

CHAPTER 2.0

Summary

This MEA assesses the potential environmental impacts of the IMMC's proposal to reopen the historic Idaho-Maryland Mine for gold mining and to operate a ceramics plant that would produce a variety of marketable ceramic tile products from mine waste product. This document has been prepared in the format of an "expanded" Initial Study using the Environmental Checklist found in Appendix G of the CEQA Guidelines. For each resource area, the potential impacts of the proposed project were assessed using the existing application documents and other available data and studies. For some resource areas (e.g., biological resources, cultural resources, noise, etc.), limited field reconnaissance and/or desk-top calculations were conducted to support the assessment or to determine if more rigorous studies would be required to support a full CEQA analysis. The City of Grass Valley is the lead agency for this CEQA process. Inquiries about the project and the CEQA process should be directed to:

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2.1 Proposed Project Components

The Idaho-Maryland Mine project site (project site) encompasses a total of 146 acres of land within the City of Grass Valley and unincorporated Nevada County. Three properties comprise the project site: (1) the Idaho-Maryland site (101 acres); (2) the New Brunswick site (37 acres); and the Round Hole site (8 acres). As part of the proposed project, IMMC has submitted applications to annex the Idaho-Maryland site into the City of Grass Valley, amend the City of Grass Valley's General Plan to accommodate the proposed use of the Idaho-Maryland site, and to zone the Idaho-Maryland site to be consistent with the proposed General Plan amendment and the proposed use of the site. The Exploration and Mining Use Permit application includes the following:

- Formal Development Review Application,
- Mineral Project Application (Use Permit/Mining Permit/Reclamation Plan),
- General Plan Application,
- Rezone/Prezone Application, and
- Annexation Application.

IMMC proposes construction and operation of the mine in three phases to meet the development and mining rates as exploration and development expands, and resources and reserves are identified. Within these three phases, IMMC proposes to dewater the existing Idaho-Maryland Mine, conduct underground exploration and development, develop industrial mineral and gold deposits, process the ore to produce gold doré, process development rock and tailings into high quality ceramic building products, and operate and maintain the facilities for the life of the project (approximately 20 years).

For purposes of this environmental analysis, it is assumed that the City would issue permits for the construction and operations of the proposed project in 2007/2008. Full production is anticipated to be achieved in 2013 with operations continuing through 2028, contingent on further underground exploration results. Any proposal to extend operations beyond that currently proposed would require an amendment to the Mining Permit and the Reclamation Plan, as well as any other City permits in effect at that time, and may also trigger additional CEQA review. Absent indication of additional ore resources to be developed, the planned site closure date (i.e., end of mining operations) is in 2028. Site reclamation would be expected to be initiated at that time and last for approximately one year.

2.2 Public Concerns

As part of the MEA process, the City held two community workshops for the public and one meeting for interested agencies. On January 25, 2006, the City held two community workshops to solicit public comments on the proposed project. The workshops were held to identify issues that should be considered for evaluation as part of the environmental review process. The workshops were held at Veterans Memorial Hall located at 255 South Auburn Street in Grass Valley, California. The format and content of the two workshops was identical; two different time slots (one in the afternoon and one in the evening) were provided to accommodate the different schedules of the public. At the workshops, City staff and the City's environmental consultant provided a brief presentation of the proposed project and described the three-phased approach for assessing the environmental issues. After the presentation, the City's consultants were available at several breakout tables to discuss specific topics or issues of interest. Comment forms were available to be filled out at the meeting or submitted to the City after the meeting. Principal areas of concern included:

- Construction and operations impacts related to traffic, air quality, and noise
- Water Quality impacts associated with construction, stormwater, dewatering (including impacts to adjacent domestic wells), mine water treatment, and discharge on local waterways (i.e., pollution, temperature, flow)
- Biological impacts associated with loss of wetlands and impacts to special status species
- Utilities impacts associated with increased demands for sewer services, water, natural gas and electricity

- Public services impacts associated with increased population on schools, local housing, and medical facilities
- Future impacts associated with closure of the mine as related to workers, infrastructure, etc. What are the reclamation plans? Who will be responsible for clean-up?

