



# Nevada Irrigation District

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VIA EMAIL: [idaho.mmeir@nevadacountyca.gov](mailto:idaho.mmeir@nevadacountyca.gov)

May 8, 2023

Nevada County Planning Department  
950 Maidu Avenue, Suite 170  
Nevada City, CA 95959

**RE: Idaho Maryland Mine (Assessor Parcel Number's 006-441-003, -004, -005, -034; 009-630-037, -039; 009-550-032, -037, -038, -039, -040; and 009-560-036)**

Dear Members of the Planning Commission:

Thank you for the opportunity to comment on the Idaho- Maryland Mine project that will be before the Planning Commission on May 10, 2023, for consideration of a recommendation regarding the Board of Supervisor's certification of the final Environmental Impact Report (EIR), the project's conditional use permit, and the proposed development agreement. Nevada Irrigation District (NID) previously provided comments on the project's draft Environmental Impact Report. While the District appreciates that some of the comments that Nevada Irrigation District provided were satisfactorily addressed, others were not. As such, we are providing additional comments to the Planning Commission for consideration.

**Financial Assurance:**

Regional groundwater models are simplistic representations of complex systems and therefore there is a high level of uncertainty related to predictions based on groundwater modelling. If the predicted number of wells impacted increases and more parcels do not have a potable water source, NID will have no obligation to provide financial assistance for the construction of improvements, or the payment of fees. Therefore, connection to NID's potable water system may be delayed, or worse may not happen, if the County or the applicant does not have the fiscal resources to pay for the infrastructure needed or the required fees.

As such, NID is once again requesting that the applicant be required to provide financial assurance (such as a bond or security deposit) in the amount of \$14 million dollars to cover the cost of mitigating potential dewatering impacts in the Greenhorn, Woodrose and Beaver Lane areas. This financial assurance should be required until such time there is adequate evidence supporting a determination that continued dewatering activities have no impact to any private wells in the areas mentioned. Additionally, any lapse or failure to provide or maintain the

security deposit or bonds should result in the immediate suspension of the conditional use permit.

This requirement for financial assurance should be included in the proposed development agreement or the conditional use permit.

**Climate Change:**

Considering the uncertainty related to climate change and impacts to groundwater levels, it is recommended that the 10% drawdown threshold of significance for well mitigation be reduced to any drawdown from the established baseline (please see comments regarding baseline below). As climate change progresses, it is not widely understood what the long-term impacts will be on local groundwater supplies. NID has received an increased number of complaints related to groundwater impacts thought to be associated with climate change from parcels that do not have a potable water connection. NID is not the local groundwater authority and there is no dedicated source of funding to facilitate connection to a treated water system. Therefore, setting the drawdown threshold of significance at 10% could result in making a functioning well today, non-operable because of the proposed project combined with climate change. Potentially leaving parcels with no potable water source and no funding to provide one.

**Groundwater Monitoring:**

It is imperative that groundwater monitoring prior to dewatering occurs for more than 12 months. Groundwater levels fluctuate greatly from season to season, and it will not be possible to establish a reasonably sufficient baseline with data from only one year. NID requests that the baseline groundwater monitoring program period be extended to three years.

Again, thank you for the opportunity to provide comments on the Idaho Maryland Mine project. NID looks forward to working collaboratively with the County and Rise Grass Valley. If you have any questions or would like additional information, please contact me at (530)-273-6185.

Thank you,



Jennifer Hanson  
General Manager

cc: Chris Bierwagen, NID Board President, Division II  
Karen Hull, NID Board Vice President, Division III  
Ricki Heck, NID Director, Division I  
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