of said board, and that his genuine.			
The undersigned further certifies the following vote:	that said resolution was adopted by		
Ayes: Ashburn, Austin, Shell	300		
Noes: None			
Absent: Larwood, Peterson			
Dated: <u>June 13, 1994</u> .			
	SUE DAVIS Clerk of the Board of Supervisors, County of Kern		
Ref. No. 9411232	By Kaaren Shatswell		

Deputy Clerk

NOTICE OF PREPARATION

TO: Mailing list attached FROM: Kern County Planning Department

2700 M Street, Suite 100 Bakersfield, California 93301

Contact: Glenn Barnhill

(805) 862-8606

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT

REPORT

The Kern County Planning Department will be the Lead Agency (per CEQA Guidelines Section 15051) and has required that a Project Environmental Impact Report (per CEQA Guidelines Section 15161) be prepared for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the Environmental Impact Report (EIR) prepared for our agency when considering your permit or other approval of the project.

The project description, location, and the potential environmental effects are contained in the attached materials. Open pit mining operations which use cyanide heap leaching processes to produce gold or other precious metals are required to prepare an EIR in accordance with CEQA Section 21151.7. A joint document will be prepared as a project EIR/EIS in accordance with the Memorandum of Understanding between Kern County and the U.S. Department of Interior, Bureau of Land Management (BLM) because the project area includes a mix of private and public lands.

Due to the limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Glenn Barnhill at the address shown above. We will need the name of a contact person in your agency.

PROJECT TITLE: Soledad Mountain Project, CUP 41, Map 213; CUP 22, Map 214

PROJECT LOCATION: Kern County, California

PROJECT DESCRIPTION: Development and operation of a mine to recover precious metals (gold and silver) from the Soledad Mountain ore deposit within the boundary of fee acreage, mining leases, patented mining claims and unpatented claims controlled by Golden Queen Mining Company, Inc. The project will consist of an open pit mine with a heap leach pad and overburden piles as well as processing facilities located near the leach pad. Approvals or entitlements necessary to implement the proposed project:

Conditional Use Permit and Surface Mine Reclamation Plan.

Date:

Signature:

Title: Special Projects Division Chief Telephone: (805) 862-8606

Attachments

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Section 15082

(a), 15103, 15375

SOLEDAD MOUNTAIN PROJECT DISTRIBUTION LIST

CITIES

Arvin

Bakersfield

California City

Delano

Maricopa

McFarland

Ridgecrest

Shafter

Taft

Tehachapi

Wasco

COUNTIES

Inyo

Kings

Los Angeles

San Bernardino

San Luis Obispo

Santa Barbara

Tulare

Ventura

FEDERAL AGENCIES

U.S. Department of Interior, Bureau of Land Management/Ridgecrest

U.S. Department of Interior, Bureau of Reclamation/Fresno

U.S. Fish and Wildlife Service/Sacramento

Soil Conservation Service/Bakersfield

COUNTY OF KERN

County Administrative Office/Fiscal

Engineering & Survey Services/Floodplan

Engineering & Survey Services/Survey

Environmental Health Services Department

Fire Department

Health Department

Library/Administration Beale Library

Kern County Air Pollution Control District

Kern County Museum

Kern County Supervisor 2nd District - Steve Perez

Mojave Public Library

Planning Department/Special Projects

Parks and Recreation

SOLEDAD MOUNTAIN PROJECT DISTRIBUTION LIST

COUNTY OF KERN (cont.)

Resource Management Agency/Fiscal
Rosamond Library
Sheriff's Department/Fiscal Analysis
Transportation Management Department
Transportation Management Department/Transit
Waste Management Department/Special Districts
Waste Management Department/Solid Waste
Waste Management Department/Liquid Waste

LOCAL AGENCIES

Kern County Superintendent of Schools
Kern COG
Kern County Local Agency Formation Commission (LAFCO)
Mojave Public Utility District
Mojave Unified School District
Antelope Valley East Kern Water Agency

OTHER

East Kern Resource Conservation District
Native American Heritage Council/Kern County
Pacific Bell Engineering/Bakersfield
Sierra Club/Kern Kaweah Chapter
Southern California Edison/Lancaster
Southern California Gas Company
Southern Pacific Transportation Co.
Property Owners et.al (81 total)

STATE AGENCIES

Archaeological Inventory Center
California Air Resources Board
CalTrans District 6
Office of Planning and Research (State Clearinghouse 10 copies)
California State University Bakersfield Library
California Energy Commission
California Fish and Game/Fresno
California Department of Health Services
California Highway Patrol

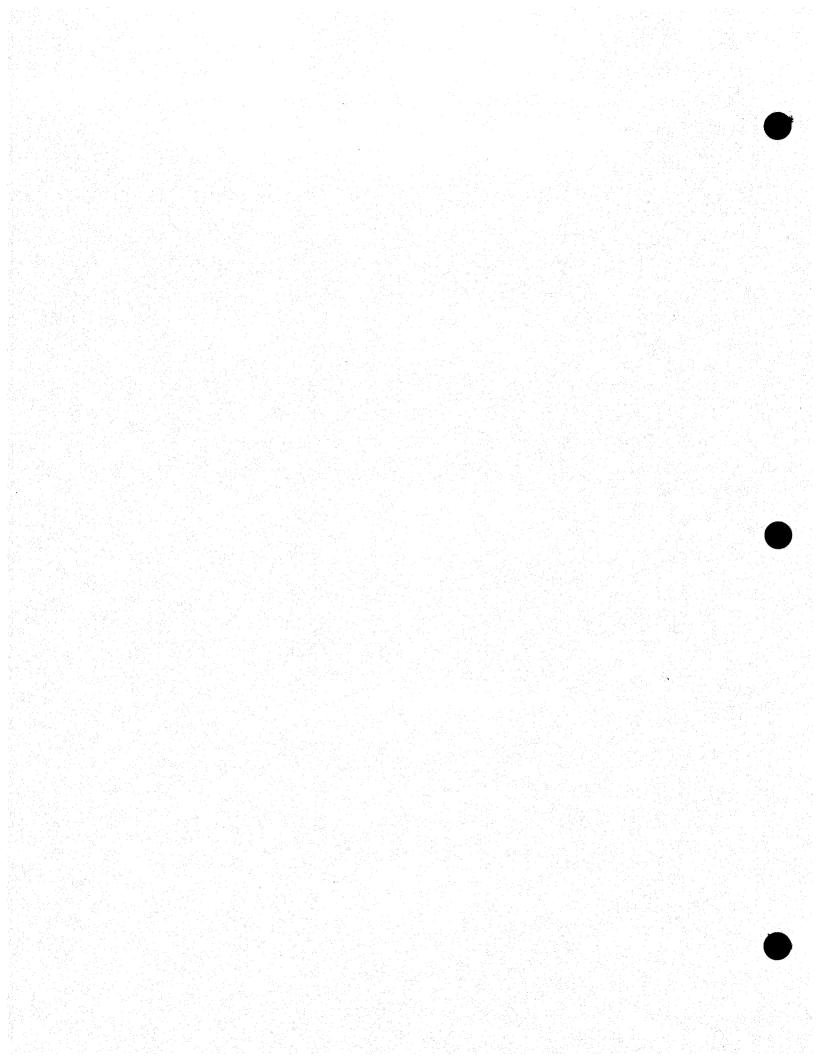
SOLEDAD MOUNTAIN PROJECT DISTRIBUTION LIST

STATE AGENCIES (cont.)

Integrated Waste Management Board
Native American Heritage Commission
Public Utilities Commission
California Department of Conservation Office of Mine Reclamation
Regional Water Quality Control Board/Lahontan
State Lands Commission
Department of Water Resources/San Joaquin District
Cal OSHA Division of Mines and Tunnels







1.0 PROJECT DESCRIPTION

1.1 INTRODUCTION

The project applicant, Golden Queen Mining Company, Inc., proposes development of the Soledad Mountain Project. The approximate 1,228 acre project consists of an open pit precious metals (gold and silver) mining and cyanide heap leach processing operation at the Soledad Mountain Project area located approximately four miles southwest of the unincorporated town of Mojave in Kern County, California.

Over the life of the proposed project, 40 to 50 million tons of ore and 180 to 225 million tons of overburden materials will be mined. Construction is anticipated to begin in 1997 and require nine to twelve months. Mining operations will continue until approximately the year 2014. Processing operations will continue until approximately the year 2016, at which time the project will begin closure and reclamation.

The entire Soledad Mountain Project site and surrounding area, totaling approximately 9,600 acres, is included in the Specific Plan for Soledad Mountain - Elephant Butte & Vicinity - South of Mojave. The Specific Plan recognizes gold and silver mining operations as important past land uses and protection of potential commercial value ores and deposits is incorporated through restriction of incompatible land uses. The proposed project is consistent with the Specific Plan for the general vicinity of the project site and previous land use. Open pit mining operations which use cyanide heap leaching processes to produce gold or other precious metals require an Environmental Impact Report (EIR) under the California Environmental Quality Act. The project area includes approximately 269 acres of unpatented mining claims on public lands administered by the BLM thus requiring the preparation of an Environmental Impact Statement (EIS) under the National Environmental Policy Act. A project level combined EIR/EIS is being prepared to analyze environmental impacts of the Soledad Mountain Project.

1.2 BACKGROUND

Within the property boundary shown in Exhibit 1, Golden Queen owns or leases approximately 2,500 acres of privately owned land, patented land, and unpatented lode mining claims on land administered by the BLM. The proposed project is composed of an open pit mine with heap leach, overburden piles and associated processing facilities. Gold and silver mining operations are recognized in the Specific Plan for Soledad Mountain - Elephant Butte & Vicinity - South of Mojave as important past land uses and protection of potential commercial value ores and deposits is incorporated through restrictions of incompatible land uses. Mining operations have existed on Soledad Mountain for nearly 100 years with many areas of disturbance visible on the mountain.

Soledad Mountain is a silicic volcanic center consisting of felsic flows, tuffs, and breccias of Middle to Late Miocene age. The rock types range from rhyolite to rhyolite porphyry and quartz latite. Gold was first discovered at Soledad Mountain in 1894. The historically mined veins at the site include the Queen Esther, Silver Queen, Golden Queen, Starlight, Gray Eagle, Echo, and Soledad Extension. The veins crop out in a northwest trending belt approximately 2,000 feet wide and 6,500 feet long. The ore deposits occur as a result of mineralization in a series of epithermal veins, filling faults, and shear zones which vary in width up to 50 feet. The veins are consistent along strike and down dip, some having been mined to a vertical depth of 1,000 feet. The ore deposit contains finely divided free gold as well as silver minerals including chlorargyrite and acanthite in a gangue of oxidized, brecciated quartz. Pyrite, chalcopyrite, and galena are also present in minor amounts.

By 1904, three stamp mills were processing ore from the underground mining of veins on the Queen Esther, Karma, Echo, Elephant, and Gray Eagle claims. The Silver Queen vein was discovered in 1933 and a 300 ton per day cyanide mill was constructed in 1935 by Gold Fields America, a subsidiary of Gold Fields of South Africa, after consolidating various claims on Soledad Mountain. It is estimated that over one million tons of ore at grades of approximately 0.23 ounces of gold and 2.5 ounces of silver per ton were mined by underground methods and processed before the War Production Board Order L208 shut down the operation in 1942. During the 1950's, small tonnages of ore were mined by lessees. In 1985, Golden Queen began acquiring land in order to evaluate the area for an open pit mining operation. Golden Queen now owns or controls a total of 2,500 acres. Of this total, approximately 1,228 acres are part of this proposed action, including 959 acres of private land and 269 acres of public land administered by the BLM.

Proposed disturbance within the 1,228 acre project will be 935 acres, including 782 acres on private land and 153 acres on public land. Approximately 208 acres of the project area have been disturbed by historical mining and mining related activities resulting from surface mining and at least 60 miles of underground workings on Soledad Mountain. Exhibit 2 shows a map of Soledad Mountain with existing surface disturbances detailed. From 1988 through 1995, 471 drill holes totaling 160,229 feet, and sampling of 22,252 feet of underground cross cuts were completed by Golden Queen and others. The exploratory effort has resulted in the identification of approximately 40 to 50 million tons of ore. A further drilling program is planned which will be directed at proving up additional minable reserves.

1.3 SETTING

The project is located within the unincorporated area of eastern Kern County. Exhibit 3 shows a regional location map with the location detailed relative to Kern County and within California. The project area is on and around Soledad Mountain, west of State Highway 14 and south of Silver Queen Road. The entrance to the facilities is expected to be off Silver Queen Road approximately 1.5 miles west of State Highway 14.

The site is located approximately 4 miles south-southwest of Mojave, an unincorporated town of approximately 4,000 people situated at the intersection of Highways 58 and 14. The Mojave airport stores and repairs jets for various operators. Industrial facilities in Mojave include chemical plants and recycling facilities.

The area surrounding the project is sparsely populated with approximately 10 residences located along Backus Road south of the mountain. The Camelot housing development is located 3 miles directly north of the project area and consists of 109 lots on approximately 15 acres. Development began in 1986, and all lots have been developed. A golf course is located next to the development and less than 10 additional homes are located on the other side of the golf course outside the development.

In the higher elevations to the northeast of the site are several hundred windmills generating electricity. Edwards Air Force base is located to the east and occupies a large portion of the desert floor.

Distances to the nearest urban centers include Bakersfield, approximately 49 miles northwest, Lancaster, approximately 22 miles south, and Los Angeles, approximately 62 miles southwest.

Other open pit mining activity in the East Kern area near the project site includes Standard Hill (precious metals), Cactus Gold (precious metals), Granite Construction (aggregate and asphalt batch plant), Asphalt Construction (aggregate and asphalt batch plant), and California Portland Cement Mojave Plant (aggregate and cement plant). Exhibit 4 shows the relative location of these mining operations.

The topography of the western Mojave Desert in the area of the site varies from relatively flat alluvial areas to steep mountains. Elevations vary from approximately 2,000 feet above mean sea level in the flat alluvial covered areas to over 5,000 feet in some of the mountainous areas. Soledad Mountain, is a volcanic peak approximately 3 miles in diameter. The topography of the project area consists of rugged outcrops and ridges with intervening drainages which grade to alluvial slopes and flat areas on the flanks of Soledad Mountain. The elevation of the project area varies from 4,190 feet above mean sea level at the peak of Soledad Mountain to approximately 2,700 feet above mean sea level along the northeast flank. Exhibit 5 is a topographic map taken from the USGS quadrangles in the area showing the area primarily north and west of Soledad Mountain.

Mineral rights and surface rights ownership in the project area is fragmented, however, Golden Queen has put together control over a block of approximately 2,500 acres including the project site. Golden Queen has purchased outright ownership of claims and leased lands from approximately 81 private owners.

1.4 PROJECT CHARACTERISTICS

The proposed project consists of approximately 1,228 gross acres of open pit mining, heap leach pads, overburden piles and processing facilities. Mining and mineral extraction within the existing zoning districts is subject to a Conditional Use Permit and

approved Reclamation Plan without requiring either a zone change or a general plan amendment. Development of this project is consistent with the policies established in the Specific Plan for Soledad Mountain - Elephant Butte and Vicinity - South of Mojave.

Golden Queen is proposing to construct and operate an open pit precious metals mine and heap leach recovery operation on Soledad Mountain. Aggregate and construction materials will be a marketable by-product. Additional underground mining potential may exist at the project site, particularly in zones of higher grade ore which may be exposed in the course of open pit mining and continue into the wall or floor of the open pit mine.

The project is scheduled to begin construction in April 1997, or as soon as permitting is completed. Construction will be completed in nine to twelve months, with a projected start of mining operations in 1998. The projected operating life is 7 to 14 years at a production rate of 3 to 4 million tons of precious metals ore per year. The operating life will be determined based on economic conditions and further delineation of the ore body during mining. The operation will be manned 24 hours per day, 7 days per week.

Construction activities for the Soledad Mountain Project will include: building haulage and access roads to the open pit mine areas, preparation of the initial open pit mine production areas, leveling the crushing and sizing area and installing the equipment, grading the first cell of the heap leach pad and installing the liner system, erecting the process facility, grading the parking areas and erecting the ancillary facilities.

Several of the interconnected open pit mining areas within the ultimate pit boundary will be in production at any time to allow blending of the ore delivered to the heap leach pad and to prevent production interruption in any one open pit mining area from causing total loss of production. Overburden materials will be mined at a rate of 7 to 12 million tons per year in conjunction with the production of the precious metals ore. Overburden materials which are suitable may be sold for use as aggregate and construction materials.

Project operations will be followed by closure and reclamation of the site. The objectives of reclamation are to ensure that the site is left in a condition that: (1) allows reuse consistent with premining uses; (2) does not pose a threat to public health and safety; (3) protects air and water quality; and (4) encourages natural establishment of vegetation that will provide productive wildlife habitat.

1.4.1 Project Objectives

The applicant's objectives for the proposed project are:

- Develop a commercial mine to recover gold and silver from the ore body.
- Efficiently design and manage the project to optimize precious metal recovery.
- Minimize surface disturbances and mitigate other potential environmental effects.
- Perform reclamation that will return the site to a state that is consistent with surrounding land use following mining.
- Recover gold at an economic ore processing rate of about 3 to 4 million tons per year.
- Construct, operate, and reclaim the site in a manner consistent with federal, state, and local laws and regulations.

1.4.2 Project Components

Exhibit 6 presents a conceptual plot plan of the facilities proposed at the project site showing the proposed locations of the open pit mines, the overburden piles, the heap leach pad and a potential heap leach pad site as well as the location of the proposed processing facilities.

The proposed method for recovering gold from the Soledad Mountain Project ore is heap leaching, followed by the Merrill-Crowe recovery process. For the proposed heap leaching method, the ore will be crushed to reduce the particle size to a nominal minus 10 mesh. From the crushers it will be agglomerated, conveyed and stacked on the heap leach pad where dilute cyanide solution will be distributed over the ore. Solution will be collected on the impermeable liner inside the toe of the heap and processed for metal recovery. Once the gold has been extracted from the ore, the ore will be rinsed to permitted levels. The rinsed heap will be reclaimed in place.

For general reference to the design concept, the term modified valley-fill heap leach can be used to describe a dedicated heap leach pad with internal solution control. The heap leach pads will be designed as a side hill leach pad with a perimeter dike supporting the toe of the heap. The dike also provides solution storage capacity. One of the most important attributes of the valley- fill concept is the lack of solution ponds exterior to the leach pad. The toe dike creates a pond area for in-heap management of the solutions, run-off from precipitation and retention of the design storm event. The lack of barren and pregnant solution ponds minimizes hazards to wildlife.

All pregnant solution on the pad will be contained inside the heap. Pregnant solution will be extracted by pumps placed in pipes laid down on the inside slope of the dike. This prevents liner penetration and associated leakage problems. Booster pumps will move the solution to tankage at the process plant. As noted, no open ponds are planned with this arrangement. The pregnant solution will be circulated through a Merrill-Crowe process plant and passed to one or more covered barren solution tanks for application to the heap leach pad by a drip system.

The closest power lines that are capable of satisfying site power requirements are located at the northeast corner of the project site. A new substation and circuiting equipment will be constructed on the project site with overhead and underground distribution to serve the various locations on the project site.

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1.5 ALTERNATIVES TO THE PROPOSED PROJECT

The Draft EIR/EIS will analyze a range of alternatives to the proposed project. Each alternative will be described and analyzed to determine if it can reasonably attain the objectives of the proposed project. The following alternatives will be considered during preparation of the Draft EIR/EIS:

- No Action Alternative
- Alternative mining techniques
- Backfilling alternatives
- Alternative gold extraction techniques
- Alternative project location and configurations
- Alternative power supply
- Alternative ore beneficiation rates.
- Reduced Project Size

Section 15126(d)(2) of the CEQA implementing guidelines requires that, of the alternatives addressed in an EIR, one be identified as "environmentally superior." If the environmentally superior alternative is the No Action Alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

1.6 PROPOSED ACTIONS

The following describes the actions or procedures which are required for approvals or entitlement necessary to implement the proposed project:

- Certification of the Final EIR/EIS.
- Approval of a Conditional Use Permit/Surface Mine Reclamation Plan.

In addition, the following table shows specific permits which may be required from federal, state, and local agencies for the Soledad Mountain Project.

Permits Required for the Soledad Mountain Project

AGENCY/DEPARTMENT	PERMIT/APPROVAL	
KERN COUNTY AGENCIES		
Planning Department	Environmental Report	
	Mining/Reclamation Plan and Financial Assurance	
	Conditional Use Permit	
	Grading Permit	
	Road Encroachment	
	Building Permit	
Environmental Health	Sewage Disposal System Permit/Water Well Drilling Permit	
Fire Department	Hazardous Materials Business Plan	
	Hazardous Materials Inventory	
	Fire Protection Plan	
Air Pollution Control District	Authority to Construct	
	Permit to Operate	
STATE AGENCIES		
State Water Resources Control Board Regional Water Quality Control Board	General Construction Activity Stormwater Permit	
	Waste Discharge Permit	
California Department of Fish and Game	Consultation	
State Office of Historic Preservation (SHPO)	Section 106, (National Historic Preservation Act, 16 USC 470): Designation, survey, determination of effect	
California Occupational Safety and Health Administration (Cal OSHA)	Construction Permit	
	Explosive Blaster's License	
FEDERAL AGENCIES		
Bureau of Land Management	Plan of Operations	
	Cultural/Paleontological Resource Permit (National Historic Preservation Act, 16 USC 47)	
Fish and Wildlife Service	Section 7 Consultation	
Bureau of Alcohol, Tobacco and Firearms	Purchase, Storage, or Transportation of Explosives Permit	

1.7 ENVIRONMENTAL DETERMINATION

Open pit mining operations which use cyanide heap leaching processes to produce gold or other precious metals are required to prepare an EIR in accordance with CEQA Section 21151.7. Accordingly, Kern County has determined that a project EIR will be prepared as defined by Section 15161 of the CEQA Guidelines. This project EIR will include a comprehensive analysis of all impact areas, feasible mitigation measures available to eliminate or reduce significant impacts, and a reasonable range of feasible alternatives which satisfy all or most of the project objectives and which can eliminate or reduce one or more significant project impacts. A joint document will be prepared as a project EIR/EIS in accordance with the Memorandum of Understanding between Kern County and the BLM because the project area includes private and public lands. The Draft EIR/EIS will incorporate input received from responsible/trustee agencies and other interested parties during the 30-day Notice of Preparation comment period.

The proposed project has the potential to result in the below listed significant environmental impacts. The project EIR will analyze potential impacts on these environmental topics:

Mineral Resources

Development of the open pit mines will allow access to deeper zones of mineralization, possibly by underground mining methods.

Physiography and Geology

The effect to the physiography of the site will be a change in the topography due to the creation of the open pits, heap leach piles, and overburden material piles. The mining activity will continue for ten to sixteen years. The reclaimed open pit mine overburden piles and a heap leach pile will become permanent features on the project site. The proposed action will result in the production of approximately 40 million tons of ore

material and potential construction aggregate from the overburden materials. The site could be subject to significant ground shaking due to the proximity of known Holocene active faults.

Soils

Construction of the heap leach pad will result in the disturbance of approximately 90 acres mantled by Arizo type soils.

Hydrology

Surface disturbance can result in increased erosion and silting of surface run-off. Overburden materials will be piled on the surface of the ground and may have the potential to generate acid drainage. Based on the evaluation of acid generation/neutralization potential and pH data for the representative overburden samples, the acid generating potential is considered to be minimal. Pumping of groundwater may lower the groundwater table in proximity to the installed well(s). Quality of the groundwater must be protected due to the mining activities.

Air Quality and Meteorology

The proposed project is located within the portion of the Southeast Desert Air Basin which is under the jurisdiction of the Kern County Air Pollution Control District. This portion of the air basin is designated as an "unclassified" area for PM₁₀ and a nonattainment area for ozone under the National Ambient Air Quality Standards. Construction Activities - Although temporary in nature, fugitive dust emissions are generated from surface disturbance during construction activities and travel on unpaved roads by vehicles and construction equipment during construction and mining operations. Increased surface disturbance during construction will increase fugitive dust emissions which will, in turn, cause an increase in total suspended particulates (TSP) and PM₁₀ emissions (PM₁₀ is that portion of Total Suspended Particulate less than 10 microns in size). Normal Operations - Fugitive and controlled emissions are generated from the proposed mining and processing operations. Reclamation Activities - The primary

sources of PM_{10} fugitive emissions during reclamation activities include the loading and unloading of growth media, bulldozing, road emissions, and erosion from disturbed surfaces before vegetation is established.

Biological Resources

The proposed action will disturb approximately 673 acres of the upper slope area of Soledad Mountain by the excavation of open pits and creation of overburden piles. Approximately 262 acres of the lower slope and alluvial fan areas will also be disturbed by the construction of the heap leach pad and overburden pile, process facility, offices, and ancillary activities.

The project will disturb 935 acres of potential wildlife habitat. No threatened or endangered species have been identified on the project site.

Cultural and Historical Resources

The historical sites lie in areas which will be disturbed by the excavation of open pits and creation of overburden dumps and the heap leach pad. The existing structural remains, surficial and subsurface deposits, and shafts and adits will be affected.

Paleontological Resources

Because of their igneous and metamorphic origin, the rock types in Soledad Mountain are not likely to contain fossils that might be lost or damaged by the project.

Visual Resources

Impacts to visual resources from the Proposed Action will result from the visibility of surface disturbance associated with construction and operation of project facilities, the creation of overburden piles, the creation of the heap leach facilities, the creation of the open pit mine, and the occasional dust plumes resulting from blasting in the open pit mines.

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The heap leach pad, open pit mine, overburden piles, and access road constructed as part of the Proposed Action will represent a visual contrast for viewers in the proximity of the project.

The form of the reclaimed project will approach the form of the surrounding landscape, however, some areas will remain discontinuous and there will be some areas of angular line. The color of the reclaimed project will approach that of the surrounding landscape.

Noise

The noise which will be generated by the proposed project falls into identifiable noise patterns, including: engine noise and back-up alarms from haul trucks; engine noise from loaders and other vehicles; blasting, crushing and screening equipment; and miscellaneous equipment noise from the process plants, shop and office. Noise from the haul truck engines and loader operations occurs when the trucks are filled with material in the open pit mines. Truck engine noise is also associated with hauling the materials to the overburden material piles of the crusher. Truck back-up alarm noise will be generated in the open pit mines, on the overburden material piles, and at the crusher location. Noise from the truck and loader activities will occur 24 hours per day, 7 days per week. Blasting will occur twice each day, during the day. Noise from the crushing equipment will occur 24 hours per day, 7 days per week.

The noise generated by typical mining operations can be as intense as 95 dBA at 25 feet. Blasting may cause very short-duration noise levels in excess of 100 dBA at 25 feet. Typically, a noise reduction of 6 dBA occurs as the distance from a noise source is doubled. The nearest residence is 1,500 feet from an active mining area, which will result in a maximum noise level at the residence of 59 to 64 dBA outside the residence.

Land Use

The project will obtain a Conditional Use Permit. The existing zoning will not change. The project does not require a General Plan Amendment or Specific Plan Amendment. The existing Specific Plan recognizes the mineral resources within the area. The plan states in part that "No industry is proposed within the Plan Area with the exception of mining and possible processing of silver and gold ores" and that "Those areas known to contain potential commercial value ores and deposits should be restricted from potential incompatible use and protected for their Beneficial future use." The land use designation for portions of Sections 5, 6, 7 and 8, Township 10 North, Range 12 West, is "Mineral Extraction and Processing." The remaining portion of Section 6 is designated as "Public Lands." Golden Queen has acquired or is in final negotiation for the surface rights through the acquisition of mining claims, mining leases and fee purchase. The impact of Golden Queen's acquisition of mineral rights is the consolidation to a single entity.

Golden Queen has acquired the right to mine for precious metals and other valuable products within the project area. The existing zoning and Specific Plan designations are consistent with mining activities. Golden Queen has applied or is in the process of preparing applications for various permits required by local, state and federal agencies. The permits will contain conditions that Golden Queen must adhere to during the life of the mining activity.

Recreation

The project will occupy 153 acres of public lands within the proposed disturbance area with no recreational value.

Socioeconomics

During the construction phase, expenditures for labor and materials will infuse approximately \$13.7 million dollars into the regional economy. Two hundred and fifty construction workers will be employed, earning approximately \$9.9 million dollars in

wages. This economic activity will support an additional 166 workers with wages of \$3.7 million.

The project will create 144 permanent jobs, which will pay \$4.8 million dollars in wages, exclusive of benefits. The expenditures made by Golden Queen on goods, labor and other services will support another 136 jobs, which are expected to pay wages of \$3.3 million. As shown in the following table, the value added by the direct and indirect effects of this activity are forecast at \$8.3 million.

