



LEGACY Land Conservancy

*Protecting and Preserving
Southern Michigan*
February 12, 2026

Norvell Township Hall
300 Mill Road
Brooklyn, MI 49230

Re: Proposed Sand and Gravel Mine adjacent to Watkins Lake State Park

Dear Norvell Township Officials,

My name is Diana Kern and I am the Executive Director at Legacy Land Conservancy, a 55-year-old land conservancy that protects land and water resources in Jackson, Lenawee, and Washtenaw Counties. I am writing to express our concern about the sand and gravel mine being proposed by American Aggregate in Norvell Township. The proposed gravel mine is adjacent to several conserved lands, including Watkins Lake State Park and County Preserve and Legacy's Arnold Fen Conservation Easement.

Legacy has invested significant time and financial resources, including public and private dollars, toward the protection of hundreds of acres of rare natural habitat and high-quality recreation land in the area. I believe it is my fiduciary responsibility to comment about our concerns related to the investments in natural infrastructure our nonprofit has made in the area and on behalf of the community surrounding the proposed sand and gravel mine location.

These properties contain highly sensitive habitats that are globally rare: prairie fens. Prairie fens are unique ecosystems that are dependent on groundwater and its interactions with rare soil types. The results of this interaction create irreplaceable habitats that are home to many threatened and endangered plants, as well as threatened and endangered insect, bird, amphibian, reptile, and aquatic invertebrate species. Furthermore, Watkins Lake State Park and County Preserve is home to significant grassland acreage, which provides vital habitat for state and federally threatened and endangered insect and bird species.

As you can see by the enclosed map showing nearby protected lands, Legacy, the State of Michigan, and numerous other conservation organizations have invested untold energy and public and private dollars into conserving the unique habitats and natural resources of Norvell Township.

Watkins Lake State Park and County Preserve is one of Legacy's top accomplishments in our 55-year tenure in land conservation. The property contains high quality ecosystems home to many rare plant and animal species, as well as globally rare water features. These high-quality and intact remnant ecosystems protect the quality of water resources for the Great Lakes Basin by allowing for groundwater recharge, water filtration, and flood mitigation. Introducing this high-impact industrial use next to a place of respite, both for wildlife and for the public, runs counter to the investment in the land made by the State of Michigan, as well as the many people who helped support the project and the many people who enjoy the property now. Given the potential mine's location in the River Raisin Watershed, this



project could negatively affect the more than 178,000 Michiganders living within the watershed and relying on this precious freshwater resource.

Arnold Fen, directly to the north of the proposed gravel mine, is also home to the rare prairie fen habitat described above. This land is protected by a conservation easement, which Legacy Land Conservancy is entrusted to uphold. Arnold Fen is one of the highest quality conservation properties in the three counties Legacy has the responsibility to protect. Our records indicate that a total of eight state or federally protected species have been seen on the property with an additional six species on adjacent land. For many of these species, habitat loss and degradation are the top threats to their existence. The proposed sand and gravel mine, given its location, could reasonably and tangibly threaten the survival of local populations of these globally rare species.

Legacy works closely with the Michigan Natural Features Inventory (MNFI) to monitor and protect sensitive species. Ashley Cole-Wick, a Conservation Associate- Zoologist with MNFI, provided the below information when asked about Mitchell's satyr butterfly (MSB) and other sensitive species at Arnold Fen.

"The MSB is one of the rarest butterflies in the Great Lakes and relies on rare wetlands called fens, where it clusters around [groundwater] seeps and springs. The MSB population at Watkins Lake State Park [(WLSP)] was first observed by MNFI scientists in 2017, and was last observed in 2023. This elusive butterfly has low detectability so we are hopeful that the population remains at WLSP. Many other rare species rely on prairie fens at WLSP (massasauga [rattlesnake]), which would most likely be harmed by the aquifer disruption caused by gravel pit mining operations in the adjacent parcels."

In the Michigan Zoning Enabling Act 125.3205, the township is to consider the listed factors in the statute. We are writing today to say we are concerned that the proposed mine would result in very serious consequences on the adjacent conservation and recreational use of the land. Disruption to the quantity and quality of groundwater, habitat loss, increased high- and low-decibel noise (which can be very disruptive to wildlife), and negative impacts to local road and energy infrastructure are just a few of the ways that we anticipate the proposed gravel mine will be detrimental to the natural resources you are tasked with managing on behalf of your constituents and the overall public interest in the property and adjacent properties. We urge you not to permit this gravel mine project to proceed at this location.

To be clear, our organization is realistic about the community economic needs met through gravel mines and other land uses not compatible with our work. We would encourage these heavy industrial uses to occur on areas not adjacent to environmentally sensitive places where significant public and private dollars have been invested. We hope you will consider helping to continue to protect these areas not only for their threatened and endangered species, but for the wellbeing of Norvell Township residents, who choose to live there because of the peace, quiet, and connection with nature they provide.

Thank you for your time and consideration.



Diana L. Kern
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CC: Senator Sue Shink
Representative Carrie Rheingans
Scott Bowen, Department of Natural Resources
Michael Monfils, Natural Features Inventory
Scott Hicks, USFWS
Phil Roos, EGLE