

To: Sharon Township Mineral Licensing Board
From: Sharon Preservation Society
Date: December 20, 2021
RE: Aggregate Industries application to expand mining on F-52

INTRODUCTORY COMMENTS – MLB MTG 20-DEC-2021

Sharon Preservation Society is an all-volunteer, non-profit organization of Sharon Township residents. Our mission is to inform residents about issues that impact our health, safety, welfare, or property values. The focus of our current efforts is on the dramatic increase in aggregate mining applications in our township.

On your agenda today is the review of information submitted by a subsidiary of Aggregate Industries, which wishes to significantly expand the existing aggregate mining operations on M52.

Several of us are here today to raise our concerns regarding the proposed expansion. We will request the Mineral Licensing Board to:

- **Require additional information before deeming this application complete AND;**
- In your subsequent review of the information, to **proceed with extreme caution as this mine has to potential to negatively impact township residents.**

We think this is necessary for several reasons:

First, on a general level, this application represents an exponential increase in the amount of mining at this site: **24 times more gravel AND 10 times more sand** extracted than in 2019. We recognize these parcels were already permitted for aggregate mining, but it certainly seems reasonable to assume that this level of expansion would create a substantial and material change to the levels of noise, dust, traffic concerns and values of the properties in the neighboring residential areas.

If possible, in light of these changes, the township should consider revisiting any conditions in the special use permit for these parcels.

Second, we understand that the property owner - and prior operator of the west parcel – Fifty-Two Minerals, had a cooperative and respectful relationship with the township and surrounding community. We appreciate this. However, Aggregate Industries, a subsidiary of LaFarge Holcim, is a different organization and, as such, bears scrutiny. Consider:

- LaFarge Holcim has incurred nearly a quarter billion dollars of penalties in the US since 2000 for reported environmental-related offenses alone. (Good Jobs First, 2021)
- As recently as this year, in Alpena Michigan, Holcim agreed to pay \$170,000 in penalties and costs in settlement of allegations at a cement plant that it failed to have dust collectors operating correctly, exceeded air emissions permit limits from one kiln, and failed to correctly monitor emissions.
- Aggregate Industries also has a less-than-stellar environmental record with a number of environmental offenses in the same time period, some incurring millions of dollars. Attached is one example from a few months ago in Massachusetts. Aggregate

Industries North East Region was sued by the Massachusetts Department of Environmental Protection for one million dollars. (See attached press release) The company produced asphalt in violation of its permit and caused emissions and noxious odors that caused a public nuisance in the surrounding suburban neighborhood.

Finally, we believe there are deficiencies in the information submitted. We will outline these in the next comment period.

We believe Sharon Township's Mineral Licensing Board will fairly evaluate residents' concerns along with the applicant's submission.

We thank you in advance for the serious consideration we know you will give our concerns.