

# **FINAL ENVIRONMENTAL IMPACT STATEMENT**

## **American Rock Salt Company, LLC Hampton Corners Salt Mine Westward Underground Mine Expansion**

Towns of Mt. Morris, Leicester, Groveland, and Geneseo  
Livingston County, New York  
DEC No: 8-2428-00019/00001

### **APPLICANT & PROJECT SPONSOR:**

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**DEIS Accepted: July 25, 2018**

**FEIS Issuance Date: January 9, 2019**

**Findings Statement and Decisions After: January 21, 2019**

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## **I. INTRODUCTION**

### **A. Contents of the Final Environmental Impact Statement**

This final environmental impact statement (“FEIS”) has been prepared for the proposed underground expansion of the Hampton Corners Mine (“Project”) in accordance with the State Environmental Quality Review Act (“SEQR”) as contained in the New York State Environmental Conservation Law (“ECL”) (see ECL § 8-0101 *et. seq.*) and its implementing regulations (see 6 NYCRR Part 617). The FEIS contains three (3) sections. Section I summarizes the environmental review process and contains a description of the Project. Section II provides information presented by American Rock Salt Company, LLC (“ARS”) to the New York State Department of Environmental Conservation (“DEC” or “Department”) after the draft environmental impact statement (“DEIS”) was deemed complete by the Department on July 25, 2018. Section III contains the Department’s responses to public comments.

Copies of the public comments are contained electronically in Appendix 1, which includes an electronic copy of the transcript of the public hearing held on August 15, 2018 and electronic copies of written comments received by the Department during the written comment period. The DEIS accepted by the Department on July 25, 2018 is also incorporated herein by reference and provided electronically in Appendix 2.

### **B. Application History**

On September 15, 2016, the Department received an application for an Article 23, Mined Land Reclamation Permit modification, and State Environmental Quality Review (SEQR) Act Long Environmental Assessment Form, proposing a 1,700 acre ± underground expansion of the currently permitted rock salt mine. After classifying the action as a Type I action under SEQR, the Department coordinated with other involved agencies and was established as the SEQR Lead Agency on November 10, 2016.

After review of the application and SEQR Environmental Assessment Form, the Department issued a SEQR Positive Declaration on December 27, 2016 requiring the preparation of a Draft Environmental Impact Statement. On March 2, 2017, the Department made available for public review and comment, a draft Scoping Document for the Draft Environmental Impact Statement. A public hearing was held on the draft Scoping Document at the Livingston County Center for Emergency Operations on Gypsy Lane in Mount Morris on March 21, 2017 to accept verbal comments, and written comments were accepted through March 31, 2017. A final scoping document was accepted on July 19, 2017 and provided to all SEQR involved agencies.

A Draft Environmental Impact Statement was initially submitted to the Department on August 31, 2017. After review of subsequent revisions, the Draft Environmental Impact Statement was accepted and circulated for public review on July 25, 2018. At the same time, the application was deemed complete and made available for public review.

The DEIS describes the project, the purpose of the project which includes the benefits and need of the project. It also discusses the potential environmental impacts of this underground project, the environmental setting of the project, the information needed to assess any potential impacts, and mitigation measures which would minimize or eliminate identified impacts. It also included

consideration of reasonable alternatives to the proposed action. In addition to the above, this DEIS also addressed potential impacts on socio-economic resources, irreversible and irretrievable commitment of resources, growth inducing aspects of the project as well as effects on the use and conservation of energy.

The DEIS did not include potential surface impacts associated with construction activity or the modification of the mine's existing surface facility, since the proposed project does not include any new surface land use such as surface construction or modification of the currently permitted surface facility and mine shafts.

After the July 25, 2018 announcement of the DEIS acceptance and notice of complete application, a public hearing on the DEIS and complete permit application was held on August 15, 2018. In addition, the written comment period on the DEIS and permit application ended on August 27, 2018.

### **C. Description of Proposed Project**

ARS proposes the expansion of a currently-permitted Hampton Corners Salt Mine (HCSM) comprised of approximately 9,000 acres of underground reserves located in the Towns of Groveland and Geneseo. As proposed, the expansion would include approximately 1,700+ additional acres of underground reserves located west of the existing mine in the Towns of Mount Morris and Leicester. There are no proposed surface activities on this 1,700+ acres of the project area, and there would be no modifications to the surface components or operations of the existing mine, including the surface facility, mine shafts and vehicular traffic.

In addition, an alternate/additional room and pillar mine design is proposed to improve the operational performance within the mine workings, while maintaining the currently permitted room and pillar mine design and 60% or less salt extraction ratio. The permitted and currently utilized mine design utilizes 95x95 foot (or larger) wide supporting pillars and 150-foot (or larger) pillar center spacing, 13 foot (average) high rooms and 55 foot (or smaller) wide room spans between supporting pillars. Salt extraction is 60% or less. The modified (additional/alternate) room & pillar mine design would “shrink” the current room & pillar mine design by reducing both the pillar size and room width, and maintain the current 60% or less salt extraction ratio. This additional/alternate room & pillar mine design would be utilized where applicable (such as travel ways) to eliminate or reduce floor heaves within rooms by reducing the room spans between supporting pillars. These spans would be reduced to 40 feet wide and the design would maintain the 60% or less salt extraction ratio by utilizing 70x70 foot wide supporting pillars, 110-foot pillar center spacing and 13 foot (average) high rooms.

No modifications to the surface components or operations of the mine are proposed, nor are any necessary for the proposed underground expansion.

## **II. ADDITIONAL INFORMATION TO THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT**

ARS has not proposed any changes to the project since the Department published the notice of complete application and accepted the DEIS on July 25, 2018. No additional information has been requested by the department, except adding to the DEIS that there is a second sewer line south of Route 408 and the project area, in addition to the single sewer line and water line along the north side of Route 408 and discussed in the DEIS. The presence of this second sewer line is acknowledged and is shown in a revised Figure 39, which is included in Appendix 2 of this document.

### III. RESPONSIVENESS SUMMARY

There were eleven (11) speakers who provided public comment statements during the August 15, 2018 Legislative Public Hearing on the ARS permit application and Draft EIS for the Westward Underground Expansion of the existing Hampton Corners Salt Mine (HCSM). The public hearing was held at the Livingston County Conference Center in Mt. Morris, NY. The eleven unsworn statements were documented in the transcript of said public hearing. In addition to the comments received at the public hearing, forty-nine (49) written comments were received during the DEIS written public comment period, which ended on July 27, 2018 (duplicate comments were counted once). The transcript of the public hearing and the written comments are included in Appendix 1 of this FEIS document.

The public comments received were generally in support of the project. This included support for the project from the Town Supervisors of the Town of Mt. Morris and Town of Leicester, where the project would be located. The Town Supervisor for the Town of Groveland, where most of the existing underground mine and the entire surface facility of the mine are located, and have operated for approximately 20 years, spoke in support of the project and positive past experiences with ARS. The comments in support of the project are acknowledged, but no specific responses are provided elsewhere in this FEIS.

Responses to comments are provided below address questions or concerns that were raised. Comments on the same topic have been combined or grouped to provide a consolidated response.

#### A. Noise

**Comment 1: The Department received two comments related to potential noise impacts associated with surface ventilation fans. One commenter wanted to make sure the project would not include additional ventilation fans in the project area. Another commenter supported the project and asked for measures to improve the noise levels of an existing ventilation fan, but did not want the improvement of noise levels to be a requirement to approve the proposed project.**

**Response 1:** The proposed project does not include any surface components, including new ventilation fans or changes to existing ventilation fans. The DEIS discusses on page 5 under “Project Components” that the proposed project would not include any surface activities, nor any modifications to the surface components or operations of the existing mine. The existing ventilation fan is in compliance, and is critical to ensure the safe operation of the mine. The mine operator has advised the Department that, as a good neighbor, it is currently taking actions to further dampen and attenuate the existing ventilation fan noise.

#### B. Public Infrastructure

**Comment 2: The Department received one comment advising the Department that there is a sewer plant outflow discharge line south of NYS Route 408 that runs from the Village of Mount Morris sewer plant to Canaseraga Creek, that is not identified in the DEIS.**

**Response 2:** The sewer plant outflow discharge line south of Route 408 is more than 700 feet from the project area. This structure would not be impacted by the proposed project. The presence of the sewer plant discharge line south of Route 408 that runs from the Village of Mount Morris to Canaseraga Creek is acknowledged and is now noted on page 85 and Figure 39 of the DEIS, provided here in Appendix 2.

**Comment 3: One comment was received advising the Department that any work within the right of way of any state highway will require a Highway Work Permit from the NYS Department of Transportation Traffic Safety and Mobility Office and coordination with the NYSDOT's scheduled work.**

**Response 3:** The proposed project does not include any work within the right-of-way of any NY State Highway. As part of the subsidence monitoring, ARS will be required to evaluate any potential long-term impacts to nearby highway infrastructure.

### **C. Geology**

**Comment 4: The Department received one comment that fully supports the project and stated the applicant has done due diligence with the DEIS and sound science to demonstrate that the project would have minimal impacts to the surrounding area; but also expressed a small concern with top loading the supporting beam above the mine workings with additional water weight during a 300-500 year flood.**

**Response 4:** The DEIS addressed flooding, overburden stress, and the supporting beam above the mine workings. The DEIS shows that flooding and resulting “top loading” is unlikely to occur in the project area due to channel depth and the proximity of the project area to the Mt. Morris flood control dam upstream of the project area. The DEIS also addressed that in the event of an unlikely 300-500-year flood, and a resulting out of channel flow in the project area, these waters would drain by surface drainage, and by percolation to a shallow unconfined aquifer and then to the Genesee River and Canaseraga Creek, as they currently do and had done prior to the construction of the Mt. Morris Dam, when out of channel flow regularly occurred and replenished farmlands with new sediments.

A 1972 Hurricane Agnes type flood (300-500-year flood) event is highly unlikely, but was addressed in section 4.2.3 of the DEIS. Its occurrence would result in temporary water depths less than 10 feet deep over the project area. The weight of this water would be equivalent to less than 5 feet of overburden rock since water is less than one half the weight of rock. The DEIS indicates that the supporting beam above the adjacent existing mine workings at the HCSM has proven by experience capable of supporting more than 1,500 feet of overburden rock weight. The same supporting beam and mine workings in the expansion area would be subjected to less top loading or overburden weight because there is only 1,100-1,300 feet of overburden in the expansion area. It would require water depths more than 400 feet deep to flood the valley, and equal the weight of an additional 200 feet of overburden, to equal the same 1,500 feet of overburden load the beam and mine workings have sustained in the existing HCSM. Furthermore, the 1972 flood (300-500-year flood) had no impact due to top loading to the supporting beam or mine workings at the Retsof Mine in 1972.

#### **D. Livingston County Environmental Management Comments**

**Comment 5:** The Department received a letter from the Livingston County Environmental Management Council that commented on the overburden characteristics of the project area being different than previously mined areas and potentially different impacts. It premised questions and comments with the following; “Given that this is a new area of underground mining with different overburden characteristics and potentially different impacts”. The comment letter provided a number of questions and comments related to various topics, including potential impacts to surface/ground waters, alternative mine design, mine collapse, and scope of the original review under SEQR.

**Response 5:** The questions and comments contained in this letter are addressed either in the DEIS, the previous DEIS for the HCSM, or are outside the scope of the current action. The responses below are provided in sequence, beginning with the overburden characteristics of the project area and then in the numbered sequence of the comments and questions raised in the letter.

In regard to the premise (on page 1 of comment letter), that the project area has different overburden characteristics, the DEIS repeatedly discussed and demonstrated that the western expansion area is in a more favorable geologic setting, including overburden characteristics, than previously and successfully mined areas proximal to the project area. The DEIS also included that the mine designs for the expansion area would be room & pillar mine designs that are similar or more conservative than those utilized for more than a century in previously and successfully mined proximal areas. This included findings relative to overburden characteristics noted on pages 6, 11, 12, 13, 17, Section 4.0, which includes subsections pertaining to Environmental Settings, Significant Environmental Impacts and Mitigation Methods to Minimize Environmental Impacts, Geologic Setting, Mine Design, Surface Subsidence, Previous Mining at Retsof Mine and Hampton Corners Mine in pages 20 – 52 of the DEIS. There are additional third party findings in Respec Report RSI-2608, which further discusses the more favorable overburden of the project area. This report concluded on page 53 that the geologic conditions in the west expansion area are suitable for mining, and are in fact, generally expected to be more favorable than geologic conditions at the existing mine. This report also predicted the subsidence related impacts above the western expansion area would be similar or less than the impacts over the existing mine, due to less overburden stress, and equal or less rates of subsidence. This is significant since it was pointed out in the DEIS, in Section 4.0, that there have not been any significant adverse impacts due to subsidence at the existing mine.

Furthermore, the DEIS also discusses in Section 4.0 that the western expansion area is in a similar, but more favorable geologic setting than the Retsof Mine where the room & pillar mine design was utilized and sustained a dry mine for more than 100 years. It points out that the project area is down dip of the Retsof Mine and the overburden in the project area contains a thicker and less scoured supporting beam above the mining horizon. It shows that this supporting beam is comprised of impermeable rock layers that further separate the mining horizon from the glacial/fluvial sediments and the Genesee River flood plain in the project area.

Additional responses to the numbered comments and questions in the Livingston County Environmental Management Council letter are provided below:



- 1. Surface Water Impacts** – Potential impacts of the project on surface waters were addressed in Section 4.2.1 of the DEIS. As explained in sufficient detail in that section of the DEIS, the project is not anticipated to impact surface water quality since 1) there are no changes in surface mining activities associated with the project and 2) land subsidence within the expansion area will be very gradual (averaging a rate of approximately 1 inch or less per year), allowing natural fluvial processes to maintain river and stream channel characteristics.

See also response to Comment 4 above.

