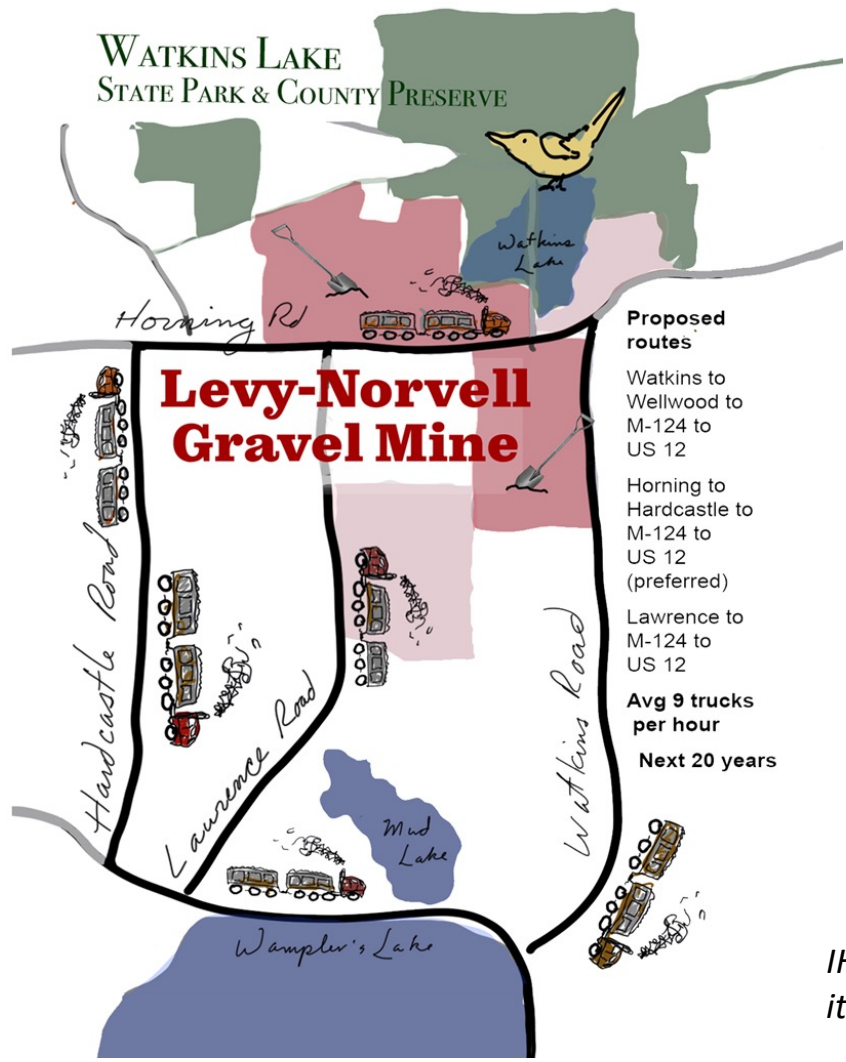


# Community Meeting On Proposed Norvell Township Gravel Mine

March 14, 2026



**Proposed routes**  
Watkins to Wellwood to M-124 to US 12  
Horning to Hardcastle to M-124 to US 12 (preferred)  
Lawrence to M-124 to US 12  
**Avg 9 trucks per hour**  
**Next 20 years**



*IHCC's mission is to protect Watkins Lake State Park & County Preserve, its birds and wildlife, and the rural character of the surrounding region.*

# Agenda

- **Welcome & Introductions** – Sybil Kolon, President
- **IHCC Updates** – Emily Jade Foley, Board Member
- **Environmental Concerns** – Silas Bialecki, Board Member
- **Legal Questions & Answers** – Andy Buchsbaum, Vice President

*~10 Minute Break~*

- **Lessons from our Neighbors** – Peter Psarouthakis, Former Sharon Township Supervisor
- **Fundraising** – Jim Vella, Fundraising Committee
- **Yard Sign Update** – Cathy King, Community Outreach Committee
- **Next Steps & Upcoming Meetings**





## About IHCC

3/14/26

Irish Hills Concerned Citizens (IHCC) was incorporated as a non-profit in January 2026. IHCC's mission is to protect Watkins Lake State Park & County Preserve, its birds and wildlife, and the rural character of the surrounding region.

# IHCC Updates



- Background:
  - The Law
  - The Application
  - The GEI Report
- Where we are now:
  - Additional Review
  - GEI Addendum
  - Outstanding Questions
- Where we go from here:
  - Once Application Complete...
  - Public Comment
  - Planning Commission Recommendation
  - Township Board Vote to Approve or Deny
- Potential Outcomes?



# The Law

- The **Michigan Zoning Enabling Act (MZEA)** is the state law that governs how local units of government regulate land use development.
- MZEA limits the authority of local zoning ordinances to prevent mining unless "**very serious consequences**" (**VSCs**) that will result from the mine's operation outweigh "**need**" (i.e. public demand for the specific resource).



# The Sliding Scale

According to MZEA, the following factors may be considered:

- (a) The relationship of extraction and associated activities with **existing land uses**.
- (b) The impact on **existing land uses** in the vicinity of the property.
- (c) The impact on **property values** in the vicinity of the property and along the proposed hauling route serving the property, based on credible evidence.
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- (e) The impact on other identifiable **health, safety, and welfare** interests in the local unit of government.
- (f) The overall **public interest** in the extraction of the specific natural resources on the property.