On February 28, 2006, the City held an agency workshop to solicit comment on the proposed project. The workshop was held to identify issues that should be considered for evaluation as part of the environmental review process. The workshop was held in the Hullender Room at the City of Grass Valley City Hall located at 125 East Main Street in Grass Valley, California. The content of the meeting was similar to the community meetings described above as City staff and the City's environmental consultant provided a brief presentation of the proposed project and described the City's three-phased approach for assessing the environmental issues. However, rather than have break out tables, a roundtable discussion ensued that allowed City staff and Agency representatives an opportunity to provide comment and response to potential issues that should be considered in the environmental review process. Principal areas of discussion included:

- Dewatering: volume of water, discharge location, pollutants, dewatering of adjacent domestic wells
- Water Quality impacts to local water courses associated with stormwater runoff
- Utilities impacts associated with streams of waste (i.e. sewage and solid waste).

Information from the two community meetings as well as the agency meeting were used to inform the document preparers of issues and concerns that needed consideration in the CEQA process.

2.3 Summary of Potentially Significant Impacts and Data Gaps

Table 2-1, presented at the end of this chapter, summarizes the potentially significant impacts of the proposed project. Each of these impacts is explained in more detail in the corresponding resource area in Section 4, *Environmental Checklist and Discussion*. Although these impacts were identified in this MEA as potentially significant, there could be mitigation measures and/or additional information that, when considered in the subsequent phases of the CEQA analysis, may reduce the impact to less than significant.

A list of data gaps was developed in each resource area and are described in Section 4, *Environmental Checklist and Discussion*. These data gaps represent information items, additional project details, or site-specific studies that were not available for this MEA but which will be required to conduct a thorough evaluation of the proposed project during the EIR process. These data gaps and corresponding entity that is responsible for fulfilling those request are summarized in **Table 2-2**.

2.4 Environmental Constraints Map

Figures 2-1 through **Figure 2-3** illustrate the site boundaries for the Idaho-Maryland, New Brunswick, and Round Hole sites, respectively, and depict some of the environmental constraints identified in this MEA which lend themselves to spatial representation. These constraints include:

- Slopes >30%
- Potentially sensitive habitat (e.g., potential wetlands)
- Other biologically sensitive habitat
- Adjacent levees, dikes, or similar hazards
- Existing utility corridors
- Location of potentially hazardous soils
- Geologically unstable areas
- Potential land use conflicts.

TABLE 2-1
SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Environmental Impact
<p>Aesthetics</p> <p>Impact 4.1-1: Implementation of the proposed project could result in short-term visual impacts due to construction activities.</p>
<p>Agriculture Resources</p> <p><i>No potentially significant impacts</i></p>
<p>Air Quality</p> <p>Impact 4.3-1: Project construction emissions would result in intermittent, temporary increases in air pollutant emissions.</p> <p>Impact 4.3-2: The proposed project would generate emissions of criteria pollutants (PM10, NOx, CO, SO2, and ROG) at the project sites and along haul routes. Project-generated emissions would potentially be above the applicable significance threshold.</p> <p>Impact 4.3-3: The proposed project would generate DPM emissions from on-site mobile sources and TAC emissions from processing operations. These emissions would have the potential to increase exposure to project TAC emissions at nearby receptors.</p> <p>Impact 4.3-4: The proposed project would generate localized CO emissions at intersections in the project vicinity.</p> <p>Impact 4.3-5: Operational activities associated with project implementation could lead to increases in odorous emissions.</p> <p>Impact 4.3-6: The proposed project, together with anticipated cumulative development in the area, would contribute to regional criteria pollutants.</p>
<p>Biological Resources</p> <p>Impact 4.4-1: The proposed project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS.</p> <p>Impact 4.4-2: The proposed project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFG and/or USFWS.</p> <p>Impact 4.4-3: The proposed project would have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.</p> <p>Impact 4.4-4: The proposed project would interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.</p> <p>Impact 4.4-5: The proposed project would conflict with local policies or ordinances protecting biological resources.</p>

TABLE 2-1 (continued)
SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Environmental Impact

Cultural Resources

No potentially significant impacts

Geology, Soils, and Seismicity and Mineral Resources

Impact 4.6-4: Mining activities associated with the project may be impacted by or contribute to subsidence hazards associated with existing subsurface mine works. Sudden subsidence due to collapsed mine portals and tunnels present a hazard to people, mine workers, and property.

