

Technical Memorandum

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Via Email: bsutherland@norvelltp-mi.gov
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To: Bill Sutherland, Supervisor, Norvell Township
Scott Pacheco, SP Urban Planning

From: Allan Blaske, P.G., CPG

Date: February 25, 2026

Re: American Aggregates of Michigan Application for Site Plan Approval, Conditional Use Permit and Mining Permit, Norvell Township, Michigan
GEI Consultants Review Notes – Addendum No. 1

Project No. 2507059

This memo is an addendum (Addendum No. 1) to the January 12, 2026 memo submitted to Norvell Township regarding the review (by GEI Consultants of Michigan, P.C. (GEI)) of the American Aggregates of Michigan Application for Site Plan Approval, Conditional Use Permit and Mining Permit, submitted to Norvell Township. Upon further review of the application package by GEI, additional issues were discovered which require clarification by the applicant. These review comments are outlined below.

List of Documents Reviewed

“Application” = American Aggregates of Michigan’s (“Applicant” or “AAOM”) Application for Site Plan Approval, conditional Use Permit and Mining Permit under Article 7 (“Application”) for a proposed sand and gravel mining operation (“Project”), prepared by Zausmer, P.C., dated November 17, 2025

“Project Report” = Project Report, Norvell Sand and Gravel Site, American Aggregates of Michigan, prepared by Smithgroup, dated November 14, 2025,

Exhibits to the “Application” and “Project Report” include:

- Exhibit 1 – Sealed Boundary Surveys
- Exhibit 2 – Site Plans
- Exhibit 3 – Traffic Impact Study
- Exhibit 4 – Purchase Order
- Exhibit 5 – Infrastructure Reports
- Exhibit 6 – Wetland Delineation Report
- Exhibit 7 – Threatened and Endangered Species Survey and Habitat Assessment

- Exhibit 8 – Hydrogeological Report
- Exhibit 9 – Phase 1 Environmental Site Assessment
- Exhibit 10 – 2025 Market Study
- Exhibit 11 – Property Valuation Studies
- Exhibit 12 – Industrial Hygiene Exposure Assessment Report
- Exhibit 13 – Focused Noise Estimation Report

“Township Ordinance” = Norvell Township Zoning Ordinance, Ordinance No. 2025-058, Adopted August 18, 2025, Norvell Township, Jackson County, Michigan, Including:

- Article 7 – Mining Activities and Operations
- Article 12 – Site Plan Review and Approval
- Article 13 – Conditional Use Review

Review Comments

During further review of the application documents and zoning ordinances, GEI has prepared the following questions and comments related to the mine permit application package. These comments are in addition to those presented in the January 12, 2026 memo provided to the Township by GEI. In the comments below, GEI references the “Application” “Project Report” and “Township Ordinances” as necessary. These questions and comments do not dispute the completeness of the application package or the adherence of the information within the application to the Township Ordinances. Rather, these questions should be provided to the applicant to obtain additional information and clarification related to the permit application.

A-1. Section 7.2(A)(2) of Article 7 of the Township Ordinance requires “Mining activity shall be prohibited within sixteen hundred (1,600) feet from the perimeter of subdivisions.....or any other natural resource as determined by the Township in its sole discretion.” Also, Section 7.2(B)(4) requires “no excavating shall take place closer than one hundred fifty (150) feet to a street right-of-way line or a wetland, or within three hundred (300) feet of any lot line in a non-residential district.” Review of the site plan (Exhibit 2 of the Application) indicates inconsistencies with these required setback distances. Two examples include:

- a. The setback from the edge of the mining area to the edge of Watkins Lake does not appear to be 1,600 feet as required for a “natural resource”.
- b. The setback from the edge of the mining area to the edge of Lake R, is not documented. The setback does not appear to be 1,600 feet as required for a “natural resource.”

The setback distances for the perimeter of the proposed mining operation should be reviewed by the applicant and justification should be provided for all setback distances around the perimeter of the mining area. Setbacks should conform with township zoning requirements.

A-2. The Traffic Impact Study (Exhibit 3 of the Application) indicated that “vehicular turning movement counts” were conducted on February 14, 2023. The date of this study is not likely to represent traffic patterns during peak and summertime road use in the area. At the very least, justification should be provided by the applicant to support the use of the February 14, 2023, traffic count data and how it is representative of expected summertime or peak traffic patterns. Alternatively, additional data should be provided by the applicant to reflect summertime or expected near-peak traffic flow (including vehicle, bicycle, and pedestrian traffic) for the area surrounding the proposed mine.

A-3. Within the Wetland Delineation Report (Exhibit 6 of the Application), Table 1 references “Wetland AA” as being “within 500 feet of Lake R”. Yet on Page 2 of the report and Figure 1 of the report, Lake R is described as being in the northern portion of the property. Figure 1 illustrates Wetland AA as being just to the west of Watkins Lake. This inconsistency should be resolved.

GEI has provided these additional comments to the Township regarding the permit application package. The township may use this memo to request additional information and clarification from the applicant.

If you have any questions, please feel free to contact me at ablask@geiconsultants.com.

Sincerely,

GEI CONSULTANTS OF MICHIGAN, P.C.



Allan R. Blaske, P.G., CPG
Senior Geologist



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Senior Professional

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