# The Application

- Submitted November 17, 2025 by **American Aggregates of Michigan, Inc. (AAOM)**, a subsidiary of Levy Company, a Dearborn-based multi-national corporation with facilities across 12 countries and 14 U.S. states.
- The application package totals approximately **1, 120 pages**, including site plans, a hydrogeological report, a traffic study, and environmental assessments, all of which they commissioned for the application).
- The primary objective of the application is to obtain a **Conditional Use Permit** and **Site Plan Approval** from Norvell Township to extract construction-grade sand and gravel from a 625-acre site purchased from the Trolz Family.



# The GEI Report

- The township hired the engineering and environmental consulting firm, **GEI Consultants** (GEI), to review the AAOM application.
- On January 12<sup>th</sup>, GEI asked AAOM for clarification on 25 different points:
  - ❑ **Phasing Discrepancies:** The application and project report provide conflicting numbers of 5, 6, or 10 phases for extraction.
  - ❑ **Amount Discrepancies:** Marketable reserves of sand & gravel on the site are listed as 17 million tons in the application but only 10.4 million tons in the project report.
  - ❑ **Corporate Identity:** AAOM and Levy Co., are used interchangeably throughout the documents.
  - ❑ **Clerical Discrepancies:** “Exhibit 2” in the application is not the same as in the Table of Contents for Book 1; discrepancy between the "Intent and Purpose" statement and the Township Ordinance.



# The GEI Report - Groundwater

- AAOM proposes to extract sand and gravel only **above the water table** by staying 5' to 10' above the groundwater level (“dry mining”).
- GEI has asked AAOM to address the following:
  - Groundwater Cross-Sections:** GEI asked for cross-sections for each mining phase showing measured groundwater elevations relative to the ground surface to show that mining will not extend into the groundwater.
  - Water Table Limits:** GEI asked AAOM to acknowledge that any future plans to mine below the water table will require entirely new permitting.



# The GEI Report - Wash Water

- AAOM proposes to utilize an **existing agricultural well** to supply a **closed-loop recirculation system** for washing extracted sand and gravel and for on-site dust suppression.
- GEI has asked AAOM to address the following:
  - Gravel Washing:** Provide details on the closed-loop water recirculation system (How much water? What happens to settled material? Are surface settling ponds necessary?)
  - Well Specifications:** Provide the location, size, depth, and well logs for the existing agricultural well to ensure it is adequate.
  - Well Usage:** Clarify the intent of the statement that the "excavation process" will utilize existing agricultural wells.



# The GEI Report - Stormwater

- AAOM proposes containing all **stormwater runoff** within the project boundaries by directing it to low-lying **infiltration basins** and reclaimed areas for **groundwater recharge**.
- GEI has asked AAOM to address the following:
  - Detailed Stormwater Management Plan:** While the application discussed general drainage patterns, it failed to provide the detailed stormwater management plan required by Township Ordinance, including proposed grading, drainage easements, catch basins, retention/detention areas, and points of discharge for all drains and pipes.
  - Characterization Study:** GEI suggested a short-term stormwater characterization study to assess potential impacts.



# The GEI Report - Mitigative Measures

- AAOM promises it will work to "reduce or eliminate impacts that may be inherent in the mining process".
- GEI has asked AAOM to address the following:
  - Dust Control:** As required in the Township Ordinance, there needs to be on-site dust control (i.e. water or chloride on unpaved surfaces) and cleaning of paved surfaces (street sweeping to prevent dirt onto the roadway from truck traffic)? Is a plan in place for this control?
  - Chemicals:** The township should be provided with a copy of the Spill Prevention Control Countermeasure (SPCC) plan, the Pollution Incident Prevention Plan (PIPP), and a plan for the storage and handling of waste and hazardous materials, including anticipated chemicals and quantities (fuel, oils, grease, solvents, etc.)



# The GEI Report - Noise

- AAOM's Noise Study concluded that while noise in the vicinity will increase, it will remain within the Township Ordinance limits of 65 dBA for agricultural districts and 55 dBA for nearby residents.
- GEI has asked AAOM to address the following:
  - ❑ **Noise Study Methodology:** There are extensive questions regarding the noise study, including:
    - How one day of monitoring in December represents year-round conditions.
    - How truck acceleration and braking noise near residences was accounted for.
    - Details on the five monitoring locations in relation to noise sources.
  - ❑ **Stone Crushing:** Justification is needed for the 90 dB estimate for the stone crusher, since GEI's resources suggest active crushing operations can reach 80 to 100 dBA even at a 50' distance.



# The GEI Report - Surrounding Use

- AAOM's application states that "the Project Site's adjacent low density land use and the absence of significant environmental impacts are notable."

- GEI pointed out:

"The proximity of the proposed operation to the Watkins Lake State Park and County Preserve, and the potential impacts to the park should be discussed. The proximity of the two different land uses may be considered to be incompatible by some residents."





# The GEI Report - Conclusion

- Despite these issues, the GEI report unequivocally stated that “the extraction operation will not cause ‘very serious consequences’.”
- On February 4<sup>th</sup>, Irish Hills Concerned Citizens (IHCC) sent a memo to the Norvell Township Planning Commission with our initial response:

“GEI properly questioned a number of aspects of the mining proposal, including the mining company’s studies on noise, dust and hydrogeology. But GEI missed major gaps and anomalies in the mining company application in key areas, including traffic, property values, and the impacts on the adjoining Watkins Lake State Park and County Preserve. GEI also made wholly unsupported conclusions about the seriousness of the mine’s impacts and the need for the gravel from the mine.”