- 2. Groundwater Impacts** – Impacts on ground waters were addressed in Section 4.2.2. of the DEIS. Current mining operations do not generate significant amounts of brine underground, except for small amounts of groundwater that enter the existing mine shafts. This water is used underground for dust suppression or pumped back to the surface for discharge in accordance with the facility's SPDES permit. Accordingly, and based on the analysis provided in the DEIS, no brine migration is anticipated to result from the proposed project.
- 3. Underground Monitoring** - Monitoring plans are addressed in the DEIS (pages 37 & 38) & previous HCSM 1995 DEIS – MLUP-Appendix E (page 2). The DEIS discussed that underground room closure monitoring, room inspections and groundwater monitoring would continue as currently done in the HCSM. Monitoring plans are based on the HCSM and more than 100 years of experience at the up dip and dry Retsof Mine that was closer to water sources and utilized a less conservative room & pillar mine design in a less favorable geologic setting. Backfilling to mitigate closure rates was previously established by ARSC as a precautionary measure. Page 21 of section 4.0 of the DEIS (mitigation methods to minimize environmental impacts) indicates that these response measures would be triggered by specific rates of room closure, as currently done in the HCSM. The backfill would be comprised of soluble and insoluble rock and bonded by insoluble flowable cementing materials. The placement of the materials would not result in salt solutioning. This mitigation technique has never been required and water entry has never occurred in the HCSM or in the Retsof Mine where the conventional room & pillar mine design was used.
- 4. Alternative Mine Design Use** - This design was addressed in numerous sections of the DEIS, and specifically on pages 5, 6 & 36. The smaller room spans and 60% salt extraction design (alternate mine design) would be utilized as needed, including in roadways and conveyor belt passageways to reduce floor heave closure rates and sustain openings for longer periods. This is also discussed in RESPEC Report # 2584 & 2608. With respect to salt pillar vulnerability to solutioning in the highly unlikely event of a mine flood, increased solutioning would be limited to the area of water entry and would quickly dissipate with distance as water becomes fully saturated brine, losing the ability to dissolve solid salt (see also response 5 below).
- 5. Impacts of Possible Mine Collapse** - Section 4.1.1 of the DEIS discusses the limited overburden failure at the Retsof Mine where a new yielding pillar mining technique was exclusively used for less than one (1) year before resulting in overburden failure and water entry. The DEIS also discussed that more than a century of mining occurred in two separate mines proximal to the project area with no overburden failure and no water entry, where a conventional room & pillar mining technique was utilized. This

continuation of a long successful trend of dry mining with a conventional room & pillar design is further supported in the DEIS by components of the proposed project, since it would utilize an even more conservative room & pillar mine design with a lower salt extraction ratio in an even more favorable geologic setting. This was discussed in numerous sections of the DEIS, including section of the DEIS entitled “Project Area” on pages 28-37.

Given the conservative nature of the proposed room & pillar design, more favorable geological setting than the current areas mined at the HCSM, thorough surface subsidence and underground mine closure monitoring program, and mitigation measures using appropriate backfill material when needed, no overburden failures are anticipated to occur within the proposed expansion area. In the unlikely event of an overburden failure special condition 2.c. of the existing mining permit requires ARS to maintain a financial security for the purposes of reclaiming all affected surface areas, and maintain general liability insurance coverage for bodily injury or property damage which may arise from the operation of the HCSM. Furthermore, special condition 2.j. of the permit authorizes the Department to require remedial plans and implementation schedule for any surface damage due to subsidence caused by ARS's underground mining activities.

## **6. Location in the Genesee Valley:**

**Soils, sediments, erosion, water and mine integrity** - This was discussed in numerous sections of the DEIS, including a section of the DEIS entitled “Project Area” on pages 28-37 and section 4.2 on Water Resources. The DEIS indicates that sediments and associated groundwater in the project area are above a very substantial impermeable beam of competent rock that separates the valley bottom and the mine horizon in the project area. It also shows that this beam thickens in the project area relative to other proximal mining areas where water entry did not occur and a less conservative room & pillar mine design was utilized. The gradual lowering of the land surface due to mining would promote sediment deposition (not erosion) in this fluvial valley, which is a very basic principal of sedimentary geology. These non-consequential attributes or lack of significant adverse impacts have been demonstrated for decades where the conventional room & pillar mine design was utilized in the Retsof Mine and below the same fluvial valley, at similar stream gradients and slightly lower ground level elevations where there are additional streams (water) inflowing to the valley downstream of the project area.

**Dam break - Mt. Morris dam** - A “break” or failure of the Mt. Morris Dam is outside the scope of the DEIS. A dam break scenario was not evaluated since a catastrophic failure is highly unlikely and the dam is well maintained by the U.S. Army Corps of Engineers. Further, no potential impacts of the existing or proposed mining operation have been identified that would result in any effects on the integrity of the dam.

## **7. Changes in the underground mine use and amendments to the surface facility-**

The comment questions what notifications would be required for changes involving underground storage of ash or natural gas or increases in surface salt storage. These are not part of the proposed action and are not within the scope of the DEIS for the proposed expansion project. Any future modification of underground uses and increases of salt storage operations would require an appropriate review and approval of the

project by the department. Furthermore, special condition 2.b. of the existing permit does not authorize any use of the mine, or cavities created by extraction, for any use not currently identified in the approved plans.

- 8. State Environmental Quality Review (SEQR) –** Questions pertaining to the life of the mine were addressed in the DEIS on page 5 under “Project Components”, Project Component #1; on pages 11, 12 and 14, under “Executive Summary”; and on page 16 under “Significant Beneficial and Adverse Impacts of Project”. The DEIS indicates that the expansion area would extend the duration of mining by approximately 10 years depending on market demand. The existing mine, based on current extraction rates, would likely have a life of mine of approximately 35 years. The proposed project would extend the duration of mining approximately 10 years to approximately 45 years.

There are no additional mine shafts or surface facility improvements proposed, nor have any been determined necessary, as part of the current underground expansion. Should additional mine shafts or future changes in the surface facility be proposed, the Department will review the proposal(s) in accordance with the applicable requirements under the Mined Land Reclamation Law and State Environmental Quality Review Act.

Surface subsidence monitoring will continue annually throughout the life of the operation, and is not contingent on a specific time frame. The subsidence monitoring program has been recently upgraded to an airborne LiDAR system which allows for complete coverage of the entire mine surface footprint and will be maintained throughout the life of the project. This will allow for the continued comparison of subsidence data to ensure original subsidence projections are accurate and that the mine is performing as expected. In the unlikely event that subsidence rates deviate from modeled projections, the existing permit contains special conditions 2.a., and 2.j. which gives the Department the ability to require a remedial plan and implementation schedule for unanticipated subsidence impacts. These permit conditions, or substantively equivalent conditions, would be maintained in any approval given for the proposed expansion.

Potential impacts to resources and hydrologic features due to subsidence were previously questioned in this letter and responded to above. These potential impacts are discussed numerous times in the Executive Summary of the DEIS on pages 13-14, section 4.0 pages 28-91 of the DEIS, and sections 4.1.1, 4.2.1, 4.2.2, 4.2.3 of the DEIS. This includes identifying the project area being in a more favorable geologic setting, the project using a more conservative room & pillar mine design that would result in lower subsidence rates than successfully mined areas where no significant adverse impacts have occurred, and concluding in numerous sections of the DEIS that subsidence rates would result in no significant adverse impacts to resources. The DEIS discussed that total closure and compaction would likely require hundreds of years.

## **APPENDICES**

## **APPENDIX 1**

### **PUBLIC COMMENTS:**

**TRANSCRIPT FROM PUBLIC HEARING AUGUST 15, 2018**

**AND**

**WRITTEN COMMENTS SUBMITTED BY AUGUST 27, 2018  
DEADLINE**

STATE OF NEW YORK  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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LEGISLATIVE PUBLIC HEARING: In the Matter of the Applications of American Rock Salk Company, LLC for DEC Permit Modification for a proposed 1,700 +/- acre westward underground expansion of the existing Hampton Corner's Mine pursuant to Article 23 of the Environmental Conservation Law, and Parts 420-425 of Title 6 of the New York Compilation of Codes, Rules, and Regulations; and In the Matter of the State Environmental Quality Review Act Draft Environmental Impact Statement prepared for the same proposal pursuant to Part 617 of Title 6 of the New York Compilation of Codes, Rules, and Regulations.

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August 15, 2018  
Livingston County Building 1 Conference Center  
One Murray Hill Drive  
Mount Morris, New York  
6:00 p.m.

REPORTED BY: Rhoda Collins, Court Reporter  
FORBES COURT REPORTING SERVICES, LLC  
21 Woodcrest Drive,  
Batavia, NY 14020  
(585) 343-8612

1           MOLLY MCBRIDE: Good evening, everyone. Thank  
2           you for coming out. My name is Molly McBride and I  
3           am an administrative law judge with the New York  
4           State Department of Environmental Conservation. I  
5           will be presiding over today's legislative public  
6           comment hearing regarding the application of  
7           American Rock Salt Company LLC for the expansion of  
8           a currently-permitted mine comprised of  
9           approximately 9,000 acres of underground reserves,  
10          located in the Towns of Groveland and Geneseo.

11           Pursuant to 6 NYCRR Part 621.8, the New York  
12          State Department of Environmental Conservation  
13          published notice of this hearing in the  
14          Department's Environmental Notice Bulletin on  
15          July 25, 2018, and the applicant published notice  
16          in the Livingston County News on July 26, 2018.

17           This legislative public comment hearing is for  
18          members of the public to put their comments on the  
19          record for the Department's consideration and the  
20          review of the pending application. Please  
21          understand that this is not a question and answer  
22          session, but an opportunity for you to put your  
23          comments on the record. If you would like to ask  
24          any questions of DEC staff their contact  
25          information is available at our sign-in table and

1           you can take that with you here this evening.

2           Anyone who would like to make a comment on the  
3 record must fill out a speaker card. The cards are  
4 available at our sign-in table right there at the  
5 doorway. We will call elected officials first and  
6 then members of the public in the order that they  
7 filled out their speaker cards.

8           I will call your name when it's your turn to  
9 speak. I would ask you to please come forward and  
10 speak into the microphone at the podium here at the  
11 front of the room. If I mispronounce your name I  
12 apologize, please correct me when you come forward.  
13 When you do speak, if you are speaking on behalf of  
14 a group please identify the group that you're  
15 representing here this evening. Start with your  
16 full name as well. I would ask that you please  
17 speak loudly, slowly and clearly into the  
18 microphone so that our Court Reporter who is making  
19 a record of all comments here this evening can make  
20 an accurate record of your statement.

21           I would ask that you please hold any applause  
22 or any noise while the person is speaking, again,  
23 so that we can all hear the comments and so the  
24 Court Reporter can make an accurate record.

25           I would also ask that you please respect the



1           comments made by all speakers whether you agree  
2           with them or not, and please remain silent during  
3           all comments. If you do not wish to make a  
4           statement here this evening on the record, you may  
5           submit a written statement. You may either submit  
6           that written statement here this evening to the DEC  
7           staff or send them in to the Department. We have  
8           both mailing address and an e-mail address  
9           available at our sign-in table.

10           All comments must be submitted by August 27,  
11           2018, to be considered. Again, that date is  
12           August 27, 2018. And the mailing address and  
13           e-mail address are available there at our sign-in  
14           table.

15           Before I begin calling speakers, I'm going to  
16           introduce Scott Sheeley who's from the Department's  
17           Region 8 office who will give a brief summary on  
18           where the matter is right now.

19           SCOTT SHEELEY: Thank you, Judge. Thank you,  
20           everyone for attending tonight's hearing on this  
21           project. As Judge McBride indicated, my name is  
22           Scott Sheeley and I'm the DEC Regional Permit  
23           Administrator. Also with me here tonight from the  
24           DEC Region 8 office to assist with this hearing are  
25           Regional Director Paul D'Amato, Mineral Resource

1 Supervisor Steve Army, Assistant Regional Attorney  
2 Dudley Loew, and Citizen Participation Specialists  
3 Regina Willis and Jill Bishop.

4 On September 15, 2016, the Department received  
5 an application for an Article 23, Mined Land  
6 Reclamation Permit modification, and State  
7 Environmental Quality Review Act Long Environmental  
8 Assessment form, proposing an underground expansion  
9 of the currently permitted rock salt mine. After  
10 classifying the action as a Type I action under  
11 SEQRA, the Department coordinated with other  
12 involved agencies and was established as the SEQRA  
13 Lead agency on November 10, 2016. After review of  
14 the application and SEQRA Environmental Assessment  
15 Form, the Department issued a SEQRA Positive  
16 Declaration on December 27, 2016, requiring the  
17 preparation of a Draft Environmental Impact  
18 Statement. On March 2, 2017, the Department made  
19 available for public review and comment, a draft  
20 Scoping Document for the Draft Environmental Impact  
21 Statement. A public hearing was held on the draft  
22 Scoping Document at the Livingston County Center  
23 for Emergency Operations on Gypsy Lane in  
24 Mount Morris on March 21, 2017, to accept verbal  
25 comments, and written comments were accepted

1 through March 31, 2017. A final scoping document  
2 was accepted on July 19, 2017, and provided to all  
3 SEQRA involved agencies. A Draft Environmental  
4 Impact Statement was initially submitted to the  
5 Department on August 31, 2017. After review of  
6 subsequent revisions, the Draft Environmental  
7 Impact Statement was accepted for public review on  
8 July 25, 2018.

9 As described in these application materials  
10 and DEIS, the project proposes to expand the  
11 presently permitted underground mining operation.  
12 The surface facility is located between New York  
13 State Route 63 and I-390, just north of I-390  
14 Exit 7 in Livingston County. No changes in the  
15 surface facility or operations are proposed.

16 The currently permitted mine is comprised of  
17 approximately 9,000 acres of underground reserves,  
18 located in the Towns of Groveland and Geneseo. As  
19 proposed, the underground expansion would include  
20 approximately 1,700+ additional acres of  
21 underground reserves located west of the existing  
22 mine in the Towns of Mount Morris and Leicester.  
23 This area is generally west of I-390 and north of  
24 Route 408, extending westward. In addition to the  
25 underground expansion, an alternate/additional room

1 and pillar mine design is proposed to improve the  
2 operational performance within the mine workings,  
3 while maintaining the currently permitted room and  
4 pillar mine design and 60 percent or less salt  
5 extraction ratio. According to the application, no  
6 modifications to the surface components or  
7 operations of the mine are proposed, nor are any  
8 necessary for the proposed underground expansion.

9 As indicated in the notice for tonight's  
10 hearing your verbal and written comments are being  
11 accepted tonight at this hearing. In addition,  
12 written comments on the proposal and Draft  
13 Environmental Impact Statement will continue to be  
14 accepted by the Department through Monday,  
15 August 27, 2018. Verbal and written comments will  
16 be given equal consideration.

