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**MEMORANDUM**

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**TO:** HAILEY LANG, MONO COUNTY

**FROM:** OPAL ADAMS AND DOUG MURRAY, RADIUS GOLD

**SUBJECT:** RESPONSES TO PREAPPLICATION COMMENTS

**DATE:** SEPTEMBER 17, 2019

**CC:** GERRY LEFRANCOIS, BRUCE SMITH

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The following responses in blue italics are to comments made by the Mono County Land Development Technical Advisory Committee (LDTAC) requests for additional information in order to make a determination on project viability and appropriate land-use entitlements.

The following impacts may be associated with the project area:

- The Sage-grouse population may be enlisted as an endangered species in the near future. It's a crucial biological resource to the area and this bird located in and near the subject property.
  - *Listing is a time consuming process and under the new Endangered Species guidelines the Department of the Interior (DOI) on August 12, 2019 announced three (3) final regulations implementing portions of the Endangered Species Act. The rules are "designed to increase transparency and effectiveness and bring the administration of the Act into the 21st century."*

*The first rule, specific to the U.S. Fish and Wildlife Service (FWS), withdraws the FWS blanket 4(d) rule that automatically conveys the same protections for threatened species as for endangered species. Prospectively, they will now do a species-specific 4(d) rule. This does not apply retroactively to currently listed species.*

*Any mitigation or protection measures would be followed under this low impact mineral exploration project.*
  - *Generally, the Tribes are very protective of their sacred sites and are not amenable to discussing with the general public. Consultation with the Tribes must be conducted on a government to government (Mono County or the State of California with the particular Tribe) as the Native Americans have sovereign status.*

*Radius Gold has contracted with a permitted archaeological firm to complete a cultural resources survey of the area of proposed drilling. The firm is G2 Archaeology. This firm will work with the California State Lands Commission to review the report and file with*

*the State Historic Preservation Office. The survey will take place the end of September 2019.*

- There is known mercury in the creeks and hills of this property. A biological study will be necessary to determine the implications of this.
  - *A general biological study utilizing data bases can be completed for the area. The area primarily consists of outcrop. There is no processing associated with exploration drilling and there will be no impacts to the creeks or hills. A mercury study is beyond the scope of this limited exploration project.*
- Hidden Lake is located on this property and there also may be cultural resources located there. This lake is very close to the proposed drill sites.
  - *No off road activity will take place so any cultural resources that are off the existing publically used road; therefore, any cultural sites will not be impacted.*
- What is your plan to deal with wastewater and sewage?
  - *All sewage will be contained and flown out of the site. The overall operation will utilize a small crew for a relatively short duration so the generation of any sewage will be minimal. There will be no wastewater utilized on the property. Only water with acceptable water quality will be used and any drilling additives will be non-toxic.*
- The 0.9-acre total disturbance area is awfully close to the 1-acre requirement of the Surface Mining and Reclamation Act (SMARA) to have a reclamation plan. We will need to see the calculation or background information that ultimately leads to the 0.9-acre disturbance.
  - *Radius Gold has reduced the number of drill holes needed to test the target so will be below the 1-acre requirement under SMARA. Please see revised supplemental sheet with drilling details.No*
- You may want to consider the potential fire effects and its implications. This remote property is managed by BLM and their firefighters.
  - *All necessary fire prevention techniques and equipment will be implemented. The teams contracted to complete the drilling work will be well trained and equipped to prevent and extinguish fires.*
- Your current proposal has water transferring over state lines. We do not know if this could be an issue, but this has been raised as a potential issue.
  - *Although the water crosses state lines it all comes from the same Hydrographic Basin. Pumping from the Humboldt Pit Lake is the lowest impact option we have been provided. IF Radius could extract water from any creeks or springs within California then the potential issue is eliminated, and the impact would also be reduced.*
- How will you access the property? Del Monte Canyon is not accessible. Access through Bodie State Park is potentially allowable but that is up to the State parks jurisdiction. That being said, how will you improve or develop roads? The maps you provided shows roads that are not there.
  - *The property will be accessed through Bodie State Park. Only standard vehicles will be driven through the park no large machinery. No new roads would be developed and no roads would be improved. Just as with the general public utilizing the Park for through*