Impact 4.6-6: Areas of the project sites contain fill material that is unsuitable to support structural improvements.

Hazards and Hazardous Materials

Impact 4.7-1: The proposed project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Impact 4.7-2: The proposed project could result in the accidental release of hazardous materials into the environment.

Impact 4.7-3: The Idaho-Maryland site is listed as a hazardous material site and thus, the proposed project could result in a significant hazard to the public or environment.

Hydrology and Water Quality

Impact 4.8-2: Mine dewatering activities proposed under the project could reduce groundwater levels or entirely dewater certain high risk domestic groundwater supply wells in the vicinity of the Idaho-Maryland mine site.

Impact 4.8-4: The project would require the discharge of mine water into Wolf Creek (from the Idaho-Maryland site) and South Fork Wolf Creek (from the New Brunswick site). The increased flows during high flows could increase the potential for flooding downstream and the flows during dry months could increase base flows and result in increased bank erosion.

Impact 4.9-5: The structural integrity of the berm separating the Milco Property and the Idaho-Maryland site is unknown. In the event of an earthquake or a static failure within the earthen structure, water could be discharged in the pond to the Idaho-Maryland site.

Land Use and Planning

Impact 4.9-2: The proposed project, including proposed annexation of the Idaho-Maryland site into the City of Grass Valley, proposed General Plan Amendments, proposed zoning changes, and operation of a gold mine would result in a change to land uses at the project sites and could conflict with existing adopted applicable land use plans and policies.

Noise

Impact 4.10-1: Construction activities associated with the proposed project would temporarily and intermittently increase noise levels and ground-borne vibration at nearby sensitive receptor locations.

Impact 4.10-2: Operational activities (stationary and off-road mobile equipment) associated with the proposed project could increase ambient noise levels at nearby residences.

Impact 4.10-3: Operational activities (transportation) associated with the project could increase ambient noise levels at nearby residences.

Population and Housing

Impact 4.11-1: The proposed project could indirectly induce substantial population growth in the City of Grass Valley and surrounding areas.

Impact 4.11-2: The proposed project would indirectly displace housing units by changing the land use designation for a portion of the Idaho Maryland site from *Urban Medium Density* residential to Manufacturing Industrial to accommodate the proposed mining operation.

Public Services

Impact 4.12-1: The proposed project could affect Grass Valley and Nevada County Fire Departments' ability to provide adequate fire suppression and emergency services.

TABLE 2-1 (continued)
SUMMARY OF POTENTIALLY SIGNIFICANT IMPACTS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Environmental Impact
<p>Impact 4.12-2: Implementation of the proposed project could affect both the City of Grass Valley and Nevada County Police and Sheriff Department’s ability to provide police protection services to the project site and other areas under its jurisdiction.</p> <p>Recreation</p> <p>Impact 4.13-1: The proposed project could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.</p> <p>Transportation and Traffic</p> <p>Impact 4.14-1: The proposed project would increase traffic volumes on area roadways.</p> <p>Impact 4.14-2: The proposed project would potentially affect traffic safety on area roadways.</p> <p>Impact 4.14-3: The proposed project would require adequate site access for general and emergency vehicles.</p> <p>Impact 4.14-4: The proposed project would generate demand for parking spaces.</p> <p>Utilities and Services Systems</p> <p>Impact 4.15-1: The proposed project would require additional domestic water service from the Nevada Irrigation District.</p> <p>Impact 4.15-2: The proposed project would decrease the excess wastewater capacity of the City of Grass Valley WWTP.</p> <p>Impact 4.15-3: The proposed project would generate solid waste.</p> <p>Impact 4.15-4: The proposed project would increase annual consumption of electricity and natural gas, which would increase demand on nonrenewable resources.</p>