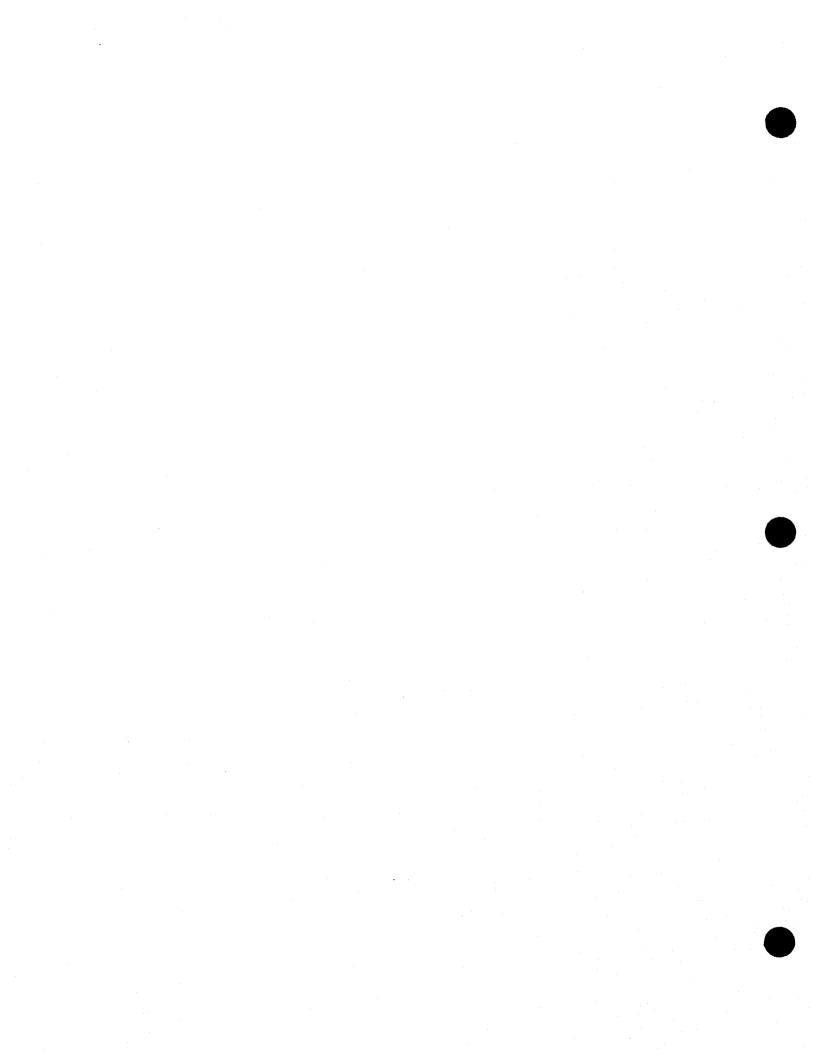
Predicted Impacts to Regional Economy (Millions of dollars)			
	Employment	Wages	Value Added
Direct	144	\$4.8	\$4.5
Indirect	136	\$3.3	\$3.8
Total	280	\$8.1	\$8.3

Health Hazards and Public Safety

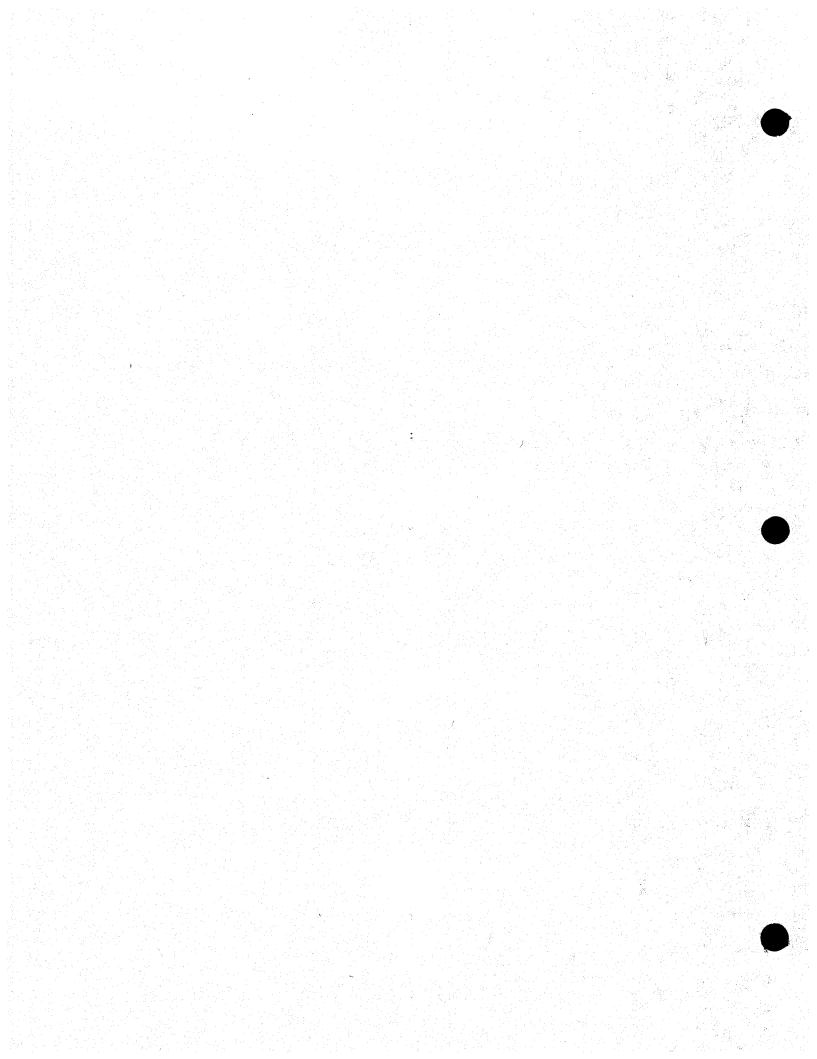
Impacts could consist of toxic or hazardous substances released in the environment (air, land or water).

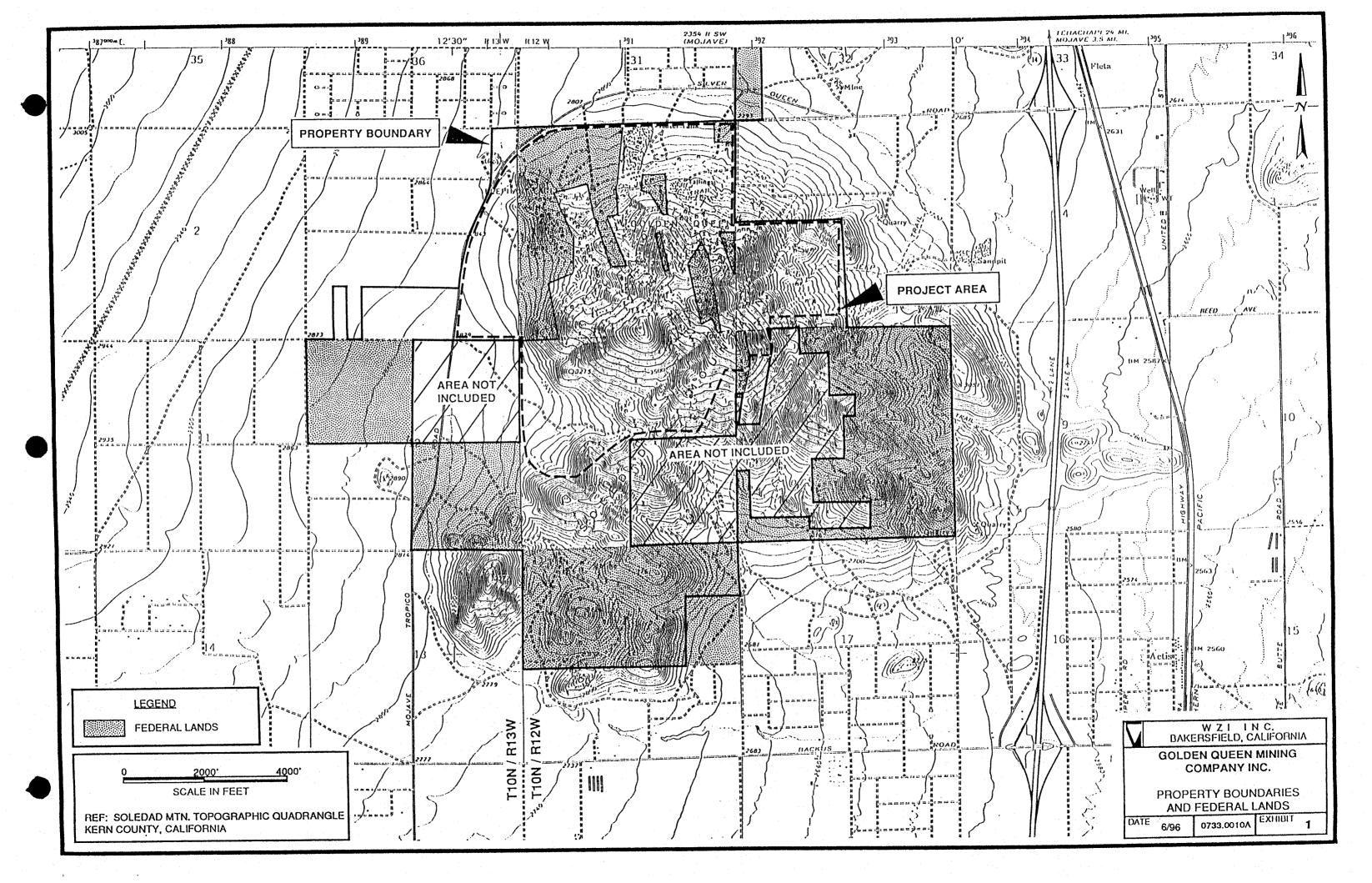
• Traffic and Transportation

No change is expected in Silver Queen Road other than the Golden Queen project. The facility is expected to employ approximately 250 workers during construction and 144 workers during normal operation. During normal operation the facility will operate 24 hours per day. Approximately one hundred trucks per month will deliver supplies to the site and approximately 70 daily trips are estimated for the sale of aggregate and construction materials.

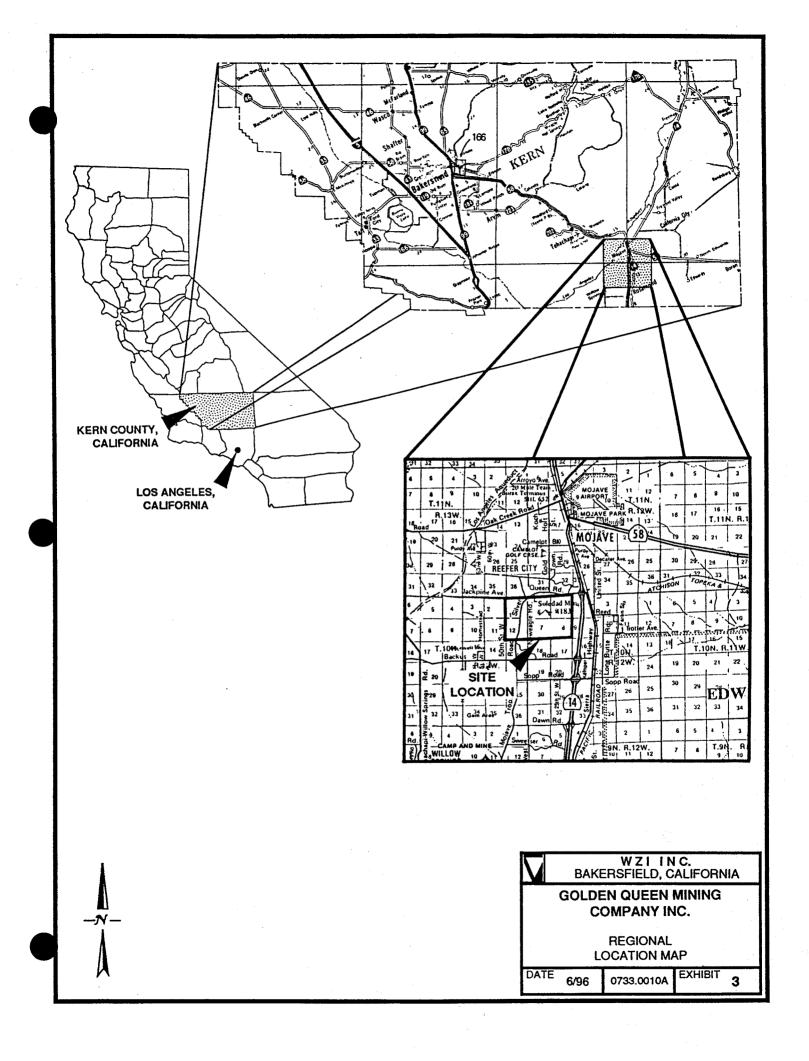


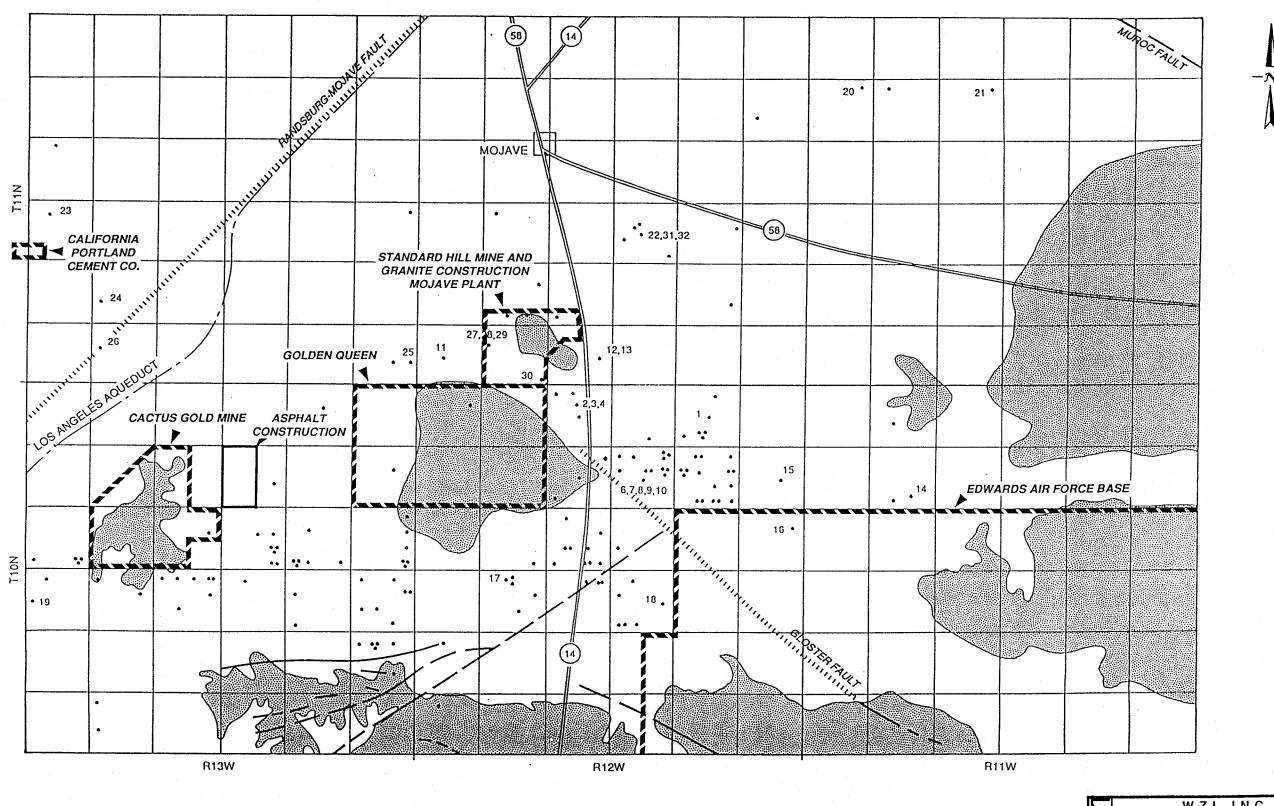
EXHIBITS











W Z I I N C.
BAKERSFIELD, CALIFORNIA

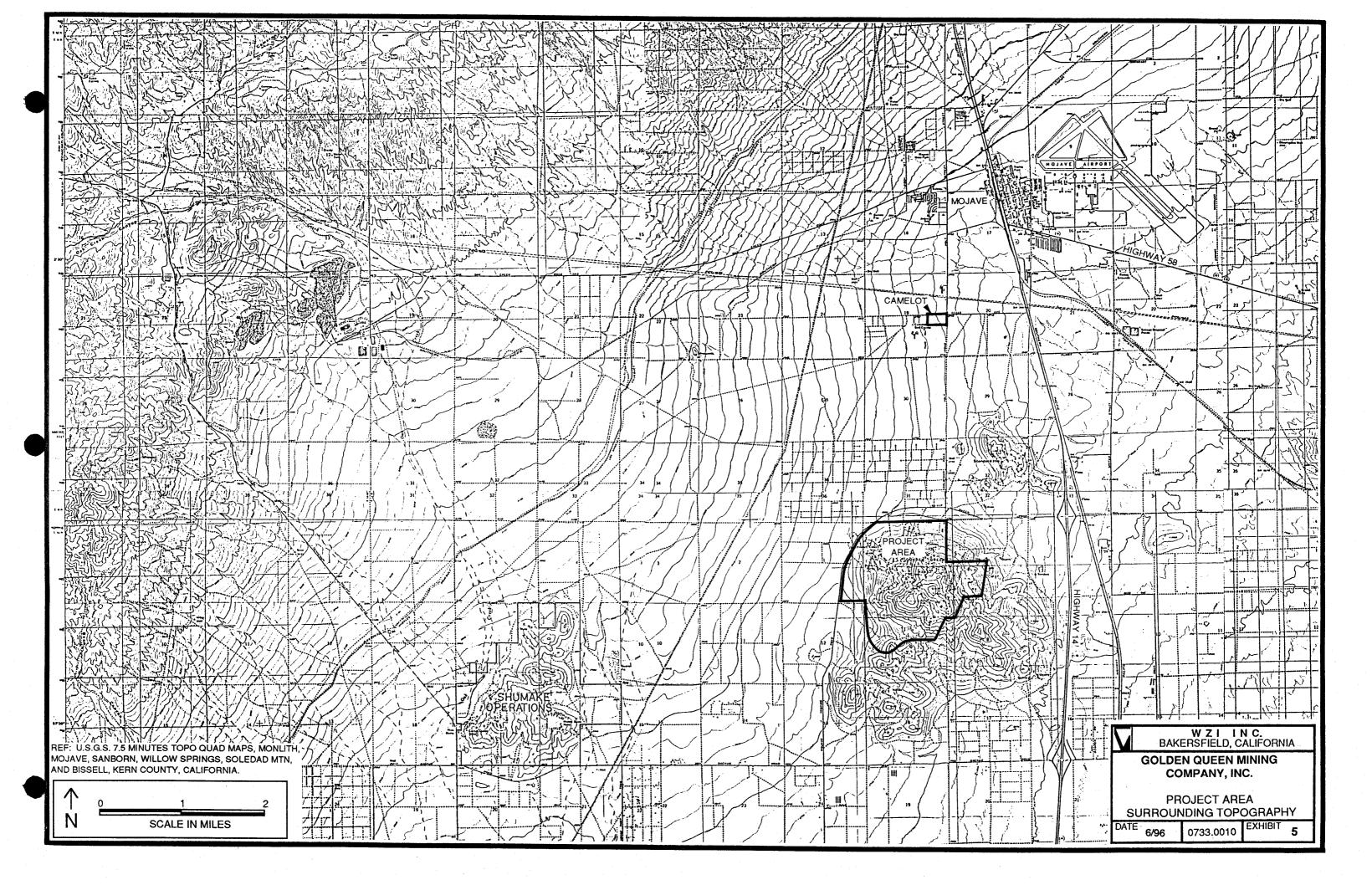
GOLDEN QUEEN MINING
COMPANY, INC.

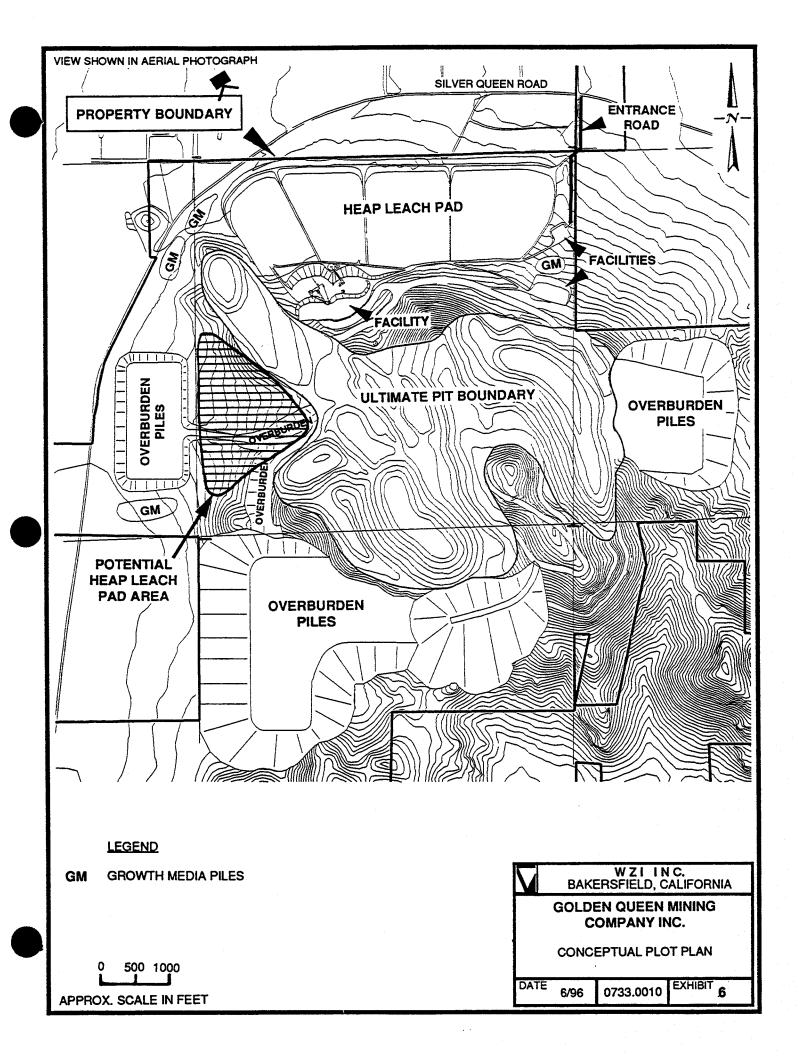
LOCATION OF NEARBY MINES

DATE 6/96

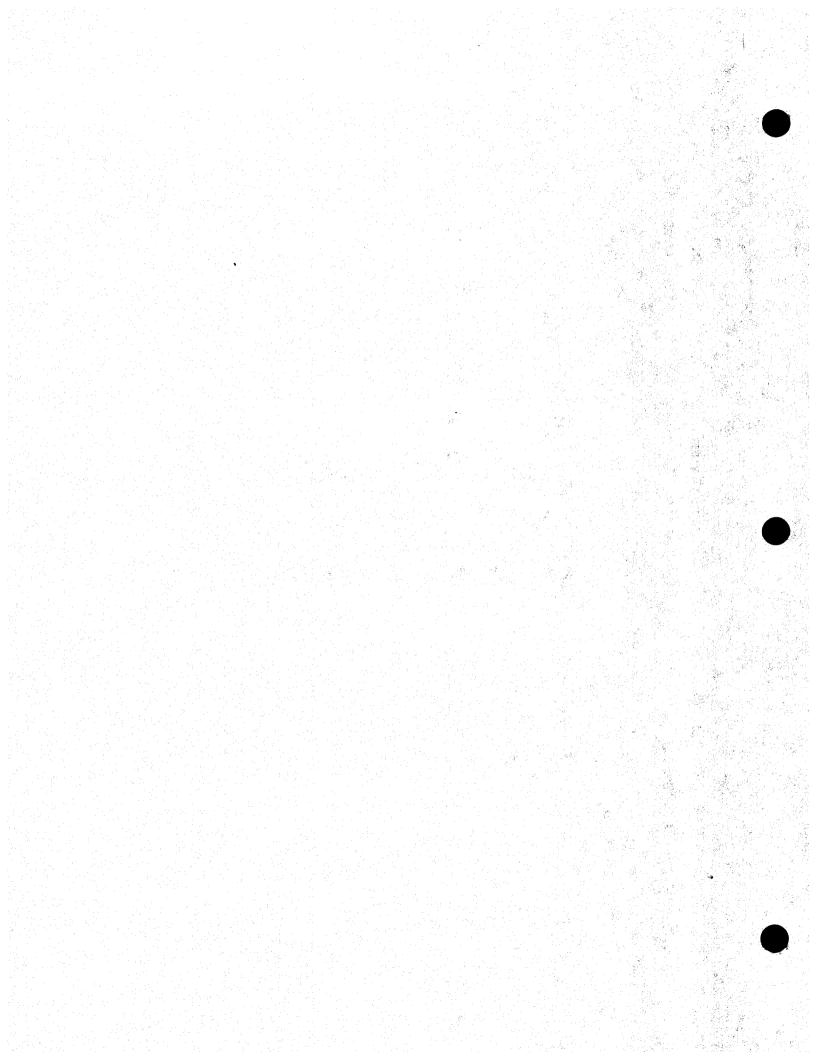
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Scale In Miles





DISTRIBUTION LIST FOR NOTICE OF PREPARATION



City of McFarland P.O. Box 1488 McFarland, CA 93250

City of Ridgecrest 100 West California Avenue Ridgecrest, CA 93555

City of Shafter 336 Pacific Avenue Shafter, CA 93263 City of Taft Planning and Building 209 East Kern Street Taft, CA 93268

City of Tehachapi P.O. Bin 668 Tehachapi, CA 93561 City of Wasco P.O. Box 159 Wasco, CA 93280

Inyo County Planning Department P.O. Drawer "L" Independence, CA 98526

Kings County Planning Agency Kings County Government Building #6 1400 West Lacey Boulevard Hanford, CA 93230

Los Angeles County
Department of Regional Planning 320 West Temple
Street, Room 1390
Los Angeles, CA 90012

San Bernardino County
Office of Planning
385 North Arrowhead Avenue, 3rd Floor
San Bernardino, CA 92415

San Luis Obispo County Planning and Building Department County Government Center San Luis Obispo, CA 93408

Santa Barbara County
Resource Management Department
123 East Anapamu Street
Santa Barbara, CA 93408

City of Arvin P.O. Box 548 Arvin, CA 93203 City of Bakersfield Planning Department 1715 Chester Avenue Bakersfield, CA 93301

California City Planning 21000 Hacienda Boulevard California City, CA 93515 City of Delano P.O. Box 939 Delano, CA 93216

City of Maricopa P.O. Box 548 Maricopa, CA 93252 Tulare County
Planning & Development Dept. Room 105-111
County Civic Center
Visalia, CA 93291-4503

Ventura County Planning Department Attention Victor R. Husbands, Director 800 South Victoria Avenue Ventura, CA 93309 U.S. Department of Interior Bureau of Land Management Ridgecrest Resource Area 300 South Richmond Boulevard Ridgecrest, CA 93555 U.S. Department of Agriculture Natural Resources Conservation Service 1601 New Stine Road, Suite 270 Bakersfield, CA 93309-3698

Kern County Engineering and Survey Services Department/Floodplain Management Section 2700 "M" Street, Suite #500 Bakersfield, CA 93301

Kern County Fire Department 5642 Victor Street Bakersfield, CA 93308

Kern County Library/ Administration/Beale Library 1415 Truxtun Avenue Bakersfield, CA 93301

Kern County Museum 3801 Chester Avenue Bakersfield, CA 93301

Kern County Parks Department 1110 Golden State Avenue Bakersfield, CA 93301

Kern County Library/Rosamond Library 2646 Diamond Rosamond, CA 93560

Kern County Roads Department 2700 "M" Street, Suite #400 Bakersfield, CA 93301

Kern County Waste Management Department/ Special Districts 2700 "M" Street, Suite #500 Bakersfield, CA 93301

Kern County Waste Management Department/ Liquid Waste 2700 "M" Street, Suite #500 Bakersfield, CA 93301 County Administrative Office/Fiscal 1115 Truxtun Avenue, 5th Floor Bakersfield, CA 93301

Kern County Engineering and Survey Services Survey Department 2700 "M" Street, Suite #300 Bakersfield, CA 93301

Kern County Health Department 1700 Flower Street Bakersfield, CA 93305

Kern County Air Pollution Control District 2700 "M" Street, Suite #290 Bakersfield, CA 93301

Kern County Planning Department/ Special Projects 2700 *M* Street, Suite #100 Bakersfield, CA 93301

Resource Management Agency/Fiscal 2700 "M" Street, Suite #350 Bakersfield, CA 93301

Kern County Sheriff's Department/ Fiscal Analysis 1350 Norris Road Bakersfield, CA 93308

Kern County Roads Department/Transit 2700 "M" Street, Suite #400 Bakersfield, CA 93301

Kern County Waste Management Department/ Solid Waste 2700 "M" Street, Suite #500 Bakersfield, CA 93301

Kern County Supervisor 2nd District STEVE PEREZ 1115 Truxtun Avenue, 5th Floor Bakersfield, CA 93301 Kern County Superintendent of Schools Attention Stephen Hartsell 1300 - 17th Street Bakersfield, CA 93301

LAFCO 2700 "M" Street, Suite #302 Bakersfield, CA 93301

Mojave Unified School Dist. 3500 Douglas Mojave, CA 93501

Native American Heritage Council of Kern County/Robert Gomez 2619 Driller Avenue Bakersfield, CA 93306

Sierra Club/Kern Keaweah Chapter Arthur Unger 2815 La Cresta Drive Bakersfield, CA 93305

Southern California Gas Company Attention: Jose Mendez 1510 North Chester Avenue Bakersfield, CA 93308

Southern San Joaquin Valley Archaeological Infor. Center California State University 9001 Stockdale Highway Bakersfield, CA 93309

CalTrans District 6 P.O. Box 12616 Fresno, CA 93778

California State University Bakersfield - Library 9001 Stockdale Highway Bakersfield, CA 93309

State Fish and Game 1234 East Shaw Avenue Fresno, CA 93710 Kern COG 1401 19th Street Bakersfield, CA 93301\

Mojave Public Utility Dist. 15844 "K" Street Mojave, CA 93501

Eastern Kern Resource Conservation District P.O. Box 626 Inyokern, CA 93527

Pacific Bell Engineering Attention: Beverly Hendrix 5101 Office Park Drive, Room 300 Bakersfield, CA 93309

Southern California Edison Planning Department 510 S. China Lake Boulevard Ridgecrest, CA 93555

Southern Pacific Transportation Co. Real Estate Dept., Room 225 One Market Plaza San Francisco, CA 94105

