



Community Development Department
Planning Division
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June 13, 2018

Riverside County Planning Department
Attention: Dionne Harris, Urban Regional Planner II
4080 Lemon Street, 12th floor
P.O. Box 1409
Riverside, CA 92502-1409

Re: Comments on a Notice of Preparation for a Draft Environmental Impact Report-
Gilman Springs Mine Expansion

Dear Mr. Harris:

The City of Moreno Valley appreciates the opportunity to review and comment on the Notice of Preparation (NOP) to prepare a Draft Environmental Impact Report (DEIR) for the proposed Gilman Springs Mine Expansion. The project consists of the expansion of an existing 150 acre mine site by 54 acres to approximately 204 acres at full build out. The project is located northeast of the intersection of Gilman Springs Road and Bridge Street in unincorporated County of Riverside, approximately 3.0 miles southeast of the City of Moreno Valley city limits.

In accordance with Section 15082 (b) of the CEQA Guidelines, the City requests the following interests be fully discussed, and cumulative impacts mitigated as appropriate, within the DEIR document and its pertinent supporting technical documents:

1. Air Quality

The expansion of the mine operations and site by 54 acres and hours of operation to 24 hours, 7 days a week have the potential to affect surrounding community and regional air quality. Any expansion of unpaved roads will also contribute to dust and reduced air quality levels with the potential to impact sensitive receptors. The City requests that all impacts associated with the expanded construction and operations of the mine be reviewed in the Environmental Impact Report and in a corresponding Air Quality Technical Study. Appropriate mitigation measures must be included in the environmental document to mitigate any noted dust and air quality impacts. The document must also include dispersion modeling, with a detailed analysis of the terrain and wind patterns as well as a description of the particulate matter type in the area.

2. Noise

Noise is considered a potentially significant impact as the proposed project would expose sensitive receptors to construction noise, operational noise and increased traffic volumes in surrounding communities. The expansion of the mine operations and site by 54 acres and operations expanded to 24 hours, 7 days a week has the potential to affect surrounding community noise levels and would likely impact sensitive receptors in short proximity of the site. Disturbances such as blasting within the existing and future mining areas would occur for a longer duration with implementation of the proposed mine expansion project. As the proposed mine expansion has the potential to increase noise levels and significantly impact surrounding areas and cities, the DEIR must include a Noise Study detailing all related noise impacts. The Study must consider both short-term construction related noise and long-term operational noise impacts associated with the project. Appropriate feasible mitigation measures that will lessen noise impacts on surrounding communities must be identified.

3. Transportation/Traffic

The expansion of an existing mine has the potential to significantly impact traffic and particularly increase truck trips in the surrounding communities originating from and traveling to the Mine. This statement is particularly true for the City of Moreno Valley, as Gilman Springs connects directly with State Route 60 roughly 3.5 miles from the site. Trucks used in the expanded mining operation will likely travel Gilman Springs Road to access and connect with State Route 60 to and from the site. The expansion of the mine operations and site to approximately 204 acres and operations expanded to 24 hours; 7 days a week has the potential to increase operational truck traffic on Gilman Springs north of the project site. Any required protective mitigation options, particularly any needed in the public right-of-way, must be properly discussed in the DEIR. A detailed Traffic Study reviewing traffic impacts to and from State Route 60 must be provided for this project. All impacts and appropriate/feasible mitigation measures must be considered in the DEIR document.

The City of Moreno Valley looks forward for the opportunity to review additional information on project scope and potential environmental impacts that may be associated with the proposed Prado Raceway. The City would request to review the completed DEIR and corresponding response to NOP comments once the document becomes available. Please include the City of Moreno Valley on any and all mailing lists related to the draft and final environmental documents as well as for future notifications of meetings/public hearings associated with the project.

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Should you have any questions or concerns, please contact me at (951) 413-3215.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Gross", with a stylized flourish at the end.

Mark Gross, AICP
Senior Planner

- c: Richard J. Sandzimier, Community Development Director
- Albert Armijo, Acting Planning Manager
- Michael Lloyd, Engineering Division Manager/Assistant City Engineer
- Vincent Tran, Associate Engineer
- Claudia Manrique, Associate Planner
- Joy Chen, Planning Intern
- Natalie Qaqish, Planning Intern