TABLE 2-2
SUMMARY OF DATA GAPS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Data Gaps	Responsibility
Aesthetics	
1. Additional detail is needed regarding the maximum anticipated height of the stockpiles.	IMMC
2. Does the lumber mill located on the Idaho-Maryland site include existing nighttime operations or any other lighting during nighttime hours?	IMMC
Agriculture Resources	
<i>No data gaps identified</i>	
Air Quality	
1. Additional information regarding air emissions from the air quality Authority-to-Construct Permit is needed. If an ATC will not be submitted until completion of the CEQA analysis, the applicant should provide all relevant information regarding manufacturer specification and initial air emissions estimations for the equipment to be used for the project. For the air emission sources which are likely to require a permit from the NSAQMD (e.g., backup generator, kilns, furnaces, and dryers), provide the stack/vent parameters such as diameter, height, exhaust flow rate, exhaust temperature.	IMMC

TABLE 2-2 (continued)
SUMMARY OF DATA GAPS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Data Gaps	Responsibility
2. Is there a frit furnace within the ceramic processing units?	IMMC
3. Provide the size, fuel type, expected hours of operation, and location of the emergency generators and water treatment plant pump stations (if applicable).	IMMC
4. Provide Figure 1 Flow Diagram 2400 STPD, Section 1 (FDR) and Section 2 (MP) Applications, Volume 1 of the Application documents, as the referenced is not contained within the documents received.	IMMC
5. Information on the process material crystalline silica content and asbestos content and the fluorine content in the ceramic raw material is needed.	IMMC
6. Will the haul trucks be owned by the mining operator?	IMMC
Biological Resources	
1. Rare plant surveys results conducted during the 2006 blooming season should be incorporated into the environmental documentation during the next phase. These surveys focused on identifying species listed on Table 4.4-1 that may be affected by the proposed project.	EIR Team
2. Obtain and review for adequacy aquatic species surveys conducted by Affiliated Researchers in 1991 and Willdan and Wallace-Kuhl in 1995 for South Fork Wolf Creek. Supplemental surveys will be required if the previous surveys are not adequate.	IMMC/EIR Team
3. Aquatic surveys should be conducted during the appropriate season for evaluating habitat and water quality that may be affected by the proposed project (i.e., Wolf Creek).	IMMC/EIR Team
4. During the EIR phase, map sensitive natural communities in the project area including riparian, other wetlands, oak woodlands, and gabbro-soil associated communities to evaluate whether adverse impacts to the communities would be substantial.	EIR Team
5. Update MACTEC 2004 Wetland Delineation to reflect current regulatory standards and baseline conditions.	IMMC
6. Confirm with CDFG information from the City of Grass Valley 1999 General Plan Draft EIR that states that a locally important deer herd would not be affected by activities within the project area.	EIR Team
7. Confirm with CDFG that no Natural Community Conservation Plans or Habitat Conservation Plans are in effect in the project area.	EIR Team
8. Coordinate with Nevada County to determine if the Nevada County Natural Resources Report data layers pertaining to habitats are at an appropriate scale for project analysis. If so, EIR Team would request these data layers to incorporate into the CEQA analysis.	EIR Team
Cultural Resources	
1. Further field efforts are recommended to identify and map the remains of the Nevada County Narrow Gauge railroad extent that runs near the New Brunswick mine—also in terms of the potential for the project to impact this site.	EIR Team
2. Confirm if Nevada County has an adopted cultural resources ordinance.	EIR Team
Geology, Soils, and Seismicity and Mineral Resources	
1. In order to adequately assess project impacts of unsuitable fill materials, the applicant should provide an additional assessment on how they propose to mitigate the areas reported by H&K as containing fill material that are unsuitable and incapable of supporting structures.	IMMC

