MBCA

morongo basin conservation association

Post Office Box 24
Joshua Tree CA 92252
www.mbconservation.org

August 17, 2026

The Morongo Basin Conservation Association (MBCA), a 501(c)3, community-based, California Nonprofit Corporation, advocates for a healthy desert environment which nurtures wildlands and supports our communities' rural character, economic well-being, and culture.

We wish to express our opposition to Project No. PMISC-2026-00029, the recommendation to remove the county from the permitting of mining operations that obtain a federally approved plan of operation or authorization.

The immediate target of this motion is the Music Valley Mine, slated for an area adjacent to Joshua Tree National Park (JTNP) and the City of Twentynine Palms. The impacts of an active mine on tourism in the National Park and in Twentynine Palms are both obvious and extreme and are being commented on by several other parties. MBCA supports those arguments against mining in this area.

In this letter, we will focus on the potential health impacts of the proposed Rare Earth Elements (REEs) mine in Music Valley, adjacent to the northern entrance of JTNP and to the City of Twentynine Palms.

The proposed mine is located directly adjacent to the northwestern boundary of JTNP and to the "Utah Trail" neighborhood of the City of Twentynine Palms. It is approximately 2 miles from Park HQ, and 2-1/2 miles from the center of the unincorporated community of Wonder Valley. Approximately 70,000 people live and work in the Morongo Basin in which the mine site is located.

The rare earth elements are contained within hard rock deposits of Pinto Gneiss and related formations. The REEs are present in a rock type classified as xenotime, which is an REE phosphate complex that can also contain Thorium and/or Uranium. Exploiting this requires open pit mining via blasting and subsequent crushing and grinding of the exposed ore. Blasting and crushing are necessarily performed on-site. Grinding may be performed

on site or elsewhere after transport of the crushed rock. All these operations produce dust and a waste stream. The human impacts from the dust and waste stream are the main concerns of this letter.

Rare Earth Elements are often present in rocks in association with the element Thorium (Th), and this is true of the deposits in Music Valley.

Thorium is a radioactive element, strongly linked to lung, pancreatic, and bone cancers. The greatest danger is inhalation of dust that contains the element. Fine particles are not readily expelled from the lungs. It has a long half-life (billions of years), and its decay products include radium and radon which are dangerous gamma-emitters. It is bad news to have this in your lungs.

The Thorium in this deposit is not just an incidental inclusion. When the initial mining claims were made (post-Second World War), they were Uranium claims, based on radiation surveys using Geiger counters. It was later determined that the radiation was from the presence of Thorium, which was not then being purchased by the U.S. government. Later still, in the 1960s, it was confirmed that REEs were present in the Thorium-bearing formations. In short, the radiation led to the discovery of the REEs. As mentioned, Thorium and REEs are often found in close association, occurring within the rock crystals themselves. Mining REEs in Music Valley <u>will</u> expose Thorium.