# Where are we now?

3/14/26



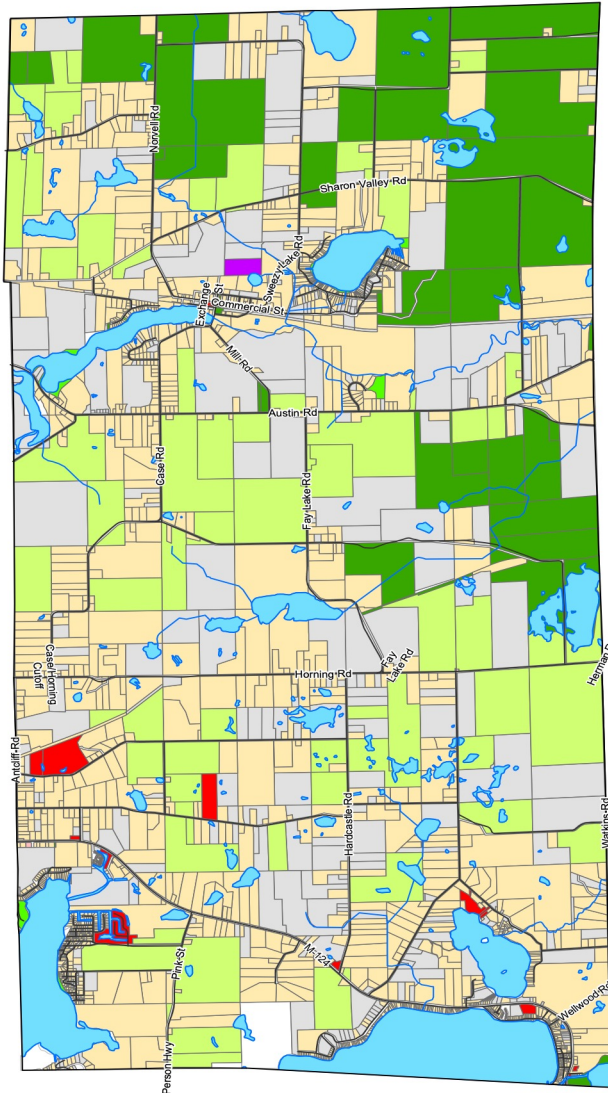
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## Existing Land Use

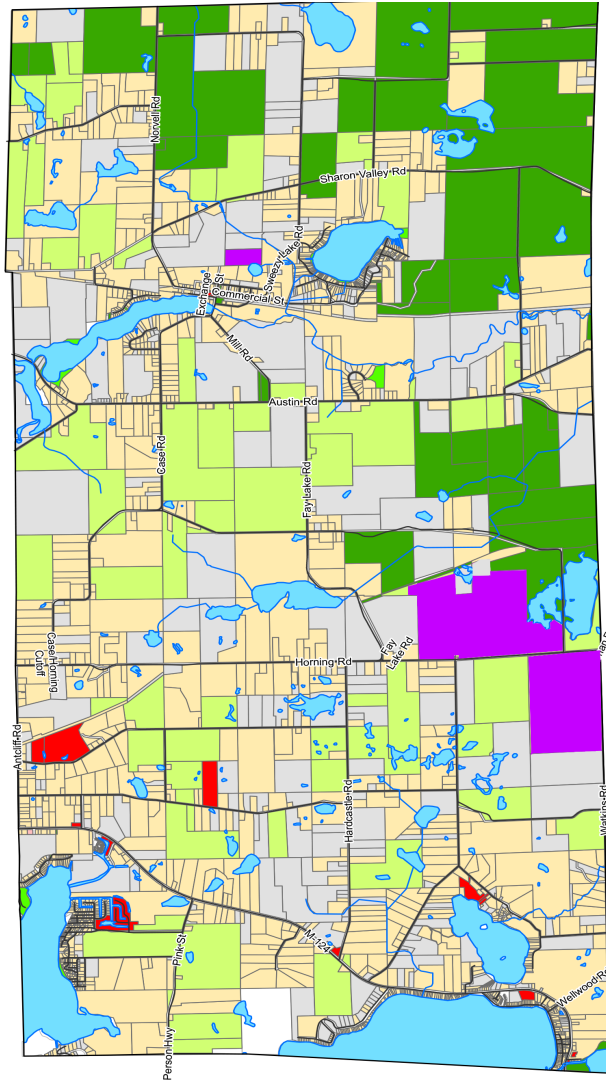


- Roads
- ▭ Township Boundary
- ▭ Agricultural
- ▭ Commercial
- ▭ Conservation
- ▭ Medical Facilities
- ▭ Industrial
- ▭ Institutional
- ▭ Parks
- ▭ Residential
- ▭ Vacant
- ▭ Unclassified
- Rivers and Streams
- ▭ Lakes and Creeks

Source:  
Norvell Township Master Plan



3/14/26



- Roads
- ▭ Township Boundary
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Source:  
Norvell Township Master Plan