TABLE 2-2 (continued)
SUMMARY OF DATA GAPS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Data Gaps	Responsibility
<p>2. H&K did not conduct a seismic evaluation in their preliminary geotechnical evaluation nor did they discuss seismic risk. It is understood that earthquake ground shaking could occur but the shaking intensity will likely be low. Nevertheless, it would assist our analysis if the applicant, through H&K, provided results of a site seismic characterization. Such an evaluation should include a summary of earthquake related risks, estimated ground motions, an assessment of the likelihood of seismically induced ground failure, potential discussion of the likely earthquake sources, and distances from the site to causative faults.</p>	IMMC
<p>3. Additional information is needed to fully assess the potential for subsidence due to collapse of mine workings. This analysis is necessary to demonstrate that reactivation of the Idaho-Maryland Mine and the proposed development would not lead to subsidence hazards that could affect people of property. The MEA team requests that IMMC provide information on past or present failures of mine workings, at the Idaho-Maryland Mine, if any, that have led to surface subsidence, settlement, or structural damage. Of primary interest are failures in the mine workings that occurred near the ground surface (i.e., entrances to declines or shallow tunnels) and resulted in subsurface collapse noticeable at the surface.</p>	IMMC
<p>4. Our geotechnical analysis would benefit from additional information on the structural competence of the stormwater detention pond and basic design features of other proposed or existing water retention facilities, slated to be used for the project. Useful information would include size, depth, liner material, spillway design and underlying geologic materials.</p>	IMMC
Hazards and Hazardous Materials	
<p>1. The estimated amount of hazardous materials that would be generated, stored, used, transported, and handled at the project site are needed. This information would be included in the Material Safety Data Sheets and the Emergency Response Plan/Health and Safety Plan. The existing Emergency Action Plan is generic and does not provide sufficient information for emergency response.</p>	IMMC
<p>2. Information regarding past land uses at all of the project site, including areas of the Idaho-Maryland Mine site not covered by the Due Diligence site Investigation, and the New Brunswick and Round Hole site, should be compiled. Existing environmental conditions at these sites, including any past hazardous material releases, LUSTs, or historical land uses associated with hazardous materials should be identified.</p>	IMMC
<p>3. Laboratory results for soil and groundwater analysis are needed for all portions of the project site where historical land uses could have potentially affected the site. The analysis should evaluate the integrity of the site with respect to the presence of metals (cyanide, arsenic, mercury, and lead), petroleum hydrocarbons, chlorinated hydrocarbons, and pentachlorophenol.</p>	IMMC
Hydrology and Water Quality	
<p>1. If possible, the South Fork Wolf Creek and Wolf Creek flows should be updated and made available for baseline data prior to project implementation, especially the mine dewatering and discharge phase. Updated data may capture increased runoff in the creek system due to development within the vicinity of project site. If flow data from another source, (i.e. Wolf Creek Community Alliance) is not available, baseline flow monitoring should be strongly considered as part of the project. Monitoring should be implemented prior to additional discharges from the Idaho-Maryland site and prior to initiating proposed mine dewatering at the New Brunswick. (Walker and Associates, 2006). See Appendix B for Walker and Associates Technical Memorandum.</p>	IMMC

TABLE 2-2 (continued)
SUMMARY OF DATA GAPS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Data Gaps	Responsibility
2. Erosion potential should be determined by segments within the creeks and downstream of the proposed discharge point. Typically the segments can be 500 to 1,000 feet in length. Each segment should be characterized to ensure that erosion or flooding would not be affected by addition of discharge water to the Creek (Walker and Associates, 2006).	IMMC/EIR Team
3. If available, baseline historic and current water quality data for both Wolf Creek and South Fork Wolf Creek would provide a baseline for future comparison after mine water begins entering the system (Walker and Associates, 2006).	IMMC
4. In 2006, the shaft was re-sampled at several different depths for a comprehensive list of analytes. These data are pending and should be reviewed prior to drawing conclusions as to mine water chemistry. Based on the reviewed available data, it is recommended that:	
<ul style="list-style-type: none"> • The new shaft water chemistry data be reviewed and compared to the data collected in 1994. This would elucidate changes in water quality and allow for a detailed geochemical assessment of the data, including metal speciation calculations and saturation index calculations for common minerals. The data from each level can be compared to the rock type to determine the effect of wall rock on shaft water chemistry. This may help with predicting long-term water quality changes in pumping during mine operation (Walker and Associates, 2006). 	EIR Team
<ul style="list-style-type: none"> • Samples of surface discharge should be collected and compared to the 1994 data. As before, rock samples should also be collected to determine sources of arsenic and metals if possible. 	EIR Team
<ul style="list-style-type: none"> • Upstream samples should be collected to assess the potential influence of mine seeps on downstream water quality. 	EIR Team
5. It is recommended that a hydrologic assessment be performed that will show to what extent the release of mine water would increase stream flows throughout the year. Since normal winter flows have been found to approach 6 cfs, this flow should not be exceeded during dewatering. Adequate creek baseline flow data will be needed (See Data Gap Item No. 1).	IMMC/EIR Team
6. The applicant needs to provide data regarding locations of new mine workings (at least the most shallow) before a risk assessment can be performed on all wells (formerly analyzed during the 1995 study). Reliable information as to the documentation of the location(s) of all wells (new and old) within ½ mile distance from any existing and proposed underground workings of the mine will be needed. To achieve control over spatial data relating old/new wells to old/new workings, it is recommended that all these locations be included into one transit survey. The applicant using old mine maps could acquire required control over existing mine workings and a new or recent surface survey could acquire control over all wells, if not already performed. New or proposed mine workings could then be added. Both systems, including all workings/all wells, could be combined using a common benchmark. The design of this combined system must achieve control over distances between all existing wells (old and new) to all underground mine workings (existing and proposed).	IMMC