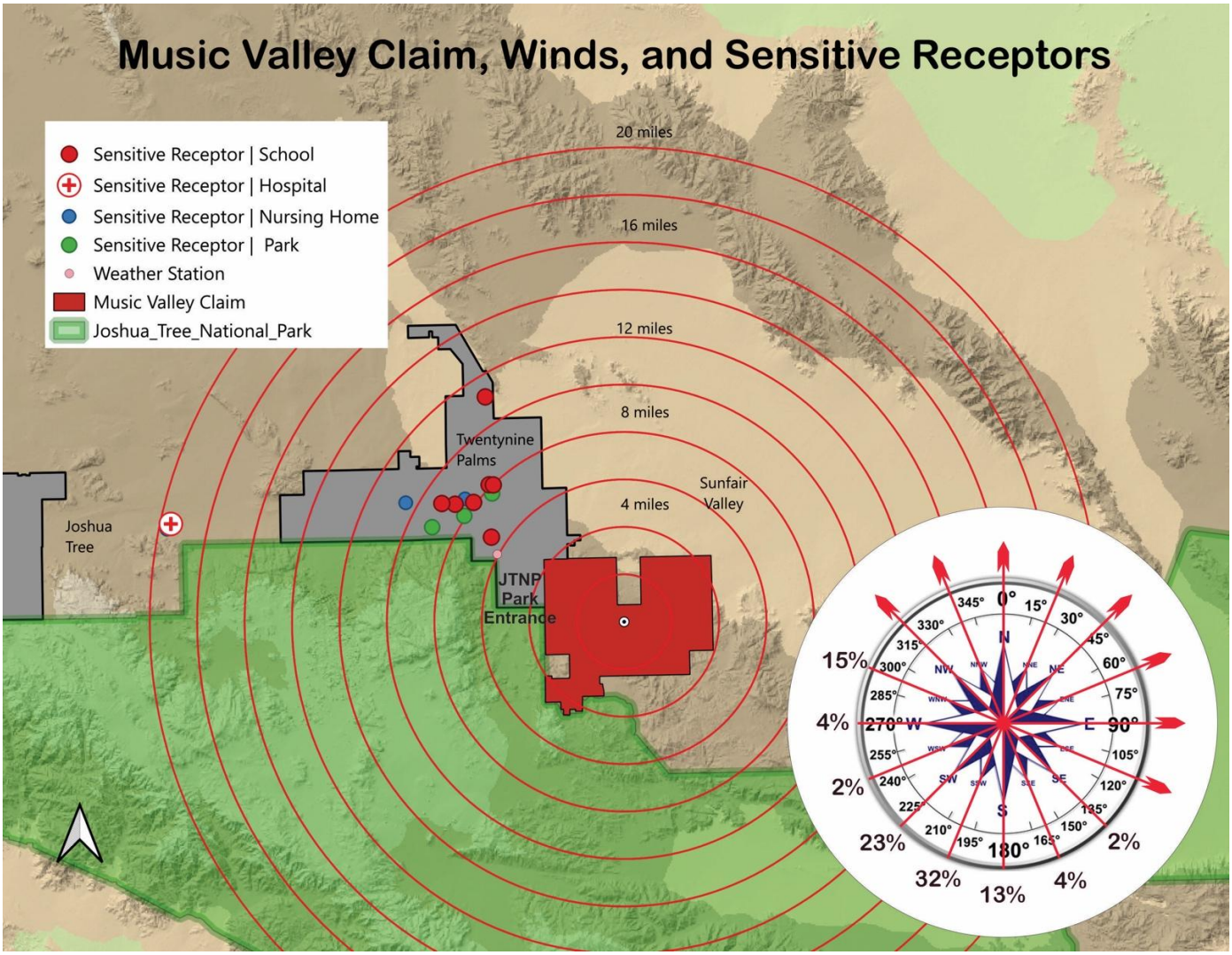
The blasting, crushing, and grinding of the ore will produce prodigious amounts of dust, including many particles in the PM10 and PM2.5 size ranges. At least some of these operations are necessarily done in the open air at the mine site. The dust particles (especially the finer PM2.5 particles) are of special concern. They are readily carried long distances by wind and are retained in the alveoli of the lungs. These can cause significant health problems (asthma, COPD), even when radioactivity is not present. Other mining-related activities (hauling ore on mining roads and highways, wind erosion of tailings and exposed surfaces, ore/concentrate handling and stockpiling) can also contribute to the spread of radioactive dust.