0 0.5 1 2 Miles

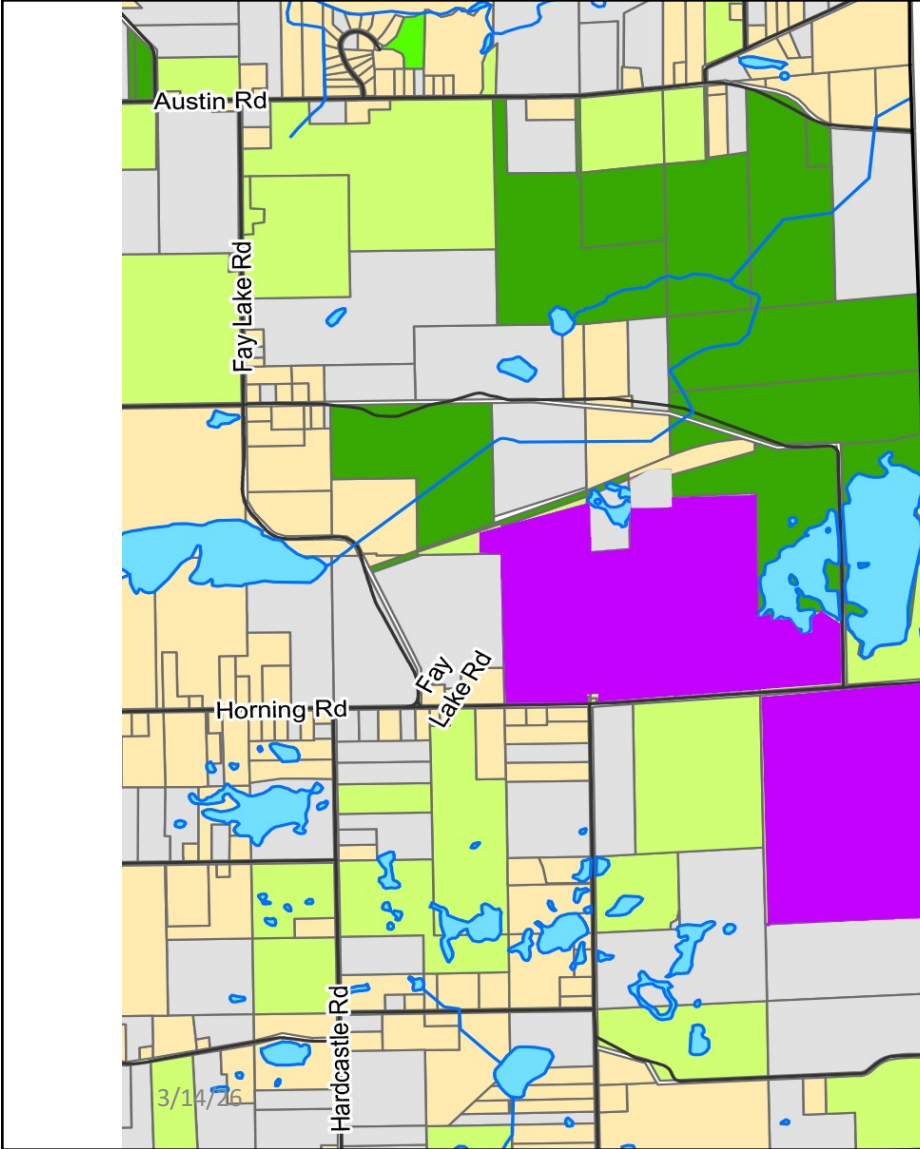


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- Roads
- ▭ Township Boundary
- ▭ Agricultural
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Source:  
Norvell Township Master Plan



0.5 1 2 Miles



# Watkins Lake State Park

- Watkins Lake State Park & County Preserve, dedicated in 2016, is Michigan's 103rd state park and the first in the state to be jointly managed by the Department of Natural Resources and a county recreation agency.

# Watkins Lake State Park

The site holds immense historical significance, bearing the name of pioneering settlers Royal and Sally Carpenter Watkins, whose 19th-century farm served as a key stop on the **Underground Railroad**.

# Watkins Lake State Park

- Today, the 1,122-acre park is a refuge for thousands of waterfowl and other birds, some of whom live there year-round and many more who travel through as they migrate. It is one of the most popular birding areas in the region, and a favorite place for hikers and families to enjoy a beautiful, quiet, remote experience in nature.

Irish Hills  
Concerned  
Citizens

# Watkins Lake State Park

Its most prominent feature is Watkins Lake itself, which serves as a designated seasonal waterfowl refuge, while a 4.5-mile former rail corridor provides a scenic route for hiking, bird-watching, and future community trail connections between Manchester and Brooklyn.

# Watkins Lake State Park

The park also protects over 90 acres of high-quality prairie fen, a rare groundwater-fed wetland community that is a primary focus of the park's conservation efforts. A particularly vulnerable ecosystem, they provide critical habitat for a number of species such as the federally endangered Mitchell's satyr butterfly and the Eastern Massasauga Rattlesnake.



Irish Hills  
Concerned  
Citizens

# Additional Review - WLSP

- Neither the application or the GEI report makes any attempt to determine the impact of the proposed mine on **birds or other wildlife** other than the small subset that may be threatened or endangered.
- GEI raises significant questions about the mine's **noise study**, but they are using the wrong measuring stick, as they do not address the special noise concerns of a state park that serves as a **bird refuge**. AAOM and GEI need to identify the noise level that would preserve bird migrations and nesting and then explain how the mine would meet that noise level.
- GEI says that the facility needs to better describe its **dust control plan** and we agree. But again, even if all dust is maintained on site (which has yet to be demonstrated), what is the impact on passing **birds**, and subsequently birders and other park users?
- These are only a fraction of the impacts on the park. Because the mine would **flatten nearby hills** and create dust, noise and night-time lighting, the other impacts to the park are likely to be significant.