TABLE 2-2 (continued)
SUMMARY OF DATA GAPS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Data Gaps	Responsibility
Land Use and Planning	
1. Additional information regarding the proposed visitor's center is needed. Specifically, an explanation why the visitor's center is considered to be "consistent with the intent of the City's Parks and Recreation Master Plan as a pocket park..." With the information we have now regarding the proposed Visitor's Center, we are unable to determine that the project would not conflict with the City's Parks and Recreation Plan.	IMMC
2. Additional information is needed regarding proposed mitigations to address inconsistency of proposed 3,000 square-foot hoist house on the New Brunswick site with the Nevada County Zoning Ordinance.	IMMC
3. Additional information is needed regarding proposed mitigations to address conflict with City of Grass Valley Parks and Recreation Master Plan.	IMMC
4. To adequately assess potential conflicts with the City of Grass Valley Capital Improvement Plan, as adopted by the General Plan, it is necessary to have more detailed plans for implementation of the proposed Centennial Drive arterial right-of-way by 2015 or a proposed alternative to the proposed Centennial Drive arterial right-of-way that would meet the City of Grass Valley's needs; as well as any further modifications to avoid potential conflicts with adopted City policies pertaining to the proposed road extension.	IMMC
5. To adequately assess potential conflicts with the Whispering Pines Specific Plan, it is necessary to have a more detailed site plan for the Round Hole site that shows Ponderosa Pines to be saved and those to be removed as part of the project.	IMMC
Noise	
1. Traffic noise analysis will need to be updated when additional traffic trip volumes become available.	IMMC
2. CEQA analysis will require more detailed mapping of off-site sensitive receptors, distance of proposed site operations to those receptors, existing noise measurements at those locations and topography between site operations and those receptors. Maps are needed to show sensitive noise receptor locations including receptors potentially affected by construction and operations. The location of proposed projects near the project site should also be indicated.	IMMC/EIR Team
3. Revisions are needed for the noise level estimates from aboveground off-road mobile equipment based on the types of equipment and potential proximity to nearby receptors. Also, noise levels of diesel powered versus electric powered forklifts will be needed for comparison to determine if the equipment noise levels generated at the tile storage area in the BBA report were overestimated, since electric forklifts have been proposed as mitigation in Table 4.10-5.	IMMC
Population and Housing	
<i>No data gaps identified</i>	
Public Services	
1. Additional information is needed regarding proposed mitigations to reduce indirect and direct impacts to police and fire services.	IMMC
2. A more detailed emergency management plan is necessary. The Plan should include proposed accident avoidance measures, evacuation plans, specific demand that would be placed on the fire department by operation of the mine, training of on-site personnel that would be qualified to assist in an emergency, etc.	IMMC

