

Wells Coalition Position

The following piece was originally published as an opinion piece in The Union newspaper.

Wake Up Call for Well Owners Near the Mine

The Wells Coalition – a group of well owners near the Idaho-Maryland Mine – has completed its review of the Final Environmental Impact Report (FEIR). We are deeply concerned about the proposed reopening of the mine. If you own a well near it – you should be too. The proposed operation poses a serious threat to our local groundwater resources and our pocketbooks.

100% certainty is a myth.

The FEIR asserts that stronger mitigations and/or financial assurances are "not necessary because no significant impact to domestic water wells are predicted".

But a "prediction" is only an educated guess – NOT a certainty. In this case, it is based on an analysis that has serious flaws.

The stakes are too high to get this wrong. The County's Economic Impact Report revealed this mine proposal is unprecedented in its proximity to so many homes. Pumping over a million gallons a day from an area with hundreds of wells is a huge risk. If "predictions" are wrong, it could cost the County, NID, and individual homeowners tens of millions of dollars – and years or decades – to connect a permanent water supply to each property.

Claiming "no significant impact" defies both science and common sense.

Predictions of the groundwater model have limited reliability.

In Draft EIR comments, multiple hydrology experts confirmed groundwater models in fractured bedrock like ours can NOT deliver 100% certainty. They also revealed numerous defects in the groundwater model. The Final EIR dismissed these concerns, but – in contradictory fashion – agreed more data is needed for validating the model.

Without current well monitoring data, the FEIR's "threshold of significance" is invalid.

The FEIR lacks *current* well performance baseline data and is inadequate under the California Environmental Quality Act (CEQA). The FEIR relies only on sparse patches of data from 15 years ago.

Baseline data is needed to assess potential impacts to groundwater and well owners *prior* to determining mitigations. It is also the lynchpin in determining what threshold should be used to determine the measure of "significance". The FEIR sets that threshold at a 10% drawdown in water level, but legal experts call that number "arbitrary" and "invalid".

The FEIR's addition of a Domestic Well Monitoring Program for 378 properties is a feeble attempt to address the issue, but it collects data after the fact, doesn't last long enough, and *excludes* wells in NID-served areas.

Toothless mitigations mean serious risk for well owners.

Other than 30 properties on E. Bennett Road, there are no plans or financial assurances for connecting to NID if wells are rendered useless. NID asked for a \$14M bond to cover costs if wells fail, but the FEIR dismissed it, insisting NID needs nothing. That means no bond, no water supply assessment, no design plans, and no easements.

This is a recipe for disaster. Today's NID projects take years to complete, but a failure in this project would create a large-scale crisis for NID, the County, and especially homeowners. Costs could run into \$10's of millions as people scream "where's my water?". And a property with no permanent water supply is worthless.

The FEIR is striking in its absence of accountability. It describes steps for fixing wells or providing temporary water, but all decisions are left solely up to the mine operator, who would take action only if the 15 monitoring well locations in the official Groundwater Monitoring Program flag an impact.

This is especially concerning because the complexity of the fractured bedrock geology in the area may mask impacts. With the impact threshold arbitrarily set at a 10% drawdown, homeowners with marginal wells may lose water long before they get a call from the mine operator.

The bottom line is well owners are being told to trust that nothing will go wrong with their water supply for 80 years based on assumptions and speculation.

The Wells Coalition is asking the County to REJECT the FEIR for the Idaho-Maryland Mine and VOTE NO on the project.

If you're a well owner whose property is within roughly a ½ mile of the mine's mineral rights area https://bit.ly/mineral-rights, consider joining the Wells Coalition to make a bigger impact on County decision makers. Visit our website at https://bit.ly/wells-coalition to learn more.

Interested in reading the full length version with citations? Contact wells@cea-nc.org.