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Development Services and Capital Projects Division  
2220 Tulare Street, Sixth Floor  
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**Subject: Public Comment on CEMEX Rockfield Quarry Modification Project EIR**

Dear Mr. Randall,

I am writing to express my concerns regarding Draft Environmental Impact Report (DEIR) No. 7763 for the proposed CEMEX Rockfield Expansion Project. This project threatens the San Joaquin River, local water quality, air quality, public recreation, wildlife, and public safety. Many of the proposed mitigation measures are inadequate, and some impacts lack any mitigation at all.

**Impacts on Water Quality & the San Joaquin River**

The project involves deep mining next to the San Joaquin River, raising serious concerns about water loss and contamination. The DEIR acknowledges that mining could reduce river flows, yet fails to provide clear solutions.

The DEIR should identify impacts to downstream water users from the dewatering of the pits and potential capture of the river during flood events.

* What is CEMEX’s plan if major flooding, like the 1997 flood, breaches the levee and captures the quarry pit?
* Who will be responsible for cleanup and long-term damage if the pit becomes part of the river system?

Additionally, the groundwater data used for the DEIR was conducted during a low river flow period. The DEIR should evaluate the groundwater data at different flow rates since the document identifies the fact that there is groundwater/surface water interaction at both sites.

**Impacts on the San Joaquin River Parkway & Recreation**

CEMEX has referenced potential trail easements for public use, yet the DEIR lacks clear commitments or a timeline.

* The DEIR should identify the timeframe and exact location of the trail to be constructed.
* The DEIR should describe how the proposed trails meet the San Joaquin River Parkway Master Plan’s requirement for a 300-foot buffer between mining operations and public access
* The DEIR should identify that CEMEX is responsible for constructing and maintaining the trail if the trail is used as a community benefit of the project.

The DEIR uses out of date information when identifying recreational sites in close proximity to the quarry. The Noise from rock crushing, blasting, and drilling will negatively impact visitors to Lost Lake Park, Ledger Island, and Sumner Peck Ranch, but these noise impacts are not evaluated. The DEIR should fully analyze these impacts and identify appropriate mitigation measures for the impacts.

**Lack of Mitigation for Visual, Traffic, and Air Quality Impacts**

The DEIR identifies several unavoidable negative impacts, including:

* **Scenic Degradation:** The project will harm scenic views, with proposed mitigation occurring only after the harm takes place (rock staining after mining phases) This constitutes an inappropriate deferral of mitigation which is not allowed under CEQA.
* **Traffic Congestion:** Significant traffic impacts are expected, yet there is no guaranteed funding or timeline for necessary road improvements. How will the County ensure that CEMEX is held accountable for road damage, including truck debris and safety hazards? The lack of detail on *how* mitigation takes place is just one example of the inadequacy of the DEIR. The docu
* **Air Quality:** The DEIR underestimates the project's impact by comparing emissions to current operations rather than a no-project scenario. Why was this approach taken instead of analyzing the full environmental cost of continued mining?

**Threats to Wildlife**

The DEIR fails to adequately analyze the impact on species like Swainson’s hawk, Tricolored blackbird, Burrowing owl, and Western red bat. Drilling, blasting, and excavation could disrupt nesting and migration patterns, but those impacts are not identified or evaluated. The proposed mitigation measures do not comply with existing regulations for protection.

Additionally, the DEIR uses Alaska-based standards to assess fish protection instead of California-specific guidelines. Are these standards appropriate for protecting spring-run Chinook salmon in the San Joaquin River?

The biology section of the DEIR leaves more questions than it answers, and therefore does not fulfill the CEQA requirements to fully evaluate and disclose impacts, and propose mitigation measures that will reduce those impacts. This section should be completely rewritten and recirculated for public comment.

**Conclusion**

Given the significant impacts to the river, wildlife, public safety, and air quality, the County should require additional analysis, stronger mitigation measures, and financial guarantees from CEMEX. The additional information will need to be drafted and recirculated for public review before the finalizing the environmental impact report for the project.

Thank you for your time and consideration.

Sincerely,  
[Your Name]  
[Your Address]