*access to public and private lands, all speed limits and other laws and regulations would be followed.*

- There have been impacts associated with livestock drinking out of drilling holes. The holes would need to be fenced to mitigate any issues associated with livestock.
  - *The drill holes would be less than six inches in diameter and it is unlikely there will be any water in the holes that cattle could potentially reach. Only small hand dug sump pits could potentially be accessed and will be fenced. After drilling the sump will be safely and securely reclaimed and all drill holes will be abandoned in accordance with Bulletin 74 – California Well Standards.*

Radius Gold looks forward to the next LDTAC meeting and will likely attend in person.

Sincerely,  
Opal Adams  
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Environmental Consultant  
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Exploration Geologist  
Radius Gold Inc.  
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**Mono County  
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commdev@mono.ca.gov

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[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

**PREAPPLICATION  
REVIEW REQUEST**

DATE September 17, 2019 DATE RECEIVED BY CDD \_\_\_\_\_

**PROJECT NAME** Bald Peak Exploration Project

**ANTICIPATED PERMIT OR APPLICATION:**  General Plan Amendment  Specific Plan  
 Conditional Use Permit  Director Review  Other Mineral Exploration Project

**REPRESENTATIVE** Bruce Smith or Doug Murray/Radius Gold (US) Inc. or Opal Adams/consultant

ADDRESS 650-200 Burrard St. CITY/STATE/ZIP Vancouver BC Canada V6C3L6

TELEPHONE ( 204 ) 793-9251 FAX ( \_\_\_\_\_ ) \_\_\_\_\_

E-MAIL dmurray@Goldgroup.com ASSESSOR PARCEL # 009-140-002-000

**REVIEW REQUEST:** A preapplication review by the Mono County Land Development Technical Advisory Committee (LDTAC) is requested for the following project. Briefly describe below the type of project, units, square footage, etc. Please attach expanded narrative if available.

\_\_\_\_\_  
The Project is a helicopter supported minimal impact drilling project to determine if there are valuable minerals located on lands whose subsurface is owned by the California State Lands Commission.

\_\_\_\_\_  
Each of the 5 drill sites will disturb approximately 0.1 acre per site for a total disturbance of 0.05 acre.

\_\_\_\_\_  
Please see revised supplemental information (attached) that was submitted to the California State Lands Commission.

\_\_\_\_\_  
**PLEASE PROVIDE:** Maps, drawings, illustrations and narrative that may be useful for staff review.

## Supplemental Information Revised 9/17/19 – Attachment A

Radius Gold (U.S.) Inc.  
Suite 650-200 Burrard St.  
Vancouver, BC, Canada V6C 3L6  
Page 1

- 1. On large-scale and small-scale maps or drawings, show the location of the State land or resource, the site of the project and the surrounding area. Include such features as: roads and waterways; city and county boundaries; north arrow; scale and date. If available, also include: section, township, range and base & meridian; USGS quad sheet name(s); chain of title; legal description; Assessor's parcel or lot numbers; and any zoning information.***

Radius Gold (US) Inc. (Radius) proposes to conduct precious metal exploration activities in all or part of Section 16, Township 5 North, Range 27 East (T5N, R27E), Mount Diablo Base and Meridian in Mono County, California. This project is known as the Bald Peak Exploration Project (Project) (Figure 1) using helicopter supported drill sites and use of existing roads. See **Figure 1**.

The State Lease Parcel is partly on the Dome Hill, CA Quadrangle and partly on the Excelsior Mts., NV Quadrangle. See **Figures 2 and 3**.

**Figure 4** shows access.

Exhibit A shows the Land Description prepared by the California State Lands Commission Boundary Unit.

Exhibit B includes the deeds and chain of title for the State land.

