



San Joaquin River  
Parkway and  
Conservation Trust, Inc.

July 2, 2020

Ms. Christina Monfette  
County of Fresno  
Department of Public Works and Planning  
Development Services and Capital Projects Division  
2220 Tulare Street, Sixth Floor  
Fresno, CA 93721  
Submitted by email to: [cmonfette@fresnocountyca.gov](mailto:cmonfette@fresnocountyca.gov)

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**RE: CEMEX Rockfield Expansion Project  
EIR 7763, CUP 3666 and 3667**

Dear Ms Monfette:

The San Joaquin River Parkway and Conservation Trust, Inc. appreciates the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report 7763 and Unclassified Conditional Use Permit Applications 3666 and 3667.

Our interest in the project, and the basis for our comments, is the location of the project site in the environmentally sensitive river bottom immediately adjacent to Lost Lake Park, which is used by thousands of area residents for exercise and outdoor recreation, and other properties conserved for the benefit of people and wildlife including the Beck property, Ledger Island, Ball Ranch, and the Willow Unit of the San Joaquin River Ecological Reserve.

The NOP states that the project description, site plans, location maps, technical studies and Surface Mining and Reclamation Plan are all available on the County website. Unfortunately, the site plans, location maps, and Surface Mining and Reclamation Plan along with all other exhibits, photos and attachments were omitted from the copy of the project description that was posted on the County of Fresno's website. Numerous participants in the June 24<sup>th</sup> scoping meeting identified this omission to the County staff and project proponents, but as of July 2, 2020, the documents still have not been made available on the County website. In addition, staff stated in the June 24<sup>th</sup> scoping meeting that the technical studies produced by CEMEX (and also referenced in the project description) were being peer-reviewed by the County's consultant,



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and would be made available prior to, but around the time of, the release of the Draft EIR. The omission of these documents is contradictory to the County's Notice of Preparation. We encourage the County to therefore re-notice the project when all of the documents are available for public review, and provide the required comment period for adequate scoping of the EIR.

The State of California documented the significance of the San Joaquin River as a statewide resource and the importance of protecting it by adopting the San Joaquin River Conservancy Act. Section 32501 of the Act provides:

"The Legislature hereby finds and declares that the San Joaquin River, its broad corridors, and its prominent bluffs, constitute a unique and important environmental, cultural, scientific, agricultural, educational, recreational, scenic, flood water conveyance and wildlife resource that should be preserved for the enjoyment of, and appreciation by, present and future generations."

Any substantial development in close proximity to the San Joaquin River Parkway must be assessed for its potential impacts on the Parkway. Potential impacts to the Parkway as a result of the proposed project include the visual and aesthetic impacts on Parkway visitors, impacts to people and wildlife as a result of increased light, glare, and noise. The addition of drilling and blasting techniques and the depth of the future pit will potentially impact human health and special status species in the area by converting existing emergent wetland habitat to deep, potentially oxygen-poor open-water habitat. Other impacts to the Parkway include potential reduction in the quantity and quality of biological, agricultural, and cultural resources.

The San Joaquin River Restoration Settlement Act is federal law enacted March 30 2009 as Public Law 111-11. The Act implements the settlement of litigation abbreviated as NRDC vs. Rodgers, and covers the San Joaquin River from Friant Dam to the Confluence with the Merced. The settlement has two goals:

- 1) restore and maintain fish populations in "good condition" in the main stem of the San Joaquin River below Friant Dam

to the confluence of the Merced River, including naturally-reproducing and self-sustaining populations of salmon and other fish, and 2) to reduce or avoid adverse water supply impacts to all of the Friant Division long-term contractors that may result from the Interim Flows and Restoration Flows provided for in the settlement.

The depth of the proposed mining pit—roughly 560 feet below the bed of the San Joaquin River—has the potential to dewater a portion of the San Joaquin River between Friant Dam and the project site, thereby altering river flows necessary for the implementation of the Settlement Act. The drilling and blasting techniques contemplated for this deep pit mining may also have detrimental effects on Friant Dam and surrounding water conveyance infrastructure. These potential impacts must be evaluated and will most likely require consultation and permits from federal agencies including the National Marine Fisheries Service, US Fish and Wildlife Service, and Army Corps of Engineers.

The depth of the mining pit and future open groundwater habitat may impact the hydrology of the river and both surface and groundwater quality. Many private wells in the area are likely to run dry during the timeframe that the deepest mining and concurrent dewatering are taking place. A potential mitigation measure for this impact would be the creation of a public water system to serve all of the impacted properties surrounding the mine.

The project contemplates an increase in truck trips from 690 per day to an average of 1076 per day. This increase in truck trips will significantly impact the air quality in the San Joaquin Valley Air Basin, and contribute additional greenhouse gas emissions. The air quality impacts must be evaluated both specifically and cumulatively. Potential mitigation measures to reduce air quality impacts include reduction in the permitted amount of material produced per year, reduction in the project lifespan from 100 years to 20 years, and requirements for all trucks entering and exiting the site to be retrofitted with better emission systems.

Recent studies show that the type of vehicles have a greater impact on air pollution impacts on human health than the quantity of traffic. The significant increase in truck traffic on Friant Road may result in

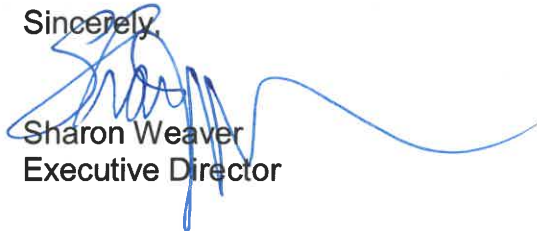
significant human health impacts including asthma and other respiratory problems, cardiac issues, and cancer.

Finally, this project proposes to convert an existing sand and gravel extraction site to one of the deepest open-pit mines in California, and the site is located on the banks of the San Joaquin Valley's most important natural resource. The idea that blasting rock out of the riverbottom will have economic benefits is laughable – any short-term benefit to the corporation selling the rock will be far outweighed by the long-term detriment to the environment and public health.

We hope that the significant impacts that will be evaluated as part of the EIR lead to a rejection of the proposal and an end to mining at the quarry site below Lost Lake Park.

Thank you for your consideration of these comments. Please contact me at (559) 248-8480 extension 105 or [sweaver@riverparkway.org](mailto:sweaver@riverparkway.org) if you have questions or need additional information.

Sincerely,



Sharon Weaver  
Executive Director