# Additional Review - WLSP

- AAOM's application doesn't address the impact of the mine on **people who use the park** or on the **revenues and jobs** such a park creates.
- Shortly after the park was established, the Jackson County Road Commission designated Arnold Road as a **Natural Beauty Road** to preserve its unique vegetation and scenery.
- Additionally, The Watkins Lake State Park General Management Plan, adopted in 2018, includes a specific 10-year action goal to explore the potential for establishing the park as a **Dark Sky viewing location**.
- What steps would AAOM take to protect these **public recreation goals**?



Irish Hills  
Concerned  
Citizens

# Additional Review - WLSP

AAOM's application proposes mining at a distance of 150' or more from wetlands and 300' from Watkins Lake, which are minimum distances required by Township ordinance. However, the ordinance also provides, "Mining activity shall be prohibited within sixteen hundred (1,600) feet from the perimeter of.... any other natural resources as determined by the Township in its sole discretion."

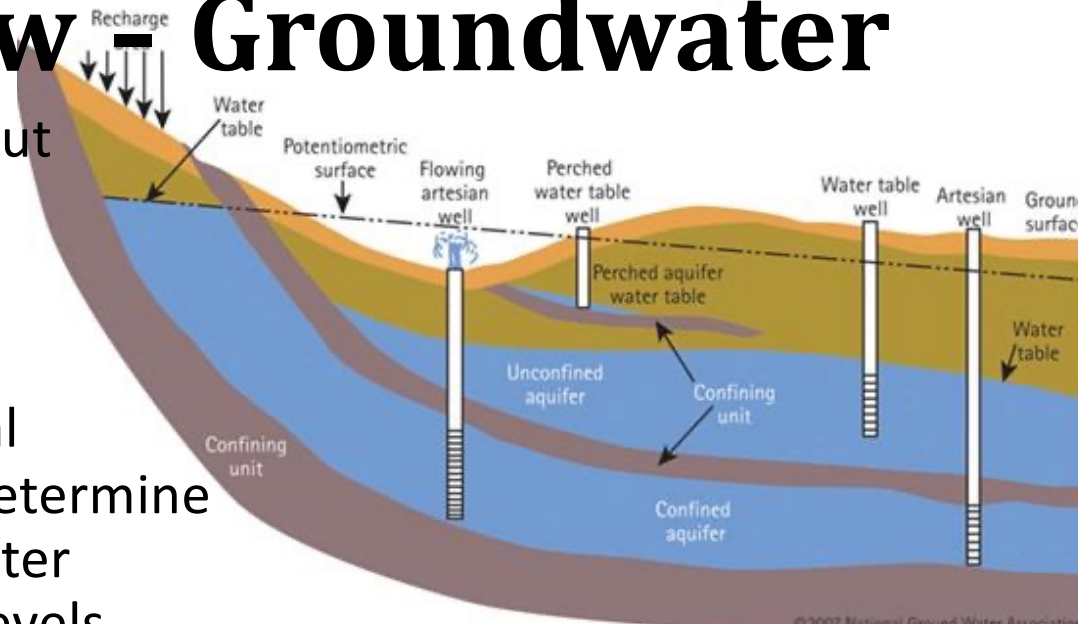


The park and Watkins Lake are among the most precious natural resources in the Township, and the Township has unfettered authority to protect them by prohibiting mining operations within 1,600' of them. Will the Township use that authority?

# Additional Review - Groundwater

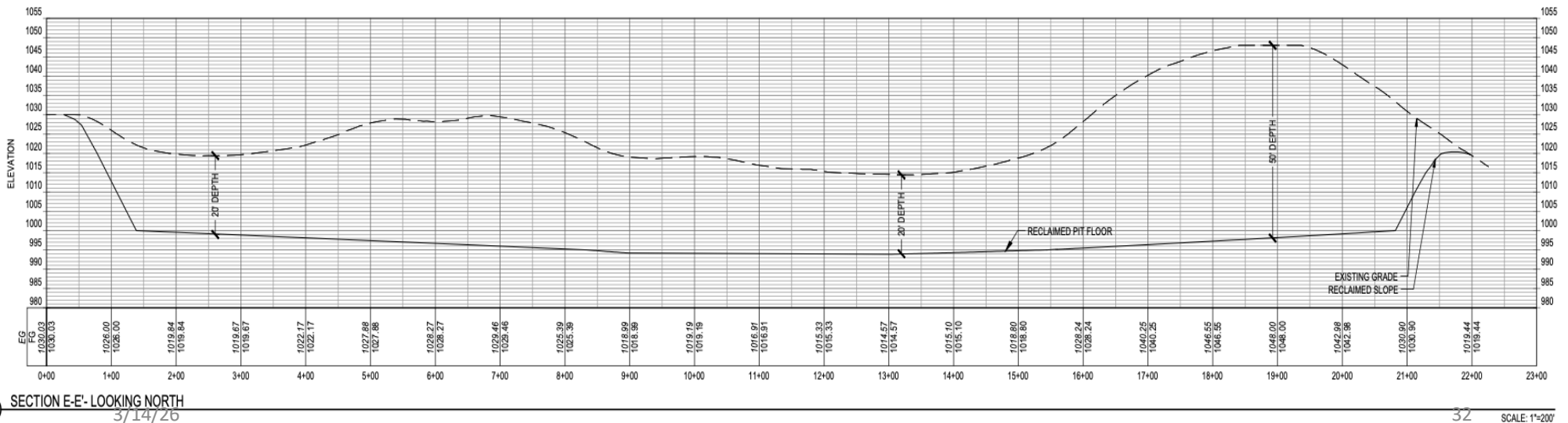
GEI asked a number of questions about the groundwater data, and hydrogeologists we have consulted have additional questions:

- They would like to see the geological cross sections of the boreholes to determine whether there is perched groundwater above the estimated groundwater levels.
- They would like to see a chemical analysis of the well water being used by AAOM in its processing. Because of previous agricultural use, the well water could contain high levels of nitrates, and because of the bedrock that houses the well, it could also contain arsenic—either of which would make the water toxic and unlawful to use.



# Additional Review - Groundwater

- Dry mining gravel operations can leave a site vulnerable to water contamination because while they do not use water for processing, they remove protective soil layers (up to 50' of sand and gravel), exposing groundwater to pollutants from surface runoff, fuel spills from machinery, and, in some cases, leaching of heavy metals from exposed rock.



SECTION E-E- LOOKING NORTH

3/14/26

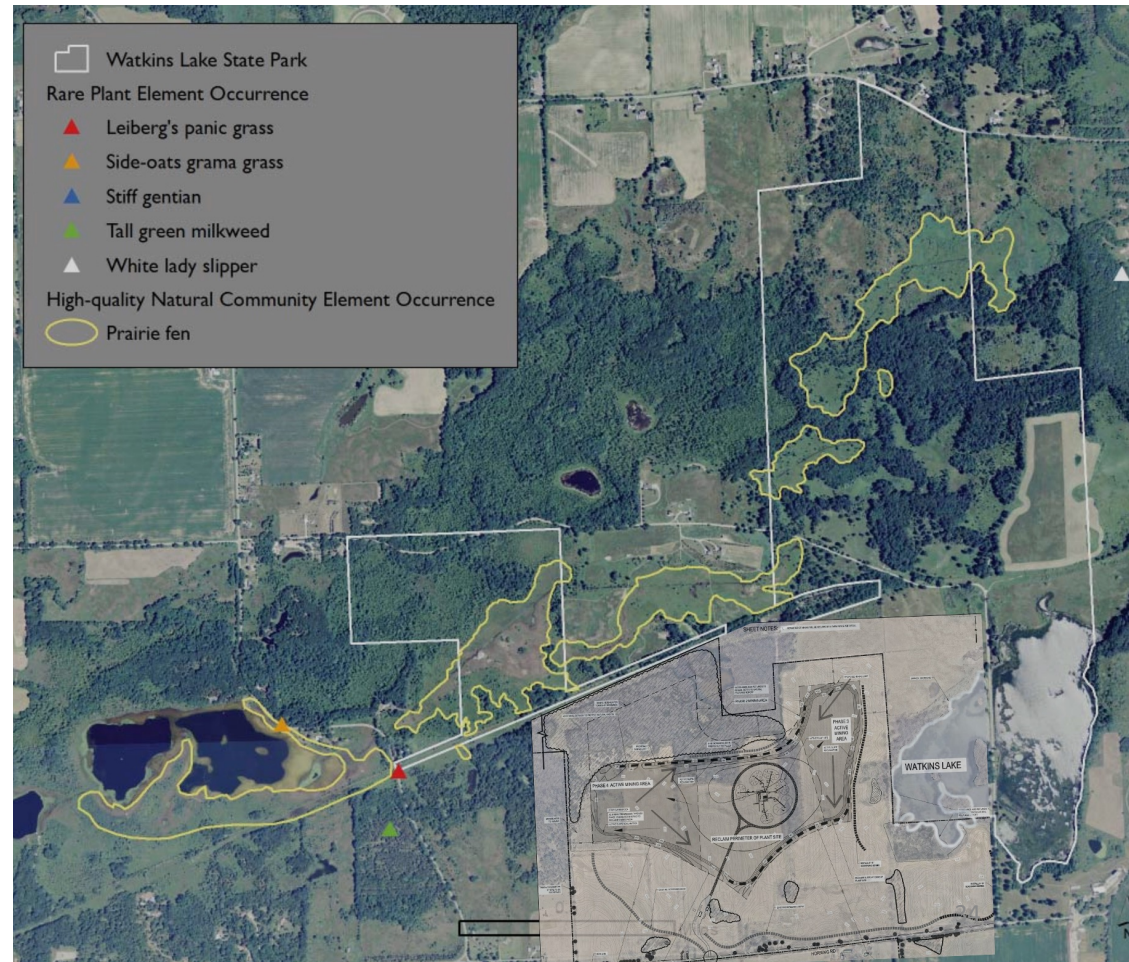
32 SCALE: 1"=200'  
VERTICAL SCALE: 10X

# Additional Review - Prairie Fens

- Prairie fens are vulnerable ecosystems that harbor high levels of biodiversity and provide potential habitat for numerous rare plant and animal species.
- They are sustained by specific cold, calcareous, groundwater-fed springs.
- Because they depend on stable groundwater flow and chemistry, changes to groundwater levels or movement in the surrounding landscape can threaten their long-term health.