- 2. Describe the project, its objectives and its relation to the State land or resource. Describe the State land or resource as it exists before the project and include information on topographic, geologic and biologic features and any cultural, historic and scenic aspects. Indicate the type of land use (agricultural, residential, etc.). Describe any existing structures on the State land and any proposed use of the structures. Include photograph(s) of the location of the State land or resource, the site of the project and surrounding area, if available.***

The project is a drilling project to determine if there are valuable minerals on State Lease Land. Radius will access the Project area using existing roads within the Bodie Hills Wilderness Study Area and by helicopter. Radius plans to construct **five** exploration drill sites, from which each constructed site a core drill will be utilized to drill one to three exploration drill holes. Drilling will be accomplished with a modular helicopter-portable core drill rig. The drill program will be helicopter-assisted eliminating the need for road construction. Access to the drill sites will be by four-wheel drive pickups.

Timber platforms will be constructed at each drill site from which the drill rig and associated equipment will be stored and operated. Construction of the elevated timber platforms will reduce impact to the environment, and eliminate the need for surface-leveling equipment. Dimensions of the timber platforms will be approximately 20 by 20 feet. Delivery of the modular drill rig, drill

pipe, and accessory equipment to the elevated platforms will be via helicopter and equipment sling.

Water will either be sourced locally and transported to the drill site in a small water truck that can traverse the existing access road or will be pumped from the Humboldt Pit Lake near Aurora, Nevada, situated on patented lands owned by Hecla Mining Company and located approximately five miles east of the Project Area. Approximately nine miles of flexible water line is proposed to transport water to storage bladders located on National Forest System (NFS) land and associated with the Bald Peak Exploration Project #02-18-01 being permitted through the U.S. Forest Service. This project is located in the same vicinity across the Nevada border.

Exploration holes will be drilled to an average depth of 1,000 feet but may be as deep as 1,500 feet with drill hole angles ranging from 45 to 90 degrees from vertical. Drill crews will consist of two to four man crews, with drill operations consisting of two, 12 hour shifts per day. The drill crew and geologists will use 4-wheel drive vehicles to access the sites. Water and drilling fluids at active drill sites will be self-contained within tubs. Excess water will be discharged to hand dug sumps approximately six by six feet and three feet deep in size. The core drill and water pumps are diesel powered, with fuel being delivered to the equipment as needed. All drill holes will be plugged according to the California Well Standard Bulletin No. 74.

Each drill site will disturb approximately 0.1 acre per drill site for a total disturbance of **0.5 acre**.

The State Parcel is used for grazing and is also wildlife habitat. The parcel is not suitable for agriculture. The target area for mineral exploration is sparsely vegetated.

Historic mining areas are located in the general area and include the Aurora and Bodie Mining Districts.

It is unknown if there are cultural sites within the private parcel with State-owned minerals; however, a cultural survey will be performed at the end of September.

It is unknown if there any sensitive biologic resources within the parcel.

The watershed associated with the parcel flows into Nevada.

The entire parcel is natural with rugged outcrops and no infrastructure. See the following photographs of the subject area.

- 3. Identify other public agencies that may have approval authority over the project. Submit copies of all acquired approvals and/or letters or other evidence from the public agency indicating the status of the pending approvals.***

U.S. Forest Service: Currently conducting an environmental assessment for the drilling program associated with National Forest System Land on the Nevada side of the area of Bald Peak. Bald Peak Exploration Project #02-18-01.

Mono County: It is unclear if permits for exploration on less than one acre of disturbance would require a permit from Mono County. Mono County does have rules and guidelines for mining activities.

Bureau of Land Management (BLM): May require notification of the project; however, no disturbance is proposed on lands administered by the BLM. Travel on existing BLM roads may be required.