State Air Resources Board Stationary Resource Division Attn: Barbara Fry P.O. Box 2815 Sacramento, CA 95812

State Office of Planning & Research 1400 Tenth Street, Room 121 Sacramento, CA 95814

California Energy Commission 11516 Ninth Street, Room 200 Sacramento, CA 95814

State Fish and Game 1416 Ninth Street Sacramento, CA 95814 State Dept. of Health Services 5545 East Shields Avenue Fresno, CA 93727

Integrated Waste Management Attn: Vince Paul 8800 Cal Centre Drive Sacramento, CA 95826

Public Utilities Commission Attn: Bob Penny 350 McAllister Street, Room 3230 San Francisco, Ca 94102

California Regional Water Quality Control Board/Lahontan Region 2092 Lake Tahoe Boulevard, Suite 2 South Lake Tahoe, CA 96150

State Dept. of Water Resources San Joaquin Dist. 3374 East Shields Avenue, Room A-7 Fresno, CA 93726

Bureau of Reclamation Rosalie Faubion 2666 N. Grove Industrial Dr., Suite 106 Fresno, CA 93727-1551

Charles Clark Akin, Jr. 7630 Via Del Reposo Scottsdale, AZ 85258

Douglas Michael Allen 17497 County Road. #501 Bayfield, CO 81122

Mary M. Benson 1702 Ninth Avenue Yuma, AZ 85364

DeAnn Akin-Hatch 61535 So Highway 97-9 #150 Bend, OR 97702 California Highway Patrol Planning & Analysis Division P.O. Box 942898 Sacramento, CA 94298-0001

Native American Heritage Commission 915 Capitol Mall, Room 288 Sacramento, CA 95814

Department of Conservation
Office of Mine Reclamation Attn: James Pompy
801 "K" Street MS 09-06
Sacramento, CA 95814-3529

State Lands Commission 100 Howe Avenue, Suite 100-South Sacramento, CA 95825-8202

Cał OSHA Division of Mines and Tunnels Steve Hart 2550 Mariposa, Rm. 4000 Fresno, CA 93721

Antelope Valley East Kern Water Agency Wallace Spinarski P.O. Box 3176 Quarty Hill, CA 93586

Scott Thomas Allen 304 Clover Lane Fort Collins, CO 80524

Thomas & Laura Barrow 4605 Post Oak Place, Suite 207 Houston, TX 77027-9728

John T. Boyle 1418 Pasqualito Avenue San Marino, CA 91108

Cheryl Catherine Allen 686 1/2 N. Coast Highway Laguna Beach, CA 92651 Mary Ann B. Allen 560 East Villa St., Apt. 1011 Pasadena, CA 91101

Mary J. Birtle Southwestern Refining Corp. 5028 Ladera Vista Drive Camarillo, CA 93012

Robert C. Brodine III 6226 West 10052 N Highland, UT 84003

Louis G. Campbell, Jr. 821 Crater Camp Drive Calabasas, CA 91302

Nancy Evans c/o Mary Slaughter 2540 N. Brimhall Mesa, AZ 85203

Howard E. Bruce c/o Nancy Eilen Hassard 12694 Mirado Avenue Grand Terrace, CA 92324

Alice E. Condit c/o Barbara Condit 402 E. McKiniey Pomona, CA 91767

Don C. Frisbee 1500 S.W. First Ave., Suite 1005 Portland, OR 97201

Eric W. Godfrey 531 Stephens Fillmore, CA 93015

Alma A. Henry Box 1267 Lyman, WY 82937-1267 Charlie Beck Soledad-Mojave Mining Syndicate 932 Springwood Lane Encinitas, CA 92024

Barbara Boyle Kingsley Manor 1055 N. Kingsley Drive, #201 Los Angeles, CA 90029

Terry Burton 5800 Pioneer Rd. #1 Mojave, CA 93501

Joyce Cousins 18717 Mill Villa Rd. #626 Jamestown, CA 95327

Theodora Frisbee-Fisher Kensington Place 1580 Geary Rd. Walnut Creek, CA 94596

Cecil Burton P.O. Box 2 La Grange, CA 95329

Rolando & Delia Cruz 8103 Los Ranchos Drive Austin, TX 78749

Barbara Frisbee-Hart P.O. Box 600 Winston, OR 97496

Marie & Stussy Hamilton 3010 Skywod Orange, CA 92665

Michael E. Holmes c/o Mary Slaughter 2540 N. Brimhail Mesa, AZ 85203 George I. Holmes II 2876 E. Virginia Apache Junction, AZ 85219

Frank Kenton 4911 Leeds St. Simi Valley, CA 93063

Praveen Gupta, M.D. 9435 Venice Blvd. Culver City, CA 90232

Teresa Gail Hanly 26382 Mimosa Lane Mission Viejo, CA 92691-1924

Ella Hodges 24410 Crenshaw Blvd. Torrance, CA 90505

Raymond R. Holmes c/o Mary Slaughter 2540 N. Brimhall Mesa, AZ 85203

Janice Iten 1010 Maple Drive Ukiah, CA 95482

Virginia Knight 540 South Arden Blvd. Los Angeles, CA 90020

Betty B. Letteau 9255 Doheny Rd. #3002 Los Angeles, CA 90069-3248

William M. Lynn 2100 El Molina Ave. San Marino, CA 91108

H.L. McMillen 1427 Madera Way Millbrae, CA 94030-2826 Grace W. Meehl 714 Valita St. Venice, CA 90291

Gaston & Wilhelmin Moore 6150 West Wagoner Rd. Glendale, AZ 85308-1151

Robert L. Moore 3075 San Pasqual Pasadena, CA 91107

Robert M. Letteau 723 No. Roxbury Drive Beverly Hills, Ca 90210

Emma G. McMillen 767 Clara Drive Palo Alto, CA 94303

Mary a.k.a. May Meehl 3730 Trieste Dr. Carlsad, CA 92008

John G. Meehl 239 Kittery Place San Ramone, CA 94583

Robert S. Moore 590 Castano Avenue Pasadena, CA 91107

Mudd Estate J. Arthur Greenfield & Co. 924 Westwood Blvd., Ste. 1000 Los Angeles, CA 90024 Roger E. Nicodemus 733 Briar Hill Circle Simi Valley, CA 93065 Barbara C. Orr 704 E. Lehi Road Mesa, AZ 85203

Marlowe Pennington P.O. Box 4667 Palm Springs, CA 92263-4667 Ginny Sigl Karma Wegman Corp. 714 Valita Street Venice, CA 90291

Selma M. Smith 5272 Lindley Avenue Encino, CA 91316 Royden W. Starke 2010 Donahue Drive El Cajon, CA 92019

Carolyn E. Norton P.O. Box 1731 St. John, AZ 85436 Marcus A. Pennington 8322 Foothill Blvd. Sunland, CA 91040

James P. Sigl 714 Valita St. Venice, CA 90291 Gean A. Slayton P.O. Box 1772 St. John's, AZ 85936

George O. Starke 9442 Mast Blvd. Santee, CA 92071 Thomas L. Stelzner 534 Selmart Lane Petaluma, CA 94954-2500

George F. Thagard, Jr. #60 Linda Isle Newport Beach, CA 92600 Wilbur Walston 8438 Venus Drive Buena Park, CA 90620

William F. Wegmann P.O. Box 16052 South Lake, CA 96151-6052 Donald Richard Van Pelt P.O. Box 4667 Palm Springs, CA 92263-4667

William J. Warner P.O. Box 1363 Sugar Loaf, CA 92386 W.L. Wilson Western Centennials, Inc. P.O. Box 2183 Golden, CO 81502

Fish & Wildlife Service Department of Interior - Ray Bransfield 2493 Portola Road, Suite B Ventura, CA 93003 Kern County Environmental Health Services Dept. 2700 "M" Street, Suite 300 Bakersfield, CA 93301

Mojave Public Library 16916 1/2 Highway 14, Space D2 Mojave, CA 93505

Mr. Phil Wyman P.O. Box 665 Tehachapi, CA 93581

Michelle Milner 1108 Oakwood Lane Rosamond, CA 93560

Pacific States Land Company Attention: B.A. Karlovich 2423 Camino del Rio South San Diego, CA 92108

Henry T. Mudd c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

Victoria K. Mudd c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

Caryll Mingst c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

Cynthia E. Sprague c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

Mary W. Steizner c/o of Thomas L. Steizner 534 Selmart Lane Petaluma, CA 94954-2500

Thomas A. Wilson c/o of Thomas L. Stelzner 534 Seimart Lane Petaluma, CA 94954-2500 Ms. Linda Matise Tehachapi Advisory P.O. Box 1438 Tehachapi, CA 93581

Chris Quigley 1005 Colorado Butte, MT 59701

Mayer, Brown and Platt Attention: Leslie T. Tedrow 350 South Grand Avenue, 25th Floor Los Angeles, CA 90071-1503

Harvey Mudd c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

John W. Mudd c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

Virginia Bell c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

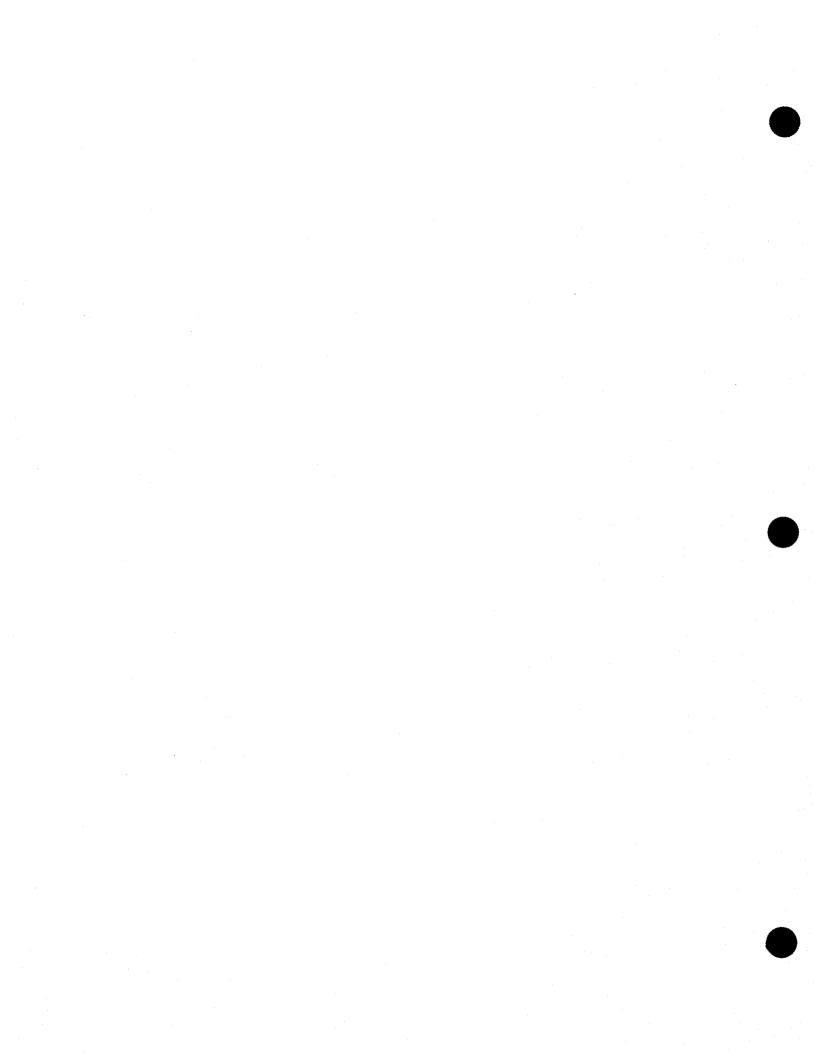
Elizabeth Mudd Sprague c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

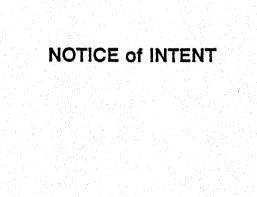
Narman F. Sprague III c/o J. Arthur Greenfield & Co. 924 Westwood Boulevard, Suite 1000 Los Angeles, CA 90024

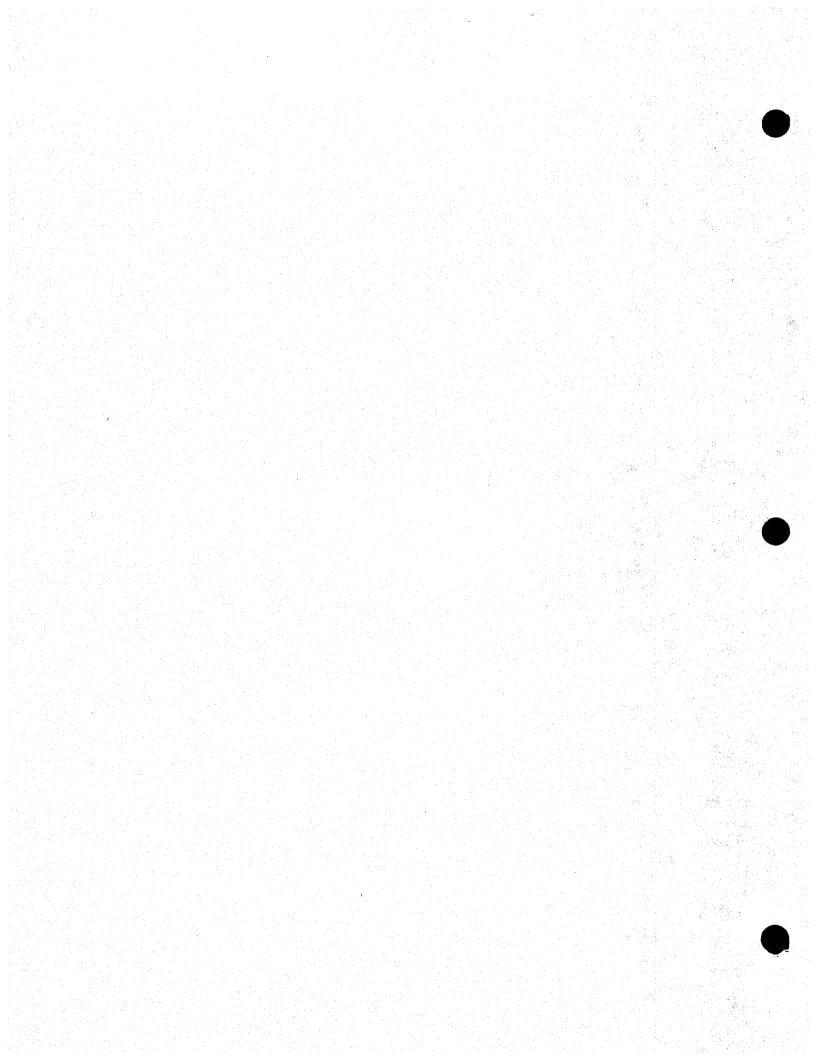
Mary Jean Waty c/o of Thomas L. Steizner 534 Seimart Lane Petaluma, CA 94954-2500

Jack E. Wilson c/o of Thomas L. Stelzner 534 Selmart Lane Petaluma, CA 94954-2500 Frank A. Ghezzi, Exec. for the Est. of Margaret L. Ghezzi c/o of Thomas L. Stelzner 534 Selmart Lane Petaluma, CA 94954-2500 Jeffery Howard Thompson c/o of Thomas L. Stelzner 534 Selmart Lane Petaluma, CA 94954-2500

Lawrence Robert Thompson c/o of Thomas L Steizner 534 Selmart Lane Petaluma, CA 94954-2500







Dated: March 25, 1996.
Annetta L. Cheek,
Chief, Regulatory Management Team.
[FR Doc. 96–7591 Filed 3–27–96; 3:45 am]
SILLING COOE 4210–84–2

[CA-065-06-1990-01]

Environmental Statements; California Desert Conservation Area, CA

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent to prepare an Environmental Impact Statement for an open pit, heap leach gold mine on portions of public lands in the California Desert Conservation Area, Kern County, CA; and notice of scoping period and public meetings.

SUMMARY: Pursuant to section 102(2)(c) of the National Environmental Policy Act of 1969, the Bureau of Land Management (BLM) will be preparing a joint Environmental Impact Statement/ Environmental Impact Report (EIS/EIR) for addressing impacts of the proposed gold mine development in Kern County, CA. The BLM invites comments and suggestions on the scope of the analysis. DATES: Public scoping meetings will be held on:

Date: April 16, 1996—Tuesday
Time: 6:30 p.m.—10:00 p.m.
Place: Rosamond High School,
2925 Rosamond Blvd,
Rosamond, CA 93560,
Glennan Gymnasium
Date: April 17, 1996—Wednesday
Time: 6:30 p.m.—10:00 p.m.
Place: Mojave High School,
15732 "O" St.,
Mojave, CA 93501,
Mustang Gymnasium

ADDRESSES: Scoping comments may be sent to: BLM Ridgecrest Resource Area Manager, 300 S. Richmond, Ridgecrest, CA 93555, Attn: Ahmed Mohsen, EIS Coordinator.

SUPPLEMENTARY INFORMATION: Golden Queen is proposing to construct and operate the Soledad Mountain Project, an open pit precious metals (gold and silver) mining and cyanide leaching processing operation at the Soledad Mountain project area located approximately five miles southwest of the town of Mojave in Kern County, California.

The proposed action includes: construction of facilities; mining and processing of precious metals ores at the rate of three to four million tons per year for a period of ten to sixteen years; stockpiling of overburden materials; sales of overburden materials as aggregate and construction materials; and reclamation of the project site.

The project area is approximately 1.228 acres, of which 959 acres are private land and 269 acres are unpatented mining claims on public lands administered by BLM. The proposed surface disturbance is approximately 782 acres on private lands and 153 acres on public lands. The proposed mining operation includes twelve interconnected open pit mining areas within the ultimate pit boundary of the proposed open pit. FOR FURTHER INFORMATION CONTACT: Ahmed Mohsen, BLM EIS Coordinator at (619) 384–5421.

Dated: March 21, 1996.
Lee Delaney,
Area Manager.
[FR Doc. 96–7495 Filed 3–27–96; 8:45 am]

[OR-015-96-1610-00: G6-0088]

Management Framework Plans; Oregon

AGENCY: Bureau of Land Management. Interior.

ACTION: High Desert Management
Framework Proposed Plan Amendment
and Final Environmental Impact
Statement for Lake Abert Area of
Critical Environmental Concern, Notice
of Availability.

SUMMARY: Pursuant to section 102(2)(c) of the National Environmental Policy Act, section 202(f) of the Federal Land Policy and Management Act, and 43 CFR Part 1610, the Lakeview District has completed a proposed plan amendment and final environmental impact statement (PA/FEIS) covering a proposal to designate the Lake Abert and the surrounding vicinity as an area of critical environmental concern (ACEC).

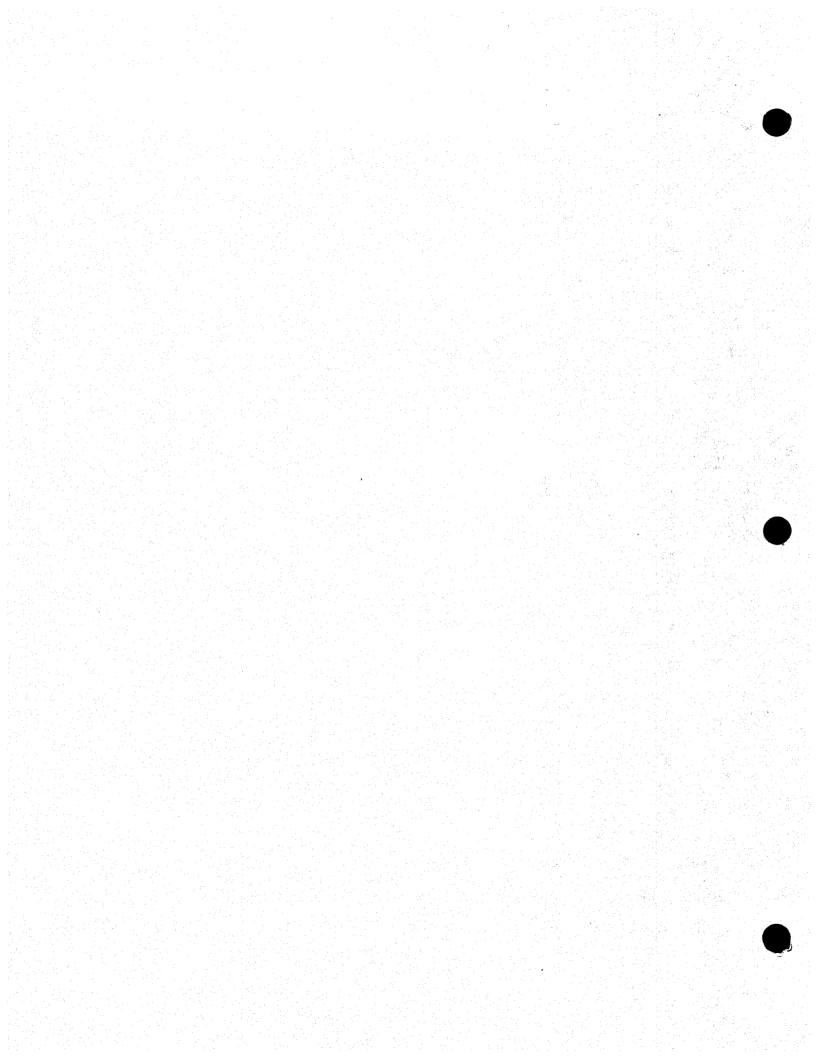
The proposed PA/FEIS addresses the management of resources within approximately 123,000 acres of public land and 101,700 acres of reserved mineral estate administered by the BLM located approximately 30 miles north of the town of Lakeview in central Lake County, Oregon. The proposed ACEC includes approximately 49,900 acres of public lands administered by the BLM. DATES: The public review/protest period for the proposed PA/FEIS will officially begin when the U.S. Environmental Protection Agency publishes its Notice of Availability of the proposed PA/FEIS in the Federal Register, which is expected on or about March 29, 1996. FOR FURTHER INFORMATION CONTACT: Paul Whitman, BLM, Lakeview District Office, P.O. Box 151, Lakeview, Oregon

97630 (Telephone: 541-947-6110). Those wishing to provide comments should submit them in writing to Scott Florence at the above address. supplementary information: Tie document presents management goals. objectives, and seven management alternatives for BLM-administered lands within the planning area. The alternatives range from no action (no change in present management), to designating portions of the planning area as an ACEC with somewhat 👡 restrictive management, to designating the entire planning area as an ACEC with very restrictive management. Alternative 7 is the agency preferred plan and involves designating about 49,900 acres of public lands as an ACEC. The area was evaluated and found to meet the ACEC designation criteria and require special management for four resource values: wildlife, visual, cultural, and ecological processes. Offhighway vehicle (OHV) use, mining location, and rights-of-way location would be restricted within the ACEC. Livestock grazing would be restricted within that portion of Abert Rim wilderness study area (WSA) falling within the ACEC, as well as within most riparian zones, and ecologically sensitive areas. Mineral leasing would be closed within approximately 18,000 acres of the ACEC with the remainder of the area being restricted.

A draft plan amendment and environmental impact statement was issued for a 90-day review period in May 1995. The review period ended on August 15, 1995. A total of 37 comment letters were received during the review period. An interdisciplinary planning team assessed these comments and utilized them in making changes in the proposed PA/FEIS. The final document has been prepared in an abbreviated format. Major sections of the draft are not repeated in the final. Copies of the draft are available for reference by contacting the point of contact listed above.

Those individuals, organizations. native American tribes, and agencies with a known interest in the plan have been sent a copy of the proposed PA/ FEIS. Persons desiring a copy of the document should contact the point of contact listed above. Reading copies of the document are available at the Lake. Klamath, and Harney County, Oregon. libraries and at the following BLM locations: Office of External Affairs. Main Interior Building, Room 5600. 18th and C Streets, NW, Washington DC 20240, and Public Room, Oregon State Office, 1515 SW 5th, Portland, Oregon 97201.

COMMENTS RECEIVED BY KERN COUNTY



ENVIRONMENTAL HEALTH SERVICES DEPARTMENT

KERN COUNTY

Office Memorandum

Date: September 17, 1996

To:

Ted James, Director

Planning Department Attn: Scott Denney

From:

Steve McCalley, Director

Environmental Health Services Department

By: Thomas Hardy, Environmental Health Specialist III

Re:

Environmental Consultation For.

CUP #22, Map #214 CUP #41, Map #213

Soledad Mountain Project

This Department recommends that the following conditions be satisfied prior to the issuance of building permits:

- 1. The method of water supply and sewage disposal shall receive approval by the Kern County Environmental Health Services Department.
- 2. An acoustical study of the area is required to ensure the noise levels can comply with the General Plan.
- 3. The developer is to contact the Regional Water Quality Control Board with regard to waste discharge requirements.

TH:ch

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Tulare County Planning and Development Department

Tulare County Courthouse Civic Center Rm. 111 Visalia, CA 93291-4593 209-733-6254 (Planning) 209-733-6282 (Building Permits) 209-730-2604 (FUX)

June 19, 1996

Kern County Planning Department 2700 M Street, Suite 100 Bakersfield, CA 93301 Attn: Glen Barnhill

Re: Soledad Mountain Project, CUP 41, Map 213; CUP 22, Map 214

Dear Mr. Barnhill,

Tulare County appreciates the opportunity to comment on the Notice of Preparation for the Draft Environmental Impact Report for the above referenced project. The distance of the proposed project from Tulare County diminishes any project specific impacts to a very low level, so that the County has no specific comments concerning the project at this time. However, we would like to request a copy of the DEIR for review when it is available.

Tulare County looks forward to working with you to address issues of mutual concern and the coordination of land use planning along our common boundaries. If you have any questions or require further information, please call Julie McCauley or me at (209) 733-6313. Thank you, once again for the opportunity to comment.

Sincerely,

Tim Battin, AICP

Environmental Review Division

CC:

Mary Beatie, Assistant Director Julie McCauley, Planner

File

George E. Finney, Director Mary E. Beatie, Assistant Director

DEPARTMENT OF CONSERVATION

DIVISION OF ADMINISTRATION
DIVISION OF MINES AND GEOLOGY
DIVISION OF OIL, GAS AND GEOTHERMAL RESOURCES
VISION OF RECYCLING



801 K Street SACRAMENTO, CA 95814-3528 Phone (916) 445-8733 FAX (916) 324-0948

July 17, 1996

Mr. Glenn Barnhill Kern County Planning Department 2700 M Street, Suite 100 Bakersfield CA 93301

Subject:

Notice of Preparation (NOP) for the Soledad Mountain Project, Golden

Oueen Mining Company, Inc. CUP 41, Map 213; CUP 22 Map 214

SCH # 96061052

Dear Mr. Barnhill:

The Department of Conservation's Office of Mine Reclamation has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Soledad Mountain Project. The project is a precious metals recovery, cyanide heap leach and open pit operation located in a previously mined area on 1,228 acres near the town of Mojave. The following comments, prepared by Michael Sandecki, are offered to assist in your review of this project.

The Surface Mining and Reclamation Act of 1975 (SMARA) (Public Resources Code Section 2710 et seq.) and the State Mining and Geology Board regulations for surface mining and reclamation practice (California Code of Regulations (CCR) Title 14, Chapter 8, Article 1, Section 3500 et seq.; Article 9, Section 3700 et seq.) requires that a reclamation plan be submitted to and approved by the lead agency prior to the commencement of new mining operations, or amended to reflect substantial changes in a mining project with an approved reclamation plan. We understand that a reclamation plan is being prepared for the project and will be provided for our review prior to approval.

SMARA Sections 2772 and 2773, and CCR Sections 3502, 3503, and 3700-3713 detail that specific items be addressed or included in reclamation plans. A copy of the Division of Mines and Geology's (DMG) DMG Note 26 has been included for your reference. SMARA Section 2774 (d) requires that lead agencies forward a copy of the reclamation plan to the Director of the Department of Conservation for review and allow the Director 30 days to prepare comments.

SMARA was amended by Assembly Bill 867. Under this amendment, information that has been prepared as part of a permit application or pursuant to the California Environmental Quality Act (CEQA) may be included in the project's reclamation plan by reference, if that item of information is attached to the reclamation plan when it is forwarded to the Department for review. To the extent that the referenced information is used to meet

Mr. Glenn Barnhill July 17, 1996 Page 2

SMARA requirements, the information will become part of the reclamation plan and subject to all other requirements of SMARA, including calculation of financial assurances.

If you have any questions on these comments or require assistance with other mine reclamation issues, please phone James Pompy, Manager, Reclamation Unit, Office of Mine Reclamation, at (916) 323-8565.

Jason Marshall

Assistant Director

Office of Governmental and Environmental Relations

Attachment

cc: James Pompy, Office of Mine Reclamation



State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET SACRAMENTO 95814



DATE:

June 20, 1996

TO:

Reviewing Agencies

RE:

SOLEDAD MOUNTAIN PROJECT

SCH# 96061052

Attached for your comment is the Notice of Preparation for the SOLEDAD MOUNTAIN PROJECT draft Environmental Impact Report (EIR).

Responsible agencies must transmit their concerns and comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of this notice. We encourage commenting agencies to respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

GLENN BARNHILL
KERN COUNTY PLANNING DEPT
2700 M STREET, SUITE 100
BAKERSFIELD, CA 93301

with a copy to the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the review process, call at (916) 445-0613.