# Additional Review - Prairie Fens

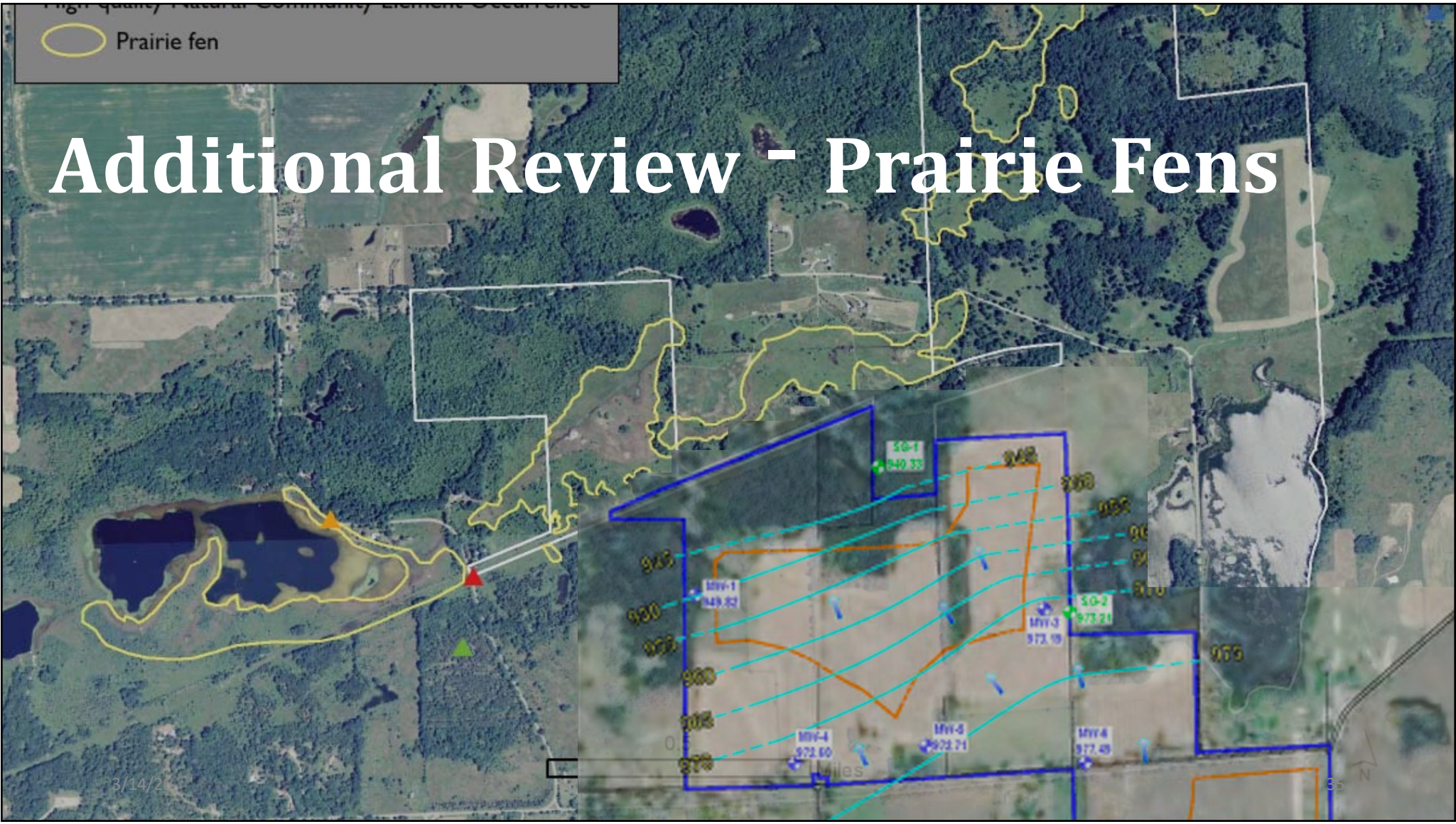
- Correspondence with US Fish & Wildlife in AAOM's application stated that **no prairie fens** were known to be in the vicinity of the proposed mine.
- However, **six occurrences** of prairie fens are in fact identified in Appendix A, all within 1.5 miles of the project site.
- In addition, the 2017 MNFI report for Watkins Lake State Park identifies the **Marsh Brook Prairie Fen Complex** immediately adjacent to the project boundary, including the Arnold Fen within approximately **100 feet** of the proposed mining area.



High Quality Natural Community Element Occurrences

○ Prairie fen

# Additional Review - Prairie Fens



3/14/20

# Additional Review - Prairie Fens

- The applicant's project report and subsequent reviews by GEI note that while regulated wetlands exist on the property, the proposed mining footprint and screening berms are designed to remain outside of these areas to avoid direct impacts regulated by Part 303.
- However, Part 303 of the Natural Resources and Environmental Protection Act (NREPA) protects wetlands on adjacent properties by regulating wetland systems that extend across property lines and by prohibiting activities on one property that would negatively impact the hydrology or integrity of wetlands on another.
- Will AAOM provide site-specific hydro-geologic modeling demonstrating that mining activity will not alter groundwater quantity, temperature, mineral composition, or introduce contaminants that could affect the Marsh Brook Fen complex?