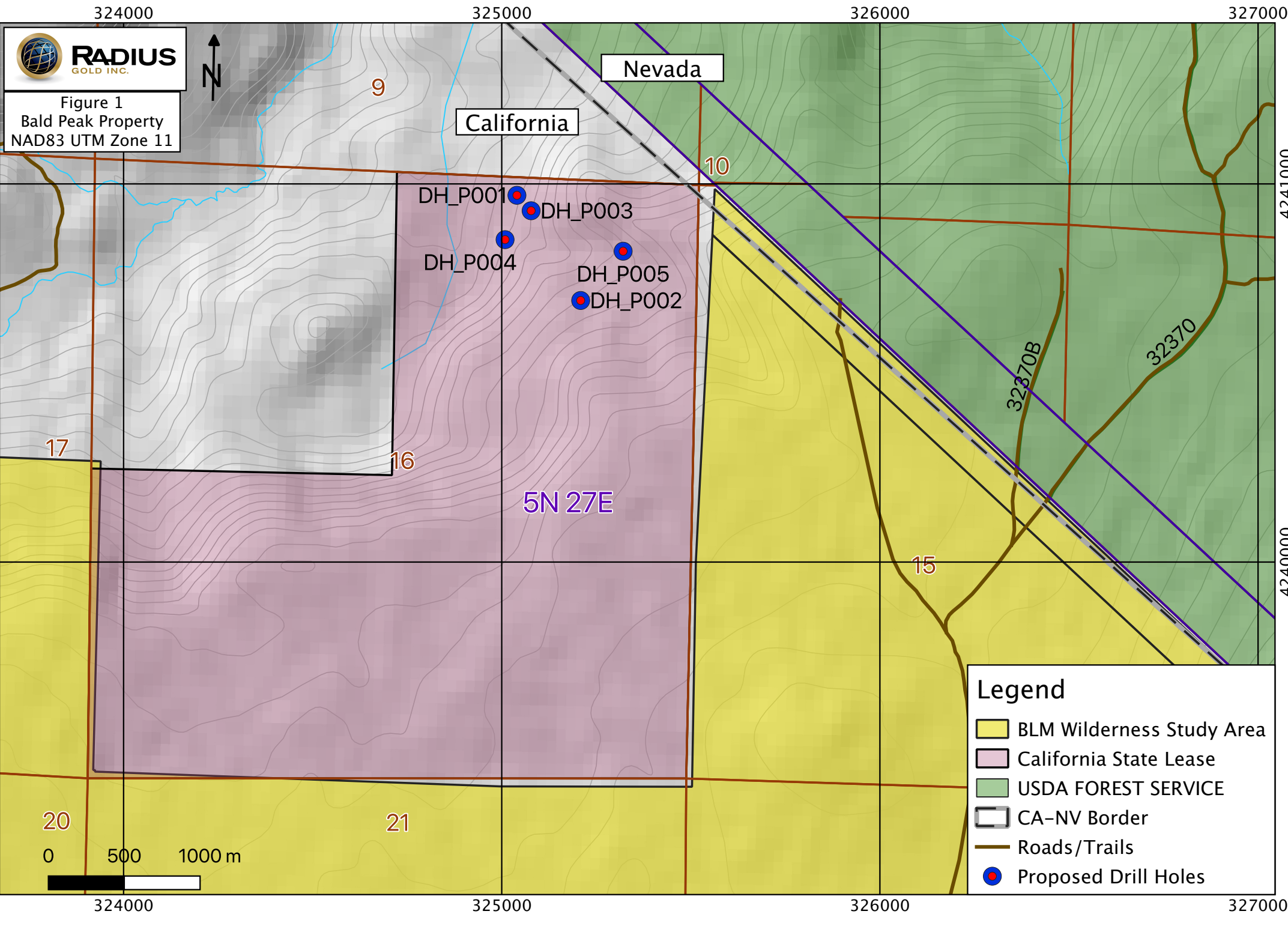


Figure 1  
Bald Peak Property  
NAD83 UTM Zone 11

Nevada

California

DH\_P001

DH\_P003

DH\_P004

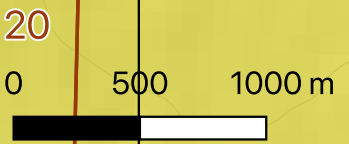
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DH\_P002

5N 27E

**Legend**

- BLM Wilderness Study Area
- California State Lease
- USDA FOREST SERVICE
- CA-NV Border
- Roads/Trails
- Proposed Drill Holes