Sincerely, Magnata

ANTERO A. RIVASPLATA Chief, State Clearinghouse

Attachments

cc: Lead Agency

NOP Distribution List

Wayne Hubbard
State Water Resources Control Board
Division of Clean Water Programs
P.O. Box 944212
Sacranento, CA 94244-2120
916/227-4408 Fax 916/227-4549 State Water Resources Control Board Division of Water Quality P.O. Box 944213 Sacramento, CA 94244-2130 916/657-0912 Fax 916/657-2388 State Water Resouces Control Board Division of Water Rights 901 P Steet 1 Ad Floor Sectamento, CA 95814 916/657-1377 Fax 916/657-1485 California Highway Parrol Office of Special Projects Planning and Analysis Division 2551 1st Ave. Sacramento, CA 95818 916/657-7222 Fax 916/452-3151 Dept. of Toxic Substances Control Caltrans - Division of Aeronautics P.O. Box 942874 Sacramento. CA 94274-0001 916/324-1833 Fax 916/327-9093 California Environmental Protection Agency Calif. Waste Management Board 8800 Cal Center Drive Sacramento, CA 95826 9167255-4164 Fax 916/255-4071 Sacramento, CA 94274-0001 916/653-9966 Fax 916/653-0001 916/324-0214 Fax 916/322-3987 Sacramento, CA 95815 916/322-8267 Fax 916/322-5982 Sacramento, CA 95812-0806 916/324-3119 Fax 916/324-1788 Insiness, Transportation, & Housing Office of Local Assistance 501 J Street, Suite 400 Sacramento, CA 95814 Dept. of General Services 400 R Street, Suite 5100 Sacramento, CA 95814 CEOA Tracking Center 400 P Sweet, Fourth Floor Air Resources Board 2020 L Street Caltrans - Planning P.O. Box 942874 State and Consumer Services Mike Falkenstein Sandy Hesnard Alice Huffaker Mike Tollstrup Ron Helgeson Robert Sleppy 916/445-3160 P.O. Box 806 Mark deBie X X Lawrence Newland
Caltrans. District 5
P.O. Box 8114
San Luis Obispo. CA 93403-8114
805/549-3683 Fax 805/549-3077 Gary Otremba Caltrans, District 2 P.O. Box 494040 Redding, CA 9649-4040 9167225-3133 Fax 9167225-3146 Stephen J. Buswell
Caltrans. District 7
120 South Spring Street
Los Angeles, CA 90012
213/897-4429 Fax 213/897-4358 Alleen Kennedy Caltrans, District 12 2501 Pullman St. Santa Ana, CA 92705 714/724-2239 Fax 714/724-2592 Eureka, CA 95501 707/445-5812 Fax 707/445-5869 Calirans, District 3
703 B Street
Marysville, CA 95901
916/327-3859 Fax 916/323-7669 Calrans, District 4
P.O. Box 23660
Oakland, CA 94623-0660
510/286-5578 Fax 510/286-5513 Caltrans, District 9
500 South Main Street
Bishop, CA 93514
619/872-0689 Fax 619/872-0678 Caltrans, District 6
P.O. Box 12616
Fresno, CA 93778-2616
209/448-4088 Fax 209/488-4101 Caltrans, District 8
P.O. Box 231
San Bernardino, CA 92402
909/383-4808 Fax 909/383-7934 Calrans, District 10
P.O. Box 2048
Stockton, CA 95201
209/948-7906 Fax 209/948-7906 2829 Juan Street San Diego, CA 92186-5406 619/688-6002 Fax 619/688-2511 Caltrans, District 11 P.O. Box 85406, MS S-5 Department of Transportation District Contacts Martin Urkofsky Caltrans, District 1 1656 Union Street Marc Birnbaum Gary F. Adams Jeff Pulverman Robert Ruhnke Harvey Sawyer Dana Cowell Lou Salazar Ken Assen, Acting Regional Manager Department of Fish and Game P.O. Box 47 Richard L. Elliott, Regional Manager Department of Fish and Game 818/543-4676 Fax 818/543-543-4685 George Nokes, Regional Manager Department of Fish and Game 1234 East Shaw Avenue Fresno, CA 93310 209/445-6152 Fax 209/445-6607 Native American Heritage Comm. 915 Capitol Mall, Room 364 Sacramento, CA 95814 916/653-4082 Fax 916/657-5390 Ryan Broddrick, Regional Manager State Lands Commission 100 Howe Avenue, Suite 100 South Sacramento, CA 95825 916/574-1872 Fax 916/574-1885 Department of Fish & Game 1701 Nimbus Road, Suite A Rancho Cordova, CA 95670 916/358-2900 Fax 916/358-2912 505 Van Ness Avenue San Francisco, CA 94102 415/703-2011 Fax 415/703-1965 Yountville, CA 94599 707/944-5518 Fax 707/944-5563 Environmental Services 330 Golden Shore, Suite 50 Long Beach, CA 90802 310/590-5132 Fax 310/590-5192 California Energy Commission 1516 Ninth Street, MS-15 Sacramento, CA 95814 916/654-3944 Zephyr Cove, NV 89448 702/588-4547 Fax 702/588-4527 770 Fairmont Avenue, Suite 100 Glendale, CA 91203-1035 Redding, CA 96001 916/225-2363 Fax 916/225-2381 Delta Protection Commission P.O. Box 530 Wahat Grove, CA 95690 916/176-2290 FAX 776-2293 Department of Fish and Game Office of Emergency Services P.O. Box 29998 Public Utilities Commission Independent Commissions/Agencies **Tahoe Regional Planning** Sun Francisco, CA 94129 415/666-9300 Gerald R. Zimmerman Colorado River Board Fish and Game - Regional Offices Environmental Review Thomas Ottoman Douglas Long P.O. Box 1038 Debby Eddy **Betty Silva** Locust S.F. Bay Conservation & Dev't. Comm. 30 Van Ness Avenue. Room 2011 San Francisco, CA 94102 415/557-3686 Fax 415/557-3767 Dept. of Health 601 N. 7th Street, PO Box 942732 Sacramento, CA 94234-7320 916/323-6111 Fax 916/327-6092 California Coastal Commission 45 Fremont Street, Suite 1970 San Francisco, CA 94105-2219 415/904-5200 Fax 415/904-5400 \$10/286-1015 Fax \$10/286-0470 Dept. of Conservation 801 K Street, MS-24-02 Sacramento, CA 95814 916/445-8733 Fax 916/324-0948 Reclamution Board 1020 Ninth Street, Room 240 Sacramento, CA 95814 916/327-1531 Fax 916/327-1600 Department of Water Resources 1020 Ninth Street, Third Floor Sacramento, CA 95814 916/327-1722 Fax 916/327-1648 Resources Agency 1020 Ninth Street, Third Floor Sacramento, CA 95814 916/327-1722 Fax 916/327-1648 Office of Historic Preservation P.O. Box 942896 Sacramento, CA 94296-0001 916/653-9107 Fax 916/653-9824 Dept. of Forestry 1416 Ninth Street, Room 1516-2 Sacramento, CA 95814 916/653-9451 Fax 916/653-0989 Dept. of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001 916/653-0538 Dept. of Boating & Waterways 1629 S Street Sacramento, CA 95814 916/445-6281 916/327-7250 State Coastal Conservancy 1330 Broadway, Suite 1100 Oakland, CA 94612 Wendy Halverson-Martin S = sent by lead agency Elizabeth A. Fuchs Deborah Hermann Hans Kreutzberg Reed Holderman Steve McAdam Nadell Gayou X = sent by SCH **Gary Brittner** Nadell Gayou Nicole Leiria Ken Plerce Kim Dinh Resources Agency dealth & Welfare

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SAN FRANCISCO BAY REGION (2) 2101 Webster, Suite 500 Oakland, CA 94612 510/286-1255 Fax 510/286-1380

CENTRAL COAST REGION (3) 81 Higuera Street, Suite 200 San Luis Obispo, CA 93401-5427 805/549-3147 Fax 805/543-0397

101 Centre Plaza Drive Monterey Park, CA 91754-2156 213/266-7556 Fax 213/266-7600 **LOS ANGELES REGION (4)**

CENTRAL VALLEY REGION (5)
343 Roulei Road, Suite A
Sactamento, CA 98877-3098
916/255-3000 Fax 916/255-3015

3614 East Ashlan Avenue Fresno. CA 93726 209/445-5116 Fax 209/445-5910 Redding Branch Office 415 Knollcrest Drive Redding, CA 96002 916/224-4845 Fax 916/224-4857

LAHONTAN REGION (6) 2092 Lake Tahoe Boulevard South Lake Tahoe, CA 96150 916/542-5400 Fax 916/544-2271

Victorville Branch Office 15428 Civic Drive, Suite 100 Victorville, CA 92392-2359 619/241-6583 Fax 619/241-7308

COLORADO RIVER BASIN REGION (7) 73720 Fed Waring Drive, #100 Palm Desert, CA 92260-2564 619/346-7491 Fax 619/341-6820

SANTA ANA REGION (8) 3737 Main Street, Suite 500 Riverside, CA 92501-3339 7147/82-4130 Fax 9097/81-6288

9771 Clairemont Mesa Blvd., Suite B San Diego, CA 92124-1331 619/467-2952 Fax 619/571-6972 SAN DIEGO REGION (9)

OTHER:

OTHER

SCH 8/1/9



Kern Pounty Roads Department Office Memorandum

TO:

Barry Nienke

DATE: June 21, 1996

FROM:

John R. Wilbanks

Kern Regional Transit

PHONE: 862-8895

SUBJECT: Notice of Preparation of a Draft EIR for Soledad Mtn. Project: CUP 41, Map 213

CUP 22, Map 214

Kern Regional Transit has no comment on the proposed project. The project is located outside current service area boundaries for the communities of Mojave or Rosamond.

Please give me a call if you have any questions.

Office Memorandum KERN COUNTY

To:

Planning Department Glenn Barnhill Date: June 25, 1996

From:

Engineering & Survey Services

Phone: 861-2201

Floodplain Management Section Clark Farr

Subject: File: Soledad Mtn. Project

CUP 41, Map #213

Our Section has reviewed the attached subject documents and have the following comments:

The runoff of storm water and sediment from the site will be increased due to the increase in disturbed surface generated by the proposed development.

Therefore, This Section recommends the following be included in the Environmental Impact Report:

On site drainage study. This study shall quantify the volume and peak discharge rates of runoff from onsite and offsite sources. The study shall also quantify the volumes of sediment anticipated. Mitigation measures shall be enumerated and discussed. The study shall be subject to the review and approval of the Engineering and Survey Services Department.

KERN COUNTY AIR POLLUTION CONTROL DISTRICT THOMAS PAXSON, P.E., APCO

BAKERSFIELD OFFICE 700 "M" STREET, SUITE 290 BAKERSFIELD, CA 93301 PHONE: (805) 862-5250 FAX: (805) 862-5251



June 25, 1996

MOJAVE OFFICE 1775 HIGHWAY 58 MOJAVE, CA 93501 PHONE: (805) 824-4631 FAX: (805) 824-1140

Mr. Glenn Barnhill Kern County Planning Department 2700 "M" Street 100 Bakersfield, CA 93301

SUBJECT: Soledad Mountain Project, CUP 41, Map 213; CUP 22, Map 214

Dear Mr. Barnhill:

Kern County Air Pollution Control District hereby provides the following guidance regarding the scope and content of information the Golden Queen Mining project proponents will need to provide for KCAPCD to assess the project's expected air quality impact:

- 1. Pursuant to Rule 210.1 applicant shall supply Best Available Control Technology for all permitted equipment and processes.
- 2. Applicant shall calculate total expected emissions, including fugitive dust from non-permitted equipment, for purposes of determining the increased health risk associated with project.
- 3. Risk associated with toxic components emitted as particulates shall utilize PM₁₀ fraction of particulate for determining inhalation pathways and PM fraction (<30 um) for determining non-inhalation pathways of exposure.
- 4. Risk determinations shall follow most recent CARB-approved risk assessment guidelines and unit risk factors.
- 5. Applicant shall discuss applicability of models and meteorological data chosen for characterizing dispersion in project area.
- 6. Effect of project on ambient air quality standards shall be modelled pursuant to most recent U.S. EPA guidelines using maximum requested daily and maximum annual emissions estimates.

Mr. Glenn Barnhill June 25, 1996 Page 2.

- 7. Applicant shall address applicability of Federal Prevention of Significant Deterioration requirements.
- 8. Applicant shall supply copies of all emission calculations.
- 9. In addition to paper copies, applicant shall supply diskettes of the completed health risk assessment and ambient air modelling, including dispersion modelling and meteorological data.
- 10. Applicant shall describe measures to be taken to reduce nuisance potential and method of control and recordkeeping to ensure control efficiencies assumed in emission calculations and risk characterization will be achieved in practice.
- 11. Application for Authority to Construct shall include all information listed in KCAPCD List and Criteria and shall address compliance with each applicable Rule and Regulation.
- 12. CARB Risk Management Guidelines will be utilized by KCAPCD in considering approval of project.

Thank you for the opportunity to comment. Should you have any questions, please let me know.

Sincerely

Thomas Paxson, P.E.

Air Pollution Control Officer

TP:MJF:bjm

Kern County Museum Memorandum

June 26, 1996

TO:

Glenn Barnhill, Kern County Planning Department

FROM:

Carola Rupert Enriquez, Museum Director

RE:

Notice of DEIR on Soledad Mountain Project, CUP 41, Map 213; CUP 22,

andalupe?

Map 214

I have reviewed the DEIR on the subject property but am unable to make a determination as to the sufficiency of the document due to lack of information. Page 14 says that "The historical sites lie in areas which will be disturbed The existing structural remains, surficial and subsurface deposits, and shafts and adits will be affected." However, there are no pictures or descriptions of these resources. According to page 2, "Gold was first discovered at Soledad Mountain in 1894. The historically mined veins at the site include the Queen Esther, Silver Queen, Golden Queen, Starlight, Gray Eagle, Echo, and Soledad Extension." Page 3 continues that "By 1904, three stamp mills were processing ore from the underground mining of veins on the Queen Esther, Karma, Echo, Elephant and Gray Eagle claims." However, there is no further information on what remains from these early operations.

It would appear to me that a complete historical archeology assessment of the site is warranted before the sufficiency of an mitigation can be addressed.

DEPARTMENT OF TRANSPORTATION

500 SOUTH MAIN STREET BISHOP, CA 93514



(619) 872-0658

June 28, 1996

File: Ker-14-012.5

Mr. Glenn Barnhill Kern County Planning Department 2700 "M" Street, Suite 100 Bakersfield, California 93301

Notice of Preparation of a Draft Environmental Impact Report

Thank you for the opportunity to review and comment on the Soledad Mountain Project by the Golden Queen Mining Company, Inc. We have no comment at this time. If you have questions on this matter please call me at (619) 872-0658.

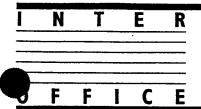
Sincerely,

DENNIS MANNING

Associate Transportation Planner

Dennis Manning

DM:mam



MEMO

To:

Glenn Barnhill, Special Projects Division Chief

Planning Department

From:

Susan Reid, AICP, Associate Planner 2

Waste Management Department

Subject:

Soledad Mountain Project, CUP 41, Map 213; CUP 22, Map 214

Date:

July 1, 1996

File:

20012

Thank you for the opportunity to review this project. The Kern County Waste Management Department has reviewed the application and has no comments.

SLR:am

MEMOS\M672-SLR.AM

KERN COUNTY WASTE
MANAGEMENT DEPARTMENT
2700 "M" Street, Suite 500
Bakersfield, CA 93301

(805) 805/862-8948 Fax: (805) 862-8901

DEPARTMENT OF FISH AND GAME REGION 4 1234 East Shaw Avenue Fresno, CA 93710 (209) 243-4014



July 8, 1996

Mr. Glenn Barnhill Kern County Planning Department 2700 M Street, Suite 100 Bakersfield, California 93301

Dear Mr. Barnhill:

Notice of Preparation Soledad Mountain Project, CUP 41, Map 213; CUP 22, Map 214, Golden Queen Mining Company

We have reviewed the Notice of Preparation for the Soledad Mountain gold mine project. We have also reviewed the Biological Study prepared by Bamberg Associates for this project, and participated in a project scoping session and site visit.

The Project is an open pit gold and silver mine, located in the western Mojave desert, about four miles southwest of the unincorporated town of Mojave. The Project site, including the proposed pit and processing facilities will encompass about 1,228 acres, of which about 782 are private and 153 are public (Bureau of Land Management). The Project site is an isolated volcanic peak surrounded by alluvial slopes and flat areas. Portions of the Project site are already significantly disturbed by historic mining activities. Other portions appear to be relatively good quality desert habitat.

A joint Environmental Impact Report and Environmental Impact Statement (EIR/EIS) will be prepared for this project. From the information obtained from the Initial Study, biological report and site visit, we are able to make the following initial assessments and recommendations:

- 1. No State Endangered, Threatened, or Special Concern animals appear to be present on the Project site. Therefore, authorization to take these species under the California Endangered Species Act is not necessary.
- 2. The ring-tailed cat (Bassariscus astutus) has been observed at the Project site. This animal is a Fully Protected Mammal in the State of California (Fish and Game Code Section 4700). We recommend that during operation of the mine, operators avoid

Mr. Glenn Barnhill July 8, 1996 Page Two

knowingly killing or injuring ring-tailed cats. We view this as a minor issue that is commonly addressed adequately without specific guidance from the Department.

- 3. Bat use of the site appears to be almost non-existent, therefore impacts to bats are not anticipated.
- 4. The EIR/EIS should include an evaluation of the potential for loss of this site in its current condition to cause significant cumulative impacts to plants and animals of the western Mojave desert. In the context of a regional approach to land-use planning, such as the Western Mojave Management Plan, such impacts would probably not be significant.
- 5. Isolated peaks such as Soledad Mountain can function as biological islands in the desert biome, and may contain uncommon physical habitats. Thus, such peaks may harbor populations of rare plants (and animals), usually associated with particular environmental or geographic conditions. The EIR/EIS should evaluate the potential for the project to cause significant impacts to plant populations that may be rare or of unusual scientific interest. At this time we are not aware of the need for similar concern regarding vertebrate or invertebrate animals.

To contribute to such an evaluation, our Department's Regional Plant Ecologist, Mr. Gene Cooley, is in contact with the applicant's biological consultant, Dr. Sam Bamberg. They are proceeding to clarify the taxonomic status of some of the plant species Dr. Bamberg collected from the project site. We will base any further recommendations to the County on the results of their work.

- 6. There are no lakes, ponds, or streams on the Project site. Natural drainage areas on the Project site have little or no channel definition, and are not expected to support aquatic life. A Streambed Alteration Agreement (Fish and Game Code section 1600 et seq.) will not be necessary for this project.
- 7. The design proposed for the acid heap leach piles, which would eliminate open puddles of toxic solution, seems likely to reduce or eliminate potential impacts to birds and most other wildlife, if the leach system functions as it is intended.

Thank you for the opportunity to provide input on this Project at an early stage. Should you have any questions or require further information, please contact Dr. Jeffrey Single,

Mr. Glenn Barnhill July 8, 1996 Page Three

Environmental Specialist or Mr. Dale Mitchell, Environmental Services Supervisor, at the address or phone number listed on the letterhead.

Sincerely,

George D. Nokes Regional Manager

cc: Ms. Laura M. Bazely, R.G.

WZI, Inc.

4700 Stockdale Highway, Suite 120 Bakersfield, California 93309

Mr. Ahmed Mohsen, EIS Coordinator Bureau of Land Management BLM Ridgecrest Resource Area 300 South Richmond Ridgecrest, CA 93555

Office Memorandum . KERN COUNTY

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DATE: 7.1.96

FROM : DE

Telephone No.

SUBJECT: GOLD QUEEN MINING OPERATION GOLEDAD MTH

Rec'd telecom this date from Jeff Eadfrey. Would like to be placed on mailing list for capies of EIR/EKS regarding above named project.

> Joff Godfrey All American Pipeline 5500 Ming Are., Suite 300 Bakersfield CA 93309 (806) 398 5329





ROBERT C. HIGHT, Executive Officer
(916) 574-1800 Fax (916) 574-1810
California Relay Service from TDD Phone 1-800-735-2922
from Voice Phone 1-800-735-2929

July 15, 1996

File Ref: SD 96-06-25.1

Glenn Barnhill Kern County Planning Department 2700 M Street, Suite 100 Bakersfield, CA 93301

Dear Mr. Barnhill:

Subject:

Soledad Mountain Project, CUP 41, Map 213; CUP 22, Map 214

Staff of the State Lands Commission (SLC) has reviewed the Notice of Preparation for the Soledad Mountain Project. Based on this review we offer the following comments.

By way of general background, upon admission to the Union in 1850, California acquired nearly 4 million acres of sovereign land underlying the State's navigable waterways. Such lands include, but are not limited to, the beds of more than 120 navigable rivers and sloughs, nearly 40 navigable lakes, and the 3 mile wide band of tide and submerged land adjacent to the coast and offshore islands of the State. These lands are managed by the SLC.

Shortly after becoming a State, California was also granted Sections 16 and 36 (2 square miles), or lands in lieu thereof, out of each township (36 square miles) then held by the federal government. The lands, classified as "School Lands", were given to the State to help support public education. While many of the School Lands were sold off over the years, the State retains an interest in approximately 1.3 million acres of mostly desert and forest lands. State legislation has mandated that revenues from these school lands accrue to the State Teachers' Retirement System. The SLC also has jurisdiction and authority over School Lands and lieu lands.

The proposed project area includes patented lieu lands where the State has a 1/16th reserved mineral interest. This reserved mineral interest is under the jurisdiction of the SLC and is located on Lots 2 and 20 in Section 6, T10N, R12W, SBM. Therefore, specific development involving this land should be reviewed by the SLC to assure that such development is consistent with State interests. Additionally, planning efforts for this area should consider the State's residual interests and address such interests within the draft document.

Glenn Barnhill July 15, 1996 Page Two

Thank you for the opportunity to comment. If you have any questions, please contact Alex Gonzalez at (310) 590-5220.

Sincerely,

MARY GRIGGS

Environmental Services Division of Environmental Planning and Management

cc:

Dwight E. Sanders

Alex Gonzalez

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LAHONTAN REGION

14CTORVILLE BRANCH OFFICE 28 CIVIC DRIVE, SUITE 100 1CTORVILLE, CA 92392-2359 (619) 241-6583 FAX No. (619) 241-7308



July 19, 1996

Glenn Barnhill Kern County Planning Department 2700 M Street, Suite 100 Bakersfield, CA 93301 State Clearinghouse 1400 Tenth Street Sacramento, CA 95814

Dear Mr. Barnhill:

COMMENTS ON THE NOTICE OF PREPARATION (NOP) FOR A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), SOLEDAD MOUNTAIN PROJECT, SCH NO. 96061052, CUP 41, MAP 213, CUP 22, MAP 214, KERN COUNTY

Regional Board staff (staff) has reviewed the NOP for the subject draft EIR. According to Section 15381 of CEQA guidelines, the Regional Board is considered a responsible agency to consider approving the project and comment on the NOP and subsequent environmental documents for this project. Staff requests that Kern County address the comments related to water quality issues listed below in the draft EIR.

The draft EIR should either a) fully respond to the issues discussed below, or b) describe in detail how the issues below will be addressed and state the criteria the owner and/or operator will use to address the issues below. The level of detail needed to address the comments below must be sufficient such that the Regional Board can fully consider approval of the project based on the information contained in the final CEQA document for this project. The issues discussed in this letter are generally divided as follows:

- o wastes that currently remain on the project site from former mining activities;
- o requirements of Chapter 15, Title 23, California Code of Regulations (siting, construction, operation and maintenance, and closure/post-closure of waste management units (WMUs));
- o applicability of the General Construction Activities Storm Water Permit and Amended General Industrial Activities Storm Water Permit programs; and
- o domestic wastewater disposal.
- o applicability of Section 401 of the Clean Water Act Water Quality Certification

Mr. Barnhill July 19, 1996 Page -2-

Wastes that Currently Remain on the Project Site from Former Mining Activities

Staff understands that there are mine tailings located on an unlined portion of the project area that are reportedly from the former Gold Fields America project. The discharge of mine tailings resulted from past cyanide vat leach operations. The tailings need to be fully characterized for cyanide and other constituents of concern content to determine the level of detoxification. Staff further understands that the project proponent may propose to use the tailings as a liner cushion material underlying the proposed synthetic liner system for the heap leach pads in the future. The draft EIR should contain the following information in detail form:

- o a description of the Gold Fields America project and all chemicals that were used;
- o an assessment of any past impacts to the immediate environment before any of the tailings are mobilized, and any potential future impacts related to future mobilization;
- a description of any other former mining operations that were located on the project site and chemicals that were used;
- o an assessment of each former mining operation, including analysis of any remaining actual or potential water quality impacts from past discharge of waste, and, if necessary, measures to remove the threat to water quality;
- a report containing results of ground water investigations that indicates if ground water has been impacted due to past mining operations, and, if necessary, measures to address any impacts to ground water quality; and
- a statement regarding the responsibility of Golden Queen to address any past environmental impacts, including ground water impacts, due to former mining operations on the project site.

Requirements of Chapter 15, Title 23, California Code of Regulations (Chapter 15)

The draft EIR should specifically cite Chapter 15 as the regulations that will be used by the Regional Board to regulate discharge of wastes at the project site. Supporting information, as outlined below, for compliance with Chapter 15 should also be included in the draft EIR. The draft EIR should include detailed measures and actions, in compliance with Chapter 15, to protect water quality during siting, construction, operation, and closure/post-closure maintenance for the WMUs that will be regulated under Chapter 15. In addition, the draft EIR should include a detailed scenario to address a reasonably foreseeable release from the WMUs as required by Chapter 15.

Mr. Barnhill July 19, 1996 Page -3-

The information should be presented in the draft EIR in an understandable written, tabular, and graphic format as appropriate, and should be at a level of detail appropriate for the WMU classification. Plans, diagrams, and other graphics should be prepared to appropriate scale and each should include a legend identifying the information presented. All sources of data requested below should be identified.

General

The draft EIR should contain an analysis describing how the ground water may affect the WMU and how the WMU may affect ground water. This information is used to determine the suitability of the unit with respect to ground water protection and avoidance of geologic hazards. It will also be used to demonstrate that the unit meets the classification criteria set forth in Chapter 15.

Owners and operators of proposed WMUs should provide the following information to include in the draft EIR. The information should be related to the physical characteristics of the WMU and the surrounding region in order to demonstrate suitability for the appropriate classification.

SITING -

Staff has tentatively rated the proposed wastes for discharge to the WMUs for cyanide leaching of precious metals as Group A wastes according to Section 2571 of Chapter 15.

Topography

Section 2572 of Chapter 15 requires that mining WMUs containing Group A waste must be located outside the 100-year floodplain. The draft EIR should contain information to indicate that mining WMUs that contain Group A wastes will be located outside the 100-year floodplain, if this is the case. The draft EIR should contain the following information:

a map of the proposed WMU area and its surrounding region within one mile of the unit, showing elevation contours, natural ground slopes, drainage patterns, and other topographic features. The draft EIR should also identify whether the facility is located within the 100-year floodplain. This identification must indicate the source of data for such determination and include a copy of the relevant Federal Insurance Administration (FIA) flood map, if used, or the calculations and maps used where an FIA map is not available. Information should also be provided identifying the 100-year floodplain and any other special flooding factors that must be considered in designing, constructing, operating, or maintaining the facility to withstand washout from a 100-year precipitation event;

Mr. Barnhill July 19, 1996 Page -4-

- engineering analysis to indicate the various hydrodynamic and hydrostatic forces expected to result at the site as a consequence of a 100-year precipitation event; and
- structural or other engineering studies showing the design of WMUs and flood protection devices (e.g., floodwalls, dikes) at the facility and how these will prevent washout.

Climatology

- calculations of climatologic values for WMUs from measurements made at a nearby climatologically similar station. In addition to the calculations for each unit, the draft EIR should provide the source data from which such values were calculated, together with the name, location, and period of record of the measuring station;
- a map showing isohyetal contours for the proposed WMU and its surrounding region within ten miles, based on data provided by the National Weather Service or other recognized federal, state, local, or private agencies;
- o estimated maximum and minimum annual precipitation values at the proposed WMUs;
- o maximum expected 24-hour precipitation for storm conditions;
- o estimated mean, minimum, and maximum evaporation, with the months of occurrence of maximum and minimum evaporation;
- o projected volume and pattern of runoff; and
- o an estimated wind rose showing wind direction, velocity, and percentage of time for the indicated direction.

Geology

- a geologic map and geologic cross-sections at areas underlying the WMU showing lithology and structural features. Cross-sections should be indexed to the geologic map and should be located to best portray geologic features relevant to discharge operations;
- a description of natural geologic materials underlying the WMU and its surroundings, including identification of rock types, nature of alteration depth and nature of weathering, and all other pertinent lithologic data;

- a description of natural geologic materials underlying the WMU, including the attitude of bedding (if any); thickness of beds (if any); the location, attitude, and condition (tight, open, clay- or gypsum-filled, etc.) of any fractures; the nature, type (anticlinal, synclinal, etc.) and orientation of any folds; the location, attitude, and nature (tight, gouge-filled, etc.) of any faults; and all other pertinent structural data;
- the results of a testing program for determination of physical and chemical properties of soils needed to formulate detailed site design criteria;
- a determination of the expected peak ground acceleration at the WMU location associated with the maximum credible earthquake and/or maximum probable earthquake. The methodology used should consider regional and local seismic conditions and faulting. Data and procedures should be consistent with current practice and should be based on an identified procedure or publication. The analyses should include modifications to allow for site-specific surface and subsurface conditions. The peak ground acceleration so determined should be the stability and factors of safety for all embankments, and cut slopes during the design life of the unit. The analysis should include:
 - the method used to calculate the factors of safety (e.g., Bishop's modified method of slices, Fellinius circle method, etc.);
 - the name of any computer program used to determine the factors of safety; and
 - a description of the various assumptions used in the stability analyses (height of fill, slope-and-bench configuration, etc.).

