

MAD RIVER TOWNSHIP

260 EAST MAIN ST., BOX 34, ENON, OHIO 45323
TRUSTEES: ROBERT MCCLURE, JOE CATANZARO, KATHY ESTEP
FISCAL OFFICER: DAVID RUDY

May 10, 2017

Re: Industrial Minerals Permit Modification# IMM-340-4 & Amendment # A-0340-

To: Chief Lanny Erdos, Division of Mineral Resources Management, ODNR



The Mad River Township Trustees strongly oppose the above permit modifications that would allow the merging of IM-34 and IM-375, deeper mining, dewatering, and blasting on an additional 389.8 acres of land adjacent to hundreds of homes and our Junior/Senior High School.

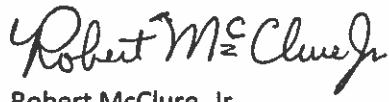
We thank you for the extension of the comment period. Since the extension was granted, we have received the following additional information:

1. Brent Huntsman, Chief Hydrogeologist, Teran Corporation, has completed a report which contends that the Eagon model was constructed with disregard to some very important hydrogeologic and geologic data. The model in its current configuration appears to be inaccurate and unreliable in predicting realistic groundwater flows, water level elevations, and discharge pumping rates. He will be submitting his report to you directly.
2. Concerns regarding documented wetland areas within 200 feet of the area to be mined have been brought to our attention by owners of that property. Please refer to the letter we have provided. We are also including a list and map of springs and sinkholes in close proximity to the area.
3. Concerns regarding groundwater contamination in the area of the proposed mine. In the report "Mad River Township, Clark County Karst Investigation, Ohio EPA, 2008" it was concluded that water supplies in this karst setting are especially vulnerable to contamination. This information is available at http://www.epa.ohio.gov/portals/28/documents/gwqcp/2008_305.pdf. The Newsletter of the Ohio Geological Society, October, 2008 also contains an article summarizing the investigation of the Dissected Niagra Escarpment in Mad River Township, which states: "The investigation also helps confirm the sensitivity of the shallow karst aquifer to contamination." We have included a copy of that portion of the newsletter.
4. ORC 1514.02, A, 3 states that..."The Application shall contain an explanation of how the applicant intends to comply with any applicable provisions of zoning resolution or ordinance." Mad River Township is governed by Clark County Zoning Resolution. The Clark County Community and Economic Development Department has been notified via its legal counsel that a Conditional Use Application must be filed with Clark County's BZA pursuant to Chapter 7, Section 129 of the Clark County Zoning Regulations. The application shows no evidence that this process is planned or underway. Please refer to the letter we have provided.

5. Since the extension was granted, we have received additional petitions containing the names of hundreds of our residents who share our concerns about these issues and more if this mining permit is granted. We are providing copies of those petitions.

We thank you for providing additional time for the township to gather information regarding this proposal. To reiterate, we are opposed to this permit modification on two grounds. According to the letter sent by Clark County Department of Development, the appropriate zoning variance was never granted to allow mining by the previous owners. Secondly, we feel that there are serious environmental concerns that make this mining operation dangerous to the water supply, health, and welfare of our community.

Sincerely,



Robert McClure, Jr.



Joe Catanzaro



Kathy Estep