17 After our receipt of all written comments and  
18 the hearing transcript from tonight's hearing, the  
19 Department will review the comments in light of our  
20 permit jurisdiction under the Mined Land  
21 Reclamation Law and our role as the SEQRA lead  
22 agency under the State Environmental Quality Review  
23 Act. The Department staff will be required to make  
24 a determination about whether the material must be  
25 referred to an adjudicatory or trial-type hearing

1 before the DEC Office of Hearings and Mediation  
2 Services. As the lead agency, the Department will  
3 also be required to develop a Final Environmental  
4 Impact Statement, including DEC's responses to all  
5 comments received, and a Statement of Findings  
6 under the State Environmental Quality Review Act  
7 that considers the relevant environmental impacts  
8 presented in the Environmental Impact Statement;  
9 weighs and balances them with social, economic and  
10 other essential considerations; certifies the  
11 requirements of SEQRA have been met; provides a  
12 basis for our final decision on the permit  
13 applications; and, certifies that environmental  
14 impacts have been avoided or minimized to the  
15 maximum extent practicable. If no adjudicatory  
16 hearing is conducted, a final decision on the  
17 permit applications will be issued by staff without  
18 further public hearings upon completion of the  
19 SEQRA process.

20 And that is all I have. Thank you, Judge.

21 MOLLY MCBRIDE: Thank you, Scott. We are  
22 going to start calling our speakers and our first  
23 speaker is Frank Provo.

24 FRANK PROVO: Thank you. My name is Frank  
25 Provo, I'm the Mayor of the Village of Mount

1 Morris. I have been the Mayor in Mount Morris  
2 since April of 2017. Any paperwork prior to that I  
3 was not privy to, to see what was goes on.

4 But I wanted to make the people here aware  
5 along, with the supervisor of Mount Morris, it does  
6 show on Figure 39 infrastructure, going down Route  
7 408 where the Town of Mount Morris has a water line  
8 and the County of Livingston has a sewer line. The  
9 Village of Mount Morris also has the outflow  
10 discharge from our sewer plant that runs basically  
11 on the south side of Route 408, on the north side  
12 of what I would call the race. So there's a whole  
13 other discharge line that runs down to the  
14 Canaseraga from the Village of Mount Morris on that  
15 side of the infrastructure where it's not shown.

16 Secondly, under the public notice it is stated  
17 that there will be no above ground modifications.  
18 There's been a number of complaints throughout the  
19 years, especially in the winter months in Mount  
20 Morris of a constant hum from the fans, I guess is  
21 what we would call it, the air intake fans at the  
22 mine. I just wanted to make sure that there was  
23 nothing more closer to the Village. It is a  
24 problem right now that some people it bothers  
25 pretty much seasonal. But I wanted to make

1 everyone aware of it. It is a concern, it's been a  
2 concern. There's been a number of complaints in  
3 the Village of Mount Morris.

4 MOLLY MCBRIDE: Thank you.

5 SCOTT SHEELEY: Thank you.

6 MOLLY MCBRIDE: John Demais. I might be  
7 reading that wrong, I think it says D-e-m-a-i-s, or  
8 maybe Dennis?

9 JOHN DENNIS: There you go.

10 MOLLY MCBRIDE: I should have known that,  
11 John, I apologize.

12 JOHN DENNIS: Judge McBride, it's an honor to  
13 be here this evening. Thank you for holding this  
14 session. My name is John Dennis and I'm a resident  
15 of Tompkins County, and therefore I'm not an  
16 immediate stakeholder regarding whether or not  
17 American Rock Salt will be permitted to expand  
18 their life of mine by about 700 acres as requested.

19 I'm a cofounder of Cayuga Lake Environmental  
20 Action, a citizens organization that is researching  
21 and advocating for the protection of Cayuga Lake  
22 and we do have concerns about Cayuga Salt Mine  
23 which I will mention in a moment.

24 But the reason I'm here tonight is to thank  
25 the DEC for holding this session and for requiring

1 American Rock Salt to do a Draft Environmental  
2 Impact Statement. I'm also here to congratulate  
3 American Rock Salt for doing what looks to be a  
4 very good job. I'm not technically qualified to  
5 know all of the technical details, but it's a big  
6 document, I'm sure it was done at a great expense  
7 with a lot of effort. I know RESPECT, one of their  
8 consultants is one of the best in the industry.  
9 I'm glad to see American Rock Salt choosing good  
10 consultants.

11 And I should mention I had a tour of the  
12 Hampton Corners Mine in 2015. I was part of a  
13 group of geologists from the Solution Mining  
14 Research Institutes annual meeting in Rochester.  
15 We were very well received. We spent over an hour  
16 or two down in the mine, and it looked to be very  
17 professionally operated and we felt very welcomed  
18 by all of the people we met there.

19 So in speaking with Joseph Bucci Junior, the  
20 American Rock Salt's environmental manager, he's  
21 told me that ARS welcomes the opportunity to do  
22 these DIS's. They're rigorous studies but he says  
23 that they get to know the mine better, their  
24 workers are safer as a result of these studies, and  
25 they get to know the neighbors better as well.



1           In that respect, DEC Region 8 has sent the  
2           prox set the proper environmental review standard  
3           for the region. And I would ask that basically,  
4           that officials at Region 8 paid more attention to  
5           the Cayuga Salt Mine, an increasingly large part of  
6           that mine is in Seneca County which is in Region 8.  
7           Although the entrances to the mine are in Region 7,  
8           we believe that Steve Arby continues to play a  
9           significant role in giving advice on what the next  
10          move should be.

11          So we would ask that DEC consider revisiting  
12          their negative declarations for Cayuga Salt Mine  
13          Shaft 4 project. It's a \$44 million project to  
14          create another access to the mine which is very  
15          important for workers. But in the process of  
16          reviewing the technical documents related to that  
17          project we've become aware of some significant  
18          anomalies out in the middle of the lake due to the  
19          up dip of the strata for each mile that you mine  
20          north, there's 70 to 100 feet less of bedrock  
21          separation between the Syracuse formation and  
22          Cayuga Lake. And Cayuga Lake, I'm sure you could  
23          imagine is an invaluable asset probably valued in  
24          the tens of billions of dollars. So we are just  
25          wondering if it's appropriate for an out of state

1 corporation to be given a free pass. They've owned  
2 the mines since 1970, they've never, ever been  
3 required to do a Draft Environmental Impact  
4 Statement. We feel it's high time, so we have  
5 brought an actual lawsuit asking a judge in  
6 Tompkins County to rule on this matter.

7 So just in closing, I realize I'm probably  
8 getting close to my three-minute limit if there is  
9 one, I just wanted to turn in a small version of  
10 this to show that Cargill has produced four  
11 different mining plans in the space of about  
12 14 months. So that's a new three-year mining plan  
13 every three or four months. So maybe they're  
14 working really hard looking at new information.

15 But one of our concerns is that in the  
16 earliest one, three of these anomalies had 1,000  
17 foot setbacks, meaning no mining could happen in  
18 those 1,000 foot setbacks area. You go from  
19 September 2016, to February of the next year and  
20 suddenly only one of those anomalies has 1,000 foot  
21 setback.

22 And then in August of 2017, anomaly C has no  
23 mining under it, but then when you get to November  
24 suddenly there's mining under it. So recently they  
25 have bored into the Syracuse formation underneath

1           that anomaly and harvested some salt cores. We  
2           think third party analysis of these salt cores is  
3           probably appropriate rather than just relying on  
4           Cargill to sort of -- and their consultants.

5           Anyway, with that I will close. It's an honor  
6           to be here and we look forward to hearing that  
7           American Rock Salt continues to be a good employer.  
8           Maybe I should just note in passing, the workers at  
9           Cayuga Salt Mine were unionized until the 1980s.  
10          We probably feel that they'd probably be better  
11          represented if they had a union to speak up for  
12          them. Again, thank you so much.

13           MOLLY MCBRIDE: Thank you.

14           Bill Bacon.

15           BILL BACON: Thank you, Judge. Good evening,  
16          everyone. My name is Bill Bacon, I'm the Director  
17          of Economic Development for Livingston County and  
18          I'd like to offer some commentary on the economic  
19          importance of American Rock Salt for this area.

20           Since 1997, American Rock Salt has operated in  
21          and located in the Town of Groveland. Originally  
22          the operation was projected to create 146 jobs. It  
23          easily surpassed that number with the last  
24          reporting of 346 individuals at work. That's  
25          136 percent of the protection. This makes American

1           Rock Salt one of our top three private employers in  
2           the county and a critical employed for the overall  
3           employment in this area.

4           The viability and sustainability in the  
5           operation identified by this proposed expansion  
6           will ensure another generation of employment  
7           opportunities, while maintaining the economic  
8           condition of all of the surrounding villages and  
9           townships.

10          American Rock Salt provides an opportunity for  
11          both the skilled and unskilled worker, a  
12          demographic that exists in our county, and adds  
13          strength to our efforts for the recruitment of  
14          other businesses and industries seeking to locate  
15          here.

16          The indirect benefit of American Rock Salt  
17          should not be understated either. Numerous locally  
18          located large and small businesses offering  
19          services in technology, industrial, mechanical,  
20          construction, rail, trucking, financial, and retail  
21          all benefit greatly from this ongoing relationship.

22          This enhancement to the mine's operation will  
23          offer additional efficiencies to the process  
24          thereby making American Rock Salt more competitive.  
25          Mining product that lies further away from the main

1 shaft creates inefficiency and adds to the expense  
2 of extraction. This westward expansion will allow  
3 the miners to get the product to the surface  
4 quickly without requiring lengthily underground  
5 transportation.

6 Our experience with American Rock Salt has  
7 always been positive and I expect that the future  
8 will provide more of the same. Management has  
9 delivered on their promises throughout the years  
10 and the salt mine has become one of the greatest  
11 economic assets we have in this county.

12 Approval and issuance of this permit will  
13 ensure the continuation of long term economic  
14 viability for American Rock Salt and all of the  
15 benefactors associated with the business, both  
16 direct and indirect. Thank you very much.

17 MOLLY MCBRIDE: Thank you.

18 Scott Ingalls.

19 SCOTT INGALLS: Good evening. My name is  
20 Scott Ingalls, I'm the president of Power &  
21 Construction Group Incorporated. We're a utility  
22 contractor located in Caledonia, New York,  
23 Livingston County. We employ approximately  
24 260 people and have an annual revenue rate of about  
25 \$60 million. We strongly support the American Rock

1 Salt proposal because it will prevent potential  
2 reliance on foreign supplies, it will stabilize  
3 3-to-400 jobs that Bill just mentioned, and help  
4 support over 1,000 other related jobs in the local  
5 community.

6 It will also help sustain local and regional  
7 trucking and gravel workforce in both the short  
8 term and the long term. We believe and we are  
9 fortunate to have American Rock Salt as a major  
10 employer and taxpayer, as a company that's  
11 responsible to the environment, and to the people  
12 in New York State and in Livingston County.

13 Again, for those reasons, Power & Construction  
14 group strongly supports the American Rock Salt  
15 proposal. Thank you.

16 MOLLY MCBRIDE: Thank you.

17 Ken Stewart.

18 KEN STEWART: Hello. My name is Ken Stewart,  
19 I'm president of C.P. Ward Incorporated. We are a  
20 heavy construction contractor based firm, based in  
21 Caledonia, Livingston County. We have been in the  
22 contracting business for over 100 years and employ  
23 approximately 150 people.

24 We certainly support the American Rock Salt  
25 proposal because the expansion will help ensure

1 short-term, long-term supplies of critical deicing  
2 road salt. Especially during harsh winters when  
3 need is the greatest. In the past during unusually  
4 harsh winters, the American Rock Salt company is  
5 often called on by many agencies within the State  
6 that fill shortfalls of deicing road salt when  
7 other suppliers failed to meet their needs.

8 It will also improve the efficiency by mining  
9 areas closer to shafts and ventilation air sources.  
10 It will help to conserve energy and minimize  
11 additional construction material costs by  
12 shortening the hauling distance underground.

13 As a father of two teenagers ready to hit the  
14 roads, it will also ensure safe travel hopefully  
15 for years to come for my family and many more. So  
16 we certainly support the expansion. Thank you.

17 MOLLY MCBRIDE: Thank you.

18 Ray Yacuzzo.

19 RAY YACUZZO: Hello. A little about myself,  
20 I'm Ray Yacuzzo, I'm a geologist, I'm retired from  
21 the DEC. For several years I've participated in  
22 coordinating the DEC investigation of Retsof Salt  
23 Mine collapse. I was with a team of very fine  
24 geologists who are still employed by the DEC. I  
25 equated myself thoroughly with the geology of the

1 area, I conducted the public hearing concerning the  
2 closing of the desalination plants. I summarized  
3 the geology of the action against Akzo which  
4 resulted in a more than \$20 million settlement.

5 I'm an environmental activist. I'm also an  
6 elected official in the village of LeRoy, and have  
7 been a 5-term mayor before I became part of the  
8 DEC. And after DEC, I've been back on the Village  
9 Board.

10 There's several reasons I can endorse the  
11 approval of this mining application and extension.  
12 First, there are no surface changes; room and  
13 pillar technic has been proven to my satisfaction;  
14 the mining environmental in my opinion is  
15 considerably safer than the incident-free area of  
16 the old Retsof Mine; there's less load and more  
17 support.

18 Further, New York State is on record as  
19 encouraging the healthy mining industry. This mine  
20 is a major contributor to our local economy, that's  
21 been mentioned before. But it's not just jobs, but  
22 safety and savings. Consider not getting to work  
23 on time because the roads are icy. Those are lost  
24 work hours, of lost production, that's money.  
25 There are savings for our municipalities and



1           everybody here is a taxpayer whether you own  
2           property or you rent, you are paying property  
3           taxes. And those taxes pay for salting the roads  
4           and deicing the roads.

5           If we have to buy salt, deicing salt from out  
6           of state or foreign salt, that's going to boost  
7           your tax base. That's not good for the economy.  
8           It's often been said the two ways to make wealth  
9           are to grow it or you mine it, and it's true. Or  
10          of course, you can improve through manufacturing  
11          but mining is an integral part, it's an age old way  
12          of increasing the worth of your life, surroundings,  
13          and your property, and your nation.

14          This project could minimize the chance of  
15          shutdowns. If there's a shutdown then we are  
16          buying salt from other vendors, trucking it farther  
17          and more cost. Preventing these shutdowns  
18          preserves supplies for winter safety. This plan  
19          that is being submitted is a more conservative plan  
20          and one that worked for over a century without  
21          incident in the old mine.

22          I have to point out there was a collapse in  
23          the old mine, but it was in an area where a  
24          different mining technique was used. It was in an  
25          area with less roof rock which acts as a support

1 beam over the mine. It's an entirely different  
2 environment in the expansion area and I endorse and  
3 I recommend this action.

