

MAD RIVER TOWNSHIP

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

April 3, 2017

Re: Industrial Minerals Permit Modification: IMM-340-4 and A-340-1

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.

The Mad River Township Trustees sent a previous letter regarding this issue expressing concerns about the permit modifications. Since that time, we held a public meeting with representatives of Enon Sand and Gravel, ODNR, Clark County Department of Community Development, Clark County Combined Health District, numerous other government officials and independent individuals with expertise in hydrology and hydrogeology. The information provided at that meeting caused us to have even greater concerns.

1. There are numerous issues with local zoning. The Clark County Community Development Department officials have raised questions about the existing permits issued in 1977 and later amended, as to whether proper processes and procedures were followed. Since that time, there has been significant residential development in the adjacent area. Even if those issues are resolved, because this is a significant proposed modification to allow pumping and discharging of water to facilitate mining to an increased depth, Clark County Zoning requires a review by the Board of Zoning Appeals in order to grant a conditional use for this significant change in the operation.
2. According to the model provided by Eagan and Associates for Enon Sand and Gravel, there will be significant impact to the water table of surrounding homes with private wells and potential impact on water quality to those wells. Brent Huntsman, Chief Hydrologist of Terran Corporation is very familiar with this area. Terran Corporation has been working with the Village of Enon for many years providing information regarding their water supply. He indicated that there were serious problems with the modeling that was done by Eagan and Associates. Additionally, much of the information obtained by the company regarding individual wells was either missing or incorrect.
3. Increased truck traffic in terms of both safety and deterioration of Township and County roads due to higher load capacity was not adequately resolved. We have no assurance that designated routes will be established and followed.
4. Potential air quality issues were not addressed by OEPA or RAPCA.

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5. Potential flooding of downstream properties due to continuously pumping 220 gallons of water per minute into Mud Run was not addressed by any regulatory agencies. Part of the property is in the established flood plain. Currently, Mud Run floods several times a year due to rainfall.
6. Impact on water quality of Mud Run, a part of the Little Miami Watershed and a tributary of the Mad River was not addressed by any regulatory agency. An inadequate assurance that there would be “no problem” was given by the Enon Sand and Gravel.
7. Potential for damages to nearby homes, outbuildings, and the school due to blasting was dealt with by a vague promise to have a survey done prior to blasting and damages to be assessed after blasting occurs. Determining damages after the fact is not acceptable.
8. Additionally, we have been informed that the OEPA has expressed concerns regarding the impact on 48 public water system wells located within a five mile radius of the application due to the karst limestone formations, many of which have experienced water quality impacts from potentially pathogenic micro-organisms and nitrates. This issue was not even discussed by the company or its representatives.
9. Numerous studies, including one done by the Upjohn Institute for Employment Research, show that property values are negatively impacted by proximity to a quarry. This in turn will impact the tax base of the township. County Auditor, John Federer informed us that as property values decline in areas near the quarry, other households in our township will see their property taxes rise to make up for the difference in total millage collected.
10. The proposed permit modifications would be in direct violation of the Mad River Township Land Use Plan, “Preserving Our Heritage in a Changing Environment” that was adopted in 2002.

This property is in close proximity to over two hundred homes and our local Junior/Senior High School. We understand that a small portion of this property has previously been an active gravel pit, but this permit would allow very significant changes and a large expansion of that operation that we believe will be detrimental to the quality of life and the property values of our community. We strongly oppose this permit application.

Sincerely,

Robert McClure

Joe Catanzaro

Kathy Estep