



18 May 2007

Todd M. Mathes
Whiteman Osterman & Hanna LLP
One Commerce Plaza
Albany, NY 12260

Re: Archer Mine DEIS Review Comments on Noise Sections

Dear Mr. Mathes:

As you requested, I have reviewed the Noise Study (Appendix D, dated June 21, 2006) and the Noise section of the Draft Environmental Impact Statement (DEIS), dated December 8, 2006, for the Red Wing Properties Archer Mine project. Our main issues of concern with these documents are related to the monitored levels in the area and the barrier calculations. More specifically:

1. The monitored background levels referenced in the documents have no reference to time of day or duration for the Leq. The Leq is an energy-average value which is highly dependent on the duration of the reading and the activities occurring during the monitoring period. We monitored the background noise levels near Bill Jeffway's house for a continuous 24-hour period between Monday, May 7 and Tuesday, May 8, 2007. Mr. Jeffway's house is located south of Turkey Hill Road approximately 400 feet south of the Archer Mine site boundary. This was not one of the noise monitoring locations used in the DEIS analysis, but it is a residential property close to the site which is less affected by traffic noise than many of the other monitoring locations chosen for the DEIS analysis. During the applicant's planned hours of operation (7 AM to 4 PM) we monitored background Leq levels in the range of 28 to 53 dBA on a 1-minute basis and 35 to 43 dBA on a 1-hour basis. The applicant monitored background levels in the range of 46 to 52 dBA without a time reference. The standard Leq time reference for the State of New York (used in NYSDEC's State Environmental Quality Review (SEQR) process) is 1-hour, but we don't know from the report what was used. This provides a potential discrepancy of more than 20 dBA between our background readings and those referenced in the DEIS.
2. The barrier attenuation that was used exceeds the "practical limit" (20 dB) that is shown in the chart in the applicant's report, and it also exceeds the levels we would expect for distances greater than 500 feet away (referenced to the procedures designated in the international ISO standard 9613-2 for determining sound levels due to propagation outdoors) by a factor of 10 dBA or more.

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The two factors listed above alone can make a difference of more than 30 dBA in the predicted levels, which would result in clear noise impacts to the community where the applicant is stating that there will be none. Feel free to contact me with any questions about this.

Respectfully submitted,
Resource Systems Group, Inc.



James P. Cowan, INCE.Bd.Cert.
Director of Acoustics and Noise Control