4 MOLLY MCBRIDE: Thank you.

5 Bill Carman.

6 BILL CARMAN: Bill Carman, I'm the Town  
7 Supervisor of Groveland. First of all, I think  
8 that all of Groveland and Livingston County owe a  
9 debt of gratitude to the Bucci's and to the salt  
10 mine. They have done a fantastic job, they've been  
11 a great neighbor. And I have not heard a single  
12 person in Groveland that is not for this. Nobody's  
13 come to me and said they're against it. Everybody  
14 is for it and I think they should be granted the  
15 expansion. I don't think they're going to do  
16 anything that's going to jeopardize the safety for  
17 their workers or of the mine, and I think they  
18 should be granted it. Thank you.

19 MOLLY MCBRIDE: Thank you.

20 That was the last card that I have. Is there  
21 anyone else who is here this evening that would  
22 like to make a comment on the record? Okay, then  
23 on behalf of the DEC, I want to thank you all for  
24 taking the time to come out this evening.

25 Oh, wait, I have one more, Laura Lane.

1           LAURA LANE: Good evening, on behalf of the  
2           the Livingston County Area Chamber of Commerce, I  
3           am here to support the American Rock Salt Hampton  
4           Corners salt mine westward underground mine  
5           expansion.

6           A Standard & Poor's study in 1998, of the  
7           northeastern states found that over \$500 million a  
8           day in Federal, State, and local tax revenues would  
9           be lost if impassable roadways paralyzed the region  
10          due to a lack of deicing road salt. And with the  
11          cost of employees, an estimated \$1.4 billion in  
12          lost wages and \$600 million in lost retail sales.

13          The need for capacity growth at American Rock  
14          Salt through their proposed westward expansion is  
15          critical for the continuation of business during  
16          the hash winter months throughout the northeast.

17          Not only will this expansion provide for the  
18          increased capacity to service the deicing road salt  
19          needs of the northeast it stabilizes nearly 400  
20          jobs in Livingston County. With ancillary job  
21          stabilization of another nearly 1,000 in support  
22          sectors. The expansion will also help to sustain a  
23          local and regional trucking and railroad workforce  
24          for both the short and long term.

25          As a Chamber of Commerce, our vision is to

1 create a vibrant and sustainable business  
2 environment in Livingston County buy fulfilling our  
3 mission of fostering business development and  
4 providing opportunities for our members to prosper.  
5 The proposed westward expansion of the American  
6 Rock Salt Hampton Corners Salt Mine fulfills this  
7 mission. Not only for the American Rock Salt  
8 business but for that of our nearly 600 member  
9 business base that benefit from the salt extracted  
10 from the mine keeping our roads safe for travel to  
11 and from the businesses located throughout  
12 Livingston County and the northeast.

13 The Chamber of Commerce strongly supports this  
14 expansion project, the stabilization of jobs in  
15 Livingston County, and the continuation of commerce  
16 derived from the clear deiced winter roads. Thank  
17 you.

18 MOLLY MCBRIDE: Thank you.

19 Do we have anyone else who would like to make  
20 a comment? Come right up sir, just state your name  
21 when you get to the microphone.

22 JOE NEHALCA: Good evening, everyone. My name  
23 is Joe Nehalca, I'm employed with American Rock  
24 Salt. I have a little over 51 years of mining  
25 experience, 29 years of it was in the Retsof Mine.

1           When I started in that mine we were probably around  
2           Route 63 in the vicinity of -- we mined right down  
3           through that valley, never had a problem until the  
4           mining pattern had changed.

5           And now the 20 years with American Rock Salt I  
6           welcome the expansion to the west, I see improved  
7           ventilation, less overburdened, just better -- good  
8           working conditions to work in. And I look forward  
9           to it and maybe some continuous mining, and I just  
10          welcome it. I have been looking forward to this  
11          for a long time. Thank you very much.

12           MOLLY MCBRIDE: Thank you.

13           Is there anyone else who would like to make a  
14          comment? Just state your name for me please.

15           CHARLES DIPASQUALE: Charles DiPasquale, Town  
16          Supervisor of the Town of Mount Morris. I know a  
17          lot of you people in this room and I've talked to a  
18          few of you over the years since I became  
19          supervisor. There's been two times I needed to  
20          contact the salt mine and within five minutes after  
21          I hung up Mr. Bucci himself was on the phone  
22          talking to me. They're a good outfit to work with,  
23          they do what they tell you they're going to do.  
24          And our Town of Mount Morris is totally supportive  
25          of this project.

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MOLLY MCBRIDE: Thank you.

Is there anyone else that would like to go on the record this evening? One more, just state your name for me please.

DAVE FANARO: My name is Dave Fanaro, F-a-n-a-r-o. I'm also very appreciative of all the hard work you guys have put in all these years, especially Joe Junior. Lately, you know, what you guys have gone through since the collapse to get you guys where you are now. And like Chief said, the Town of Leicester fully supports your expansion and anything we can do to help out, let us know. Appreciate it.

MOLLY MCBRIDE: Anyone else? Okay. Thank you all for coming out this evening.

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REPORTER CERTIFICATE

I, Rhoda Collins, do hereby certify that I did report in stenotype machine shorthand the proceedings held in the above-entitled matter;

Further, that the foregoing transcript is a true and accurate transcription of my said stenographic notes taken at the time and place hereinbefore set forth.

Dated this 6th day of September, 2018.

At Rochester, New York

  
Rhoda Collins



**HARRISON WESTERN CONSTRUCTION  
CORPORATION**

July 27, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516  
Attn.: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Harrison Western Construction Corporation (Harrison Western) supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt



Date: August 1, 2018

Page 2

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

Harrison Western believes that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,  
Harrison Western



Eric Gavin  
Vice President, Operations



Scott Chest  
Project Manager

July 27, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Hicks Recruiting, LLC, Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt

Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.
- Hicks Recruiting, LLC assists American Rock Salt with hiring new employees to get through busy seasons, support major projects, and business growth. As a small business owner, working with American Rock Salt has provided a tremendous opportunity to help expand my business along with providing new jobs for the local community.

Hicks Recruiting, LLC believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

Sarah A. Hicks, Principal

Hicks Recruiting, LLC

July 27, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Dansville Collision Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt

Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
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Dansville Collision Inc., believes that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

David M. Hoag

President of Dansville Collision Inc.

July 27, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

I support this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt

2.

Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
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- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
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I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

**Michael Miller**

July 27, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

I support this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
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I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



July 27, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516  
Attn: Mr. Scott E. Sheeley, Regional Permit Administrator

**Re: American Rock Salt Hampton Corners Mine  
NY ECL Article 23, Mined Land Reclamation,  
DEC # 8-2428-00019/00001**

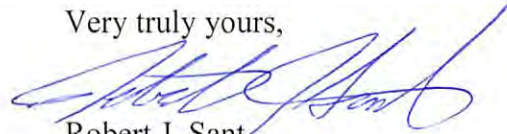
Dear Sirs/Mesdames:

The American Rock Salt Company, ("ARS") is a valued business party of **Valley Propane & Fuels**, as well as our affiliate, Countryside Propane. Valley Propane & Fuels supports the ARS's proposal to expand its mining operations by 1,700+ additional acres of underground reserves and add an alternate/additional room and pillar mine to improve the operational performance for the following reasons:

- This expansion will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- American Rock Salt currently purchases approximately \$400,000 in fuel from Valley each year. This expansion will not only stabilize employment with their own company but will also stabilize our revenues and provide additional job security to our existing work force.
- It will help sustain the local and regional trucking and railroad workforces, in both the short term and long term.
- The proposed expansion is essential to the continued viability of the mine, and will (i) result in additional jobs, (ii) increase tax revenues in New York State and (iii) contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt. This is crucial to local businesses like Valley. We depend on safe road conditions to make customer deliveries.

In sum, American Rock Salt Company is a responsible corporate citizen and valued member of the community, and has consistently demonstrated its commitment to sustainable environmental practice and compliance with laws. Valley Propane & Fuels unequivocally supports the proposed expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved.

Very truly yours,



Robert J. Sant,  
Vice President

July 27, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

The Duke Company supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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The Duke Company believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

David Terry  
Owner

July 27, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

I support this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



607-343-1621

July 27, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Empire Realty Group supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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Salt Mine Statement of Support (cont.)

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Empire Realty Group, believes that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

Bridgett C. Hoag

Licensed Sales Agent

Empire Realty Group



# LIVINGSTON ASSOCIATES, INC.

80 River Road • P.O. Box 210  
Scottsville, New York 14546  
(585) 889-8700  
Fax (585) 889-6008

July 30, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

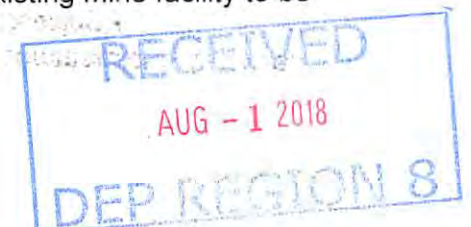
Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. In an increasingly environmentally conscious society dealing with sensitive raw material products over many acres of surface and underground areas, the American Rock Salt Company has consistently demonstrated its responsibility to the environment, government agencies, employees, vendors, local merchants and its neighbors in the Genesee Valley. Livingston County is no doubt grateful to have such a successful venture as one of its major employers.

Livingston Associates, Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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Salt Mine Statement of Support (cont.)

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As another of Livingston County's major employers, we believe that the American Rock Salt Company has consistently demonstrated its responsibility to the environment for decades and we heartily support the proposed west expansion of the salt mine. We request that this proposal of The American Rock Salt Company be approved. Thank you.

Yours truly,



Richard A. Ash

Chairman, Livingston Associates, Inc.



Stone Manor Corporate Center  
2700 Kelly Road, Suite 300  
Warrington, PA 18976-3624  
T: 215.345.7500 F: 215.345.7507  
www.foxrothschild.com

M. JOEL BOLSTEIN  
Direct No: 215.918.3555  
Email: JBolstein@FoxRothschild.com



July 30, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516  
Attn: Mr. Scott E. Sheeley, Regional Permit Administrator

**Re: American Rock Salt Hampton Corners Mine  
Salt Mine Statement of Support**

Dear Mr. Sheeley:

I have worked with American Rock Salt Company for many years in the State of Pennsylvania. The Company is the leading provider of road salt to state and local governments and private industry in Pennsylvania. In all its endeavors, the Company promotes sustainable environmental practices and its product is lifesaving. The American Rock Salt Company is committed to protecting the environment and the safety of their employees and has consistently demonstrated its responsibility to government agencies, employees, vendors and local merchants.

I whole-heartedly support this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies, including those in Pennsylvania, to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia Florida Illinois  
Minnesota Nevada New Jersey New York Pennsylvania Texas Washington

July 30, 2018

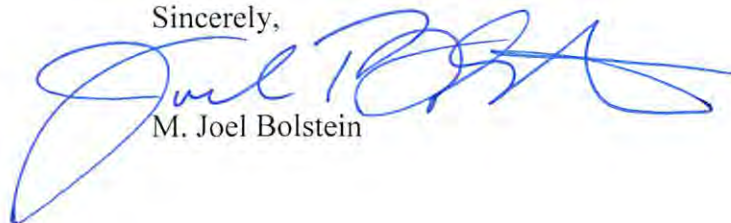
Page 2

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- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States, including highways in Pennsylvania, for an additional 10 years with virtually no impact on the existing land surface.

Based on the many years I have worked with the Company, I know that American Rock Salt Company is committed to sustainable environmental practices and I support the proposed west expansion of the salt mine. I respectfully request that this proposal of The American Rock Salt Company be approved.

Thank you.

Sincerely,

  
M. Joel Bolstein

MJB:ajw



96 West River Road  
PO Box 30  
Scottsville, New York 14546

585-889-8500  
585-889-6018 fax

July 30, 2018



New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. In an increasingly environmentally conscious society dealing with sensitive raw material products over many acres of surface and underground areas, the American Rock Salt Company has consistently demonstrated its responsibility to the environment, government agencies, employees, vendors, local merchants and its neighbors in the Genesee Valley. Livingston County is no doubt grateful to have such a successful venture as one of its major employers.

Power and Construction Group, Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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As another of Livingston County's major employers, we believe that the American Rock Salt Company has consistently demonstrated its responsibility to the environment for decades and we heartily support the proposed west expansion of the salt mine. We request that this proposal of The American Rock Salt Company be approved. Thank you.

Yours truly,



Scott Ingalls, President

Power and Construction Group, Inc.



5711 Gateway Park, Lakeville, N.Y. 14480  
phone: (585) 346.0720 fax: (585) 346.2706

July 30, 2018

Mr. Scott E. Sheeley  
Regional Permit Administrator  
New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516

Re: American Rock Salt Hampton Corners Mine  
Salt Mine Statement of Support

Dear Sir,

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Ramsey Constructors, Inc. supports this proposal by American Rock Salt for the following reasons:

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- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt

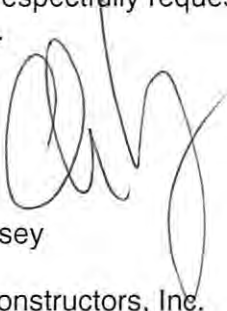


Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

We believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



Chris Ramsey  
President  
Ramsey Constructors, Inc.



SERVING FOR OVER 100 YEARS

100 WEST RIVER ROAD  
PO BOX 900  
SCOTTSVILLE, NEW YORK 14546  
585-889-8800  
FAX 585-889-6008

July 30, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. In an increasingly environmentally conscious society, dealing with sensitive raw material products over many acres of surface and underground areas, the American Rock Salt Company has consistently demonstrated its responsibility to the environment, government agencies, employees, vendors, local merchants and its neighbors in the Genesee Valley. Livingston County is no doubt grateful to have such a successful venture as one of its major employers.

C. P. Ward, Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.

Salt Mine Statement of Support (cont.)

- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt
- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

As another of Livingston County's major employers, we believe that the American Rock Salt Company has consistently demonstrated its responsibility to the environment for decades and we heartily support the proposed west expansion of the salt mine. We request that this proposal of The American Rock Salt Company be approved. Thank you.

Yours truly,



Ken Stewart, President

C. P. Ward, Inc.

July 31, 2018

Scott E. Sheeley  
Regional Permit Administrator  
DEC Region 8  
6274 Avon-Lima Road  
Avon, New York 14414-9519

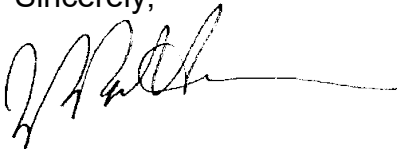
Re: AMERICAN ROCK SALT CO. LLC  
WESTERN UNDERGROUND EXPANSION  
HAMPTON CORNERS SALT MINE

Dear Mr. Sheeley,

EnSol and its staff have been providing technical support to American Rock Salt Co., LLC for over 15 years. American Rock Salt has shown to be a great steward to the environment as well as a good customer of EnSol's. The engineering and administrative staff have a great respect for environmental challenges and work to be on the forefront of ensuring the safety of human health and the environment. During recent projects, ARSC staff have played a substantial roll in addressing issues brought on by MSHA, NYSDEC, EPA and the Tribal Nations, each having a diverse set of standards and technical needs.