On page 13 of the NOP, it states that the site could be subject to significant ground shaking due to the proximity of known holocene active faults. Section 2572 of Chapter 15 states the following:

"New mining WMUs ... containing Group A and B wastes should not be located on Holocene faults. Units for Group C wastes may be located on Holocene faults if displacement will not allow escape of wastes or cause irreparable damage to containment structures."

If the WMUs will be proposed to be located on holocene faults, then staff does not intend to recommend that waste discharge requirements be adopted for the project. The draft EIR should state that the WMUs will not be located on holocene faults, if this is the case.

Section 2572 of Chapter 15 also states that "New mining WMUs ... should be outside of areas of rapid geologic change. Exemptions may be allowed by the Regional Board if containment structures are designed and constructed to preclude failure." The draft EIR should contain

Mr. Barnhill July 19, 1996 Page -6-

detailed information regarding the level of potential geologic change, including the <u>effective</u> peak ground acceleration (if it is under consideration as a design parameter) that may be used for design criteria.

Owners and operators who own or operate the proposed WMUs should demonstrate that no faults which have had displacement in Holocene time pass within 200 feet of units. This demonstration may be made using either published geologic data or data obtained from field investigations carried out by the applicant. The information provided should be acceptable to geologists experienced in identifying and evaluating seismic activity. The information submitted should show that either:

- o no faults which have had displacement in Holocene time are present, or no lineations which suggest the presence of a fault (which have displacement in Holocene time) within a margin of 3,000 feet outside of a facility are present, based on data from:
 - published geologic studies;
 - aerial reconnaissance of the area within a 5-mile radius from the facility;
 - an analysis of aerial photographs covering a 3,000-foot margin outside of the facility; and
 - if needed to clarify the above data, a reconnaissance based on walking portions of the area within a margin of 3,000 foot outside of the facility,

or

if faults (to include lineations) which have had displacement in Holocene time are present within a margin of 3,000 feet outside of a facility, no faults may pass within 200 feet of the portions of the facility where treatment, storage, or disposal of hazardous waste will be conducted. Unless a site analysis is otherwise conclusive concerning the absence of faults within 200 feet of such portions of the facility data should be obtained from a subsurface exploration (trenching) of the area within a distance of no less than 200 feet from portions of the facility where treatment, storage, or disposal of hazardous waste will be conducted. Such trenching should be performed in a direction that is perpendicular to known faults (which have had displacement in Holocene time) passing within a margin of 3,000 feet of the portions of the facility where treatment, storage, or disposal of hazardous waste will be conducted. Such investigation should document with supporting maps and other analyses, the location of faults found.

o any method to determine any known Holocene fault within 200 feet of the facility must be approved by staff.

Hydrology

- an evaluation of the water-bearing characteristics of the natural geologic materials including determination of permeability, delineation of all ground water zones and basic data used to determine the above;
- o an evaluation of the in place permeability of soil immediately underlying the WMU.

 This evaluation should include:
 - permeability data, in tabular form, for selected locations within the unit;
 - a map of the unit showing test locations where these permeability data were obtained;
 - an evaluation of the test procedures and rationale used to obtain these permeability data;
 - an evaluation of the perennial direction(s) of ground water movement within the uppermost ground water zone(s) within one mile of the waste management facility perimeter;
 - estimates of the height to which water rises due to capillary forces above the uppermost ground water zone(s) beneath and within one mile of the waste management facility perimeter. These estimates should include an evaluation of the methods and rationale used in their development;
 - a map showing the location of all springs in the waste management facility and within one mile of its perimeter. The map should be accompanied by tabular data indicating the flow and the mineral quality of the water from each spring;
 - an evaluation, supported by water quality analyses, of the quality of water known to exist under or within one mile of the waste management facility perimeter including all data necessary to establish water quality protection standards; and
 - a tabulation of background water quality for all applicable indicator parameters and waste constituents.
- background water quality for all indicator parameters or waste constituents in ground water should be based on data from at least quarterly sampling of wells upgradient

from the WMU for one year prior to waste discharge. The owner and/or operator should coordinate with staff to formulate a list of indicator parameters. The list should also contain the constituents added in the conglomeration process that may be used to produce uniform soil units for the leaching process. The analyses mentioned above should:

- account for measurement errors in sampling and analysis; and
- account for seasonal fluctuations in background water quality.
- background water quality of ground water may be based on sampling of wells that are not upgradient from the WMU where:
 - hydrogeologic conditions do not allow the determination of the upgradient direction; or
 - sampling at other wells will provide a representative indications of background water quality.
- o in developing the data base used to determine a background value for each indicator parameter or waste constituent in ground water, the owner and/or operator should take a minimum of one sample quarterly from each well used to determine background.

Land and Water use

- a map showing the locations of all water wells, oil wells, and geothermal wells or any other water related infrastructure in the WMU or within one mile of its perimeter;
- o name and address of the owner of each well indicated;
- o well information for each water well where available, to include, but not limited to:
 - total depth of well;
 - diameter of casing at ground surface and at total depth;
 - type of well construction (cable-tool, rotary, etc.);
 - depth and type of perforations;
 - name and address of well driller;
 - year of well construction;

- use of well (agricultural, domestic, stock watering, etc.);
- depth and type of seals;
- lithologic, geophysical, and other types of well logs, if available, and
- water levels, pump tests, water quality, and other well data, if available.
- description of current land use within one mile of the perimeter of the WMU, to include, but not limited to:
 - types of land use (e.g., residential, commercial, industrial, agricultural, recreational, etc.);
 - types of crops;
 - types of livestock;
 - · number and location of dwelling units; and
- current and anticipated future use of ground water within one mile of the perimeter of the WMU.

Acid Generating Potential

The draft EIR should discuss acid rock drainage and contain a detailed evaluation of the acid generating potential of proposed ore, ore body, and any excavation exposed to the environment during operation.

CONSTRUCTION -

WMU Construction Plan

The draft EIR should contain language stating that a WMU construction plan will be developed and submitted for approval to the Regional Board. Portions or all of the WMU construction plan relevant to mitigating potential environmental impacts should be included in the draft EIR. The construction plan should include information related to all aspects of construction of the WMUs including, but not limited to, subgrade preparation, fill, compaction, liner details and installation, and the information below.

Mr. Barnhill July 19, 1996 Page -10-

Quality Assurance/Quality Control

The draft EIR should contain a plan to maintain quality assurance/quality (QA/QC) control during construction of WMUs (i.e., supervision by a professional civil engineer, registered geologist, and/or certified engineering geologist) and for laboratory work (i.e, sample collection, preservation, shipment, chain of custody, etc.).

Liners

The liners of the WMUs must meet specifications of Section 2572(f) of Chapter 15. The draft EIR should discuss the preferred alternative design(s) and type(s) of liner(s) that will be used to meet Chapter 15 specifications. The design should include consideration of permeabilities that must be relative to the fluids, including waste or leachate, to be contained. The permeability of clay liner material should not exceed 1 x 10⁻⁶ cm/s. Clay liners should be a minimum of two feet thick and should be installed at relative compaction of at least 90 percent according to American Society of Testing and Materials (ASTM) method D698-91 or D1557-91.

Staff will be requiring that a sealed double ring infiltrometer test (SDRI) be used as a field test on a clay liner test pad constructed prior to installation of the proposed clay liner to ensure that the proposed clay liner will meet permeability requirements. The clay liner test pad should be constructed similar to the proposed clay liner of the WMUs. The draft EIR should state that the SDRI will be used to determine permeability of the clay liner test pad. Other field test methods (i.e., air permeameter test) should also be identified in the draft EIR. Other field tests methods should be identified and used on the clay liner to ensure that clay liner meets quality control/quality assurance during construction.

Slope Analysis and Friction Between Liner System Components and Subgrade

The draft EIR should contain an analysis of and design criteria for slope stability of the proposed WMUs. The draft EIR should also contain design criteria for friction between the synthetic liner system and subgrade to mitigate potential interface slippage within the WMUs. The design criteria should be based on seismic analysis, including determination of maximum credible earthquake, maximum probable earthquake, and peak ground acceleration, etc., mentioned above.

Leachate Collection and Removal Systems for Group A Wastes

The draft EIR should contain a design for leachate collection and removal systems (LCRSs) of the WMUs. The LCRS must conform to specifications contained in Section 2572(g) of Chapter 15. All LCRSs should be designed to meet the following performance criteria:

- be capable of collecting and removing twice the maximum anticipated daily volume of leachate from the WMU;
- have strength and thickness to prevent collapse under pressures exerted by overlying wastes, waste cover materials, and by any equipment that may be used at the WMUs;
- have slopes that prevent ponding on the lower liner;
- to allow free flow of leachate (i.e., no blockage by liquid in the collection sump) into the leachate collection sump;
- be capable of conveying leachate migrating into any portion of the LCRS to the leachate detection sumps within 24-hours of leachate migration into the LCRS;
- to keep the depth of liquid in the leachate collection sump to a minimum; and
- to function without clogging.

The QA/QC plan mentioned above must contain measures to remove any liquid that may accumulate on the lower liner prior to installing the upper liner of a double liner system (i.e., the LCRS must not contain any free liquid prior to discharge of waste).

Precipitation and Drainage Controls

The applicant must comply with precipitation and drainage control requirements contained in Sections 2546(d) and (e) of Chapter 15. The draft EIR should identify diversion and drainage facilities to accommodate the anticipated volume of precipitation and peak flows from surface runon and runoff from a 25-year, 24-hour storm. Precipitation on Group A and B waste piles that is not diverted by containment structures should be collected and managed through the leachate collection and removal system.

WMU and containment structures must be designed and constructed to limit, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, washout, and overtopping under the precipitation conditions for a 100-year storm event. The EIR should state the number of inches of precipitation in 24 hours for a 100-year storm event, and the technical basis for determining the 100-year storm event.

Diversion and drainage facilities should be designed and constructed to accommodate the anticipated volume of precipitation and peak flows from surface runoff under the precipitation conditions for the 100-year storm event.

Mr. Barnhill July 19, 1996 Page -12-

The draft EIR should identify the collection and holding facilities associated with precipitation and drainage control systems. These facilities should be either emptied immediately following each storm or otherwise managed to maintain the design capacity of the system. Surface and subsurface drainage from outside of a WMU should be diverted from the WMU. Surface drainage should also be diverted from the proposed open pit upon closure and post-closure maintenance.

Ground Water Monitoring System

Section 2550.7 of Chapter 15 requires a ground water monitoring system (GWMS). The draft EIR should identify a preferred ground water monitoring system that will be used to detect a release from the WMUs to ground water. There must be a minimum of three ground water monitoring wells (one upgradient and two downgradient) in a triangular pattern to define a plane and to determine the ground water flow direction. Moreover, the minimum number of ground water monitoring wells must be sufficient to detect a release from any portion of the WMUs to ground water at the earliest possible detection of a release. The GWMS must be installed for ground water samples to be collected and analyzed for constituents of concern for one year prior to discharge of wastes into the WMUs. Constituents of concern are defined in Chapter 15 as "any waste constituents, reaction products, and hazardous constituents that are reasonably expected to be in or derived from waste contained in a WMU."

Unsaturated Zone Monitoring System

Section 2550.7(d) of Chapter 15 requires an unsaturated zone monitoring system (UZMS). The draft EIR should identify a preferred UZMS that will be used to detect a release from the WMUs to the unsaturated zone. The UZMS must have a sufficient number of background monitoring points, including a number outside the boundaries of and beneath the WMUs, to yield soil-pore liquid measurements that represent the quality of soil-pore liquid that has not been affected by a release from the WMUs. The UZMS must be established at appropriate locations and depths to yield soil-pore samples that provide the best assurance of the earliest possible detection of a release from the WMUs. In addition, the UZMS must be established at appropriate locations that will detect a release from any portion of the WMUs.

OPERATION -

Action Leakage Rate

The draft EIR should contain a proposal for an action leakage rate (ALR) for triggering corrective action should the amount of liquid draining into the LCRS of each WMU exceed the ALR. Corrective action must reduce the amount of liquid draining into the LCRS to below the ALR level. The Federal Register dated January 20, 1992, and 40 Code of Federal Regulations Parts 260, 264, 265, 270, and 271, contain guidance information regarding the determination of ALRs (and RLLs discussed below) for corrective action.

Mr. Barnhill July 19, 1996 Page -13-

Rapid and Large Leakage Rate

The draft EIR should contain a proposal for addressing a rapid and large leakage rate (RLL), which will be used for triggering stoppage of waste discharge to the WMUs and immediate corrective action should the amount of liquid draining into the LCRS of each WMU exceed the RLL. The RLL was defined by the federal EPA as the maximum design leakage rate plus a safety factor that the LCRS can remove under gravity conditions. Corrective action must reduce the amount of liquid into the LCRS to below the ALR level.

Ground Water Monitoring

The draft EIR should also identify the preferred statistical method (either intrawell or interwell) to detect a release of constituents of concern in down gradient ground water monitoring wells. If the geology is relatively complex, staff recommends that an intrawell comparison be used provided adequate background is obtained. If ground water supply wells will be located near the monitoring wells, then the draft EIR should discuss any drawdown effects from operation of supply wells on the GWMS.

Unsaturated Zone Monitoring

The draft EIR should also identify the preferred statistical method to detect a release of constituents of concern in the unsaturated zone.

General Maintenance of the WMUs

The draft EIR should contain a general maintenance plan to maintain the integrity of the WMUs after construction is completed to ensure that wastes are contained. The general maintenance plan should contain the frequency of inspections, aspects of the WMUs that should be inspected to maintain the WMUs, and a contingency plan to implement corrective action should irregularities be found during inspections.

Reasonably Foreseeable Release

Section 2550.0 of Chapter 15 requires the owner and/or operator to submit financial assurances to the Regional Board for addressing a reasonably foreseeable release (RFR) scenario. The purpose of the financial assurance will be to allow the Regional Board to address a release from the WMUs to ground water should the owner and/or operator fail to address a release. A RFR is considered a typically of a release of wastes or leachate from the WMUs to ground water. The draft EIR should contain a corrective action plan for addressing a RFR scenario.

Mr. Barnhill July 19, 1996 Page -14-

Chemicals used at the Mine - Storage and Disposal

The draft EIR should contain a list and quantities of all chemicals that will be stored and how the chemicals will be used at the mine. The draft EIR should also state the disposal method for each of the spent or waste chemicals in a manner protective of water quality.

Vehicle Maintenance

The draft EIR should describe the facilities (i.e., concrete pads, roof, drainage and wastewater collection facilities) that will be used to maintain vehicles and measures to ensure that any chemicals used will be disposed of legally in a manner protective of water quality. The draft EIR should also describe the quantity and quality of any wastewater that may be generated from vehicle maintenance activities and a disposal method protective of water quality.

Storage Tanks

The draft EIR should describe all storage tanks, including their function and capacity, and related ancillary facilities, that will be used at the mine. The draft EIR should also describe measures to maintain the integrity (i.e., inspections, potential corrective measures) of tanks and ancillary facilities to ensure that water quality will be protected.

CLOSURE AND POST-CLOSURE OF THE WMUS -

Section 2574 of Chapter 15 requires the owner and/or operator to submit financial assurances to the Regional Board for addressing closure and post-closure maintenance of the WMUs. The draft EIR should contain a preferred preliminary closure and post-closure maintenance plan (PCPCMP) and related enumerated cost estimates. The PCPCMP must include procedures contained in Section 2574 of Chapter 15 to ensure that the WMUs are closed in a manner protective of water quality. The WMUs can be closed in one of two ways - either clean closed or closed as a landfill in accordance with Section 2581 of Chapter 15. If the WMUs used for leaching cyanide will be closed as landfills, then the owner and/or operator must conduct studies to determine the type and characterization of the wastes that will be generated in the WMUs during operations, and the type and characterization of wastes that will be left in-situ during closure and post-closure maintenance. The closure scenario will depend on the type and characterization of wastes that will be left in-situ during closure and post-closure maintenance. The draft EIR should discuss a preferred method and contain a preferred plan, with alternatives, that will be used for detoxification of wastes in the WMUs. Procedures for decommissioning wells used for ground water monitoring must also be included in the PCPCMP.

Mr. Barnhill July 19, 1996 Page -15-

Storm Water Permits

The draft EIR should state that the owner and/or operator is required to determine applicability of the General Construction Activities Storm Water Permit and Amended General Industrial Activities Storm Water Permits that are administered by the State Water Resources Control Board. Both of the permits require the owner and/or operator to implement a storm water pollution prevention plan and a monitoring plan to mitigate potential degradation of receiving waters from surface water runoff from the entire mining operation.

Domestic Wastewater Disposal

The draft EIR should state that domestic wastewater must be disposed of in accordance with all applicable state and local regulations. The draft EIR should also identify the method of domestic wastewater disposal and all sources, including projected quantities, of domestic wastewater from the project.

Applicability of Section 401 of the Clean Water Act - Water Quality Certification

The draft EIR should state that there are no wetlands, and a technical basis for determining that there are no wetlands, if this is the case. In addition, the draft EIR should state that the owner and/or operator must review the applicability of Section 401 of the Clean Water Act. If applicable, the owner and/or operator must submit an application for Section 401 - Water Quality Certification to the Regional Board.

Thank you for the opportunity to comment on the NOP. If you have any questions, please contact Ted Evans (responsible agency contact person) at (619) 241-7393 or myself at (619) 241-7404.

Sincerely.

Kenn Carter Senior Engineer

cc:

Regional Board members Steven Blum, OCC Ahmed Mohsen, BLM Dave Weiss, WZI

rp9/barnhill.ltr[goldenqueen]

Ahmed Mohsen BLM 300 South Richmond Blvd Ridgcrest, CA 93555

Dave Weiss WZI 4700 Stockdale Highway, Suite 120 Bakersfield, CA 93389

P.O. Box 999 Mojave CA 93502-0999 805-824-8417 Fax: 805-824-8213

July 26, 1996

Mr. Glenn Barnhill
Special Projects Division Chief
Planning and Development Services
Resource Management Agency
County of Kern
2700 M Street - Suite 100
Bakersfield CA 93301

Dear Glenn:

The Mojave Town Council is quite interested in the approval process for the proposed Golden Queen Mine. We wish to be kept informed of all public meetings, notices, documents, etc. during this process. Our address and fax number are listed above.

We also wish to submit the attached questions to which we request answers to help us in our efforts to reach a decision on support or opposition to this proposal.

Your cooperation in this matter will be appreciated.

Sincerely yours,

William H. Deaver

President

Enclosure

cc: Supervisor Steve Perez

Laura Bazeley

Questions on Proposed Golden Queen Mine

- 1. Does Golden Queen Mine have any business associations, etc. with the firms operating the Cactus Queen and Standard Hill mines?
- 2. Did any employees at Cactus/Standard report illnesses as the result of working at the Cactus or on Standard Hill? If so, what are the details?
- 3. Have any claims for alleged illness or injury been paid to people living in the vicinity of either of these operations? If so, what are the details?
- 4. How will the mine's water usage affect local water availability?
- 5. We have been told that monitoring by public agencies of the Cactus and Standard Hill operations have been ineffective. Is this true?
- 6. What benefits other than pay will be provided to employees at the Golden Queen Mine (e.g.: health insurance, etc)?

The Gas Company



July 18, 1996

Glen Barnhill
COUNTY OF KERN
Planning Department
2700 "M" Street, Suite 100
Bakersfield, CA 93301

Subject: Notice of Preparation of a Draft Environmental Impact Report, Soledad Mountain Project, CUP 41, Map 213: CUP 22, Map 214, Mojave area of Kern County, California. (Gas Co. Atlas # EG07B02, etc. and Easement No P-14794))

Southern California Gas Company

9400 Qakdale Avenue

Chatsworth, C.A

Mailing Address: Box 2300

Chatsworth, C.A 91313-2300

91313-2300

Dear Glen:

This letter is to notify that the Gas Company has high pressure facilities in the area of this proposed project running in a north to south easement at the east foot of Soledad mountain and in Silver Queen Road. Gas Co. Atlas sheets are enclosed.

Due to the nature of the mining and the proving-up processes, notification a week before **blasting** in the vicinity of our pipeline for safe engineering of the blasting weight and distance is necessary. Please call Mr. James Strader, P. E., in this office at 818-701-3338 for the related engineering.

If you require further information or have any questions call me at 818-701-3324.

Sincerely,

Jim Hammel

Technical Services, Northern Region

Enclosures

c: D. Shea, Mojave District Base
J. Strader, Engineering
City Correspondence File

C:\AgencyCom\Kern_will.doc

Pacific States Land Company

July 25, 1996

Kern County Planning Department 2700 M Street Ste 100 Bakersfield CA 93301

Dear Glenn Barnhill

I am in receipt of your Notice Of Preparation Of A Draft Environmental Impact Report regarding the Soledad Mountain project.

After review of your package I am surprised to hear that Kern County would be considering this project. As you can see on your map Exhibit #2 dated 6/96, there is a residential subdivision abutting the east side of Soledad Mountain, along Silver Queens Rd, 1/4 mile west of Highway 14. There are approximately 732 residential parcels in this subdivision. There are presently a minimum of 7 family homes built in this surrounding area.

Would you like to live next door to a 24 hr 7 day week mining operation, which would include blasting, chemicals, blowing dust,dump trucks and possible water contamination. I do not believe you or I would. I would like to think the county of Kern would be considering the safety and welfare of these property and or home owners.

I am truly opposed to this Soledad Mountain Project and expect to be informed of any meetings and or progress on this matter. I can also be reached at the phone number listed below.

Sincerely,

Brett A. Karlovich

President

Certified Z 093 134 928

To: Glen Barnhill Kern County Planner

From: James A. Hooper re: Golden Queen Mine

Members of my family have lived on Backus Road in Mojave, directly downwind from the proposed Golden Queen Mining operation, since 1955. As such, I have been aware of the promises made by Kern County Planning to residents of the area. Specifically, at one tme, when the planning commission sought to restrict the land use to 2 ½ acre ranches, we residents were told that, in agreeing to the change, we were thereby assured the area would retain the desirable characteristics commensurate with the new "small ranch" zoning. (Quietness, less traffic, higher income level of resident, etc.) Obviously, the proposed mining operation flies in the face of these prior committments.

The Golden Queen Mine is out of place in the area at this time—vastly out of place. There are approximately 90 residential units (I personally counted them) down wind or downstream from the proposed mine. All of these families will be impacted negatively and substantially by the operation. The list of negative impacts is a long one and they will occur to one degree or another.

- 1. Airborne dust
- 2. Airborne toxin
- 3. Water table depletion
- 4. Groundwater pollution
- 5. Noise from 24 hour operation
- 6. Vibrations and underground shock waves caused by blasting
- 7. Heavy truck traffic on Backus and Silver Queen Road
- 8. Spills of fuel and other toxins (mercury, arsenic, cyanide, etc.)
- 9. Drops in real estate value and development
- 10. Historic Mt. Soledad will largly become a pit and heap-leach piles 11. etc.

If you were living downstream or downwind from such a project, wouldn't you stand up against it?

All of these negative impacts are countered, in the eyes of some, who see the open pit mine in mere short-term economic interests, by the promise of a handful of local jobs and other economic benefits. However, Golden Queen Mine's own people have said publicly that the jobs will go mostly to outsiders. Also, the Golden Queen Mine is a Canadian corporation—even though it's been packaged to make it seem otherwise.

Furthermore, our area is already being impacted by other huge threats to public health and safety: two cement plants, Cactus and Standard Hill mines (even if these mines are not operating concurrently, we are living with their destructive impacts.)

Please let your conscience be your guide and do not permit this out of place project.

Sincerely,

James C. Hooper

2700 M Street, Suite 100 Bakersfield, California 93301

Attn: Glenn Barnhill

There seems to be some misconception by Golden Queen Mining Company and parts of the Media believing that almost everyone in the local area being in favor of the Soledad Mountain Mining Project. Nothing could be farther than the truth. We are enclosing copies of a petition signed by people in this area who are not in favor of this endeavor. These people do not believe that it will benefit them in any way and that their will be great detriment to their health safety and welfare. The signed petitions are being sent at this time as we understand that the cutoff date is 24 July 1996. However, we continue to get signatures from others who are also not in favor this project and are greatly concerned for their health, water quality and supply and property value.

Sincerely,

Stephen and Susan Mathis

Dur S. mai

9201 Shirley St. Mojave, CA 93501

An International Mining Corporation is proposing to Mine Soledad Mountain at an unprecedented level which will dramatically alter the Mountain and adversely affect life in our community. If you do not want this proposed cyanide-driven, heap-leach, open pit mine in your back yard, please join us and stand against this assault on our quality of life. We must all work together to keep our air clean and healthy and our ground water safe.

We the undersigned are opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain Project, Mojave, Kern County, California.

	Name & Signature, Date:	Address:
	Print: John & Gergean	16548 Del NORTE
	Signature of C. Flordson Date: 4 July 96	16548 Del NORTE Majare Calif. 93501 16548 Del Monte
	Print: Maria G Gsadean	16548 Del Monte
	Signature: Maria C. Cradean Date: 7 Julyin	Morano (cl. 9350)
	Print: CLETA HUDSON	16536 DEL NO 275
	Signature: Caleta 14 william 7-12-96	MOJave (6 9350)
	Print Alta R SEALE	11536 Del NorTE De
	Signature: Date: 7.12 - 96	Maixo Ca 43501
	Print: ANN LITTLE	16561 Del N'ONTE
	Signature: Date:	1
·	Joure Manasra	2849 Berita Ave.
	Joyce 11/anasra 7/12/96	Mojare, CA 93501
	Print: Ed Little	18915 0 57
	Signature: Date: 7-1496	Mojave Ca 93901
	I ANDONNA M. LITTLE	1 15415 (2) 57
	Signature: Date: 9-12-96	MOJAVE, CA 93501
	Print ALLen Mitchell	16524 Del Norte Dr
	Signature: Date: 9-19-21	M 67 d 08, C3. 93501
	JEANNETTE MITCHELL	16524 PE/NORTE
	Signature: Date: 9/19/96	10 AVE Ca. 93501
	James a HOORE	3966 Backus Rd.
	James A- Hooper of	mojare, Calif 9350/
	Manlaur Alson	
	Mache Hoper	in the second se
	Marlene Hoper	

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	Name & Signature, Date:	Address:
	Susan M. Mathis, 62094	901 Shirley St
1.	Susan M. mothis	Mojave, CA 93501
	WAYNE ROWLEY 6/20/96	4049 TRUNTAGE RIW.
2	Tipine Kowles	MO AUE CA 9350/
	Alikia F Rowley 6/20/96	9049 frontage Rd W.
3	Wicia Truley	Mijave, A 9350/
4	Oty Oliver 6/20/96	May Are (a 750/ Olive
5	Skerly Olever 6-20-96	Wy sue Ca 9350/ Snirie
	CLAYDIA VIIVER	Fackus Rd
6	Clautia Oliver	Mojave CA 93501
7	Cathet. Sedam Cotty	
1	Cathur L. Sodam	9081 Soledad Ave Mojace
	Janet Hitchen	9200 tempered
8	Donet Station 620-96	Marque Ca 9350
	Thim Hitchen	9200 Thenen Prd.
19	Them Notober 6-20-96	Mojave C+ 93501-
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Address: Name & Signature, Date: B 14 15 SAMOND, CA 93560 19 19 90

Page _ _ _ of _ _ _ _ O

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	Name & Signature, Date:	Address:
	John Cir	7050 Ceux Hardo
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\ \ \ \	Betty & Vandriska	10654 M St
X	Robert & Vondrick	majane Co. 9350/
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· <u>·</u> "	Betty L Vondriska	
3	Betty L Vondriska	15654 MST, Mojar (293501
0 -	Robert J. Vandriska	
25	Robert & Vondriska	15654 M St Majore Cosso
	Mark Mashouri	16060 BL Street
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Page <u>3</u> of <u>20</u>

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	Name & Signature, Date:	Address:
~·	Wanda Quinton 6/20/96	
20	Wanda Quinton	5091 Backus Rd Mojair Calif
	JOSEPH WPEFE JR. 6-21-96	•
29	Joseph Helpe Je.	9170 Skiles Magore. Ca
)	Thomas A Miller Thomas a. M.	Me P.O. Box 1588 Posement
30	Elizaber Thomas a. miller 1/2/4	4
G:	EHZABETH A. MILLER	P.O. BOX 1588
	Pleasent miles 62196	ROSAMOND, CA 93560
20	AMN K. PENNER	4561 WAXM-12
	Cour (2) men	Q.H. Ca-93536
20	Christie Sullivan	P.O.Box 2615
(C.C.	Christie Sullivan	KASAMUN, CA 93560
5/1	Steven P. Cores	15859 Jean DR
104	Steven Cores	MOSAVE, CA - 93 50/
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Page 4 of 20

In International Mining Corporation is proposing to Mine Soledad Mountain at an unprecedented level which will dramatically alter the Mountain and adversely affect life in our community. If you do not want this proposed cyanide-driven, heap-leach, open pit mine in your back yard, please join us and stand against this assault on our quality of life. We must all work together to keep our air clean and healthy and our ground water safe.

