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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN BERNARDINO

Coordination Proceeding  
Special Title (Rule 1550(b))

**SUCTION DREDGE MINING CASES**

Judicial Council Proceeding No. JCPDS 4720

**DECLARATION OF CHAD STANFORD  
IN SUPPORT OF MINERS' JOINT  
MOTION FOR INJUNCTION AGAINST  
DEFENDANTS**

Judge: Hon. Gilbert G. Ochoa  
Dept.: S36J  
Date: June 23, 2015  
Time: 8:30 a.m.

**Related Actions:**

*Karuk Tribe of California, et al. v. California  
Department of Fish and Game*

RG 05211597 – Alameda County

*Hillman, et al. v. California Department of  
Fish and Game*

RG 09434444 – Alameda County

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<i>Karuk Tribe of California, et al. v. California Department of Fish and Game</i>	RG 1263796 – Alameda County
<i>Kimble, et al. v. Kamala Harris, Attorney General of California, et al.</i>	CIVDS 1012922 – San Bernardino County
<i>Public Lands for the People, et al. v. California Department of Fish &amp; Game, et al.</i>	CIVDS 1203849 – San Bernardino County
<i>The New 49er’s, et al. v. State of California; California Department of Fish and Game, et al.</i>	SCCVCV 120048 – Siskiyou County
<i>Foley, et al. v. State of California; California Department of Fish and Wildlife, et al.</i>	SCSCCV 13-00804 – Siskiyou County
<i>Walker v. Harris, et al.</i>	34-2013-80001439 – Sacramento County

1 Chad Stanford declares:

2 1. I am a plaintiff in *The New 49er's, Inc., et al. v. California Department of Fish*  
3 *and Wildlife, et al.* (SCCVCV1200482 Siskiyou County).

4 2. I am the co-owner of mining claim uniquely identified as CAMC281177 (Bear  
5 Hide 3). My father Bill Stanford is also a plaintiff, and the sole owner of CAMC271616 (Three  
6 B's). Both of these claims are located along the North Fork of the Salmon River.

7 3. Under the regulations that were in effect when the suction dredging moratorium  
8 commenced, this body of water was open from July 1<sup>st</sup> to September 15<sup>th</sup>. Under the 2012  
9 Regulations, it is partially closed as "Class F" water body on account of an alleged "thermal  
10 refugia" that is located on the border between the two claims. As a result, the 100-yard zone  
11 where possession of suction dredging equipment is prohibited near closed areas thus extends to  
12 our parking and camping area, which is the only available area to stage suction dredging  
13 operations.

14 4. I have had ample opportunity to observe the fish and wildlife in and around both  
15 claims. Operating under the pre-moratorium regulations, I never encountered fish eggs in the  
16 streambed when I was mining. Nor have I encountered any holding areas with large populations  
17 of juvenile fish of the sort imagined to constitute "thermal refugia".

18 5. I also have not encountered any historical or cultural artifacts, other than lead  
19 fishing weights and other metal debris and trash, all of which I removed from the stream. With  
20 respect to the question of noise, I have very seldom observed another human being in the vicinity  
21 of my dredging activities, other than people accompanying me.

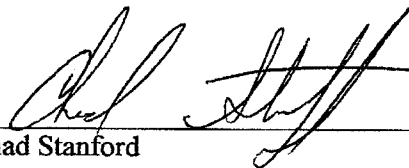
22 6. It has at all times been obvious that my suction dredging operations on the claim  
23 do not involve any appreciable adverse effect on the environment, and the winter flows typically  
24 erased all traces of my summer activity. It has also been observed that before commencing any  
25 dredge operations, there were no observable fish in the area, and after commencing dredge  
26 operations, fish tended to gather and feed on food stirred up from dredge operations, and also  
27 tend to enjoy the deeper water created by dredging.

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7. I have discussed this testimony with my father, and if called to testify, he would concur in the conclusions I have presented.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 18, 2015.

  
Chad Stanford



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Carole Caldwell  
Declarant