On behalf of EnSol, Inc. we support the ARSC Western Underground mine expansion and hope the NYSDEC works positive and forward on approving the application.

Sincerely,



John B. Battaglia PE

**EnSol, Inc.**



Solara Environmental  
661 Main Street  
Niagara Falls, NY 14301

CALL 716-628-5656  
SURF [www.solaraeps.com](http://www.solaraeps.com)  
FOLLOW @SolaraEPS

August 1, 2018

Scott E. Sheeley  
Regional Permit Administrator  
DEC Region 8  
6274 Avon-Lima Road  
Avon, New York 14414-9519

Re: AMERICAN ROCK SALT CO. LLC  
WESTERN UNDERGROUND EXPANSION  
HAMPTON CORNERS SALT MINE

Dear Mr. Sheeley,

Solara, Inc. is an environmental consulting firm whom works with entities in the private and public sector on feasibility studies and sustainability practices. Data from the American Rock Salt DEIS suggests notable cost and energy savings associated with the ARSC expansion, such as:

- Help keep de-icing road salt costs lower by reducing shortages of de-icing salt
- Improved efficiency by mining areas closer to shafts and ventilation air source
- Conservation of energy and construction material due to less transport distance underground
- Prevent waste of salt reserves (leaving in the ground) that are suitable to be mined and accessible by existing infrastructure/facility.

Due to the significant economic and environmental benefits, Solara, Inc., supports the American Rock Salt western mine expansion and hopes the NYSDEC works positively to approve the American Rock Salt Expansion application.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah L. Battaglia".

Sarah L. Battaglia, MBA  
Founder, CEO



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August 1, 2018  
New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414-9516

ATTN: Mr. Scott E. Sheeley, Regional Permit Administrator  
RE: American Rock Salt, Hampton Corners Mine  
Subject: Salt Mine Statement of Support

Dear Sir,

Jennmar Corporation is an American based company specializing in the manufacturing of ground support products for both the mining and tunneling industries. Jennmar has been conducting business with the American Rock Salt, Hampton Corners mine site for nearly 20 years or since the mine started production.

A multidisciplinary team of technical sales and engineering staff at Jennmar has been working with the engineering, production, and roof control management teams as well as the front line personnel of American Rock Salt for the past 12 years. In this time frame JENNMAR and American Rock Salt has conducted numerous projects throughout the Hampton Corners mine site to enhance the safety environment for the workforce, better control ground movement, and more efficiently utilize the mine reserves. Management at Hampton Corners Mine has demonstrated a commitment to developing and embracing the latest technologies to enhance safety, ground support, and mining efficiency.

Approval of this mine expansion will secure 300-400 local jobs directly associated with this mining operation. These jobs are better than living-wage jobs than include underground miners, technical support personnel, and transportation and logistics workers. In addition, this operation indirectly supports over 1,000 local jobs in the service and retail sectors. Finally, the Hampton Corners mine expansion will support more than 50 American manufacturing jobs at Jennmar Corporation as well as bolstering the American steel industry, which provides the raw material for ground support at this operation.

JENNMAR Corporation believes that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental and underground safety practices and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved.

Manufacturer of Strata Control Products

---

258 Kappa Drive / Pittsburgh, PA 15238 / Phone: 412-963-9071 / Fax: 412-963-9767 / [www.jennmar.com](http://www.jennmar.com)

**Facilities and Plants**

Cresson, PA/Reedsville, WV/Winchester, KY/Clearfield, UT/Pounding Mill, VA/Mt. Pleasant, SC/Sydney, Australia/Mackay, Australia

Very Truly Yours

**JENNMAR CORPORATION**



James George  
Technical Sale Engineer

Manufacturer of Strata Control Products

---

258 Kappa Drive / Pittsburgh, PA 15238 / Phone: 412-963-9071 / Fax: 412-963-9767 / [www.jennmar.com](http://www.jennmar.com)

**Facilities and Plants**

Cresson, PA/Reedsville, WV/Winchester, KY/Clearfield, UT/Pounding Mill, VA/Mt. Pleasant, SC/Sydney, Australia/Mackay, Australia

August 1, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Hoffman Land Surveying & Geomatics supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt



2.

Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

Hoffman Land Surveying & Geomatics believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

*Larry W. Hoffman*

Larry W. Hoffman, PLS



**LMC INDUSTRIAL CONTRACTORS INC.**

July 27, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time, they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining and is no doubt grateful to have such a successful venture as one of its major employers.

LMC Industrial Contractors, Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
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- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.

**CORPORATE OFFICE:**  
2060 LAKEVILLE ROAD  
AVON, NY 14414  
TEL: 585-226-6244 | FAX: 585-226-3317

**OPERATIONS & FABRICATION COMPLEX:**  
9431 FOSTER WHEELER ROAD  
DANSVILLE NY 14437  
TEL: 585-335-3131 | FAX: 585-335-6245



- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt

Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
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LMC Industrial Contractors, Inc believes that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Jeff Holley

A handwritten signature in blue ink that reads 'Jeff Holley'.

LMC VP of Operations

**CORPORATE OFFICE:**  
2060 LAKEVILLE ROAD  
AVON, NY 14414  
TEL: 585-226-6244 | FAX: 585-226-3317

**OPERATIONS & FABRICATION COMPLEX:**  
9431 FOSTER WHEELER ROAD  
DANSVILLE NY 14437  
TEL: 585-335-3131 | FAX: 585-335-6245

August 4, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

American Rock salt has operated for over 20 years as one of Livingston County's largest tax payers and employers, employing hundreds of local people with stable, well paying jobs both directly and indirectly. They have demonstrated a commitment to supplying essential deicing salt for roadways all over the region, helping to maintain the infrastructure necessary to maintain trade and transportation across the nation. They are furthermore committed to providing this natural resource in an environmentally sustainable way and have shown great regard for its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. As a graduate of SUNY Geneseo's Geology Department, I attest to American Rock Salt investment in the growth and future of local students through its internship program, underground tours, and privately funded academic lectures.

I, Eraklis Hristodoulou support this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.

- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt

2.

Salt Mine Statement of Support (cont.)

- It will continue to provide academic and professional development opportunities to local students, helping to foster knowledge and ability in the next generation of local professionals.
- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

I, Eraklis Hristodoulou believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and I emphatically support the proposed west expansion of the salt mine. I respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,  
Eraklis Hristodoulou

August 4, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414-9516  
Attn: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Maddie's Motor Sports LLC supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
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Maddie's Motor Sports, LLC believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



Graham Marcus

August 7, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Bradley Supply Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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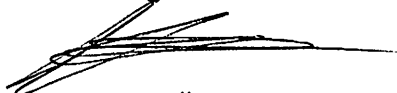


Salt Mine Statement of Support (cont.)

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Bradley Supply Inc believes that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



Jamie Bradley

General Manager

# McClurg Auto Group

## McClurg Chrysler Dodge Jeep Inc.

125 N. Center Street  
Perry, New York 14530  
(585) 237-6131

## McClurg Chevrolet Buick Inc.

16 Parker Lane  
Perry, New York 14530  
(585) 237-6191

## McClurg Automotive

2407 N. Main Street  
Warsaw, New York 14569  
(585) 786-3430

August 7, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

McClurg Auto Group, Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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Salt Mine Statement of Support (cont.)

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McClurg Auto Group believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

John McClurg



McClurg Auto Group

Perry, N.Y.

## Special Tees

57 Main Street, Geneseo NY 14454 | 585.243.1314 | [tees1@frontiernet.net](mailto:tees1@frontiernet.net)

August 7, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516  
Attn: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

### Salt Mine Statement of Support

Dear Mr. Sheeley:

As a member of the Geneseo community and a local business owner, I appreciate the considerable contribution to the community that The American Rock Salt Company has made over the past 20 years. During this time the company has proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County. My business is one of the many that depend upon the company's local presence and I am in full support of the westward expansion of their enterprise.

I believe that the expansion by American Rock Salt will provide:

- Access to mining the rock salt that is critical to ensure safe driving conditions for citizens throughout the country and to ensure timely distribution of the salt to the municipalities, agencies, companies, and individuals who rely on it to keep people safe
- A means for improving the efficiency of the mining operations, including shortening the hauling distance underground
- Responsible salt extraction and reduce the need to use foreign salt and waste salt on our country's roadways
- Continuation of 300-400 jobs at the mine, trucking and railroad workers, as well as employment at other local businesses like my own that serve American Rock Salt and its employees
- Contribution to our tax revenues both directly and indirectly through the commerce and travel enabled by keeping roadways safe

American Rock Salt has demonstrated its commitment to the environment and sustainability. Leveraging their existing infrastructure would also eliminate the need to build a new facility that would impact surface land use if new mining operations, mine shafts, transportation, and other facilities would need to be built at a new location.

Additionally, I would like to recognize the generosity of American Rock Salt to the educational, cultural, and wellness organizations in the surrounding area. The company's support has been invaluable to these programs and would be sorely missed if the mine were not able to conduct business at a level that the expansion would permit.

Please consider the significant contribution that American Rock Salt makes to our community's livelihood and the important services that the organization and its employees provide when reviewing the proposed westward expansion of the mine. I personally ask that you approve the proposal.

Sincerely,

Victor VanVliet  
President

August 7, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

I offer a brief personal background for your reference. I have been in the salt industry for 43 years, beginning my engineering career in 1968 at the Retsof NY mine. My service to the industry in brief:

19 years at the Retsof NY mine owned by International Salt / Akzo Nobel

1.5 years at the Avery Island La mine, a sister dome salt mine to Retsof.

9 years at corporate engineering working on projects throughout the U.S., primarily in Akzo Nobel's evaporated salt facilities, and some project work at a solar salt plant in Utah.

Engineering manager for a short stint with Cargill's Cleveland mine. I left Cargill on my own volition as I did not want to relocate to Cleveland.

6 years as engineering and production manager with International Salt in Clarks Summit, PA. This company was the U.S. distribution branch of a Chilean company, SPL Salt (Sal Punta de Lobos). SPL was subsequently purchased by the German K+S Group, who also acquired Morton Salt Co. a few years after I left that company to start my own consulting business.

7 years with American Rock Salt Company, until my retirement Jan 1, 2016.

During my career I also had the opportunity to visit several mining facilities in the U.S., Chili, and Germany.

Brief Salt Sourcing background:

Salt is a commodity with deposits located worldwide, and is extracted by three methods:

- hydraulic mining and vacuum evaporation
- surface and underground mining
- solar evaporation

These three are listed from most to least costly to extract and process. Hydraulically mined salt is a high energy consuming process that provides high purity salt for consumption and chemical processes. Low relative productivity and high costs prohibit its use for highway de-icing purposes, as do other reasons that I will not go into here. Solar salt also has low volume production compared to mined salt, and is limited to areas where the climate is conducive to solar evaporation and salt water is available.

There are only three major deposits in the U.S. where commercial salt mining can take place. Attached is a map showing the North American salt deposits. However, the mine-ability of these areas is limited due to many, many factors, such as the purity of salt, the depth and integrity of the ore vein, surface and geological conditions, etc. Hence one cannot just place a mine anywhere within a deposit footprint.

The greater part of the product cost is logistics to move salt to the end users, who are primarily state and local governments, ergo tax payers.

The point of the above brief and abridged salt resource background is to emphasize that salt cannot be economically sourced from just anywhere, and also demonstrate how important the Hampton Corners mine is to New York State and the regions serviced by the mine. The closer the mine is to the user, the more critical the mine becomes, an obvious but often forgotten thought.

As a person with direct knowledge of importing off shore salt products and of domestic production capabilities I weigh the ARSC mine as extremely critical to the western NY and PA areas and very important to the central NY and to north central PA, areas affecting millions of daily commuters.

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Projects Plus, Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- The mine operates with a single line of mainline conveyance from the hoisting shaft to the actual mining sections. A failure of this conveyor line can result in a complete halt in mine production. The longer this mainline chain becomes as the mine grows, the

greater the failure risk. By introducing a second area of mining, the risk of temporary loss of underground production is dramatically reduced.

- A second mining area permits shutdown of either area for any major maintenance work while production is continued in the other.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt
- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

Projects Plus Inc. believes that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



George Wilkinson  
President  
Projects Plus, Inc.





# MAJOR SALT DEPOSITS AND DRY SALT PRODUCTION SITES IN NORTH AMERICA

## LEGEND

- MAJOR SALT DEPOSITS
- Production Sites**
- EVAPORATED
- ROCK
- SOLAR

SOURCE: Salt Institute  
 700 North Fairfax Street  
 Fairfax Plaza, Suite 600  
 Alexandria, VA 22314-2040  
 703 / 549-4648  
[www.saltinstitute.org](http://www.saltinstitute.org)



August 13, 2018

New York State Dept. of Environmental Conservation – Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414-9516  
Attn: Scott E Sheeley

Re: American Rock Salt Hampton Corners Salt Mine Westward Underground Mine Expansion

To whom it may concern:

On behalf of the Livingston County Area Chamber of Commerce, I am providing this letter in support of the American Rock Salt Hampton Corners Salt Mine Westward Underground Mine Expansion.

A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. The need for capacity growth at American Rock Salt (ARS) through their proposed westward expansion is critical for the continuation of business during the harsh winter months throughout the northeast.

Not only will this expansion provide for the increased capacity to service the de-icing road salt needs of the northeast, it stabilizes nearly 400 jobs in Livingston County, with ancillary job stabilization of another nearly 1,000 in support sectors. The expansion will also help to sustain a local and regional trucking and railroad workforce for both the short and long term.

As a Chamber of Commerce, our vision is to create a vibrant and sustainable business environment in Livingston County by fulfilling our mission of fostering business development and providing opportunities for our members to prosper. The proposed westward expansion of the American Rock Salt Hampton Corners Salt Mine fulfills this vision for not only the ARS business, but for that of our nearly 600 member business base, that benefits from the salt extracted from the mine – keeping our roads safe for travel to and from the businesses located throughout Livingston County and the northeast.

We strongly support this expansion project, the stabilization of jobs in Livingston County and the continuation of commerce derived from clear de-iced winter roads.

