

**From:**

**Date:** Wednesday, July 16, 2014 3:11 PM

**To:**

**Subject:** Re: BCDC Commission Meeting Notice and Commission Briefing - Sediment Transpo...

San Francisco Bay Conservation and Development Commission  
July 16, 2014  
455 Golden Gate Avenue, Suite 10600  
San Francisco, California 94102

Dear Chairman Wasserman and Members of the Board,

In regards Agenda Item 10 of BCDC Commission Meeting of July 17, a Briefing on Sand Mining Background Report, please request clarification on total volume of sand to be extracted annually by proposed combined projects of Jerico, Hanson, and Suisun Associates in San Francisco Bay, Central Bay and Suisun Bay.

On page 1 and 10 of Sediment Transport and Sand Mining Background Report it states 'Applicants are now seeking new 10-year permits to mine a total of 2.04 million cubic yards annually ' within seven lease areas.

In reviewing last year's USACE Public Notice Numbers 2013-00129S, 2013-00130S, 2013-00131S, and 2013-00132S for permits for Jerico Products Sand Mining Operations, Suisun Associates Sand Mining Operations, Hanson Middle Ground Sand Mining Operations and Hanson Marine Operations Sand Mining it appears that Suisun Associates and Hanson Marine reference identical 2601 acre area site for sand mining, consisting of 9 parcels of submerged lands that comprise 4 leases from California State Lands Commission designated as Mineral Extraction Lease Nos. 709.1, 2036.1, 7779.1, and 7780.1 (Central Bay Leases).

These applications each would permit applicant to conduct sand mining operations of up to 1,540,000 cubic yards of sand annually between 2013 and 2023. This amount is then modified to 14,920,650 cu yds in total.

The Suisun Associates Sand Mining Operations USACE Application No.2013-00130S also includes a permit for sand mining up to 300,000 cubic yards annually over next 10 years within a 938 acre area of submerged lands within the Suisun Channel in Suisun Bay leased from States Land Commission as Mineral Extraction Lease Parcel No.7781.1.

The total million cubic yards of sand to be extracted by these four permits then should be 39.3413, not 20.4?

Feel this permitting process needs to be precise in consideration that California State Lands Commission in 2007 did fine Hanson \$42.2 million for failing to fully report sand taken from mining sites and which thereby deprived the State of millions of dollars in royalty payments.

On page 8 of staff report mention is made that in Suisun Bay, the invertebrate community is dominated by two species of invasive clams. Can BCDC staff suggest measures be taken to insure that territory of these invasive clams is constrained and will not encompass all of San Francisco Bay? In South Bay, Santa Clara Valley Water District has implemented stringent controls to keep Coyote Valley and South Valley clam free.

Finally, in consideration of protracted Bay Delta Conservation Plan negotiations, please request that staff explore full ramifications of proposed diversions, in light of drought and global warming, as to feasible level of Sacramento River flows that will be strong enough to carry sediments and sand to Central Bay, to marsh restoration in salt ponds of South Bay and on out the Golden Gate to ocean beaches and beyond, I would submit that any consideration of these 10 year mining leases at this time is premature.

The present stated diversion of 9000 cfs of Sacramento River to three Delta tunnels may be accompanied by a sediment removal facility, as it was in earlier engineer's design. This would critically deplete sand source in Sacramento River, Central Bay and Suisun Channel and Bay. Believe your September staff review must incorporate all impacts that BDCP is anticipated to make on this critical mid section of the Estuary. Should BDCP be implemented in next five years wouldn't it run head on into these mining leases to detriment of all?

Thank you for any consideration that you can give to these concerns.

Libby Lucas