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_	Name & Signature, Date:		Address:
۰	Jeanna Rose 1	-2294	2800 Oak Creek Kd #17
35	Seanna Losse		Majave Ca 93501
0://	Sibul Hughes 1 6-	22-96	actor Cerro Gordo
WC YC	sign from the free the		Mojave, CA. 93501
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20	MICHAEL DELL'OLO	/	·
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Page <u>5</u> of <u>20</u>

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	Name & Signature, Date:	Address:
	Prod	14 G
00	Tharmon Duinton	5091 BACKUS LD
4	Thurmon Dunton 6-209	MOTAVE PA.
4.5	BILLY A. MCVEY	
40	Bille a. me Vey	P.O.By 1221, Rospinous CA. 93560-1221
	EARLY H. BOHANNON 6	1258 ROSAMONO, BLUD #65
41	Early H. Bohannon 625-96	ROSAMOND, PA. 93560=
10	Sherri Dumin 1-25-94	PO Box 1348
42	Meuri Dumin.	Rosamond (2 93560
	W/16-12/	Possepond Ca 9856
43	Mildragi C. Davi	
	Brett NAWKINS	3348 Discovered
144	An Haulx	3348 DISCOVERY RENMOND CALIF 93560

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	Name & Signature, Date:		Address:
	Print: LOISOBEFCHIV		P.O. Box 155
45	Law O. Doer My	Date: //8/96	ROSAMAND CA 93560
	Print: Bales & Bear W	7)18/96	ROSAMOND CA 93560 ROSAMOND CA 93560
46	Signature: Robert N. Beeck	(Date:	
١. ٨	Print: VERNON R. HUNT		0-3
47	Signature: Venank, Hunt	Date: 7-18-96	P.O.BOX 638 ROSA PIONO CA
10.	Print: PUSSEIL MC HES		
40	Signature: Lunding Ke	Date: 7/89/	3337 SOTIW ROSAMOND
	RONALD ALSOBROOK		4390 SONORA CT
49	Signature: Royal Hem	Date: 7/18/96	ROSAMOND CA 93560
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We the undersigned are opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain Project, Mojave, Kern County, California.

	Name & Signature, Date:	Address:
	Osan Berra 620-96	90BOX218
50	SOAN BEULS	Rosamonel CH 93560
	(Not C	POBX 83
51	LOBERT PORSON	ROTAMO. O A 9.3560
)	Caretelex Winter	P.O. Box 477 Rosamond, CA
5	Gretchen Winfrey	9339 Kemper Rd., Mojave, CA
	W.C. Bent	40 Bx 28
53	WHET PENIS	LOSAMING CA 93560
x	-Margaret Beijo	P.O. BOX 018
54	Morganiet Bexis	Kosamondi. Ch 935760
	Begge A. mat	9201 SHIRLEY ST
55	STEPHON A. MATHIS	Majaux, (A 9350)
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Page <u>8</u> of <u>20</u>

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	Name & Signature, Date:	Address:
	ROBERT DOLAN	9130 From FAG Rd. WEST
54	Robert Dolon	MOTAUE CA
	STEVE A SAATHOPE	P.O. Box 66
57	s. Inachts	ROSAMOND, CA 93560 P.O. BOX 928
-0	Thomas Y. meraled	P.O. BOX 928
50	THOMAS L MCINTOR	ROSAMONO, CA 93560
	William J MURTHY	P.O.BOX 1116-2161 ELMST
59	William Jom Aly	ROSAMOND 9350

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	Name & Signature, Date:	Address:
	Kevin M. Jensen	638 E. Ave G
(QC)	K-m.g- 7-6-96	Lanc., CA 93535
		638 £ ave G.
61	nu de 3 7-6-96	
	Fred A. Johnson Sn. 7 July 96	
لفي	. ()	Mojave, Cd. 93501
10	JAGQUELIN R. JOHNSON	4800 GIBBS AVE.
43	Jacquelin R. Johnson	MOJAVE, CA. 93501
/ 13	YVOUNE M. WOIFE 7.84	6 9210 Shirley ST
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	Name & Signature, Date:		Address:
	Print RICHARD 19 LAPINE	stay	2733 SUMMERCHA CE
67	Signature:	Date: 7=8-96	ROSAMIND OR 93560
	Print: PATSU SHORT		230015 USt. W. #55
(کھ)	Signature Short	Date: 7-8-96	Rosamond, Ca. 93560
	Print Hermy Durgan	- 3	7070 Backus Rd.
69	Signame: MMU DUNM	Date: -8-96	Moiaue OH. 935601
7.	Print: ELS AGRILAR SR	,	ZG34 COLD CRUDEL
10	Signature:	Date: 7-8-96	ROSAMONU CA SESSO
<u>.</u>	Print: DAUTO & GRAVES		P.O-Bot 901
11	Signature Colores	Date: 4-8-96	POSTALADAO BLUD
	Princip dolaria Abone		RG. BOX 9+4 RESIMEND CA
72	Signature:	Date:	
	Print: JOSE EAN HERM ANDRE		4487) DATE MUE
13	Signature: Acule Tuy	Date: 7-8-96	LANGASTER, CA-93534
	Print: Jana Cramoton		\$3542 Tanalewood Are.
14	Signature: Jana Crampton	Date: 7.8 96	Rosamond, CA 93560
نر و	Print: FREDA ZENROD		3711 GARNET AVE
15	Signature Tred Juros	Date: 7/8/96	ROSAMOND, CA 93560
7.	Print: Melanie Marke	lizh	menamind.
14	Signature Malanie Mackelo	7-8-96	A 93500

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	Name & Signature, Date:	Address:
	Print: Thomas Van Langenhoven	14327 Winchester Drive
	Signature: Date: 10 July 96	Mojare, CD 93501
A	Print: PRUBEN GARCIA	19313 Winchester DR
76	Signature: 7-10-96	MOJAUR- CA 93501
	Print PATRICIA NEHILLA	14233 WINCHESTER DR
79	Signature: Mehilla Date: 7-10-96	MOJAVE, CA 93501
	Printerio Ca GIDSON	MOTOURE (A 9350)
80	Signature Date: 7-10-96	MARIO WINCHESTER Dr.
	Print Nonlie Krown	
81	Signature: Date: 7/0/9	(Mo min Cais 37 CD
	Print: JAMES R. SAUNDERS	14300 WINCHESTER DR.
82	Signature: James R. Landy Date: 7-10-96	MOSAVE CA. 93501
	Print: NANCY L. SAUNDERS	14300 WINCHESTER DE.
83	Signature Sounder Date: 7-10-96	MOJAVE CA. 93501
a3 .	Print: GARIF WRIGHT	14312 WINCHESTER
84	Signature: Date: 7.10-7	MOJAUE CA. 93501
		6 MOJAVE CA 9350/
25	Signature Pay Night Date: 7.	Mojave CA 9350/
(2)	Print: 1960 4 + arher	Mojave Ca. 93501
200	Signature Devos 1. Date:	Mujave Ca. 93567

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	Name & Signature, Date:	Address:
_	Print L M. HUGGES	MOJAN CA 9350/
27	Signature: Date: 0 Jal	16 14328 WINDHUTELDR
	Print Monica Padita	14336 Winchester Pr
88	Signature: Parolla Date: 7-10-9	6 mojave CA 93501
	Fernando Padila	14336 Winchester D.
89	Signature: Date: 7.10.0	76 majare (1 9750)
	Micanor Reves	14341 Lear 57
90	Signature: Mean Date: 7-10-9	6 Mojave CA 93501
	CAROLE L. BEATTY	14337 LEAR ST
191	Signature: 1 Date 10.91	MOTAUE, CA 93501
0-	Print: Guy M. Colley	14339 LEAL 5
10	Signature Date: 9/16/	96 MOTAUE CA 93501
	Print: SON EST	14332 LEUT 50
43	Signature: Date: 9-10-9	B proJ. ca 93501
n i	Print: MARIONEWhITE	14341 Somerset DR.
13	Signature: Date: 7-10/	96 MOSAVE CA 93501,
	Print: Cardinal (1) On 10/5	14333 SOMERSET OR
145	Signature: Date: 7-10-6	16 MOJANE CAI 93501
	Veras 1-10-7	6 14329 GOTOSOMETSET 6 14329 GOTOSOMETSET 6 14329 GOTOSOMETSET
190	Signature: Date:	

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	Name & Signature, Date:	Address:
	Print: JOR WILSON	3134 Brown
97	Signature: Date: AleC	MAA-
06	Print: CHARLES CUSANO	3125 GREGORY
49	Signature Date: 7-10-06	MOJAKE
	Printy lilliam Wastes I	3
Cici	Signature: Date: 1-10-96	3175 Gregory DR Ma,
	JERRY GREEK	3255 Gregory Dr.
100	Signature: Date: 7-10-96	MOJAVE CA.
:43 s	Print: Richard m. mierto# 7/10/11	3265 GREGORY DR
101	Signature: Date:	
	Print: Darla K. Woodward.	340/ Gregory DR.
102	Signature: Onla K. Woodward 7-10-98	6 Mojave, CA 9350/
	Print: Then'a Youw	0 ,
103	Signature: Oldan und Yorkson. Date: 4-10-9	5 14343 WACHESTER
	Print Clape NCE Steppard	14339 Wenderte Or
104	Signature Shepaul Date: 7-10/96	Majane Ct. 93501
	Print: Sand: Sheppard	14339 windester Dr.
105	Signature: Sheppard Date: 7/0/96	monue Ca. 93501
112	Print: Odena Parell	14331 winchester
Illy	Signature: 6/enn Rues Date:	CA, 93501

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	Name & Signature, Date:	Address:
1	Print: Susan Williams Signardie: Determinent	9205 Hell St.
107	Dusan alleman Date 7/9/96	Mojave, CA
1 - 0	VETT FAUL 1/9/96	
108	Signature: Date:	Motave, col.
100	Print: Exandon Wicksen	9081 58th West
104	Signature Date 7/9/96	MOTAVE Co.
	KANDOLPH, F KIVAS	5774 ALICE AUE
HIC	Signature: 2 1/9/96 Date: 7/9/96	MOJAUE. CA
1,,	Print: None han Signature: Date: 2/6/6/	
	in Moudran	5884 Bickus nd "
_	MHN N. WILLEY.	,
112	Signature Date: 9-96	5909 beklen Ave,
	Print Pearl I WASHBURN	
113	Signature: Pearl J. Waslum Date: 7-10-96	3181 Milta Drive
	Print: FRUDELL RISNER 7-	
114		3,52 HICTOR DRIVE
	Print: BARBAR A Tate 7-10-96	3276 bregory
115	Signature: Date: 7_4-64	
111	Print: NAPO/EON AISUECHONA	. 3234 GREZORY
$\Pi \varphi$	Signature: Date: //	b

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	Name & Signature, Date:		Address:	
	Print: Darla Madlau		1908 Silver Wires Rd	
117	Signature: Moveles	Date: (-9-96)	Mosche CA 93501	
·	Princ hris Maria		1908 Silve Cheen Rd	
118	Signature: 4 Conla	Date: 7 - 9 . 96	Majore Co 9354	-
·	sarpara Jayes		12272 Gold Town-16/10	
119	mary Jones	Date: 7-9-9%	MUTAUR CA 93101	
,	marie Vellegue	7-9-96	mojane ca 9350	1
130	Signature:	Date:		
	Print: JUPA ANTON	•	9082 Hano Sta	
121	Signature Luta	Pate: 1Ux 96	Molave Ca 93501	
	Print CAROLE ANTIN		9156 42NO St W	
122	Signature areli A. anton	Date: 9 Kelly 96	Myore Ca 9250)	
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133	Signature O anti-	Date: 96	VALLE CL 9351)	
	Print Justice Hatala	13.	9073 Hull st	
124	Signature Myster Flatali	Date: ly 9/0	mojave CA. 9350 t	
	Print: Barbara Alaxafo	5 /		
125	Signature: Mukara Hata	Bate: Thuga		
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	Name & Signature, Date:	Address:
	Print: EREN Gelletti	19324 Semenset DR.
127	Signature Collette, 10 July 9	6 morave (A 9350/
`	GERALD G-RIFFILIT	14338 SOMERGET DR
128	Signature: Date: ULY	96 MOJALE CA 93501
	Print: SeBiles	
129	Signature 87 02 CARLE 302	Ale MODAVE.
	Print: Joth - 85	15777 6 54
130	Signature: Of Date:	mosave
	Print: Kally Vauchn-Kates	1608 Sherandoch Dr.
13	Signature: Why - Kates Dates	18490 PENDE PARK, TX.) MOVING
	Print: Charles Colebialsti	7 776)4 42
132	Signature: Chorle (Chorles (Ch	Agb Cal City CA.
	Print: Moses K. Kates	15801 N St.
133	Signature State St	5th MOJAVE, CA.
	Print: Gertha Off	
134	Signature: Lautha Ott Date: Que	ly Mojave Ca,
	Print: Sandra 5 Bettes	2014 Panamint
135	Signature: Date: Date:	96 Mojace Ca 9350/
	Print: Kenny Falconer	15921 Melya
134	Signature: With John Date: 7-1	096 noiave.

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	Name & Signature, Date:	Address:
	Print: DANVELE WILLIAMS	
131	Signature: anyl Allom Date: 8	Julya nojave
	KUTH CUHMHN	
136	Signature Date: 7	8-96 Rasamord CA
	Print: KERRY L. JOHNSON	
139	Date:	-96 Rosamond CA
,	Pamela Deland 7-8-	96
140	Signature: Date: Date: 7-5	96 Rosamonda
	Neber Deland	
141	Signature: NADL Date: 1.8.	16 Rosanoso
·	Print: JESSE MURDIAY	
142	Signature: 26// Cold Date:	resonas, co
	Print RYSTAL CONEN	ROSA MONDCA
143	Signature: Date:	
\ .	Print: Waynette Mohr	, California City Ct
144	Signature: Whynette, Moh Date:	8/96
	Print: RoyalL Nash	
145	Signature: Poulle Date: 7	-896 Rosaward, CA
	Print: PAUL P.K- SWGH	
146	Signature Date:	-8/96 CACIFORNIA CITY CA

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	Name & Signature, Date:	Address:
	Print: Carol Root	3249 Arthursus
147	Signature: Carol Foot Date: 7-10-9	Mojaux Ca.92501
	Print: WAPREN E. TOBINEH	BIBB SATINWOOD BUL
148	Signature (1) Apren E. Robin Pate: 7-10-96	CAL CITY (ALIF
	Print: MILHALE FARAKETY, 2	4
149	Signature: / Charles Harry 14, 1977	Comperst. Nosamond
	Print Dehinah LAware	26/2 Valleyport ST
150	Signature: July ah Dorthe Date: 4/4/96	Rosamond, Ca 9350
	Print: WKYNE BISHOP 7-14-90	MOJAIR
151	Signature: Dayl Build Date:	7-0-1-0-0
	Print: MIKE GRACA	ROSAMOND
152	Signature Sem Date: 14'-96	WANDOTTE LN.
	Print: Sandra T Johnson	PO BOX 571
153	Signature: Sandar Johnson 7/14/96	Rosamond, Ca 93570
	Print:	1209 OAKWOOD
154	Signature Date: 14 91	Noon - ON 9356 2
	Print: Erma Butter	
155	Signature: Date: 1/4/96	Lunater la 93534
	Print: Jeffrey V. Schenck	JIQO 15# WX327
1510	Signature: O. Lines V- Schuck, 7/14/9	Kosamona la 9356
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	Name & Signature, Date:		Address:
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	Print:) jane Cabrora		STARRY / BX 44/
158	Signardia Cabrera	Date:/4.96	Rosaman a 93560
_	Print: PETER SANFILIPA		
159	Signature: La Sentelin	Date: 7-14-96	3525 KMOX AVE: 93560
	Print Athlean BALEA	 .	198 J. C.
160	Signature:	Date: 7-14-9C	5711 WRIEM LAR.
	Print Imanne Sollina	T1 .	
101	Signature	Date: 7/1/96	120. Box 25 22 65 and
	Print: Shelby Somes		
162	Signature:	Date: ////	POBOX743ROSALLON
	Print LOIS M STEVENS	>	
163	Signature: 177. Stevens	Date: 7/1/96	
	Print: Ne 1550 Hyra	,	2810 (3+ 1
11/4	Signature: Welson (Leta	Date: 7-12/96	ROSanond.
	Print: Melita Dean		
165	Signature: Dielik Dear	Date: 7 1 4 96	
	Print: Nahe (Day	/	Cosamont
liele	Signature: Ne-2/s & Da	Date:/4/07/94	

Page <u>20</u> of <u>20</u>

Gretchen Winfrey PO Box 477 Rosamond, CA 93560

July 20, 1996

Glenn Barnhill Kern County Planning Dept. 2700 M Street Bakersfield, CA 93301

Dear Sir:

I am writing to express my concern regarding Golden Queen Mining Company's proposal to mine Soledad Mountain. My husband and I live on Kemper Road to the southeast of Soledad Mountain. We own several pieces of property in the area, including rental property, in addition to owning our residence. My concern encompasses many issues which arise due to the scope of the project.

I am extremely concerned about the possible degradation of our ground water in both quantity and quality. The proposal I have seen involves massive changes to the contours of Soledad. What considerations have been given to the effect of this on the drainage patterns? How will this change of contour affect the collection of our underground water supply? The volume of water involved in a project of this magnitude is great. What effect will the removal of this quantity of water have on our water table? It is my understanding that chemicals which would render drinking water not potable will be used in this operation. What is the potential for contamination of our ground water? Have the extensive geological and hydrological studies been done to answer these questions? If not, they must be, and they must be done by people with no vested interest in the project.

With our strong winds, I am extremely concerned about the air quality in the area as a result of the massive removal and deposition of loosely consolidated earth. I have lived in this area for a considerable time and have seen the severe dust storms which result when the ground is disturbed. This has occurred through out the Antelope Valley and Mojave area. I remember what it was like during the housing tract boom when vast areas were stripped in preparation for construction and, in spite of regulations to control dust, massive dust storms occurred. This project differs in that it will be years, not months before natural events occur that will stabilize the loose material. I have seen the result of other large scale mining operations north and west of Soledad. Wind borne dirt negatively impacts our comfort, our health, and our safety.

Currently, it is not politically correct to be concerned about the native plants and animals, but I am. I have spent hours combing the Antelope Valley looking for and identifying wildflowers and other plants. Soledad Mountain has some rather unique wildflowers. Monolopia lanceolata is reported by some only to be found in two places in the valley, but I have seen them only on Soledad and no where else. While poppies are not unique, it is not common to find them in this part of the valley. They are found on Soledad Mountain as my pictures will attest. I have read that efforts will be made to repopulate the areas disturbed in this proposal, but plant populations in this climatic area do not restore easily or quickly. Will requirements be in place to maintain truly native species? Will efforts be made to maintain gene pools or will new gene pools be introduced?

We chose to live in this area because of the rural lifestyle. When we purchased our properties there were no mining operations of the type and magnitude of this proposal in the area. Who will be held accountable for problems? How will my interests be protected as well as the interests of the next generations?. Will this be an instance where the quest for short term profit leaves a long term negative impact for us and for the environment?

We need to have many questions answered and many requirements put in place before this project goes ahead. To be honest, I do not see how some of the potential negative impacts on us can be mitigated.

Sincerely.

Ketchen Winfre

Kern County Planning Department 2700 M Street, Suite 100 Bakersfield, California 93301 Attn: Glenn Barnhill

Subject: Soledad Mountain Project

Mr. Barnhill:

I am very concerned with the scope of the proposed subject project. As is understood the historical use of Soledad Mountain has been mining endeavors, these previous efforts do not even approach the impact on our natural air and ground resources and our quality of life as the proposed mining project. I understand that there will be a sincere attempt to mitigate these impacts but common sense, history, and an unbiased evaluation of Golden Queen's proposed action indicate that whatever measures are taken they will not be able to reduce these impacts to an acceptable level to preclude adverse effects to the above.

A cursory look at the proposed size and placement of the overburden piles, and a review of the direction and the magnitude of the prevailing winds in the vicinity of the proposed project should indicate to anyone that those living Southeast of the Soledad Mountain will be in real trouble. It doesn't take a rocket scientist to determine that the high wind environment will raise havor with the overburden piles taking dust and other airborne particulates downwind and straight into my children's bedroom. This is not idle speculation, if real meteorological data are used (wind velocity and direction at the proposed site) it becomes very clear that the wind will drive the overburden piles such that anything downwind will be adversely affected. Even if there were no toxins involved (I'm not convinced that there will not be) the air quality will be significantly reduced. We cannot live with this.

Property values will fall dramatically. The simple fact that we will have to disclose to a potential buyer that there will be an open pit, cyanide leached mine with major overburden piles where Soledad Mountain stands indicates that the proposed project is not a real good selling point. It is, in fact, an extreme liability. Many residents in the local area of the proposed mine have been here for decades. They, like myself and family, have expended tremendous time and effort over the years in building a home and lifestyle they are comfortable with. If the proposed mining effort is allowed to proceed without major downscaling in scope, much of what the private citizens have worked so hard for will be devalued to a point that some may not be able to financially recover.

The water level on our property was at 66 feet when we drilled our well in 1987. Our water level is still close to that level today. It is very shallow for the area. As one goes west, the water

table drops down quickly. At 60th Street West, it is understood that the water level is around 400 feet. I am very concerned that our shallow water table could easily be contaminated by the destructive disturbance of the open pit type mine proposed by Golden Queen Mining Company. It is understood that our water table is fed by the runoff water from Soledad Mountain. In conversation with Scott Denny of the Kern County Planning Department, he explained that Golden Queen Mining Company would not be allowed to let any runoff water off-site once they started this project. The impact of this is not well understood but it will obviously effect our current water supply. In addition, the project is proposing to pump 600 gallons per minute per day. The impact of this level of loading to our water table is not understood. This is of major concern as we need water for survival, not as a money making venture.

There are many other serious issues that must be resolved before a project of this magnitude be allowed to proceed but most of them have been mentioned in other documents or forums and will not be addressed here. Years ago, when the population of the area was nowhere what it is now, a mining project of this scope might have been appropriate. But in this day and age the disruption of so many lives is not a justifiable trade-off.

Sincerely,

Stephen A. Mathis 9201 Shirley St.

Ster A. mati

Mojave, CA 93501

Kern County Planning Department 2700 M Street, Suite 100 Bakersfield, California 93301

Dear Glenn Barnhill,

I am writing to you in regards to the proposed Soledad Mountain Mining project by Golden Queen Mining Co. here in Kern Co., Mojave, California. The people of this area cannot afford to have this level of destruction going on in our backyards. This open pit, cyanide heap-leach mine will greatly affect the health, safety and welfare of the people living in this area. Soledad mountain is zoned for mining and has been mined for many years. That is not our objection. We are opposed to the amount of destruction this operation will cause to the mountain and to the people and animals living in the area. It is not something we can support.

There are several things that makes this site unique. We are not on city water like so many other people are and water is one very basic thing that all humans and animals alike need to survive. Golden Queen Mining Co. is proposing to pump 600 gallons per minute for 24 hours a day, 7 days a week for the duration of the project which could be from 7 to 16 years, depending on what they find. How will this affect our wells? Who will take responsibility for the wells drying up or being contaminated? Who will pay for an alternate water supply? Will it be the BLM, Kern Co., The Mining Company? Golden Queen Mining Company are the ones who need to find an alternate water source. Who will pay for these wells to be tested? The wells of Golden Queen Mining Co. and the existing wells within a 4-8 mile radius should be tested by a lab of our choice to see the before and after affects of possible contamination. We cannot see or smell the poisons that pose harmful threats to our health, safety and welfare. Will Golden Queen Mining Co. come and tell us "Hay, sorry we poisoned your water last week. We'll try not to do it again. Here's a couple of bottles of water". The monitoring of the wells, how it will be done, and what is acceptable and what in not needs to be spelled our very specifically in the Environmental Impact Report.

The water level on our property was at 66 feet when we drilled our well in 1987. Our water level is still close to that level today. It is very shallow for the area. As one goes west, the water table drops down quickly. At 60th Street West, I believe that the water level is around 400 feet. I am very concerned that our shallow water table could easily be contaminated by the destructive disturbance of the open pit type mine proposed by Golden Queen Mining Company. I believe that our water table is fed by the runoff water from Soledad Mountain. Couldn't the erosion from the disturbed hill washing out over the area and percolate into the water table and contaminate our water supply? Or couldn't the dust that blows off the mountain settle onto the soil and percolate into the water table? In the conversation I had with Scott Denny of the Kern County Planning Department, he explained that Golden Queen Mining Company would not be allowed to let any runoff water off-site once they started this project. He explained that this would keep everything contained. But, if this is the runoff water that feeds our water table, then isn't that just another way of threatening our water supply? I am not sure that retaining runoff water was given any thought by Golden Queen Mining Company. I did not see any maps that show areas designated for water retention. What will they do if the retained runoff floods the cyanide heap leach areas? Some years there may not be very much rain water, but other years there is and this needs to be taken into consideration. This project needs to be looked at not only from the stand point of the site itself, but also how this project will directly affect the surrounding areas. Significant change in water flows, either more or less, have a dramatic affect on surrounding areas as we have seen in the past with flooding. Most of the time the problem is increased runoff. But in this case a serious look needs to be done at the decreased runoff and how it will affect the water table.

Another very important factor is the incredible wind in this area. Not too many areas in this country can support the number of wind farms that we do. This did not happen by chance. An open pit mine would be very devastating to all who live in the area, people as well as animals. The Cactus Gold Mine had an open pit and showed us how devastating the wind can be. I understand that they were shut down a couple of times. I hope we're all a little smarter now. Many people were subjected to Mercury poisoning. Some people had to leave their homes because they were too sick to live there any more and Kern Co. did very little to help these people. Inspectors came out and said that something needed to be done. But when they went to back to Bakersfield, the "Powers that Be" did not allow anything to be done. Where is the accountability?

What about our property values? How will we be compensated for the loss in property value due to contamination to our homes and property. Who is responsible for that? What about the law that requires a disclosure statement about the local mining when we do want to sell. We won't be able to sell our homes even if we wanted to move. What will the banks and lending institutions think of this?

In the notice of preparation for the EIR/EIS, I read about the population of the area. It said "The area surrounding the project is sparsely populated with approximately 10 residences located along Backus Road south of the mountain." Perhaps there was a typo of 10 rather than 100. I personally know that there are many more residences than just 10 along Backus road. There are homes both on the north and south sides of the road. My concern is that someone reading this document, who was not familiar with the area, might believe that there were only 10 residences. This concerns me and is just one of the many numbers used in this document. So much for credibility.

I am told that there are several agencies who need to give their approval on this project. They are also the agencies who will give permits, set guidelines and check up on the Mining Company to see that all is going as spelled out by the local, State and Federal laws. Are these laws adequate enough to protect the health, safety and welfare of the people and animals who live in this area? What are the people of this area going to get in return from money collected for the permits and other required fees? Golden Queen Mining Company talks of Jobs. I also read that these jobs were without benefits. Shall we ask why? Is it that the mining company does not want to pay for medical benefits. Their employees aren't going to get sick are they? If they say this mining project is so safe, why won't they provide medical benefits? Will there be a set amount of money set aside in case there is an unexpected accident? Auto companies claim cars are save too. How many are killed or maimed every day? Who will pay for any clean ups? Will it be the Mining Company, or again, us, the tax-payers? How ironic, we're the ones poisoned and we're the tax-payers paying for the clean up. Is this right? Is this what America is all about?

Now is the time for us, the people of the area to speak up and have a say. We are the ones who have to take responsibility in the times where so many people and agencies will not. We are the ones who have to speak up and let you know that this is wrong. We are the ones who have to bring these issues to the attention of you at the BLM, you at the Kern County Planning Department, and you, our elected officials who need to make responsible decisions. Money is <u>not</u> the sole purpose in life. If we cannot drink our water or breathe our air, what good is money?

Sincerely,

Susan M. Mathis

Susan M. Mathin

Sienn Barnhill: May 21, 93601Please dont interfere with
our weather pattern by taking
down a hill (mountain).

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contour of our natural racuree

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Thank you kinkly,

Refered Barton
15315 Carol St. Mijare (12350)



California Archaeological Inventory



FRESNO KERN KINGS MADERA TULARE Southern Sen Josquin Valley Information Center California State University, Bakerefield 3001 Stockdale Highway Bakerefield, California 93311-1099 805/864-2289 FAX 805/884-2415

TO:

Glenn Barnhill Kern County Planning Department 2700 M Street, Suite 100 Bakersfield CA 93301

July 23, 1996

RE: Soledad Mountain Project, CUP 41, Map 213; CUP 22, Map 214
AIC# L-96-78

Dear Glenn,

Thank you for the opportunity to comment on the above referenced project. The Golden Queen Mining Company project area has undergone Phase I surveys and Phase II test excavations by W & S Consultants in 1995. Eight of the sites that were recorded were excavated; CA-KER-4446H, 4447H, 4448H, 4449H, 4450H, 4451H, 4452H, 4453H and 4454H. All these sites are associated with historic mining activities.

The NOP states that the sites lie in areas that will be disturbed by this project's activities. Therefore, all final recommendations for the above mentioned sites, outlined on pages 138 through 147 of the Phase II W & S Report should be implemented prior to commencement of mining and cyanide heap leach processing operations.

If you have any questions or comments, please don't hesitate to contact me at (805) 664-2289.

Yours truly,

Adele Baldwin

Assistant Coordinator

ORIGINAL WILL NOT BE SENT

c: Kern County Archaeological Society

Kern County Planning Department 2700 M Street Suite 100 Bakersfield, CA 93301 Attn: Mr. Glenn Barnhill

Dear Sir,

As a person living downwind from the proposed open pit mine I am very concerned about the use of cyanide and other chemicals. We have very high winds frequently in this area and I'm sure it could become a very serious health hazard. Could these chemicals also reach our drinking water (wells)?

I was told by a realtor that if I wanted to sell my property I would have to tell the prospective buyer about the mining. The realtor said my chances of selling would be zero to none.

I can't afford to just leave my property and move somewhere else. I'm very concerned about this issue and hope that some kind of peaceful resolution can be reached.

LARRY G METTERT 11848 MYER Rd MOJAVE CA 93501

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BE AWARE!

In International Mining Corporation is proposing to Mine Soledad Mountain at an imprecedented level which will dramatically alter the Mountain and adversely affect life in our community. If you do not want this proposed cyanide-driven, heap-leach, open pit nine in your back yard, please join us and stand against this assault on our quality of life. We must all work together to keep our air clean and healthy and our ground water safe.

Ne the undersigned are opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain Project, Mojave, Kern County, California.