Sincerely,

A handwritten signature in blue ink that reads "Laura Lane".

Laura Lane  
President & CEO

Cc: Joe Bucci, Jr. – American Rock Salt

4635 Millennium Drive • Geneseo, NY 14454 • Phone: 585-243-2222 • Fax: 585-243-4824  
[www.livingstoncountychamber.com](http://www.livingstoncountychamber.com) • [www.fingerlakeswest.com](http://www.fingerlakeswest.com)

## PATRICK ROUNTREE

---

15 Stoney Oak Circle  
Caledonia, NY 14423  
Home: (585) 538-4091  
E-mail: rountreepj@frontiernet.net

August 13, 2018

Mr. Scott E. Sheeley, Regional Permit Administrator  
New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516

### **Re: American Rock Salt Hampton Corners Mine Salt Mine Statement of Support**

Dear Mr. Sheeley:

My name is Patrick Rountree and I served as Director of the Livingston County Economic Development Department and Executive Director of the Livingston County Industrial Development Agency (LCIDA) from 1988 – 2012. In 1993, I wrote the document “Economic Development Impacts of the Akzo Noble Mine at Retsof NY” shortly after the collapse of that mine. Following that report, on behalf of the LCIDA and Livingston County, I was involved in all aspects of permitting process for the new mine in Groveland. Lastly the LCIDA holds title to the economic development of the American Rock Salt mine in Groveland in a SALE/Leaseback through 2028 and administers a Payment-in-Lieu-of Taxes (PILOT) Agreement among American Rock Salt, the County of Livingston, The Town of Groveland and the Geneseo Central School District.

The American Rock Salt Company has been in business for over 20 years. During this time, they have proven to be a responsible land owner, commercial enterprise, tax payer and employer and good environmental steward in Livingston County. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining and is no doubt grateful to have such a successful venture as one of its major employers.

American Rock Salt expanded its operations several times during my employment utilizing its exist permitted mining rights. In each case the Company exceeded its job projections made in its applications for financial assistance. Additionally, the economic impacts identified in my 1993 report understate the actual direct and indirect jobs and investments that resulted from the new mine project!

Besides the above comments, I support the proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by



many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)

- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt
- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.

I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and I emphatically support the proposed west expansion of the salt mine. I respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Truly yours,

  
Patrick Rountree

C: Joseph Bucci, Jr., American Rock Salt  
William Bacon, Livingston County Industrial Development Agency

August 14, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

I strongly support this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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Salt Mine Statement of Support (cont.)

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- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and I emphatically support the proposed west expansion of the salt mine. I respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



Philip A. Jones

19 Elm Street

Geneseo, NY 14454

Aug 14, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

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I support this proposal by American Rock Salt for the following reasons:

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2.

Salt Mine Statement of Support (cont.)

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I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

**Shawn K. Monahan**



## Page, Karen E (DEC)

---

**From:** jnagel@nagelconsultingllc.com  
**Sent:** Tuesday, August 14, 2018 4:06 PM  
**To:** dec.sm.DEP.R8  
**Subject:** American Rock Salt Expansion Letter of Support

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

To Whom it May Concern:

We have worked with American Rock Salt for the past 20 years. They have been a valuable contributor to both the Livingston County area as well as all the regions they serve. They have contributed as an employer, tax payor, and a steward of the land and resources they utilize. We feel this expansion is a necessity to allow them to continue to play a vital role in upstate NY.

As an employer they have provided the above average wages and insurance protection needed by their over 300 employees and their families. Countless other businesses that work as suppliers, vendors, and consultants will see the direct economic benefit from the continued growth at American Rock Salt. In addition there are numerous businesses and individuals that are indirectly benefitting from the long term economic stability that the mine provides.

Local, State and Federal governments will benefit from the increased tax base the Mine provides directly through property taxes and indirectly through income taxes of those employed by them.

No less important the product they supply allows local and state municipalities to keep roadways clear. This benefits both for the commerce that travels on these roads but contributes to the safety of thousands of people every snowy day.

We strongly support expanding the long term viability of American Rock Salt and allowing them to be more efficient in how they operate every day.

Thank you for your consideration.

Jeffrey D. Nagel, MBA, RHU, REBC  
Nagel Consulting LLC  
2680 W. Ridge Road, Suite 201C  
Rochester, NY 14626  
Telephone: 585-227-1300  
Fax: 585-227-0418  
email: [jnagel@nagelconsultingllc.com](mailto:jnagel@nagelconsultingllc.com)

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August 14, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

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Sam Patch Promotions, Inc. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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Sam Patch Promotions, Inc. believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

Tony Saylor

Founder & President

[www.ridelcc.com](http://www.ridelcc.com)

[ridelcc@gmail.com](mailto:ridelcc@gmail.com)

August 15, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

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I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

**Rachel E. Andrews**

**Mad Dogg Spinning® Instructor**

**Cycle Craze**

**109 Main Street**

**Geneseo, NY 14454**

**Andrews.rache@gmail.com**

Scott E. Sheeley  
Regional Permit Administrator  
DEC Region 8  
6274 Avon-Lima Road, Avon, New York 14414-9519,  
Phone: 585-226-5400, Fax: 585-226- 2830  
E-mail: [DEP.R8@dec.ny.gov](mailto:DEP.R8@dec.ny.gov)

Re: **comments on Hampton Corners Salt Mine DEIS,**  
**Article 23, Mined Land Reclamation, DEC # 8-2428-00019/00001**

Dear Mr. Sheeley:

My name is John Dennis. I am a resident of Tompkins County, NY, and therefore I am not an immediate stakeholder regarding whether or not American Rock Salt will be permitted to expand their Life of Mine by 1700+ acres as requested. I am a co-founder of Cayuga Lake Environmental Action Now, a citizens' organization that is researching and advocating regarding industrial threats to Cayuga Lake. Unfortunately, one of those threats is the Cayuga Salt Mine.

As a Lansing, NY, resident living near the Cayuga Salt Mine and <sup>drinking</sup> driving the water of Cayuga Lake daily, I am here largely to congratulate the NYSDEC for making a positive declaration under SEQRA regarding the proposed expansion of the Hampton Corners Mine and to congratulate the owners and employees of American Rock Salt for the fact that the company has now completed its second Draft Environmental Impact Statement or DEIS.

Joseph Bucci Jr., ARS's environmental manager, has told me that ARS welcomes the opportunity to conduct these DEIS because during each of these rigorous studies they have learned more about the mine, their workers become safer and, as he said, "We get to know the neighbors better." In this respect, DEC Region 8 has set the proper standard environmental review of room and pillar salt mines in New York State, of which there are two, the other being Cayuga Salt Mine operated by Cargill.

Presently, the City of Ithaca, the Town of Ithaca, the Town of Ulysses, and the Village of Union Springs—municipalities which are home to >60,000 residents—have joined with Cayuga Lake Environmental Action Now (CLEAN) in bringing an Article 78 petition seeking to get a judge to rule that the DEC was in error when it awarded negative declarations to both the tunnel and shaft portions of Cargill's Shaft 4 project.

A portion of Cayuga Salt Mine lies in Seneca County and therefore in Region 8. We are here this evening to respectfully ask that Mr. Steven Army and other Region 8 officials do what they

can to revisit the negative declaration for the vertical portion of the Shaft 4 project and apply the same standards that they have held the American Rock Salt Company to.

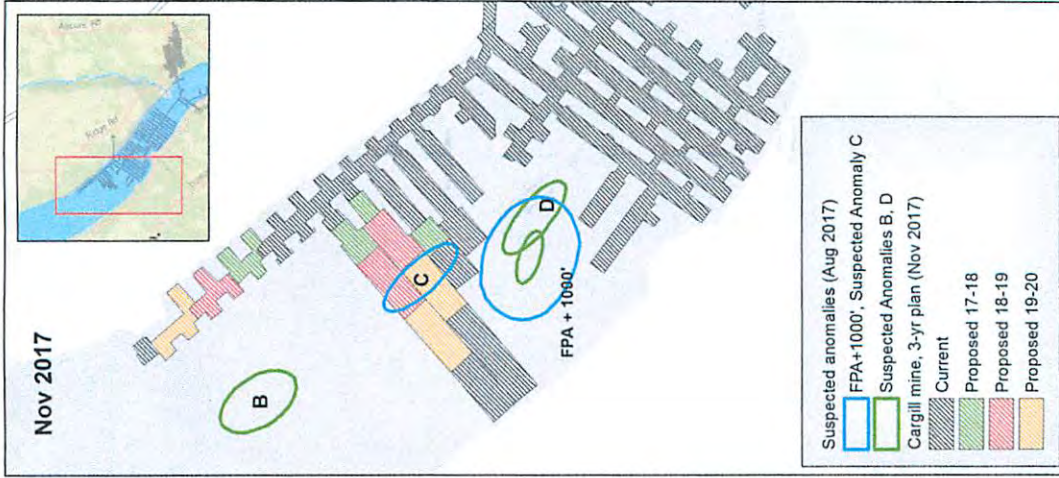
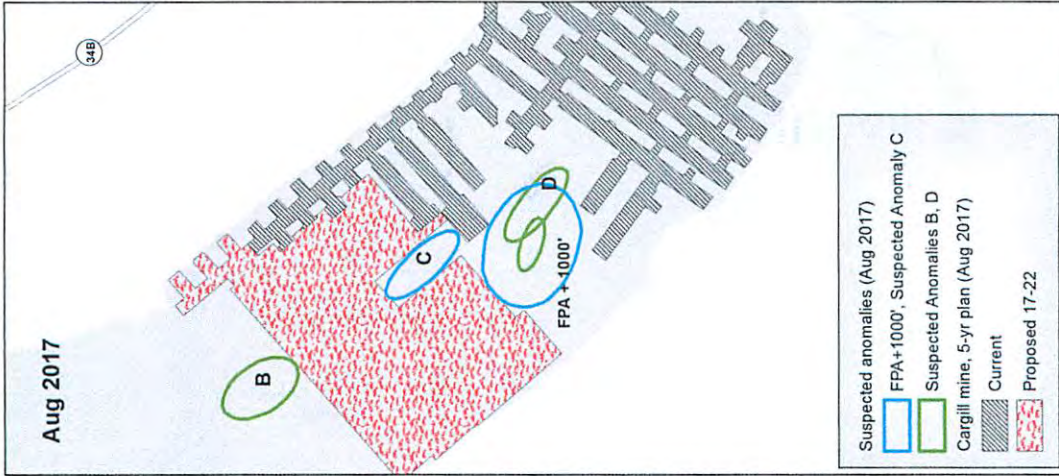
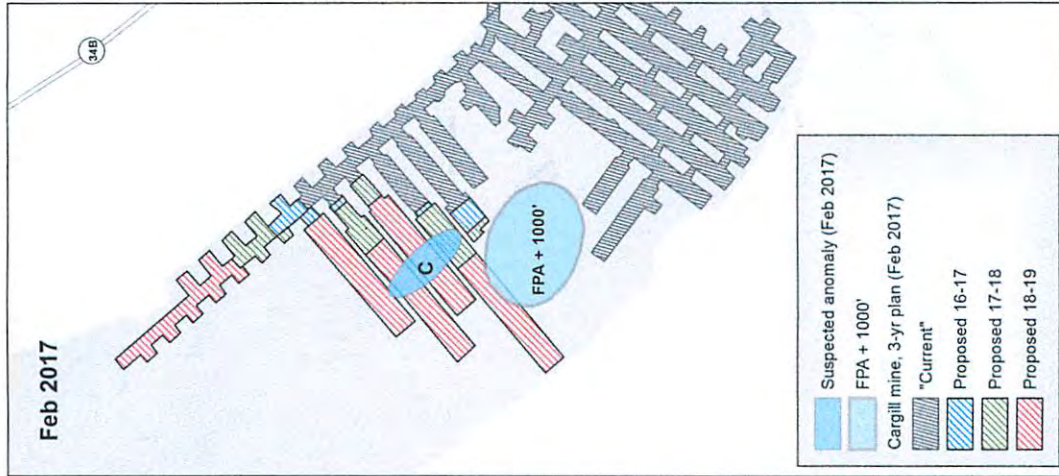
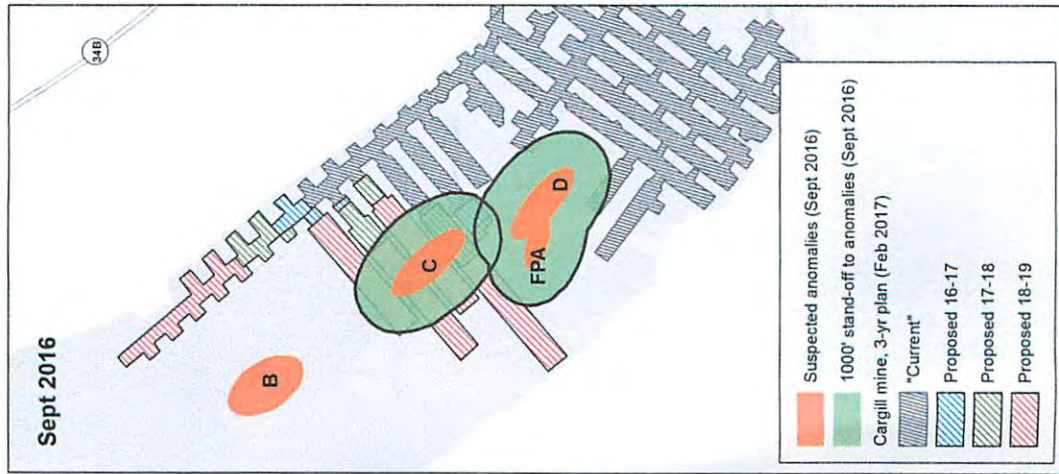
In closing, I will simply hold up and submit this four-panel graphic showing four different mining plans that Cargill produced from September 2016 to November 2017. Doing the math, that's Cargill producing a new 3 or 5-year mining plan every four months. Note the flux or uncertainty that Cargill's planner seem to demonstrate about their plans. In September 2017 Anomalies C, D, and Frontenac Pont Anomaly (FPA) all have 1000-foot setbacks designated. In February 2017, there remains only a 1000-foot setback for one of the anomalies with mining allowed under C and part of FPA. In August 2017, there is no mining under Anomaly C, but no setback and there is no mining under FPA. And then in Nov 2017, there's no 1000-foot setback for anomalies C or D and there is once again mining planned under Anomaly C.

We see a steadier hand at the helm at ARS and congratulate both DEC and ARS for the planning currently underway.