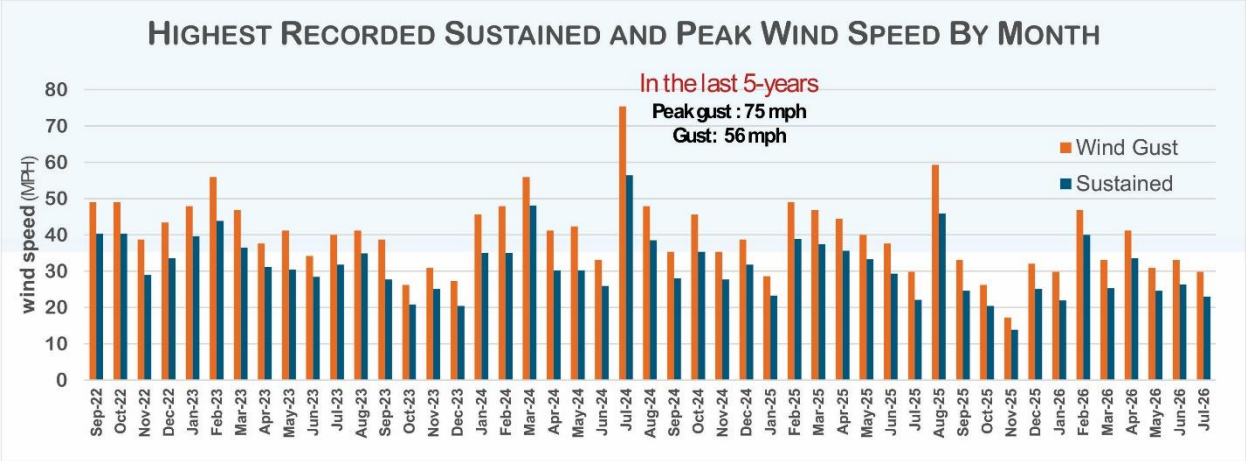
Thorium will also be present in the waste stream from ore processing, so the waste products must be considered hazardous material. In addition, Thorium will remain a persistent hazard on the surfaces exposed by mining, both during active mining and after closure of the mine.

Because of this, mine abandonment/closure/reclamation must include burial of such surfaces under clean fill, to avoid being a persistent health hazard. Such burial is often NOT performed when mining companies abandon claims, and previous actions by Dateline Resources at Colosseum Mine within the Mojave Preserve do not provide confidence that they will willingly perform responsible closure actions here. (Mining there was recently

halted by a US District Judge because the company did not get National Park Service approval before initiating mining.) If the mine must be permitted, the company should be required to deposit money into an escrow account, sufficient to mitigate hazards as they occur, and to safely and securely close the mine.

The following figures show wind direction, wind speed, and the location of sensitive receptors adjacent to the Music Valley claims. These are citizens whose health must be considered in evaluating the impact of this mine.





The San Bernardino County's Countywide Plan states:

> *Maintaining and improving* ***the health and wellness of individuals, families, and communities is one of society's most fundamental goals****, similar in importance to public safety and providing adequate shelter. Creating* ***healthier*** *places and improving the* ***health*** *and education of people contribute to lower governmental costs for health care, enhances the capacity of the individual and collective workforce, and leads to a stronger economy and overall prosperity. Positive outcomes are not only the result of health-care treatment and the provision of a social safety net; they must also be achieved through* ***preventive or upstream efforts*** *that help avoid or reduce the occurrence of physiological, financial, and social instability.* (Emphasis added)

It is manifest in this language for the County to explicitly review projects that may expose its citizens to activities that may impact that *health and wellness*. This review is the responsibility of the County (and its Board of Supervisors) and should be done regardless of any "approval" review or "authorization" by other levels of government.

The review takes place in the context of the California Environmental Quality Act (CEQA) analysis and provides support for subsequent permit requirements designed to protect human health and the environment. The review conducted by a federal agency under the National Environmental Protection Action (NEPA) is not equivalent to the CEQA requirements. The changes proposed in subsection 88.03.040(b) are not consistent with the Countywide plan and it would be irresponsible to pass them

The diminishing and inadequate level of review to which projects are subjected under the National Environmental Protection Act (NEPA), is described within the Harvard University document cited in the reference section of this letter.

MBCA opposes the proposed revision before you today unless appropriate language is included requiring environmental analyses provided by compliance with the California Environmental Quality Act (CEQA).

Thank you for providing a platform for us to comment.

Sincerely,

Arch McCulloch, Director
Morongo Basin Conservation Association

References:

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