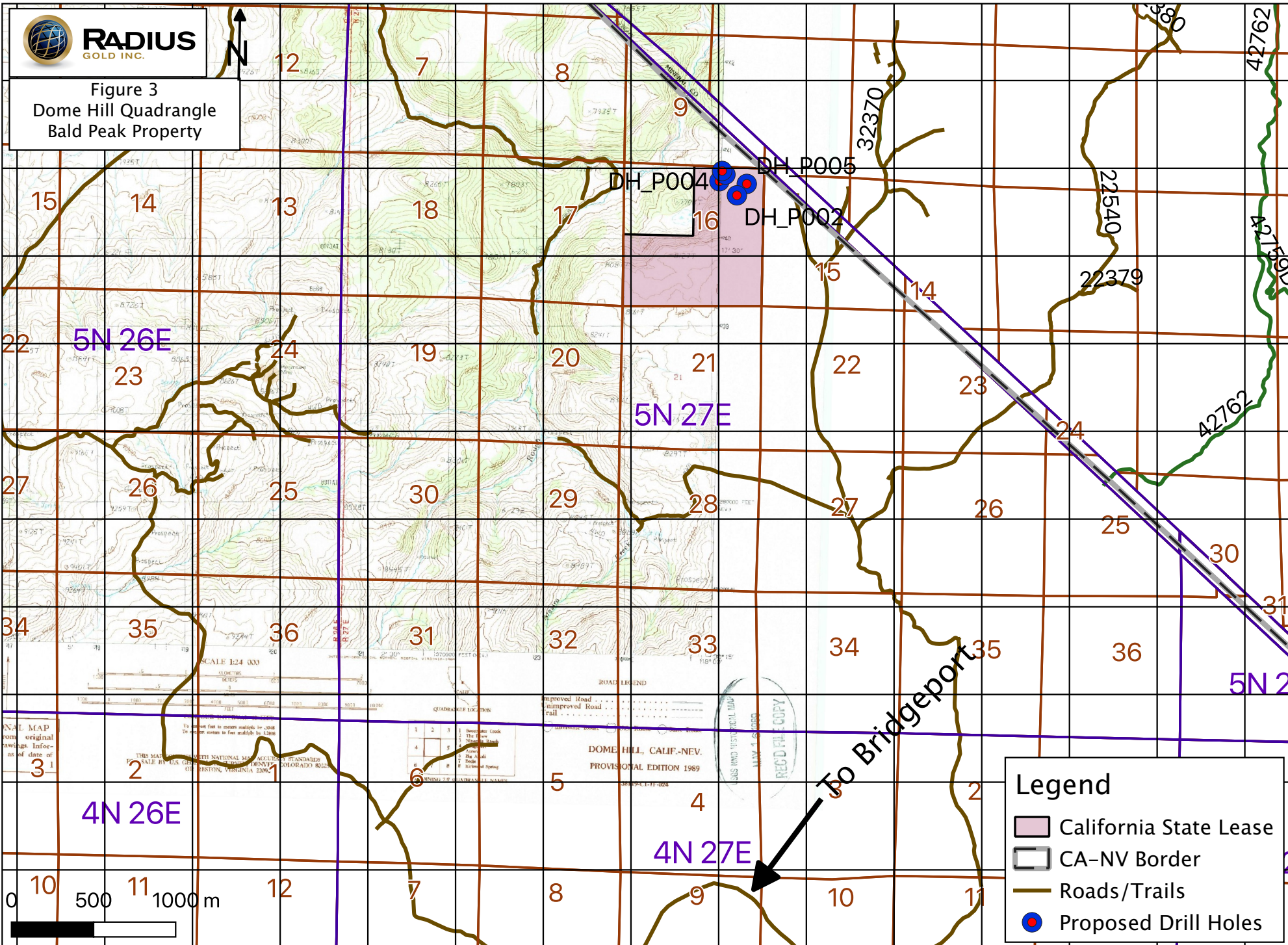




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Figure 3  
Dome Hill Quadrangle  
Bald Peak Property



**Legend**

- California State Lease
- CA-NV Border
- Roads/Trails
- Proposed Drill Holes

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Figure 4  
Access  
Bald Peak Property

All equipment will be flown in from Staging Area by helicopter

To Hawthorne

To Bridgeport

**Legend**

- California State Lease
- CA-NV Border
- Roads/Trails
- Proposed Drill Holes
- Staging Areas
- Access Roads