Best regards,







Data: ESRI, NYS GIS Clearinghouse, Exhibit A. "Cargill Mine Big Pillar Design, Updated September 22, 2016".  
 Exhibit B: "Cargill Mine, 3 Yr Plan, 2016/2017 Fiscal Year"; "Cargill Mines, 5-Yr Plan, 2017/2018 Fiscal Year"; "Cargill Mine,  
 3-Yr Mine Plan/Assuming Approval For Mining Under C Anomaly 2017/2018 Fiscal Year".  
 Map updated: 13 March 2018

**Page, Karen E (DEC)**

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**From:** George Paul <gpaul2000@aol.com>  
**Sent:** Wednesday, August 15, 2018 8:28 PM  
**To:** dec.sm.DEP.R8  
**Cc:** joe.buccijr@americanrocksalt.com  
**Subject:** American Rock Salt Hampton Corners Mine Expansion

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

August 15, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516  
Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator  
Re: American Rock Salt Hampton Corners Mine  
Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time it have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County. It is committed to environmental sustainability and the safety of its employees and has consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is fortunate to have such a successful venture as one of its major employers.

I support the expansion proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing roadways.
- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,  
**George F. Paul**

**Page, Karen E (DEC)**

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**From:** Barbara Paul <bapaul53@gmail.com>  
**Sent:** Friday, August 17, 2018 5:05 PM  
**To:** dec.sm.DEP.R8  
**Cc:** joe.buccijr@americanrocksalt.com  
**Subject:** American Rock Salt Statement of Support

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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August 17, 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time it has proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County. It is committed to environmental sustainability and the safety of its employees and has consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is fortunate to have such a successful venture as one of its major employers.

I support this proposal by American Rock Salt for the following reasons:

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- It
- will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt
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2.

Salt Mine Statement of Support (cont.)

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- 

I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and I emphatically support the proposed west expansion of the salt mine. I respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

Barbara A. Paul

126 South Main Street

Mount Morris, NY 14510

**Page, Karen E (DEC)**

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**From:** Matthew Yacuzzo <mattyacuzzo@gmail.com>  
**Sent:** Friday, August 17, 2018 4:20 PM  
**To:** dec.sm.DEP.R8  
**Cc:** joe.buccijr@americanrocksalt.com  
**Subject:** American Rock Salt

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

August 17, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

I support this proposal by American Rock Salt for the following reasons:

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  - expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state
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2.

Salt Mine Statement of Support (cont.)

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- It will
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- 

I believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

Matthew Yacuzzo  
4 East Ave  
LeRoy, NY 14482



New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon NY 14414-9516  
Mr. Scott E. Sheeley, Regional Permit Administrator  
Re: American Rock Salt Hampton Corners Mine

## **Re: Salt Mine Statement of Support**

Dear Mr. Sheeley,

The American Rock Salt Company has been in business for over 20 years, and our company has supplied and serviced their explosives needs for many of these years. During its time in business, American Rock Salt has proven to be a responsible land owner, commercial enterprise, tax payer and employer within Livingston County. ARS has also been committed to environmental sustainability, as well as the safety of their employees and vendors. Every single day the company strives to demonstrate its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Many of the mines employees come from previous generations of salt miners, and they themselves have grown up in this community, as well as having enjoyed long careers with American Rock Salt. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

Independent Explosives supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
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- **Salt Mine Statement of Support (cont.)**

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Independent Explosives believes that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Best Regards,  
Skip Sibley, President  
David Whiteside, Account Manager  
Independent Explosives

August 22, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Attn.: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

I attended the public hearing on August 15, 2018. I also reviewed the Environmental Impact Statement. I am a Town Councilman for the Town of Groveland NY. As you are aware, the American Rock Salt Hampton Corners Mine is located in the Town of Groveland. ARS is a huge part of our community providing employment opportunities for both skilled and unskilled labor. We are proud to have them in our town and are assured they are committed to protecting our environment.

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

I support this proposal by American Rock Salt for the following reasons:

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2.

Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
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American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice. I emphatically support the proposed west expansion of the salt mine and respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



Stephen L Atterbury

August 22, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Attn.: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

I attended the public hearing on August 15, 2018. I was happy to see such a great turnout. I am in agreement with the positive comments made at the hearing.

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long and rich history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

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Salt Mine Statement of Support (cont.)

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American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice. The addition of Joe Bucci Jr. as the Environmental, Health, and Safety Manager guarantees this commitment. I emphatically support the proposed west expansion of the salt mine and respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,



Michelle K. Mann

Conesus, NY 14435

Mr. Dominic F. Mazza  
223 Commerce Drive  
Avon, NY 14414  
August 2018

New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414-9516  
Atten: Mr. Scott Sheely, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Dear Mr. Sheely:

As a point of introduction, I am Dominic Mazza, and from 1989-2009, I was the Livingston County Administrator and worked closely with your agency on numerous matters related to the opening of the American Rock Salt Mine (ARS) in Livingston County.

It is my understanding that ARS has applied for a permit to expand its current operations. I am in full support of the granting of this permit for a number of reasons. Among these are:

- ✓ ARS has met or exceeded all of its original employment projections and continues to be a critical employment resource in the region for good paying jobs and benefits to its employees.
- ✓ ARS has employed a safe and healthy work environment for its employees and the community at large.
- ✓ ARS is an economic engine for the entire region in the spin off jobs and taxes it creates.
- ✓ ARS is a New York State based industry that protects not only the economic health of New York State, but, protects the economic health of the entire Northeastern United States from foreign competition and the potential price gouging that could result.
- ✓ ARS is a great corporate citizen in its support of numerous community events and charitable causes.

During my tenure as County Administrator, I was a strong advocate for the permitting and construction of ARS. Unlike many other economic development projects, once the mine was established it couldn't be moved to Mexico or elsewhere, the mine's permanent home would be in Livingston County, NY.

My hope was that the mine would create well paid jobs, providing our next generation of workers with the opportunity to stay in the communities they were raised, buy homes, pay taxes and raise a family. This hope has been fulfilled many times over.

I trust the plans and specifications for this permit are adequate and meet your regulatory requirements.

I urge the DEC to grant this permit in order that NYS and Livingston County may continue to enjoy the economic benefits and quality of life ARS has brought.

Sincerely,

Dominic F. Mazza  
Livingston County Administrator (1989-2009)





August 23, 2018

E-MAIL

[DEP.R8@dec.ny.gov](mailto:DEP.R8@dec.ny.gov)

Attn: Mr. Scott E. Sheeley  
Regional Permit Administrator  
New York State Department of Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414-9516

Subject: American Rock Salt  
Hampton Corners Mine

Dear Mr. Sheeley:

IES Engineers (IES) is pleased to submit this letter of support for the proposed westward expansion of the currently permitted American Rock Salt Company LLC (ARSC) underground mine located in the Towns of Groveland and Geneseo, New York.

IES is a professional services company committed to delivering environmental, health, and safety compliance; energy engineering; and design and construction of abatement systems for various industries. We have been in business for more than 25 years and have provided environmental support services to ARSC since 2012 at four locations in Pennsylvania, including services related to the preparation of environmental permit applications environmental emergency response plans.

While providing it with support services, we have found ARSC to be responsive and diligent in complying with environmental matters. For a new facility in Scranton, Pennsylvania, ARSC went beyond environmental requirements in-place for current facilities and essentially “raised the bar” for what has become Pennsylvania Department of Environmental Protection’s expectations for state-of-the-art salt pile installations to minimize impacts to the environment. The description of the proposed mine expansion project appears to follow this same approach. Based on our experience, we find that ARSC is fully committed to environmental sustainability and safety and has demonstrated its responsibility to governmental agencies, the community, and vendors.

Additionally, Pennsylvania, like many states in the Northeast, experiences fluctuating winters with increasing demands for salt. At times, our local state and municipal authorities have had shortages of road salt at critical times. This mine expansion will mitigate potential supply concerns in the area, thus providing highway safety and sustaining the local and regional trucking industry.



Mr. Scott E. Sheeley  
August 23, 2018  
Page 2

IES strongly supports the westward expansion of the salt mine project and therefore respectfully requests that the proposed expansion project be approved.

Sincerely,

*Marjorie J. Fitzpatrick* /e/  
Marjorie J. Fitzpatrick, QEP  
Principal Project Manager

cc: J. Bucci, ARSC  
A. Soni, IES



Department of  
Transportation

ANDREW M. CUOMO  
Governor

PAUL A. KARAS  
Acting Commissioner

KEVIN BUSH, P.E.  
Regional Director



August 23, 2018

→ Attn: Scott E. Sheeley  
Regional Permit Administrator  
NYS Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

RE: New York State Department of Environmental Conservation submission for American Rock Salt – Hampton Corners Mine Underground Expansion in Livingston County.

Dear Mr. Sheeley:

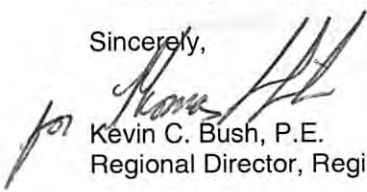
The New York State Department of Transportation has no comment on the referenced action.

Any work (including access or utility work) within the right of way of any State Highway will require a Highway Work Permit from the Department's Traffic Safety and Mobility Office. Also, any such work will require coordination with the Department's planned maintenance and/or capital improvements through our Livingston County Maintenance Office. Occupancy of any state-owned property (short or long term) may require a Permit for Use of State-Owned Property from the Department's Right-of-Way Office. As a permitting agency under SEQRA, the Department should be given the opportunity to review any site plans, environmental impact statements, traffic studies, or drainage plans prior to approval to assure that the negative impacts on State facilities are mitigated as appropriate.

The State Smart Growth Public Infrastructure Policy Act, found in Section 6 of the Environmental Law, obliges the New York State Department of Transportation to evaluate projects it approves, undertakes, supports, or finances against the enumerated smart growth criteria. It is our expectation that a Smart Growth Checklist and attestation may be required prior to the issuance of either a Highway Work Permit or a Permit for Use of State Owned Property.

Please contact Jeremy Button of our Office of Right-of-Way at (585) 272-3326 if you have any questions concerning this matter.

Sincerely,

  
Kevin C. Bush, P.E.  
Regional Director, Region 4

cc: Dwayne Aycock, Director of Operations, NYSDOT R4  
Paul Spitzer, Regional Traffic Engineer, NYSDOT R4  
Zachary Starke, Traffic, NYSDOT R4  
Christine O'Hern, Landscape Architecture/Environmental Group, NYSDOT R4  
Jeremy Button, Right-of-Way, NYSDOT R4  
Lora Leon, Planning, NYSDOT R4  
Mike Hinds, Resident Engineer, Livingston County Residency, NYSDOT R4



[www.livingstoncounty.us](http://www.livingstoncounty.us)

**LIVINGSTON COUNTY  
ENVIRONMENTAL MANAGEMENT  
COUNCIL**

Livingston County Government Center  
6 Court Street, Room 305  
Geneseo, New York 14454-1043

Telephone: (585) 243-7550

(585) 335-1734

Fax: (585) 243-7566

E-mail: [aellis@co.livingston.ny.us](mailto:aellis@co.livingston.ny.us)

August 24, 2018

Scott Sheeley  
Regional Permit Administrator  
NYS Department of Environmental Conservation  
Division of Environmental Permits, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414

RE: Comments on the SEQR Draft Environmental Impact Statement for the American Rock Salt Hampton Corners Mine Underground Expansion.

Dear Mr. Sheeley,

The Livingston County Environmental Management Council (EMC) advises the Livingston County Board of Supervisors on the preservation, development and use of the County's natural resources. In 1995, the EMC had the opportunity to review and comment on the SEQR Draft Environmental Impact Statement (DEIS) for the Hampton Corners Mine, followed by a review of the 1996 NYS Department of Environmental Conservation's Statement of Findings.

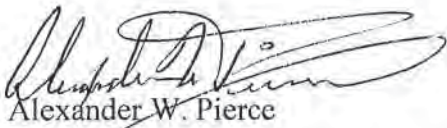
Currently, the EMC has reviewed the SEQR DEIS for the American Rock Salt Hampton Corners Mine Underground Expansion. Given that this is a new area of underground mining with different overburden characteristics and potentially different impacts, the EMC has forwarded the following public comments and questions:

1. Impacts on surface water resources, including the Genesee River and the Canaseraga Creek
  - Does the proposed provide adequate protections of these major tributaries in Livingston County, which connect to Lake Ontario (a primary water source in this region)?
2. Impacts on ground water aquifers and other potable ground water supplies
  - Does the proposed have adequate measures to prevent brine migration and infiltration into groundwater aquifers? In the event of brine migration, does the proposed adequately assess the potential impacts and provide for long term mitigation if needed?
3. Current and/or long term underground monitoring plans, including monitoring for water intrusion, mine opening closure rates and mine integrity

- The Room Closure Monitoring Plan requires backfilling the rooms if the closure rate reaches a high point. Does this practice increase the potential for salt and/or pillar dissolution, particularly with the alternate smaller pillar design, or brine migration? If backfilling is necessary, what mitigations can be implemented?
  - Per the 2018 SEQR DEIS, the room closure rates had significantly and abnormally increased in the areas where the new mining technique had been used in the Retsof mine prior to the overburden failure. Have the monitoring and response plans been modified as a result, including new key indicators/revised thresholds?
4. Alternative mine design
- Under what conditions would the alternative, smaller room design be utilized?
  - Is the proposed design with smaller 70' x 70' pillars more susceptible to salt dissolution, and does this affect mine integrity in the event of flooding?
5. Impacts of possible mine collapse and provision for containment or closure
- Are there physical barriers in place for containment, closing off parts of the mine without additional consequences?
  - Does the proposed plan for adequate financial security or bonds for long term protection of employees, civilians, and natural resources, in the case of a failure event?
6. Location in the Genesee Valley
- Does the highly erodible glacial till and the Genesee River floodplain affect mine integrity? At any future point, will highly erodible soils cause a greater risk of shifting and water infiltration of the mine, groundwater aquifers or other natural features?
  - As the anticipated life of the Mount Morris Dam has been surpassed, have impacts of a dam break on the proposed been considered?
7. Given that the proposed does not include storage of non-mining materials (such as ash or natural gas) or increased surface salt storage capacity, what notifications would be required if the proposed use/capacity was to change in the future?
8. State Environmental Quality Review (SEQR)
- Did the original SEQR include mining for the full Life of Mine project? Can the following information be provided?
    - Mining timeline for the full Life of Mine project, with & without western expansion
    - Location of future mine shafts and other surface facility improvements
  - NYSDEC identified potential subsidence impacts on:
    - Genesee River
    - Existing drainage patterns & changes in flood water flows
    - Agricultural soils, farming operations and land management systems
    - Public infrastructure, roads, utilities

- Given that the long term nature of the proposed operations increases the potential chronic, long-term subsidence impacts, can extensions of the monitoring and evaluations of subsidence be considered beyond 50 years?
- The 1996 NYSDEC Statement of Findings stated that the maximum subsidence at the Genesee River and along the Canaseraga Creek was calculated to be 1.2 inches in 50 years, which was found to be negligible. The 2018 SEQR DEIS states that the subsidence would be approximately 4 feet at the lowest areas after 50 years of mining. What are the potential impacts of this subsidence rate on these hydrologic features, or other resources? What is the greatest amount of subsidence anticipated and when will the maximum subsidence be reached?

