

**Planning Board Comments on the Administrative Draft, dated 2/4/26 of the
Mining Ordinance (MO)**

February 10, 2025

- **Article III, Section 2, Prohibited Activities** - There should be a limit on the total size of the affected area of new or expanded mining operations – not just the “working pit.”
- **Article III, Section 2, Prohibited Activities, Subsection E** - The limit on the size of the non-vegetated extraction area (working pit) of a mining operation should be ½ acre.
- **Article IV, Section 1, Registration of Existing Operations, Subsection A (5), first sentence** - The required annual report should be a report that documents the nature and frequency of use.
- **Article IV, Section 1, Registration of Existing Operations, Subsections A (5), second sentence** - For mining operations that do not have permitting or reporting requirements and are submitting a signed statement, there should be some process (for example, site visit by the CEO) for reviewing the adequacy of the statement and verification of the size of the operation and frequency of use.
- **Article IV, Section 1, Registration of Existing Operations, Subsection A (7)** - There needs to be a depiction of the actual mining or quarrying operation on a map more detailed than the town tax map e.g. (USGS, DeLorme, survey, etc.) that shows the size and location of the affected area.
- **Article IV, Section 1, Registration of Existing Operations** – The determination of whether an application has adequate information and is complete should not be the responsibility of the Town Clerk. Either the Code Enforcement Officer and/or the Planning Board should be given this responsibility.
- **Article V, Section 4, Application Process, Subsection B, Notice** - Residents near existing operations have consistently asked for better notice of applications and public hearings. Given the rural nature of Alna, notice should be given to landowners within 3000 ft of the pit.

- **Article VI, Performance Standards, Section 1, Subsection H (2)** – The slope requirement for reclamation should be the same as the slope requirement for the active pit (3:1) in Article VI, Performance Standards, Section 1, Subsection B.
- **Article VI, Performance Standards, Section 1, Subsection (C) Hours/Days of Operation** - Mining operations should be limited to the same hours and days as quarries.
- **Article VI, Performance Standards, Section 2(A) Liability Insurance** - Large mining operations should also be required to have liability insurance, not just quarries.
- **Article V, Section 2 (I); Article VI, Section 1(I); and Article VI, Section 1(H)** – Reference to the DEP Erosion and Sediment Control manuals should be consistent and refer to the “latest revised version” of the manuals.
- **Articles IV and V, Email Notification** – Whenever Notice to the public is required (for example, for site visits, or public hearings), it should include notification by email to the town email list.
- **Article VI, Performance Standards, Storage or processing of materials brought in from off-site** - The ordinance needs a standard regulating the bringing in, method of storage, and processing of materials from off-site (such as reclaimed asphalt or fill from construction sites.)

Respectfully submitted on behalf of the Planning Board

by Planning Board Chair, Cathy Johnson