



TO: Sharon Township Planning Commission
FROM: Sharon Preservation Society
SUBJECT: Position on Determination of Need for a 400-acre Aggregate Mine on Pleasant Lake Rd. for Special Meeting 28-FEB-2022
DATE: 28-FEB-2022

Sharon Preservation Society had several concerns with the information submitted by the applicant, Stoneco Inc., to the Planning Commission in December, 2021. We submitted our concerns in a memo to Planning Commission (PC) members in late January.

Our concerns have been echoed in some of the many findings articulated by Spicer Group, an independent engineering firm hired by the PC to review Stoneco's submission.

In its report of February 16, 2022, Spicer Group finds that Stoneco has not sufficiently demonstrated a need for a new aggregate mine on Pleasant Lake Rd.¹

Based on this finding, Sharon Preservation Society submits its updated position on the Determination of Need for the proposed Pleasant Lake Rd mine below.

-
- 1. Generally speaking, we recognize that sand and gravel are an important part of road repair projects. And, we recognize that Michigan residents want more roads repaired. HOWEVER, this does not necessarily mean the state needs more gravel mines.**
 - There is no evidence that existing mines cannot produce sufficient sand and gravel for the needs of our market area.
 - And, in any event, there is never a reason that any company, particularly a company based outside the US with more than 27 billion US dollars in revenue, should profit at the expense of one community's health, safety, well-being, or property values.
 - 2. We believe that our township has a fair zoning ordinance for granting or denying a Special Land Use Permit for aggregate mining. And we believe that our township officials have administered it fairly so far.**
 - The Sharon Township ordinance is based on the Michigan Zoning and Enabling Act. It balances the need for sand and gravel against the potential harm to the surrounding community.
 - We believe our township's elected officials and commissions are working in the best interests of residents. Their members have been listening to the concerns of the many, many residents that have voiced them.
 - 3. We are pleased that the Planning Commission hired an independent, outside engineering firm, Spicer Group, to review the information submitted by the applicant, Stoneco.**
 - Stoneco had nearly one year to produce evidence to prove the market need for the sand and gravel that would be produced by a 400-acre mine on Pleasant Lake Rd. Based on the Spicer Group report, it now seems clear that Stoneco failed to do so.
 - To support its claim of market need, Stoneco submitted a report in December that was prepared by FMI Consulting. It seems worthy to note that FMI Consulting authored a similar report for the State of Michigan in 2016, a report that has been widely discredited by both internal and external state auditors:

- According to the state's investigation, the report: "...risks being insufficiently comprehensive, unverifiable, partially irrelevant and, consequently, unreliable."²
 - The report, commissioned by MDOT, was unduly influenced by the Michigan Aggregates Association (MAA), a lobbying group. MAA's lobbyist recommended FMI Consulting, suggested what MDOT should pay for the report, and set out what the expected major finding would be.^{3 4}
 - This 2021 report, commissioned by Stoneco, uses the same firm (FMI Consultants), and employs many of the same methods to estimate need.
- 4. Should Stoneco continue its application for a Special Use Permit for the 400-acre, we believe Stoneco must demonstrate there will be ZERO very serious consequences for residents and the community at large.**
 - 5. Residents will continue to voice their concerns, and expect that the Planning Commission and the township Board will continue to pay attention.**

¹ Letter from Spicer Group, RE: Stoneco Pleasant Lake Road Site, Needs Analysis Review, Feb 16, 2022

² "Procurement of Michigan Markets Aggregate Study; Investigation Report," Michigan Department of Transportation, Office of Commission Audits. September 26, 2019

³ Detroit Free Press (freep.com), "Emails show MDOT let lobbyist steer report on gravel shortage for Michigan roads," June 6, 2019

⁴ Detroit Free Press (freep.com), "Audit: Michigan taxpayers ripped off with questionable \$100K MDOT study," October 18, 2019