If you have any questions regarding the EMC comments, please feel free to contact me.



Alexander W. Pierce  
Chairman

Livingston County Environmental Management Council

cc. Mr. Ian Coyle, County Administrator  
Mr. David LeFeber, Livingston County Board of Supervisors, Chairman  
Mr. Gerald Deming, Public Services Committee, Chairman

Scott Sheeley  
DEP.R8@dec.ny.gov  
NYSDEC  
Region 8 Headquarters,  
6274 East Avon- Lima Rd,  
Avon, NY

My name is Amber Lounsberry. I am a geologist who locally grew up in Leicester, NY and attended York Central School – graduating in 2010. I have personally worked on the expansion project as a geology intern at American Rock Salt, the summer of 2014.

I agree and am in full support of the mining expansion project. I assisted with ARC in the rock core drilling/operations that were used to assess the rock quality in the project area. The overlain burden above the B6 Vernon salt is made of stable thick layers of sedimentary rock. The percentage of core recovery was 99%-100%. This in other words means that the drill line of core recovered from the borehole was 99-100% intact when released. Good core recovery is indicative of strong rock mass strength. Moreover, the rock quality was more than adequate and primarily **excellent** quality. There was no evidence of rock dissolution or open fractures.

The Vernon B6 salt in these areas are thicker than the Vernon B6 Salt currently being mined. This will and could help with having more overburden and cellar of the B6 salt when setting up a mining pillar design, allowing to mine the highest quality of salt in the given project area.

As a local, this project will help keep the communities economy surrounding the mine, thriving. The longevity of jobs and the support of local businesses by the hard minerals at our reach will help in the icy winters and keep the job economy consistent from a mine that has been in service for 20 years, not including the original Retsof mine.

Thank you for your time.

Sincerely,

Amber Lounsberry

## Page, Karen E (DEC)

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**From:** Michael DaBramo <mdabramo@rochester.rr.com>  
**Sent:** Monday, August 27, 2018 10:12 PM  
**To:** dec.sm.DEP.R8  
**Cc:** Army, Steve (DEC); Sheeley, Scott E (DEC)  
**Subject:** American Rock Salt - Mine Expansion Application

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

August 27, 2018

I am offering my comments/suggestions regarding the proposed expansion of American Rock Salt's expansion of their current mining operations.

I had hoped to be able to give my perspective at the open meeting on August 15, but somehow had missed the announcement of this meeting.

ARS has a deserved reputation as an economic force, a job provider, and a good neighbor in our community. Hopefully, this expansion will keep this going for the next 100 years.

However, one item which was not addressed during this meeting and the application process: There is a great deal of noise emanating from the Groveland site; specifically due to the ventilation fan. My understanding is that the original fan installed at this site (and was used to test/measure loudness levels) had failed some time ago. Subsequently, the ventilation fan once used at the now defunct Retsof site was repurposed in Groveland. This current fan is older and much louder and can be heard miles away day and night when in operation.

In addition to ongoing communication with D.E.C. staff, I have spoken on several occasions with ARS staff. Most often, my point of contact has been with Joseph Bucci, Jr., who is in charge of environmental issues. Joe has been understanding of my concerns and has promised to try to address them. Some of the possible methods of abatement he suggested are either a completely new ventilation fan and/or a noise baffling system.

I have taken Joe at his word that improvements will be made at such a time when it makes the most sense production and business-wise. However, this conversation has been going on for a few years which is why it's important to have this issue on record.

I understand that the permit application for expansion may not directly involve the ongoing noise issue. However, barring a requirement to address this issue from the D.E.C. for approving this permit, it would be great to see a commitment from ARS to take measures to improve the noise pollution.

Respectfully submitted,  
Michael DaBramo  
Geneseo, NY



**Page, Karen E (DEC)**

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**From:** Brian McGrath <brianmcgrath@gmail.com>  
**Sent:** Monday, August 27, 2018 1:18 PM  
**To:** dec.sm.DEP.R8  
**Subject:** American Rock Salt 1,700 acre Expansion DEIS Comment

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Mr. Sheeley,

I would like to take this time to comment on the 1700 acre expansion project request from American Rock Salt. First I want to say that I am in full support of the expansion. American Rock Salt has done their dudiligents with the DEIS and they have sound science to prove that the expansion will have minimal impacts to the surrounding area. However I do have a small concern and that is with the subsidence over 50 years. I'm concerned about a 300-500 year flood filling the subsidence area and the potential toploading of the beam material with that water weight. The modeling shows where the water will go in the "bowl" area but doesn't directly talk about the top loading.

Thank you for this time and again I'm in full support of this expansion project for the mine.

Brian McGrath  
Environemtnal Scientist

August 27, 2018

New York State Department of Environmental Conservation, Region 8

6274 East Avon-Lima Road

Avon NY 14414-9516

Att'n: Mr. Scott E. Sheeley, Regional Permit Administrator

Re: American Rock Salt Hampton Corners Mine

Salt Mine Statement of Support

Dear Sir:

The American Rock Salt Company has been in business for over 20 years. During this time they have proven to be a responsible land owner, commercial enterprise, tax payer and employer in Livingston County for over 20 years. They are committed to environmental sustainability and the safety of their employees and have consistently demonstrated its responsibility to government agencies, employees, vendors, local merchants and the Genesee Valley community. Livingston County has a long history of salt mining, and is no doubt grateful to have such a successful venture as one of its major employers.

CarVaTech USA, LLC. supports this proposal by American Rock Salt for the following reasons:

- This expansion will help ensure short term and long-term supplies of critical de-icing road salt, especially during harsh winters when the need is greatest. (During unusually harsh winters, the American Rock Salt Company is often called on by many local, state and federal agencies to fill shortfalls of de-icing road salt when their other suppliers have failed to meet their needs.)
- It will improve efficiency by mining areas closer to shafts and ventilation air sources.
- It will help to conserve energy and minimize additional construction material costs by shortening hauling distance underground.
- It will allow unmined salt that is suitable and accessible to the existing mine facility to be readily mined.
- It will reduce rates of land surface subsidence due to responsible salt extraction and ground support.
- It will prevent potential reliance on foreign supplies and use of waste salt for de-icing road salt

Salt Mine Statement of Support (cont.)

- It will stabilize 300-400 local jobs and help support over 1,000 related jobs in the local communities.
- It will help sustain a local and regional trucking and railroad workforce in both the short term and long term.
- It will eliminate the necessity of developing a new salt mine with all of the related environmental concerns associated with additional surface land use, construction of a surface facility with additional mine shafts and increased vehicular traffic.
- It will provide jobs, increase tax revenues in New York State and contribute to better highway safety on thousands of miles of highways in Northeastern United States for an additional 10 years with virtually no impact on the existing land surface.
- A Standard and Poor's study [1998] of the northeastern states found that over \$500 million a day in federal, state, and local tax revenues would be lost if impassable roadways paralyzed the region due to a lack of de-icing road salt and would cost employees an estimated \$1.4 billion in lost wages and \$600 million in lost retail sales. To some extent this scenario occurs many winters in areas which do not have ready access to road salt.

We believe that the American Rock Salt Company has consistently demonstrated its commitment to sustainable environmental practice and we emphatically support the proposed west expansion of the salt mine. We respectfully request that this proposal of The American Rock Salt Company be approved. Thank you.

Sincerely,

*Todd Hicks*

Todd Hicks, PMP  
President & CEO  
CarVaTech USA - SDVOSB  
757.502.3355

MAYOR  
MATTHEW P. COOK  
DEPUTY MAYOR  
LEAH FLETCHER  
TRUSTEE  
CHRISTOPHER IVERS  
TRUSTEE  
MARY V. RUTIGLIANO  
TRUSTEE  
MARY KAY YANIK  
ATTORNEY



MARSHA B. MERRICK, RMC, CMC  
CLERK/TREASURER  
APRILE S. MACK  
DEPUTY CLERK/TREASURER  
JASON W. FRAZIER  
STREETS SUPERINTENDENT  
ANDREW W. CHANLER  
FIRE CHIEF  
DANIEL QUINLAN  
SUPERINTENDENT OF PUBLIC WORKS  
ERIC G. OSGANIAN  
CHIEF OF POLICE

August 22, 2018



Scott E. Sheeley  
Regional Permit Administrator  
NYS DEC, Region 8 Office  
6274 E. Avon – Lima Road  
Avon, NY 14414-9519

Re: American Rock Salt Expansion

I am writing this letter regarding the application for expansion of American Rock Salt. As the Mayor of Geneseo, I am representing the consensus of the Village Board of Trustees on this matter. We are in agreement that this expansion is a positive move.

American Rock Salt is an important part of the economy of Livingston County and, more specifically, Geneseo. We purchase our road salt from American Rock Salt. Clearly, the proximity of the mine makes that logistically and monetarily easier on the Village. They are a major employer who treats their employees well. The Village of Geneseo benefits through job creation in all sectors and home ownership. Their employees are customers in all retail and service business operations.

American Rock Salt is also a good neighbor. Because they are locally owned, they are aware of the culture of the communities surrounding them and the needs of the residents. They are transparent in all they do, respecting environmental and historical concerns. They are responsive to issues brought to their attention and work with residents and municipalities to minimize the impact of the overall operation.

Because of their willingness to be an active part of the community, we trust their plans are in line with decisions made in the past.

Thank you for your interest in our perspective.

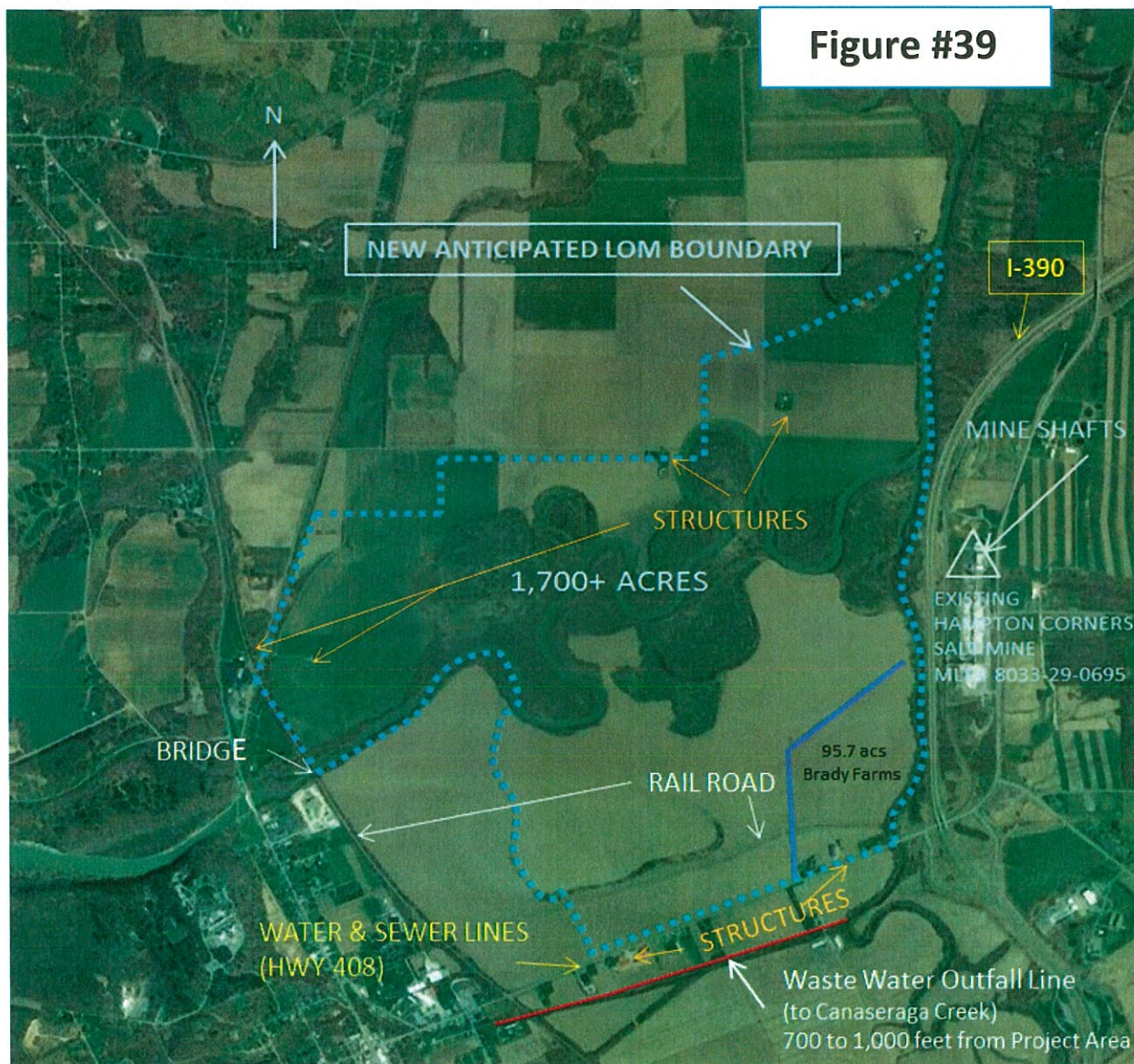
Sincerely,

A handwritten signature in cursive script that reads "Margaret Duff".

Margaret Duff  
Mayor

## **APPENDIX 2**

### **REVISED FIGURE 39**



**Figure #39 - Aerial Photograph - 1,700 + acres project area and the adjacent Hampton Corners Salt Mine's surface facility and mine shafts in the Genesee Valley - showing infrastructure resources such as structures, roads, pipelines, and utilities.**

## **APPENDIX 3**

### **DRAFT ENVIRONMENTAL IMPACT STATEMENT**

### **AMERICAN ROCK SALT COMPANY, LLC, HAMPTON CORNERS SALT MINE, WESTWARD UNDERGROUND MINE EXPANSION**

**JULY 25, 2018**

**(PROVIDED ELECTRONICALLY ON CD)**