TABLE 2-2 (continued)
SUMMARY OF DATA GAPS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Data Gaps	Responsibility
3. Evidence of affiliation with the Lassen County and/or Tuolumne County mine rescue teams is necessary.	IMMC
4. Additional information is needed regarding the criteria that are in place to be granted "small and remote" status and whether or not IMMC has applied for this "small and remote" status. What does IMMC propose to do if "small and remote" status is not granted? Similarly, if small and remote status is granted, what criteria would trigger operations to extend beyond the limits of "small and remote"? How long does IMM propose to operate as "small and remote"?	IMMC
Recreation	
1. The location of the proposed pocket park and the proposed public trail easement need to be defined, and a description is required regarding how these recreational resources would be maintained (i.e., through a public/private agreement with the City).	IMMC/City of Grass Valley
2. Detail is needed regarding the proposed visitor's center and how it would serve as a recreation facility for public use is required. Details should include amenities that would be provided and hours that the resource would be available to the public.	IMMC
3. Information regarding future plans to conform to the Wolf Creek Parkway Master Plan and to facilitate and/or allow for completion of the Wolf Creek Reach of the proposed Wolf Creek Parkway should be provided.	IMMC
Transportation and Traffic	
1. The project trip generation estimate by Crane Transportation Group (CTG), in Appendix N of Volume III of the Application for Mineral Exploration and Mining Use Permit, for the Idaho-Maryland Site only, was based on provision of four work shifts, whereas the project description stipulates there would be up to three shifts. If the latter is correct, then CTG's numbers will have to be revised.	IMMC
2. The CTG report will need to be revised to include an estimate for project construction truck trip generation.	IMMC
3. Trip generation information and parking supply/workforce characteristics are missing for the Round Hole and the New Brunswick site, and will be required to complete the analysis.	IMMC
4. Expected post-reclamation land use is needed if assessments of potential future impacts are to be presented.	IMMC/City of Grass Valley

TABLE 2-2 (continued)
SUMMARY OF DATA GAPS FOR THE IDAHO-MARYLAND MINE PROJECT
MASTER ENVIRONMENTAL ASSESSMENT

Data Gaps	Responsibility
<p>5. The CTG report is not in compliance with the City's Traffic Impact Study Methodology (as updated in January and March 2006 per Resolution 06-21), and the following will need to be completed in order to comply with the City's policy:</p> <p>a. A full estimate of project vehicle trip generation to determine, among other things, whether a full traffic impact study is required. As discussed above (under Impact 4.16-1 and 4.16-2), it is anticipated that a traffic impact study will be required.</p> <p>b. A Volume/Capacity Analysis (VCA), which shall include, as a minimum, p.m. peak-hour trip generation, distribution, assignment, in/out percentage and project location (relative to critical intersections), the increase in delay (at unsignalized intersections, using the Highway Capacity Software [HCS] 2000 methodology) or volume-to-capacity (v/c) ratio (at signalized intersections, using the Intersection Capacity Utilization [ICU] methodology) that will be created by the proposed project on the critical intersections tied to a comparison of existing versus existing plus project conditions. Upon review of this data by City staff, a determination will be made if the project has the potential to exceed the thresholds of significance (defined above, under Standards of Significance, on page 4.16-8). If the results of the VCA show that the project would exceed the LOS thresholds for any intersection, then a Comprehensive Traffic Study (CTS) will be required.</p> <p>c. Analysis for a CTS will expand upon the VCA by including, as a minimum, any intersection (in addition to critical intersections) where the project would generate more than 50 p.m. peak-hour trips, and cumulative and cumulative plus project analysis scenarios (in addition to existing and existing plus project scenarios). The City Engineer could also require an analysis of the capacity of any adjoining or connecting roadway. The NCTC or City traffic model's assumed trip generation for the project site should be backed out of the projections, and project generation shall be manually assigned to cumulative plus project projections. The CTS shall identify the extent of the project's traffic impacts and shall include recommended measures to mitigate such impacts. The CTS shall address the information and formatting provisions for preparing a Traffic Report as specified in the City's Public Improvement Standards, Section 3, Subsections 3-2.01 to 3-2.14, excluding the subsection on "Significant Adverse Impacts."</p>	EIR Team
Utilities and Services Systems	
<p>1. A letter is needed from the City of Grass Valley Public Works Department stating that its WWTP has sufficient capacity to treat the project's projected wastewater flows of approximately 30,000 gpd.</p>	IMMC
<p>2. A letter is needed from Nevada Irrigation District (NID) stating that it has sufficient water supplies to be able to serve the project's projected water demand of 44,000 gpd.</p>	IMMC
<p>3. Information is needed regarding waste disposal at the New Brunswick site (i.e., whether waste generated at New Brunswick site would be taken back to Idaho-Maryland site where it would be picked up).</p>	IMMC
<p>4. Information is needed regarding the existing use and remaining treatment capacity at the City of Grass Valley WWTP (i.e., year 2005).</p>	City of Grass Valley

**insert figures 2-1 through 2-3
11x17 color**