



February 13, 2026

Norvell Township Board of Trustees
Norvell Township Planning Commission
P.O. Box 218
Norvell, MI 49263

Dear Members of the Norvell Township Board of Trustees and Planning Commission,

I am writing on behalf of the Washtenaw County Parks and Recreation Commission (WCPARC) to express concerns regarding the proposed aggregate gravel mining operation by American Aggregates of Michigan, Inc., on property adjacent to Watkins Lake State Park and County Preserve. As the Director of Washtenaw County Parks, I respectfully urge the Township to exercise caution in reviewing and considering this conditional use permit application, ensuring that the extraordinary ecological, recreational, and conservation value of the adjacent protected landscape is fully taken into consideration as part of the Township's deliberation and review process.

Watkins Lake State Park and County Preserve is Michigan's 103rd State Park and remains the only state park in Michigan cooperatively developed and managed in partnership with a county park system. MDNR and WCPARC staff actively collaborate on stewardship, volunteer and programming activities across the shared landscape, ensuring long-term protection and public enjoyment of this unique resource.

The area holds exceptional significance for wildlife conservation. To protect valuable migratory bird habitat, the State of Michigan has designated Watkins Lake as a waterfowl refuge, restricting lake use during migratory seasons. As a result, Watkins Lake serves as a critical stop-over site for waterfowl and other species and has become a regional destination for large numbers of wildlife enthusiasts. Furthermore, the Watkins Lake State Park and County Preserve protect habitat for two federally listed species, ten Michigan state-listed threatened and endangered species, and fifteen Michigan state-level species of special concern. The landscape supports rare state-listed grassland birds that are species of critical conservation need and fen habitats known to be important in protecting Michigan's rich biodiversity.

These natural resources are enjoyed by a growing community of visitors. Trail counters along the popular hike and bike trail documented hundreds of visitors during the warmer months. That trail is currently being extended to connect through Manchester Township to the Village, which will promote more use. Thousands of visitors also descend on nearby Hayes State Park each summer. Collaboration between Hayes and WCPARC staff on trails and amenities, public programming, and volunteer events at Watkins are promoted to these visitors and enhance their vacation experience.

WCPARC has invested significantly in the long-term conservation of this area. We secured \$369,806 through The Conservation Fund's Enbridge Pipeline fund specifically to support the acquisition of the Watkins Lake County Preserve for the conservation of rare species, including birds, amphibians, and reptiles. Following acquisition, WCPARC partnered with the U.S. Fish and Wildlife Service—with funding support from Ducks Unlimited and MDNR—to restore 11 acres of wetland and 58 acres of grassland at the County Preserve. Initial investment from USFWS totaled \$44,722. Since planting in 2018, WCPARC has maintained these grasslands through staff efforts and contracted stewardship, with costs exceeding \$25,000 to date. These investments underscore our commitment to preserving this irreplaceable habitat for future generations.

A large-scale gravel mining operation immediately adjacent to this sensitive area raises substantial risks, including potential impacts from noise, dust, heavy equipment traffic, hydrological changes, habitat fragmentation, and

other disturbances that could undermine the ecological integrity of the park and preserve, disrupt migratory pathways, and affect listed species. These concerns are heightened by the site's role as a unique cooperative state-county resource and the only waterfowl refuge in the state park system.

In the spirit of responsible regional planning and shared stewardship, we encourage the Township to engage directly with the applicant in exploring alternative locations for this aggregate extraction that could meet the demonstrated need for materials while fully avoiding adjacency to Watkins Lake State Park and County Preserve and other high-value conservation lands. The broader Jackson-Washtenaw area likely contains other suitable gravel resources on sites with lower ecological sensitivity and fewer conflicts with protected public lands, residential areas, or recreational assets. Should the Township determine that some level of activity at or near the proposed location is feasible, we also urge close collaboration with the applicant to identify and implement robust measures to minimize impacts—such as enhanced buffers, phased operations, advanced dust/noise suppression, hydrological monitoring, habitat offsets, or other best-management practices tailored to protect the adjacent refuge, wetlands, fens, and migratory pathways.

We respectfully request that the Township conduct a thorough, comprehensive review of all potential environmental, hydrological, wildlife, and recreational impacts before proceeding. This should include close consultation with relevant state and federal agencies (such as MDNR, USFWS, and EGLE), independent environmental assessments, meaningful opportunities for public input from stakeholders who value this shared natural treasure, and explicit consideration of alternative sites and impact-minimization strategies as part of the deliberative process.

WCPARC stands ready to provide additional information, collaborate on impact assessments, participate in discussions regarding alternatives or mitigation, or explore ways to safeguard the adjacent protected lands. We appreciate your careful consideration of this matter and your dedication to responsible land-use decisions that balance community needs with the protection of irreplaceable natural resources.

Thank you for your attention to this important issue. Please feel free to contact me directly (bonfigiom@washtenaw.org or 734-971-6337) at your convenience.

Sincerely,



Meghan Bonfiglio, Director
Washtenaw County Parks and Recreation Commission