Name & Signature, Date:	Address:
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Signature: Mike Quin Date: 7-21-96	mojave
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Signature: Barbara Breden Date: 7-21-9	15224 Shurley
Print: Clamine Ment	15224 Shirley
Signature:) Jeannine Manka Date: 7-2790	Mojave Ca 93501
Print: MichBELGENSKE	15248 Shirley ST
Signature: Michael Janesco Date: 7-11-96	MOIAUE CH. 93501
Print: (Jarka House	3
Signature Date: 7-21-4	SAME
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BE AWARE

An International Mining Corporation is proposing to Mine Soledad Mountain at an inprecedented level which will dramatically alter the Mountain and adversely affect life in our community. If you do not want this proposed cyanide-driven, heap-leach, open pit nine in your back yard, please join us and stand against this assault on our quality of life. Ne must all work together to keep our air clean and healthy and our ground water safe.

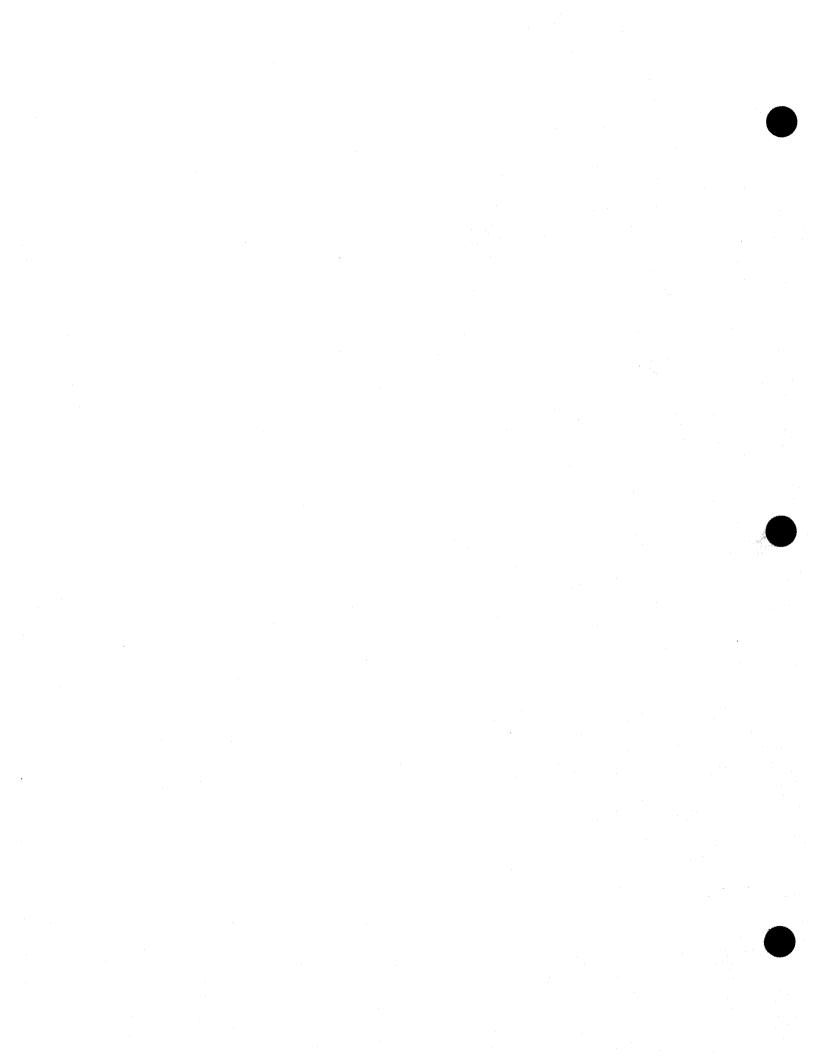
We the undersigned are opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain Project, Mojave, Kern County, California.

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	Signature: Clark Jordan	Date: 7-21-96	1224 Reed ave.	ઈંડ
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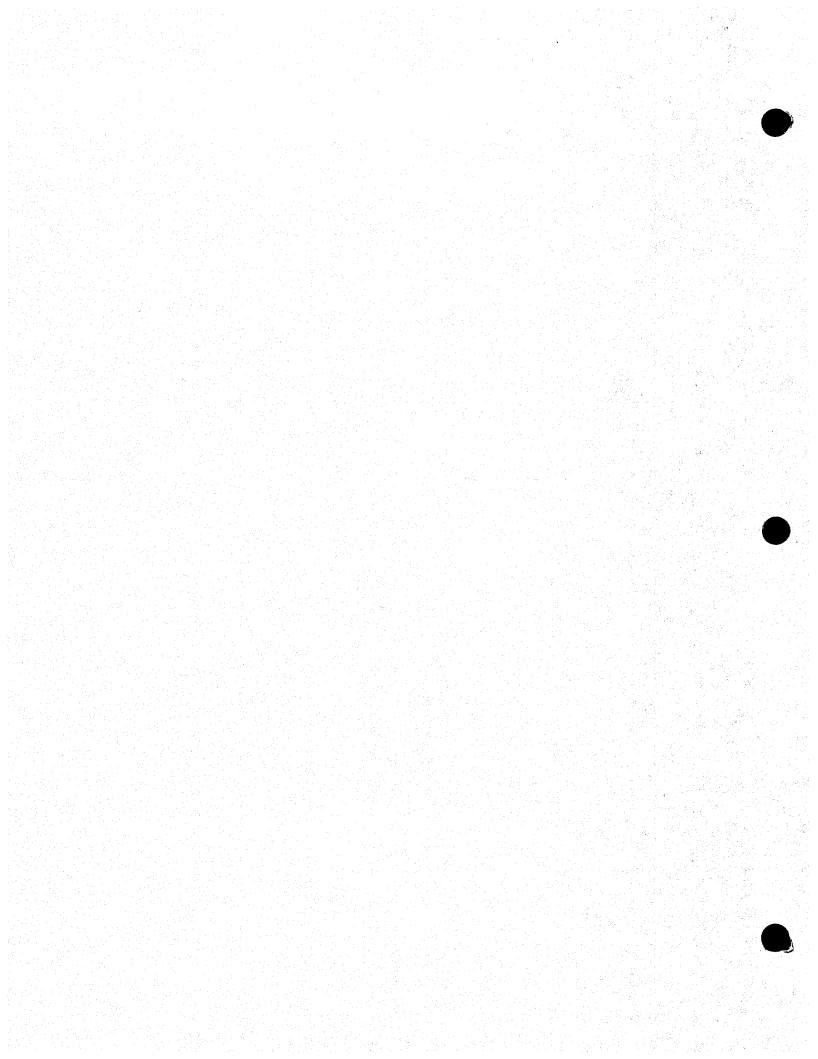
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	Dear Sus:
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	this material.
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COMMENTS RECEIVED BY BLM





Comment From: Private Citizen | #0002 Received: 8 October 1996

LETTER TO THE EDITOR AND ALL GOVERNMENT AGENCIES

RE:MINING

IN REGARD OF GOLDEN QUEEN OPEN PIT MINING, I AM CONCERNED ABOUT THE POLLUTANT IN THE AIR WHEN THEY MINE ON AN OPEN PIT, BEING THAT WE LIVE NEAR THE MINE. ALL OF THE LED AND MERCURY AND ANY OTHER CHEMICALS THAT ARE IN THE SOIL WHEN THEY BLAST WITH AMMONIA NITRATES COULD BE HARMFUL TO OUR HEALTH. THE POSSIBLE VIBRATION OF THE BLAST COULD BE DETRIMENTAL TOU OUR WELLS. THIS COULD BECOME DEADLY GROUNDS.

MY UNDERSTANDING IS THAT THE BURAL OF LAND MANAGEMENT GETS QUITE A BIT OF MONEY FOR LETTING THEM MINE ON BLM LAND.

IF THEY ARE INTENET ON MINING IN THAT AREA, THE RESIDENCE THAT LIVE CLOSE SHOULD BE BOUGHT OUT AND THEY SHOULD PAY FOR AVACK WATER TO BE PURCHASED FOR THE REST OF THE RESIDENCE. I HAVE LIVED THERE FOR 14 YEARS AND WORKED THERE AND AM WILLING TO DIE FOR MY LAND.

THANK YOU		
****	*****	





Comment From: Private Citizen | #0051 Received: 29 August 1996

8/29/96

Dear Sir:

These comments are in regard to the proposed Golden Queen Soledad Mountain Project.

From the inadequate map I received, I believe that this project is located immediately south of a large subdivision. If this is true, and even though the subdivision so far mostly exists on paper, the effect of blowing dust, and possibly blowing cyanide fumes, on the potential residents of this subdivision should be considered.

Also, since this project is near Highway 14 and Mojave, it is very visible. Therefore, even more attention to reclamation should be excercised than normally. In particular, the pits, heap leach piles, and waste rock piles remaining at the end of the project should be very carefully sculpted to resemble the natural typography of the area, and covered with rocks of various sizes and contour ripped to provide places for seeds and water to collect. Provision should be made for weed control for at least the first several years, until native vegetation can be established. All unnecessary roads and pads should be removed, and the areas ripped and revegetated.

Lastly, the amount of water to be used is a concern. Cyanide should be applied by drip emitters, and if ponds are to be used, they should be covered to inhibit evaporation, and netted if necessary to prevent migratory bird deaths. If feasible, tanks should be used instead of ponds.

Thank you for your consideration of these issues. Please keep me informed as the environmental analysis continues.

Sincerely,

**** ****





Comment From: Private Citizen | # 0034 Received: 5 July 1996

Re: Mining of Soledad My. On Mojave Ca

Dear Sir:

I do not want Golden Queen Mining Co. to be allowed to mine Soledad Mt.

I own 11.5 acres on Shirley St. 1/8 mile, S. Soledad Mt.

I fear that the environmental losses are far greater than we can perceive.

We also drink out of our well, so you can see my concern.

Sincerely,





Comment From: Desert Construction Co.
Received: 2 July 1996

BLM Ridgecrest Resource Area Manager 300 S. Richmond Ridgecrest, CA 93555

Ahmed Mohsen
BLM EIS Coordinator

Mr. Mohsen:

I live in Rosamond and have some concerns about the Golden Queen Mining Permitting Process.

The following list of items should be addressed on the D.E.I.R.

- 1. What if the large amount of water they are planning to pump dries up the area wells.
- 2. Will the large scale mining operation cause a loos of Air Quality and effect operations at Edwards Air Force Base.
- 3. Will the mining operation lower the property values of the surrounding properties.
- 4. Is this Foreign Corporation paying BLM or the U.S. Tax Payers a fair amount for the gold they plan to remove from our Property.

I feel all these items should be addressed in the D.E.I.R.

Sincerely	•	
*****	*.	******





Comment From: Private Citizen | # 0033 Received: 2 July 1996

June 26, 1996

Dear Mr. Mohsen:

I wish to go on record as being opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain, Project, Mojave, Kern County, California

Yours Truly,
***** ******, **** *. ******, ******* ******







Comment From: Private Citizen | # 0031 Received: 1 July 1996

June 28, 1996

BLM Ridgecrest Resource Area Manager 300 S. Richmond Ridgecrest, CA 93555 Attn: Ahmed Mohsen, BLM EIS Coordinator

Dear Sir:

I am writing to express my opposition and concern regarding Golden Queen Mining Company's proposal to mine Soledad Mountain. My husband and I live on Kemper Road to the southeast of Soledad Mountain. We own several pieces of property in the area, including rental property, in addition to owning our residence. My concern encompasses many issues which arise due to the scope of the project.

I am extremely concerned about the degradation of our ground water in both quantity and quality. The proposal I have seen involves massive changes to the contours of Soledad. What considerations have been given to the effect of this on the drainage patterns which result in the collection of our underground water supply? The volume of water involved in a project of this magnitude is great. What effect will the removal of this quantity of water have on our water table? It is my understanding that chemicals which would render drinking water not potable will be used in this operation. What is the potential for contamination of our ground water? Have the extensive geological and hydrological studies been done to answer these questions? If not, they must be, and they must be done by people with no vested interest in the project.

With our strong winds, I am extremely concerned about the air quality in the area as a result of the massive removal and deposition of loosely consolidated earth. I have lived in this area for a considerable time and have seen the severe dust storms which result when the ground is disturbed. This has occurred through out the Antelope Valley and Mojave area. I remember what it was like during the housing tract boom when vast areas were stripped in preparation for construction and, in spite of regulations to control dust, massive dust storms occurred. This project differs in that it will be years, not months before events occur that stabilize the loose material. I have seen the result of other large scale mining operations north and west of Soledad. Wind borne dirt negatively impacts our comfort, our health, and our safety.

Currently, it is not politically correct to be concerned about the natural environment, but I am. I have spent hours combing the Antelope Valley looking for and identifying wildflowers and other native plants. Soledad Mountain has some rather unique wildflowers. As I am typing this letter on my computer, I can see pictures of flowers, Monolopia lanceolata, taken on Soledad that I have not found other places in the valley. While poppies are not unique, it is not common to find them in this part of the valley. They are found on Soledad Mountain as my pictures will attest. I have read that efforts will be made to repopulate the areas disturbed in this proposal, but plant populations in this

climatic area do not restore easily or quickly. Will requirements be in place to maintain truly native species? Will efforts be made to maintain gene pools or will new gene pools be introduced?

Who will be held accountable for potential problems? From a personal view, who will be held accountable if we or our tenants are no longer able to live here. Who will be accountable when our properties in the area lose their value due to the proximity of this project? We chose to live in this area because of the rural lifestyle. When we purchased our properties there were no mining operations of the type and magnitude of this proposal in the area.

How will my interests be protected as well as interests of the next generations?. Will this be an instance where the quest for short term profit leaves a long term negative impact, or for some, possible devastation?

We need to have many questions answered and many requirements put in place before this project goes ahead. To be honest, I do not see how some of the potential negative impacts on us can be mitigated.

Sincerely,	
*****	*****





Comment From: Private Citizen | # 0032 Received: 1 July 1996

June 26, 1996

Dear Mr. Mohsen:

We wish to go on record as being opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain, Project, Mojave, Kern County, California

Yours Truly,

**** ******* / * * *******

Have you seen the strip mining in Kentucky, Tennessee, and other Eastern states? That's what this area will look like unless the mining stops. Privite companys profit while we, the public, suffer with what they leave behind, a barroon, non-usefull piece of ground.

* * * * * * * * * * *





Comment From: Private Citizen | # 0030 Received: 1 July 1996

June 26, 1996

Dear Mr. Mohsen:

I wish to go on record as being opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain, Project, Mojave, Kern County, California

Yours Truly,

I have been a single mother for the last sixteen years & finally was able to get my own house instead of a little one-bedroom apt. for my family. I don't want our life here indangered.

Thank you

Please don't let this project proceed.





Comment From: Rosamond Town Council
Received: 28 June 1996

Date: 6/28/96 Time: 1:17:02 PM Page 1 of 1

Attn: Ahmed Mohsen BLM EIS Coordinator

Mr. Mohsen,

The Rosamond Town Council would like to be included in any information that is sent out concerning the Golden Queen Mining Co. permitting process. If you could, please keep us informed of any hearings, general meetings or similar events it would be appreciated. Our group tries to get information about happenings in our area so we can inform our members, as well as the citizens of the Rosamond area so they can be informed with the facts and then make the decision of their choice.

Several of our members are concerned about the mining operation in respect to:

- 1. The large amount of water that is going to be pumped from ground aquifiers in the area.
- 2. The dust created by the mining and hauling.
- 3. The land values decreasing in the area.

Thank y	ou,	
*****	********	President





Comment From: Private Citizen | # 0028 Received: 28 June 1996

June 26, 1996

Dear Mr. Mohsen:

I wish to go on record as being opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain, Project, Mojave, Kern County, California

Yours Truly,
***** *****





Comment From: Private Citizen | # 0027 Received: 28 June 1996

June 26, 1996

Dear Mr. Mohsen:

I wish to go on record as being opposed to the proposed Gold Mine Development in Kern County referred to as The Soledad Mountain, Project, Mojave, Kern County, California

Yours Truly,





Comment From: Private Citizen | # 0029 Received: 27 June 1996

JUNE 24, 1996

BLM RIDGECREST RESOURCE AREA MANAGER 300 S. RICHMOND RIDGECREST, CA. 93555

ATT: AHMED MOHSEN BLM EIS COORDINATOR

WE THE *******, AS CITIZENS OF THE STATE OF CALIF. & CITIZENS OF THE COMMUNITY. WE AS LAND OWNER'S & RESIDENCE AT **** BACKUS RD. MOJAVE, CALIF. 93501, WE GREATLY OPPOSE THE PROPOSAL FROM GOLDEN QUEEB MINING CO. TO MINE SOLEDAD MOUNTAIN. PLEASE BELIRVE ME, I COULD NAME OVER 100 REASON WHY THIS PROPOSAL SHOULD NOT BE ALLOWED. IF YOU PLEASE LET ME NAME JUST A FEW

- (1). AIR WILL BE GREATLY AFFECTED.
- (2). THE GROUBD WATER COULD BE CONTAMINATED OR GREATLY AFFECTED.
- (3). PROPERTY VALUE WILL DECREASE.
- (4). WITH THE HIGH WIND AREA, WILL RESULT WITH HIGH LRVELS OF FINE DUST.
- (5). THAT COULD AFFECT WE SENIORS CITIZENS.
- (6). THIS WILL TAKE GREAT AFEECT ON OUR CHILDREN'S.
- (7). THE MINING CO. WILL BE USING CHEMICALS IN THEIR OPERATIONS, THAT COULD BE HIGH RISK FOR HUMANS & ANIMALS.
- (8). TRANDPORTING CHEMICAL ON OUR ROADS, WILL INDANGER OUR COMMUNITY.

SINCERELY YOURS,
**** ***** & FAMILY





Comment From: Private Citizen | # 0018a Received: 27 June 1996

BLM Ridgecrest Resource Area ATTN: Ahmed Mohsen, EIS Coordinator 300 S. Richmond Road 25 June 1996

Subject: Soledad Mountain Project

Ridgecrest, CA 93555

Mr. Mohsen:

I am very concerned with the scope of the proposed subject project. As is understood the historical use of Soledad Mountain has been mining endeavors, these previous efforts do not even approach the impact on our natural air and ground resources and our quality of life as the proposed mining project. I understand that there will be a sincere attempt to mitigate these impacts but common sense, history, and an unbiased evaluation of Golden Queen's proposed action indicate that whatever measures are taken they will not be able to reduce these impacts to an acceptable level to preclude adverse effects to the above.

A cursory look at the proposed size and placement of the overburden piles, and a review of the direction and the magnitude of the prevailing winds in the vicinity of the proposed project should indicate to anyone that those living Southeast of the Soledad Mountain will be in real trouble. It doesn't take a rocket scientist to determine that the high wind environment will raise havoc with the overburden piles taking dust and other airborne particulates downwind and straight into my children's bedroom. Even if there were no toxins involved (I'm not convinced that there will not be) the air quality will be significantly reduced. We cannot live with this.

Property values will fall dramatically. The simple fact that we will have to disclose to a potential buyer that there will be an open pit, cyanide leached mine with major overburden piles where Soledad Mountain stands indicates that the proposed project is not a real good selling point. It is, in fact, an extreme liability. Many residents in the local area of the proposed mine have been here for decades. They, like myself and family, have expended tremendous time and effort over the years in building a home and lifestyle they are comfortable with. If the proposed mining effort is allowed to proceed without major downscaling in scope, much of what the private citizens have worked so hard for will be devalued to a point that some may not be able to financially recover.

The proposed operation will be manned 24 hours per day, 7 days a week. In addition to the types of pollution alluded to in your various scoping meetings light pollution is another. The proposed mining action will effectively wipe out the quiet darkness currently enjoyed by those in the area. To some of us this is a tragedy. I am the President of the Antelope Valley Astronomy Club. For years many, many people have enjoyed the night sky out here on Backus Rd. Many dollars have been invested in astronomical equipment and there have been many contributions to the astronomical community made from this site The problem of light pollution could be mitigated to a great degree if a sincere concern exists for the neighbors of the mining project. This is not a negligible concern. We cherish our night and do not want it turned into day.

There are many other serious issues that must be resolved before a project of this magnitude be allowed to proceed but most of them have been mentioned in other documents or forums and will not be addressed here. Years ago, when the population of the area was nowhere what it is now, a mining project of this scope might have been appropriate. But in this day and age the disruption of so many lives is not a justifiable trade-off.







Comment From: Private Citizen | # 0018 Received: 24 June 1996

Dear Ahmed Mohsen,

June 21, 1996

I am writing to you in regards to the proposed Soledad Mountain Mining project by Golden Queen Mining Co. here in Kern Co., Mojave, California. The people of this area cannot afford to have this level of destruction going on in our backyards. A cyanide-driven, heap-leach, open pit mine is not something we can allow here.

There are several things that makes this site unique. We are not on city water like so many other people are and water is one very basic thing that all humans and animals alike need to survive. Golden Queen Mining Co. is proposing to pump 600 gallons per minute for 24 hours a day, 7 days a week for the duration of the project which could be from 7 to 16 years, depending on what they find. How will this affect our wells. Who will take responsibility for the wells drying up or being contaminated. Who will pay for an alternate water supply? Will it be the BLM, Kern Co., The Mining Company? They are the ones who need to find an alternate water source. Who will pay for these wells to be tested by a lab of our choice to see the before and after affects of possible contamination. We cannot see or smell the poisons that pose harmful threats to our health, safety and welfare. Will Golden Queen Mining Co. come and tell us "Hay, sorry we poisoned your water last week. We'll try not to do it again. Here's a couple of bottles of water". This needs to be spelled our very specifically in the Environmental Impact Report.

Another very important factor is the incredible wind in this area. Not too many areas in this country can support the number of wind farms that we do. This did not happen by chance. An open pit mine would be very devastating to all who live in the area, people as well as animals. The Cactus Gold Mine had an open pit and showed us how devastating the wind can be. Many people were subjected to Mercury poisoning. Some people had to leave their homes because they were too sick to live there any more and Kern Co. would do nothing to help these people. People came out to inspect and said that something needed to be done. But when they went to back to Bakersfield, the "Powers that Be" did not allow anything to be done. Where is the accountability?

What about our property values? How will we be compensated for the loss in property value due to contamination to our homes and property. Who is responsible for that? What about the law that requires a disclosure statement about the local mining when we do want to sell. We won't be able to sell our homes even if we wanted to move. What will the banks and lending institutions think of this?

I am told that there are several agencies who need to give their approval on this project. They are also the agencies who will give permits, set guidelines and check up on the Mining Company to see that all is going as spelled out by the local, State and Federal laws. Are these laws adequate enough to protect the health, safety and welfare of the people and animals who live in this area? What are the people of this area going to get in return from money collected for the permits and other required fees. Will there be a set amount of money set aside in case there is an unexpected accident. Who will pay for this clean up. Will it be the Mining Company, or again, us, the tax-payers. How

ironic, we're the ones poisoned and we're the tax-payers paying for the clean up. Is this right? Is this what America is all about?

Now is the time for us, the people of the area to speak up and have a say. We are the ones who have to take responsibility in the times where so many people and agencies will not. We are the ones who have to speak up and let you know that this is wrong. We are the ones who have to bring these issues to the attention of you at the BLM, you at the Kern County planning department, and you, our elected officials who need to make responsible decisions. Money is not the sole purpose in life. If we cannot drink our water or breathe our air, what good is money?

I thank you for the opportunity to give my input in this very important decision. I hope you have very seriously looked at the magnitude of the proposed mining operation and also looked very seriously at the surrounding area and it's unique environmental conditions. Please help us make this place a safe and healthy place to live in the future.

Sincerely, *****





Comment From: Private Citizen | # 0002 Received: 13 May 1996

the right of ones to have ones lands homes

- 1. of ones lift to be ok on ones land
- 2. No ones right to @#@# up are lands. So no wood like to have the land
- 3. the right to mining is not if it will truck in amonia nitrates by the homes if the truck wood go off the road be on fire the nitrates can go off
- 4. The homes down wind a new land and home do to the wind comes hi the cyaninde will come down? in the wind? the homes
- 5. Be for ones like to cut the mountain all up so do to the cyaninde. Gold Queen mining will to get \$150000 up to \$300000 for big homes so ones can go get homes out of mojave on new lands the winds is hi by the mountain one can not stop the winds 100 M.P.R go at times
- 6. the water run off to down hill like me ***** and ones on Backus and Silver Queen roads to the freeway 14 down hill
- 7. the water will be no good in time
- 8. do to it all no one wood like the lands so the money to get new lands. Are it the mining is not to be do to are land and US Rights of the Bill of Rights to be ok the right to mining is not the right to have cyanide on us. If it comes to it go to the US COURTS not look good in news.





Comment From: Private Citizen | # 0001 Received: 8 May 1996

Dear Sir,

I attended the public meeting held by the BLM on April 17 in the Mojave High School. I want to say that I too am totally opposed to the proposed mining operation for Soledad Mt.

I live close to Soledad on the south side. We know that Golden Queen has the modern technology to strip Soledad of her precious metals (gold and silver) but, in doing so, the real threat to the health and welfare of human desert dwellers as well as native animal life causes us real concern.

We who live on the desert know that we live here under its terms. We conserve our water and try not to pollut the earth too much, lest the winds blow it back into our faces! Will 150 jobs outweigh the enormous loss of our healthy environment and property values?

There are so many more of us living in the area of this proposed operation now that it is just another instance of human need vs corporate greed.





Comment From: Laser, Inc. Received: 26 April 1996



A "Master" EIS may be appropriate. This EIS would consider the cumulative impacts of past and anticipated mine expansions and minerals exploration projects within this and neighboring BLM districts and National Forests. The EIS would gather baseline data on the current environment in these jurisdictions and around this site. It would include evaluations of the existing air and water quality, summaries of typical impacts from mining, and inventories of wildlife and plant life.

After this comprehensive review, future proposals for minerals exploration and mining could be handled by incorporating by reference the "Master" EIS' findings into individual EISes that would be completed for future minerals exploration and mining projects.

A sweeping examination of the cumulative impacts from minerals exploration and mining would benefit the review process. It is difficult to evaluate the probable total impacts of exploration projects, mines, and mine expansions when considering these proposals one by one. But without weighing the probable total impacts, one cannot recommend appropriate mitigations. The cumulative impacts of these projects can be considerable. These cumulative impacts should be evaluated in a single comprehensive document.



PROJECT AND AREA DESCRIPTION

Please include a land ownership map for the surrounding area, and a preliminary site plan, including the anticipated location of all major structures, roads, parking areas, on-site temporary housing, staging areas, construction material sources, and toxic and hazardous material handling and storage areas.

Please provide a general description of the major components of the facility, including boilers, leach pads, steam generators, turbine generators, power lines, transformers, roasters, autoclaves, cooling facilities, SW/EX facility, production equipment, pits, haul roads, tailings piles, stream diversions, stormwater, process water, barren solution and pregnant solution ponds, and heaters.

Please describe the amounts of material that flow into the project (for instance water, ore, natural gas, caustic, hydrocarbon, electricity) and product and byproduct that flow out of the project. (ore concentrate, tailings, waste water, solid waste)

Please list all permits needed by the project, and the address and contact person at the permitting agencies.. Please place our name on the mailing lists, or notify the other permitting agencies, of our wish to review those permits are they become available for public comment. Please estimate the existing and projected noise levels at the project site.

Please describe the project area's land use patterns at and near the site location, including descriptions of any state or local land use plans.

Describe the procedures proposed to avoid constituting a public nuisance, endangering public health and safety, human and animal life,

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property, wildlife and plant life, or recreational facilities, including a description of monitoring programs to assess the impacts of the proposed mine and the effectiveness of those controls to mitigate environmental, social and economic impacts of the proposed mine.

SIGNIFICANT IMPACTS THAT SHOULD BE DISCUSSED IN A REVIEW OF THE PROPOSED PROJECT

LASER is concerned about the proposed mine expansion's potential impacts on the air and water quality. There could be adverse socio-economic consequences caused by the importation of an out of state construction and production work force.

LASER's comments apply to the commonly employed hiring practices and construction techniques of many engineering firms and out of state low-wage construction contractors in the mining industry.

What follows is a list of details and information that should be included in the EIS for this project.

AIR QUALITY

The EIS should discuss the cumulative air quality impacts from the existing facility, the proposed project, and the existing emissions from the nearby mines, mills, smelters, and exploration projects. The total effect of this area's air pollution on the health of humans and wildlife and plant life needs evaluation.

The EIS should describe whether or not the area near the proposed mine is in compliance with state and federal standards for criteria and non-criteria pollutants. It appears that the PM-10 (fine particulate) standard may be modified in the near future to separately regulate very fine particulate, such as particles 1 to 2.5 micrometers in diameter (PM 1.0 -PM 2.5). Please estimate the amounts of PM 10, PM 1.0 and PM 2.5 to be emitted by this project from all point source and fugitive and indirect emissions.

The EIS should include a table showing any measurements of current and recent concentrations of air pollutants in and near the proposed site, including nearby mines, both on and off site. These measurements should include any sampling by the state and federal environmental agencies, or by inspectors from the state and federal Occupational Safety and Health Administration, the federal Mine Safety and Health Administration (MSHA).

The DEIS should describe how federal agencies such as BLM will demonstrate the project's compliance with the State SIP (State Implementation Plan), as required by 40 CFR 6, 51, 93, (FR Vol. 58, No. 228, 11/30/93, p. 63214-63259). Please notify us of the public comment period regarding federal agencies' compliance with the state SIP regarding this project.

PARTICULATE EMISSIONS

The proposed project will emit particulate matter (PM) from the non-point sources of traffic on unpaved roads, erosion from slag piles and ore and

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waste rock stockpiles, and dust from drilling and explosives. Point sources of PM include silos, crushers, screening, truck and leach pad loading and unloading, the SW/EX facility, generators during construction and operation, and the conveyors and elevators.

