



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
WHISKEYTOWN NATIONAL RECREATION AREA  
WHISKEYTOWN-SHASTA-TRINITY NATIONAL RECREATION AREA  
P.O. BOX 188  
WHISKEYTOWN, CA 96095-0188



N-16

February 28, 2011

Mr. Robert Crandal  
California Regional Water Quality Control Board  
Central Valley Region  
415 Knollcrest Drive, Suite 100  
Redding, CA 96002

Dear Mr. Crandal:

The National Park Service at Whiskeytown National Recreation Area is responding to the letter dated on January 11, 2011 regarding the Tentative Waste Discharge Requirements for Shasta Gold Corporation and French Gulch (Nevada) Mining Corporation at the Washington Mine in French Gulch, California.

Overall, the National Park Service (NPS) supports the proposed waste discharge requirements being implemented at the Washington Mine by the California Regional Water Quality Control Board. However, it is not clear why Shasta Gold Corporation will be allowed four years to close and move the existing tailings to the Group B WMU (Section 27). The NPS requests that the mineralized tailings are secured as soon as possible to prevent migration of arsenic and other contaminants into surface and groundwater. The NPS feels that one to two years is a logistically feasible amount of time to move the tailings to the Group B WMU site.

The NPS would also like to take the opportunity to reiterate the position that a comprehensive plan of operations should be developed for this site. A comprehensive plan should describe all facets of the existing operation and any anticipated expansion of operations including current and anticipated mining locations, mining methods, ore beneficiation process, waste rock disposal, tailings disposal, water use, water disposal, and seasonal variations, anticipated environmental mitigation; risk analysis (public health and ecological), and, their permitting documents as required by county, state, or federal law.

Because the current mining operation is operating under an outdated plan from the former mine owner, despite having significantly expanded the operations since taking over, an updated plan of operations is necessary to adequately assess present and any proposed mine operations and possible associated environmental impacts. At present, the mining operations at this site are regulated by numerous monitoring, reporting and mitigation procedures for each facet of the

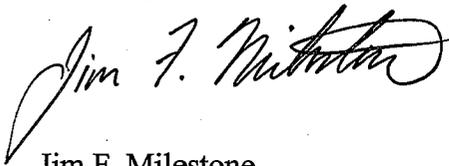
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mining operation, and CEQA compliance is conducted on an as-need basis. The NPS is concerned that without a comprehensive operations plan, some cumulative impacts from mining operations may be overlooked.

We urge Shasta County and the BLM to require the Shasta Gold Corporation to submit a complete updated proposed mining plan of operations that describes in detail all the facets of the Washington Mine operation from mining, through waste disposal, to final reclamation. We also request that the California Regional Water Quality Control Board require the existing tailings be moved from the unlined location to the Group B WMU (Section 27) within two years.

The National Park Service at Whiskeytown National Recreation Area takes our responsibility to the public to provide clean and safe recreational opportunities very seriously. Again, we appreciate the opportunity to comment and should you have any questions, or wish to discuss the above, please feel free to contact me at 530-242-3460.

Sincerely,

A handwritten signature in cursive script that reads "Jim F. Milestone". The signature is written in black ink and is positioned above the printed name and title.

Jim F. Milestone  
Superintendent