IMPACT FROM CONSTRUCTION AND ROAD BUILDING

The mine construction will cause discharges to the air of PM, oxides of nitrogen (NOx), carbon monoxide (CO), hydrocarbons (HC), and sulfur dioxide (SOx) from windblown and vehicle generated road dust, blasting, vehicle and equipment engines and generators, drilling equipment, and gravel crushing for road building.

The construction and improvement of roads will require thousands of hours of operation of heavy equipment and power tools, including bulldozers, backhoes, graders, chainsaws, and cranes. This equipment will generate additional air pollutants. Surfacing the new and improved roads may necessitate rock crushing operations, which will generate PM from the crushing, and other air pollution from the equipment engines.

The engines and compressors that power the roadbuilding and construction equipment should be described, the quantities of each type of engine should be listed, the total hours of operation for these engines should be figured, and the resulting pollution tonnage and concentrations of PM, HC, NOX, CO, and SOX from those diesel and gasoline fumes should be calculated.

The emissions from these sources can be calculated with criteria developed by the Federal Environmental Protection Agency's "AP-42" methods. Alternative low-pollution fuels for vehicle and equipment engines, and dust control measures such as haul road paving should be discussed.

DIESEL STORAGE AND USE

The EIS should say how much diesel fuel will be consumed by the mine equipment and vehicles monthly and annually, how much diesel is stored on site, how often there are deliveries, and the hydrocarbon emission rate from the storage tanks, from refueling of vehicles and equipment, and from vehicle and equipment exhaust. Since nickel is emitted in diesel (and gasoline and fuel oil) exhaust, the amount of nickel emissions and other toxics such as chromium, benzene, benzo a pyrene, and polyaromatic hydrocarbons should also be estimated from diesel use and other sources.



EMISSIONS INVENTORY

The proposed project may have several point sources of lead and other metals, CO, NOX, ammonia and other toxics, acid, HC, PM and SOx. These potential sources may include crushers, conveyors, silos, elevators, natural gas, oil or coal-fired heaters and boilers, acid drift from the

leach pad acid handling processes, storage tanks, oxidation processes, solvent extraction and electrowinning (SX-EW) circuit processes, storage, loading and unloading, and regeneration of materials including but not limited to solvents, carbon, acids, and drift from leach pad sprayers.

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The project's expected emissions in lb/hr. and ton/yr. from both point and non-point sources, and the average and maximum concentrations of these pollutants at different distances from the project should be described. This should include but not be limited to concentrations of air pollutants near the mine site and at the nearest Class I air shed.

An emissions and air pollution source inventory for the nearby mines and other air pollution sources, including but not limited to mineral exploration projects should be provided. Criteria, non-criteria and toxic pollutants should be listed. As mentioned above, special attention should be given to providing PM 1.0 and PM 2.5 emissions data.

TOXIC AIR EMISSIONS

Mine Safety and Health Administration (MSHA) records show that many metal mine and mill workers become ill from exposure to high levels of lead, cyanide, chlorine, ammonia, and sulfur dioxide.

Several incidents at gold mines may also be relevant. MSHA records on mine workers at Newmont and IMC in Nevada, and the Stibnite/West End mine in Idaho show they suffered injury from exposure to chlorine, for instance. Worker injury from cyanide exposure and inhalation is illustrated below. Alternatives to cyanide, such as thiourea should be discussed.

PROTECTION FOR WORKERS AND THE ENVIRONMENT FROM LEACH PAD FUMES

Any leach circuit processes should be tanked instead of using heap leach pads. Mine Safety records show that many mine and construction employees are injured by exposure to cyanide and other reagents from leach ponds.

The Arizona Mine Inspector cyanide procedures guidelines state flatly that heap leaching emits cyanide, for instance. I If cyanide fumes are migrating from leach pad areas, that may cause worker injury. Workers will also be exposed to cyanide and reagent dust during the loading and unloading of these materials at storage silos.

MSHA records show workers injured by ingesting cyanide at the following gold mines: Round Mountain, Northcumberland, Nerco Candelaria, Barrick, and Homestead in Nevada and Nerco Ironclad and Druid in Colorado.

Examples of cyanide-induced illnesses are cited below.

Round Mountain mine, Nevada: "Employee working near leach pad on windy day. Possible reaction to sodium cyanide coming from sprayers in leach pad area." (MSHA, 3/16/89, mine 26-0594)

Nerco Ironclad, Colorado

1 Office of State Mine Inspector Cyanide Health and Safety Procedures. pp. 8 and 25. 1991.

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"The men were exposed to hydrogen cyanide gas and they were exposed to sodium cyanide solution ... the sodium cyanide solution was not monitored and did present a life threatening condition." (MSHA, 7/9/85, mine #05-3695)

This data shows that any materials used at mines and in the leach circuit may be emitted and inhaled by workers.

MSHA records show that some of the Annie Creek, South Dakota mine workers have elevated lead levels in their blood. Lead (or other metals and toxics, such as silica) could be a pollutant emitted by this project if it is located in the ore or overburden, or if it is used in the components of the SW/EX process, for instance the alloy anodes.

The DEIS should evaluate OSHA 200 logs and MSHA 7000-1 forms that report accidents, injuries and illnesses at mines with processes similar to the proposal to determine what health hazards may be present. This would also assist estimates of the mine's impacts on local health services.

Emissions of these substances from the facility should be evaluated. The potential for the proposal to emit lead, mercury, silica, cyanide, diatomaceous earth dust, chlorine, arsenic, ammonia, hydrochloric acid, diesel fumes, and other metals and toxics should be considered. Depending on the configuration of the facility, cobalt, arsenic, bismuth, and selenium may be emitted. If it is forecasted that will emit these or other toxic materials, then the health effects of these substances on its workers, and on nearby populations, should be described.

If toxic materials will be emitted by the expanded mine, and these materials could cause or contribute to elevated levels of respiratory diseases, cancers, or other ailments, than these illnesses should be listed and described.

The DEIS should include information from local and national cancer registries and state and federal logs of occurrences of respiratory diseases and cancers, showing the current incidence rates for these illnesses in nearby Counties.

BACT/LAER SHOULD BE REQUIRED

Air pollution controls for the proposed expansion should be described. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) for the potential point sources should be discussed.

Other potential controls should include but not be limited to road watering or paving, drilling and explosive dust controls, enclosure of leaching, solvent and electrowinning extraction processes, scrubbers, and alternative low pollution vehicle and engine fuels such as methanol and propane.

Air permits for similar facilities, and the air (and water discharge) permit applications, should be appended to the DEIS, to provide an overview

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of emissions and controls that could be expected.

PREVENTION OF SIGNIFICANT DETERIORATION (PSD) REVIEW

If the project will emit more than 250 ton/year of any single air pollutant, then it is required to undergo a PSD review by the EPA or its delegate. The DEIS and the air permit applications should be sent to the EPA Region to determine if a PSD review is required.

WATER QUALITY

The surface water and groundwater in the vicinity of the proposed pits should be described fully. The DEIS should contain a site map and a cross-section that compares the proposed mine activity with the aquifers and surface water bodies, and their recharge and discharge areas. Probable effects on groundwater and surface water should be discussed, including cumulative impacts with other mines in the groundwater basin.

The impact of prior mining activities on the area's water should be described. The water quality downstream of the mine site, along with the uses of these water bodies, should be discussed.

WATER USE

Where does mine process water come from, and how will waste water be discharged, and in what amounts, and containing what contaminants? The impact of the ground water drawdown from mine dewatering and well water usage on the area's surface water and well water supply should be detailed. The cumulative effect of the other mines in the area and their dewatering should be considered.

The mine's drawdown of groundwater should be discussed regarding its effect on other water users. A description of the area's groundwater rights and the current holders of these rights, including the location and use of nearby wells, the amounts to which they are entitled, the depths of their wells, and the current drawdown rate should be described.

Amounts of water pumped, discharged, and consumed by proposed and other nearby current and future projects should be estimated and the cumulative effects described. How will additional blasting and drilling affect groundwater?

GROUNDWATER

The DEIS should characterize and identify each aquifer/water bearing zone that may be effected by the mining operation. Enough information should be provided to determine the flow rate and direction of groundwater movement in each aquifer/water bearing zone in the vertical and horizonal



zones, as well as the ground water quality.

The area's aquifers should be characterized by type; unconfined, confined, leaky, perched, geothermal, etc.

If geothermal features or hot springs are in the area, then drilling or

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the digging of mine pits may drain or vent these sources. This possibility should be examined.

The following data should be provided:

The potentiometric surface of each aquifer based on simultaneously measured water level data.

The hydraulic conductivity of each aquifer, the regional and local groundwater flow pattern, flow velocities/rate and direction, temperature, the regional and shallow groundwater quality, local and regional flow boundaries for each aquifer, and the storage coefficient for each aquifer.

The porosity measurements for each aquifer, (important for groundwater flow velocity calculations), the vertical hydraulic gradient within each aquifer, a fracture description and orientation to assess boundaries or conduits.

Aquifer testing is suggested to determine flow boundaries, storage coefficient. and transmissivity/hydraulic conductivity.

Geophysical logging is suggested to confirm lithology and saturated zone locations.

What lithologic units are saturated? What lithologic units act as confining layers? What units serve as aquifers? What is the chemistry of each aquifer and how does it vary spatially? Where and how do the aquifers recharge and discharge?

Data from nearby wells should be presented, including the lithology, type of material, depth to top and bottom of each lithologic section, the depth to the top and bottom of each water-bearing zone, the water quality, temperature and flow rate from each zone, and the static water level associated with each zone.

Samples from wells that extend beyond the bottom of the proposed bottom of the mine pits are needed, to adequately characterize the deeper aquifers that may be affected by the mine.

When the mine is closed, the pits may fill with water that is highly acid and lacking oxygen. This possibility should be examined. The alternative of backfilling the pits should be explored.

STORM WATER AND PROCESS POND AND PIT CAPACITY

The process water ponds, ditches, and leach pad should be lined with two synthetic liners and compacted clay, and underlain with a leak collection system. These containment structures and the surface water diversion channels should be bermed and sized to contain runoff from a 24 hr.,

1000-yr. storm event. The dimensions of recent flows in nearby steams and other surface water bodies nearby should be described, including flash floods.

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At least two synthetic liners, a 3 foot thick compacted clay or cement or asphalt liner, and a leachate collection system should be required under the leach circuit, process ponds, and drainage facilities.

LEACH TREATMENT ALTERNATIVES

Treatment of cyanide solutions with ferrous sulfate or other materials should be evaluated. Cyanide concentrations and Ph levels in the ponds and pads should be monitored continuously.

The EIS should require a study on the relationships between concentrations of free cyanide and WAD cyanide in process solutions.

LEAK DETECTION SYSTEM

The most important component of this proposal is the leak detection system. The type and dimension of pipe used should be described. Some sort of fabric protection must be provided for these the leak detection collection pipes, or fines may clog the pipe perforations and render the pipe inoperative. This same criteria should also be provided for the pregnant ponds and storm water ponds.

POSSIBLE EFFECTS ON WILDLIFE, THREATENED AND ENDANGERED SPECIES, AND THEIR HABITAT

Describe the project area's species, their populations, available habitat, their migration routes, and the summer and winter ranges of wildlife in and near the project area, particularly species that are listed or proposed for listing as endangered or threatened, or are species of state or Federal concern.

Changes in surface water distribution can affect fish and wildlife abundance and distribution. Since the project is located in an arid environment, all existing water sources have wildlife dependent upon its current location. Any disruptions by the project to surface springs, groundwater, and surface water bodies should be clearly documented and mitigated. For instance, the construction of the tailings facility will involve diversion of surface water.

WILDLIFE HARMS FROM THE LEACH PAD AND PROCESS PONDS

The DEIS should contain measures protective of wildlife regarding the leaching processes, process ponds, and tailings ponds, including but not limited to several alternatives; 1" netting, floating pond covers, 8' tall wildlife fencing surrounds the pads and ponds, or enclosure of these processes within tanks. Hazing may be suggested as an alternative to prevent water fowl from entering contaminated ponds. But hazing is ineffective against fowl for two reasons: birds quickly learn that it is not a threat, and exhausted fowl will not pay attention to hazing.

The DEIS should discuss requiring training of mine personnel in methods of reviving poisoned birds and animals.

If the mine does use open leach pads, pregnant ponds and storm water and

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process ponds, then treatment of the solutions in the ponds should take place to reduce the concentrations of toxic materials to levels that will avoid adverse effects on fish and wildlife. Cyanide concentrations as low as .005 mg/l have been shown to adversely certain species. Concentrations of toxic materials and Ph levels in the ponds and pads should be monitored continuously.

The DEIS/Plan of Operation should prohibit spraying of leach solution onto the heap leach pad and instead mandate a drip system. This would greatly reduce the emissions and drift that comes from the sprayers, and also reduce the ponding of solution on the heaps that can attract wildlife and fowl.

INCREASED SILTING

This project will increase erosion. The silt in this erosion will adversely affect surface water bodies and could harm the habitat of fish and wildlife.

The proportion of fine sediment less than .25" in diameter in the erosion caused by the mine should be estimated and the impact of these fines on fish spawning grounds should be described. The cumulative effect of sediment from other mines and other sediment sources on fish habitat and spawning grounds should be discussed.

BLASTING

Blasting may produce noise and vibrations that drive away many animals. During blasting at a hydroelectric project on the Pit River in Northern California, the antelope population abandoned the area, even after blasting ceased. (California Fish & Game, comments to BLM and BLM submitted regarding the Hayden Hill gold mine, 1991)

SOILS

What are the soils and rock types of the proposed area, how are they distributed, what are their thicknesses, what are their hydraulic and chemical properties, including but not limited to acidity and alkalinity? What is the surface and subsurface geology of the proposed area?

Please describe nearby lithologic formations and their thicknesses. What and where are the area's geologic structures? How many acres of what types of soils will be degraded by the project? Will be able to stockpile sufficient topsoil for reclamation of the site? It is likely that any topsoil stockpiles will degrade during the years of storage and may comingle with poor quality soils. In this event, how will reclaim this site.



Please list the types of toxic materials used or handled at the proposed facility, including but not limited to acids, caustics, hydrocarbons, ammonia, cyanide, chlorine, zinc, antimony, lead, and cobalt. The amounts of toxics stored on site, the method and frequency of transport for these materials to and from the proposed facility, the amounts of toxics to be emitted into the air and water, the type of pollution controls and storage

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facilities for the toxic materials, and spill control measures should be discussed.

The project may operate heap leaching and solution ponds. The alternative of containing toxic mine processes within storage tanks, including but not limited to the heap leaching process and the pregnant and barren ponds, and tailings ponds, should be presented.

Any netting, fencing or other methods to reduce wildlife exposure to cyanide and other toxics at the project's leach pads and toxic pits should be described. These methods should be compared in efficiency and costs to the alternative of tanking these toxic fluids and processes.

THE AGENCY SHOULD NOT REJECT THESE PROJECT ALTERNATIVES BECAUSE OF THE DEVELOPER'S ECONOMIC JUSTIFICATION

The alternative of containing toxic mine processes within storage tanks, including but not limited to the heap leaching process, should be discussed. But before the agency accepts the mine's claims that this alternative should be rejected because of its expense, it should require the calculation of the clean-up costs of reclaiming the conventional heap leach pits. This cost should be compared with the costs of remediating a tank farm that could provide an alternative leaching method.

In addition, the open cyanide process, in contrast with an contained, enclosed system, would increase the chance of spilling and leaking cyanide solution. Storm water would not enter a closed cyanide system as readily, reducing the possibility that the system would flood and release cyanide tainted solution. The possibility of leaks from open processes, and the costs of clean-up, should be compared with the probability of leaks from enclosed processes, and those clean up costs.

For instance, the Ivanhoe mine and the Bond mine in Beatty, Nevada, and Nevada Gold and Viceroy Gold's Castle Mountain mine in California contain their pregnant and barren solutions within wholly enclosed tanks. The Ivanhoe procedure of enclosing its processes in two tanks of 120,000 gallons each is environmentally superior to the leach pad proposal. Ivanhoe's practices also demonstrate that tanking of these solutions is economically feasible.

CONTAMINATION

How will the migration and geochemical reaction of water moving through the open mine, the pits and the tailings piles be calculated? How many aquifers will be modeled? How many dimensions will be considered? What boundary conditions will be used? What will be the water chemistry after percolating through the tailings pile, and what is the chemical fate of this leachate if it enters the subsurface and groundwater, springs, and wetlands?

What will happen if the heap leach and/or tailings liner, pregnant pond liner, or ditches, or other containers of chemicals or solvents fails/leaks? What will be the leakage rate, the concentration of the solution constituent at the point of leakage and the facility boundary? Where would the leachate

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solution go? What type of leak detection system will be employed? What are the proposed long term monitoring plans for the facility?

UPSET CONDITIONS

The proposed mine will handle large amounts of toxic and hazardous materials. Any severe upset condition could release large amounts of these dangerous agents. An circuit failure or upset could mean that pumps may fail, warning systems would not sound, and toxic releases could begin unnoticed and unabated. For instance, a chemical fire and explosion at the Parish Chemical company in Orem, Utah occurred in July, 1992 because of a power outage. (Associated Press, 7/26/92) Such upset conditions, and mitigation measures, deserve serious evaluation in the DEIS.

CLEAN-UP

How will the mine provide funds for cleanup/monitoring/reclamation, following mine closure? How will waste, heap leach and tailings piles, ponds and ditches be constructed to prevent leakage, discharge to land surface or drainages, and to detect leakage and discharges? Will the mine have enough topsoil stockpiled for the reclamation?

The DEIS should describe the mining and industrial compliance record of and its parent companies including but not limited to the operation of its subsidiaries and the mines and companies in which it is a partner or major stockholder. This narrative should list all toxic releases by its subsidiaries, or by companies and mines in which it is a partner or large stockholder, and any violations of rules regarding air and water pollution, toxic clean-ups, health and safety violations, and related litigation involving this mine operator.

The DEIS should contain safeguards to insure that the mine promptly clean-ups and reclaims its mine site. How will the mining activity affect future and current land uses, including but not limited to tourism, agriculture, timber harvest, geothermal energy, and recreation? What is the lost revenue from these activities that are curtailed by the mining project? How will the recent memo by BLM in California regarding backfill of mining pits affect the obligations to backfill at the site?

BONDING

The DEIS should discuss the appropriate size of a bond to finance reclamation of the mine site, such bond to be posted by the mine developer. This sum should be at least \$6000 per acre of disturbed area.

Please include a statement of the applicant's financial condition, including a profit/loss statement, debt to equity ratio and summaries of annual reports for three years. This information is needed to evaluate the bonding requirements.



ORE AND WASTE ROCK ANALYSIS

The DEIS should contain information from meteoric water mobility tests on ore and waste rock from the mine site that is representative of each

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existing and each proposed source of ore. If there are geologic boundaries that geochemically define one region of an ore body from another region within the same body, a meteoric water mobility test must be performed for each region. If a ore body is geochemically homogenous than the mine owner should provide a statement of such.

ENERGY USE AND TRANSMISSION LINE

Please discuss the project's energy demand, type and size of transmission line needed, the route of the new line, the population and land uses in and near the line corridor, and state when that line capacity will become insufficient. The energy discussion should include preferred and alternative line routes, reliability, safety, design features, description of towers and foundations, material type of conductors, mid-span ground clearance, spacing between phases, etc., static or lighting protection, insulators, right of way requirements, planned operational voltage and critical voltage, electrical effects such as corona loss, ozone generation, electric power losses, and the creation of electromagnetic fields.

The energy/power line discussion should include the expected location of the construction workforce housing, a discussion of the right of way survey, tower spotting, and the following activities: clearing, road building, foundation installation, tower assembly, conductor installation, cleanup and reclamation, and maintenance.

TRANSPORTATION AND SHIPPING

Please describe the mode of transportation for materials to the site and wastes and product away from the site, including access routes, modification of existing traffic patterns, an estimate of the additional traffic to run on the access routes, vehicle emissions, and the method of materials containment during transport.

Include discussion of the possible hazards associated with this transportation, any safety precautions, and the emergency procedure should an accident occur. The location of any storage facilities or transfer stations should be identified. Please describe how the facility's train and truck traffic will comply with state and federal transportation and environmental regulations.

SCENIC AND RECREATIONAL IMPACT

The possible effect on tourism from creation of the open pits and other mine impacts should be discussed. Please describe the project area's current scenic resources, their location, extent, and significance to the area, including any archaeological and historic resources. Please state if these sites are registered or eligible to be registered.

Please analyze the project area's outdoor, resource-oriented recreational opportunities including locations and types of the recreational resources.

One possible mitigation would be requiring to reclaim the nearby areas degraded other old mining operations.

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DESCRIPTION OF VEGETATION AND CLIMATE

Please discuss the regional vegetation, including proposed seed mixes for stabilization and reclamation. Please describe the climatic patterns, meteorology, rainfall and snowfall.

The operation of this mine will severely degrade this area, and render it unavailable for other uses such as recreation, grazing, and habitat, by withdrawal of groundwater, and extensive surface disturbance. The DEIS should contain a close calculation and comparison of the financial and other values that could be lost for many, perhaps hundreds of years, as compared to the economic gains from allowing the mine to operate for its life.



CONSTRUCTION AND PRODUCTION INFORMATION

Please state when construction is expected to commence, the construction time, estimated construction costs and payroll, total facility cost, estimate of cost of facility subject to use tax, property tax, income, severance and sales tax, as applicable.

Please list the anticipated numbers and job classifications by calendar quarter of employees of the applicant, its contractors, and subcontractors during the construction, and in a separate tabulation, during the operating life of the facility, including seasonal fluctuations, peak employment during both construction and operation, annual payroll, and the expected benefits, including housing allowances, transportation allowances, per diem allowances, pension and health benefits.

Please predict the number of employees to be utilized during construction, operation and maintenance of the facility that do not currently reside within 75 miles of the facility, and the number who do not currently reside within this State.

Please describe the methods how will maximize utilization of local contractors and the local labor force.



SOCI0-ECONOMIC INFORMATION

Please include a study of the area economy, including employment projections by major sector, economic bases and trends in the local economy, estimates of basic and non-basic employment, unemployment rates, a study of the area population, including a description of the methodology used, an evaluation of demographic characteristics for the current population, and projections of the area population without the proposed industrial facility.

Please include a fiscal analysis for all local governments and special districts that may be affected by the proposed facility, including revenue structure, expenditure levels, mill levies, services provided through public financing, and problems in providing public services Please include such services as water supply, solid waste, sewer and waste water and stormwater collection and treatment, library, police, fire, school, social service, health care. and recreational facilities, existing service levels, problems, needs, necessary improvements and expansions. and those related costs.

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The discussion on schools should include ratio of students to teachers, enrollment per grade, average class size, physical facilities and their capacities, and vocational training programs.

Please analyze the area's housing facilities by type, the number of units in the area, the current and projected vacancy rates, costs, and rental rates.

Please analyze the project area's transportation facilities, including roads, (surface, type and mileage) and railroads (frequency of service, tonnage capacity, and mileage).

SOCIO-ECONOMIC IMPACTS

The proposed mine expansion will increase the short term construction work force significantly. These workers could be imported from other areas. The recent FEIS for the Barrick/Betze mine in Nevada estimated that 70% of the workers in the peak construction work force for that expansion are imported.

If hires this proportion of out of state workers, there will be a significant, unmitigated impact on local social services.

This transient increase in the labor force burdens local social services, such as schools, roads, hospitals, jails, and welfare. This increased cost to social services should be estimated. Mitigation payments from the construction company to local city and county government to compensate for the mine's construction and its associated burdens on social services should also be estimated.

In the past, many major mine construction contractors have imported their work forces. If an out of state contractor is hired for the proposed project, there will be negative socioeconomic impacts. These potential negative impacts should be studied as part of the scoping process for the DEIS.

If an out of state contractor imports almost all of its construction crew, there is little economic benefit to the local area from the construction activity. But an out of state construction work force places heavy demands on the local government infrastructure, principally on housing and campgrounds, roads health care, schools, and police.

Many construction workers could come and go for the life of the project. Scores of out of state production workers could come and go, as different crafts and skills are in demand during the life of the mine.

The estimates of economic benefits from the construction and production work force of mine should include the probability that will import most of their construction and production work

force, and run some long term mine functions by importing out of state workers.

An out of area contractor performing continuous functions at the mine

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would reduce the number of jobs for local workers in the daily operation of this facility. This would affect any estimate of socioeconomic benefits.

In summary, the DEIS' estimates of the socioeconomic impact of this project, and the descriptions of possible alternative configurations of the project, should scrutinize the economic burdens from an imported construction and production work force. This burden should be contrasted with the project alternative of a local construction and production work force that is paid prevailing area wages and which receives a health plan.

Discussion of project alternatives should include possible mitigations for the project that would increase local hiring of construction labor. This could be accomplished with a local hire or prevailing wage requirement as a condition of this DEIS and this mine's plan of operation.

The DEIS could also mandate specific sums of mitigation payments to schools, pelice, health care, pollution control agencies and other agencies that must police and serve the mine and its work force. Wyoming, California and Utah often require industries to pay for many expansions of public services out of its own pocket as an up-front development cost.

Wyoming, for instance, has an industrial siting commission that calculates the mitigation payments required for the construction work force impacts by new projects. Recent mine expansions in Green River, Wyoming were required to pay \$112,000 to area schools to mitigate the increased enrollment from its construction work force.

Lacking appropriate mitigation, the DEIS should list the economic and social consequences of an imported construction labor force (and imported mine work force) to be an unmitigated significant impact on all social services.

MANCAMP

The DEIS should also consider the impact of inappropriate actions by persons associated with the proposed project. This includes vandalism and poaching, taking of fish and wild life, materials spills and adverse actions by vendors supplying hazardous materials to the project.

This is particularly important regarding this project if there is a proposed mancamp. Mancamps and widespread camping out by transient construction work forces can contribute to widespread poaching and killing of wildlife, and vandalism and degradation of formerly secluded natural areas that are inappropriate for extended human habitation.

LOCAL PAYROLL AND LOCAL SPENDING

The DEIS should use variations of the following calculations to determine the financial strain on public services caused by an imported construction work force.

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A locally hired construction work force spends 95% of its income in the local economy. This would multiply the favorable economic impact. In contrast, an imported work force spends only about one-half its income locally. So in comparison, an imported work force would reduce local spending and decrease the economic benefit of the construction phase of the proposed project.

The DEIS for the recent Barrick mine expansion in Nevada estimates that 70% of that mine's peak construction work force would be from out of state. The following calculations assume a similar percentage for the construction work force for this project.

SCHOOLS If out-of-state workers arrive for the proposed project, 70% of them will be married, 50% will bring their families, who will bring an average of 1.5 children. Many additional children may be placed in local schools. It may cost the school system an additional thousands of dollars per child per school year to educate these children. This means that the out of state work force will cause an annual financial impact on the local schools.

This increase in enrollment may force capital expansion of the school system. Expanding the capital expansion of a school system costs about per additional student who enrolls in already overcrowded schools. If the schools in the project area are overcrowded and forced to expand, they will be forced to spend large sums to accommodate the importation of families by an out of state work force. It is appropriate to consider the peak construction labor force in this calculation because the schools must meet this peak load of students.

In Challis, Idaho, for instance, community tax dollars were spent to build a junior high school that was boarded up when the construction boom from the Cyprus Thompson mine ended. Eureka, Nevada experienced a 50% increase in school enrollment from 1988-89 in part because of an influx of the children of mine construction workers. In Salmon, Idaho, according to county commissioner Quinton Snook, "(W)e built the new high school figuring the Cobalt (mine) money would pay for it. Then Cobalt dies and the taxpayers picked up the tab." (Post Register, Idaho Falls, Idaho, 7/23/89)

REDUCED WELFARE AND UNEMPLOYMENT PAYMENTS

The imported workers will take jobs that could have been filled by local, unemployed workers. Local unemployed workers could have been taken off the welfare and unemployment rolls instead. The predominantly imported work force will cost government coffers about \$1.6 million in additional unemployment payments to local workers who stay unemployed. There is also an increased cost in continued welfare payments to unemployed local workers that should be calculated in the DEIS.

INCREASED IMPACT ON HEALTH CARE PROVIDERS

Many of these imported construction workers will seek medical care at

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local health care facilities. To illustrate this possible impact, in one 14 month period, there were 101 injured construction workers who filed workers compensation claims from the Cyprus Thompson mine job in Custer County, Idaho. These numbers indicate there may be many injured workers from the proposed construction work force who seek care. Local hospitals will be stretched thin.

Many workers may have no health care at the start of a construction job. If their families or the workers are hurt, who will pay? The hospital or physician who treats these workers may end up passing the costs of that unpaid treatment on to the taxpayers and the paying customers of the hospital or doctor.

FINANCIAL IMPACT ON HEALTH CARE PROVIDERS

Some of the imported construction workers will have spouses and children. The national average for one person's annual medical care is \$2000. Assuming the construction work force and their families require one-half this amount of health care, and 15% of this group lacks health insurance, then local health care facilities must provide thousands of dollars in potentially uncompensated medical assistance to this group.

The DEIS should set out mitigation payments to local health care facilities for treatment of these temporary construction workers and their families.

FINANCIAL IMPACT ON THE BLM

The preparation of the EIS and the policing of the mine operations by the BLM will require a large commitment of BLM staff. The cost of this commitment should be stated in the DEIS, and borne by the applicant to mitigate the adverse financial impact on this public agency.

MINE CLOSURE

How will the mine closure affect local employment, economics, transportation, housing, public utility service, social services, local state and federal government, public government services, and schools?

What will be done to mitigate any of these negative impacts?

The EIS should contain a chart showing changes in the total numbers and percentages of the employment and unemployment rate for the entire workforce of the counties surrounding the Mine, and also for the construction and mine workforce. Other charts should show changes in the numbers of children in the local schools, and changes in the crime rates, for nearby cities and the surrounding counties. All these charts should provide yearly totals over the last ten years.