# The Sliding Scale

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- (f) The overall **public interest** in the extraction of the specific natural resources on the property.



# Additional Review - Property Values

- AAOM's application included studies from three consultants that concluded that there would be no impacts on property values near the mine site or along the haul route. All the studies based their conclusions on the same methodology: comparing the sale values of homes they classified as similar, some of which were near mines and some which were not. This methodology is flawed. It does not measure the easily observable and direct impacts on property values by looking at home prices before and after a mine was sited near them or along the haul route.
- Other studies have done so, including several in Michigan, but the application did not consider those studies. These other studies show 20 percent reductions in property values for residences near gravel mines and 5-10 percent reductions of property values up to 3 miles from gravel mines.

# The Sliding Scale

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# Additional Review - Traffic

- AAOM's application proposes 18 gravel trucks an hour—9 full and 9 empty—for 10-13 hours a day, 5.5 days a week, for 20 years.
- The application identifies three potential haul routes, one of which would run several miles down a gravel road and all of which use Wampler's Lake Road and run through Hayes State Park.
- The application included a consultant's traffic study based on the analysis of traffic on February 13, 2023. The company's traffic study stated that traffic would be at a peak during that period and based nearly all its conclusions on that baseline study. Of course, everybody in the area knows that February 13, in the middle of winter, is one of the lowest volume traffic times of the year for these roads.
- In addition, the traffic study makes no projections on increased accidents, pedestrian safety or bike safety, or impacts to Hayes State Park.
- GEI signed off on the traffic study without asking any of these questions.

# Additional Review - Traffic

- **Excavation Surcharge:** Norvell Township's zoning ordinance would require AAOM to pay a **minimum excavation surcharge** of \$0.04 per ton for the remediation of adverse effects that mining activity has on local streets and roads.
- Roads have limited lifespans and high costs. MDOT estimates the average life of an asphalt road is about 15.5 years. The three proposed haul routes total 18.3 miles, and recent MDOT projects show rehabilitation costs around \$1.3M per mile and reconstruction costs exceeding \$5M per mile.
- Other Michigan counties have negotiated aggregate royalties ranging from \$0.75 to \$2.50 per ton, which is significantly higher than the current \$0.04 per ton excavation surcharge required by the ordinance.

# The Sliding Scale

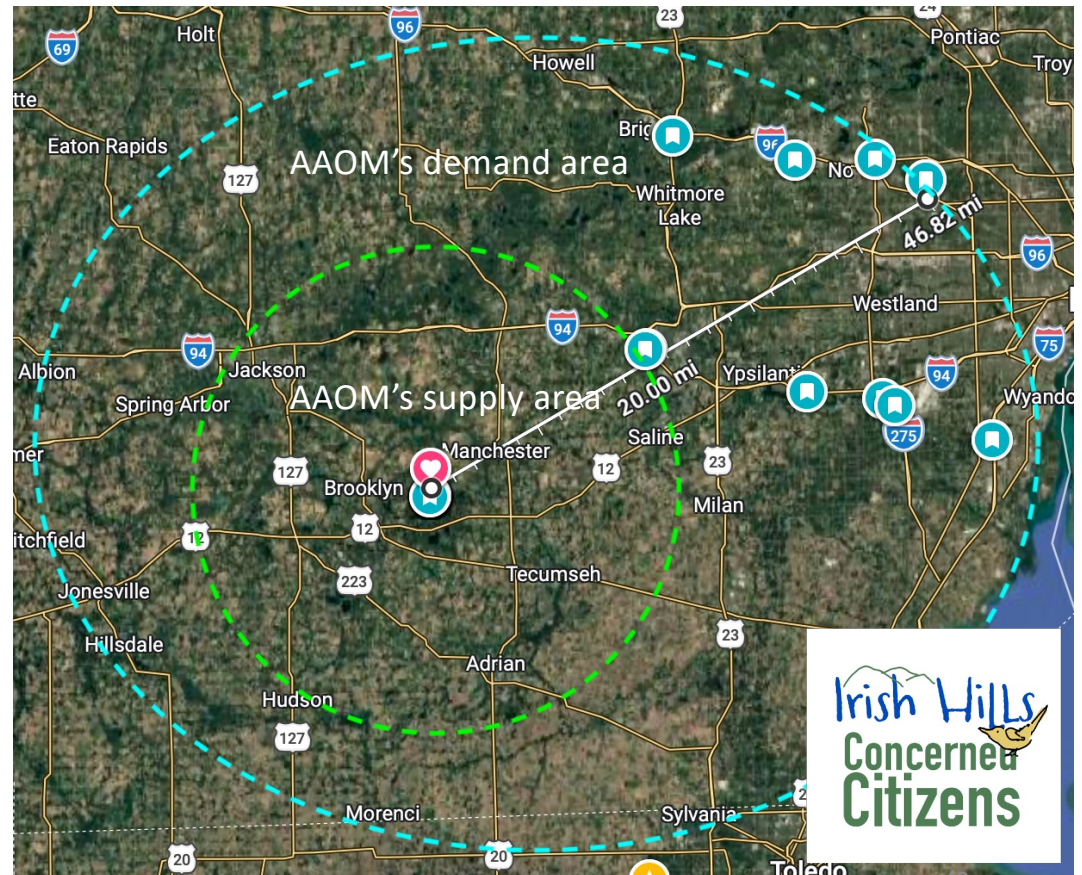
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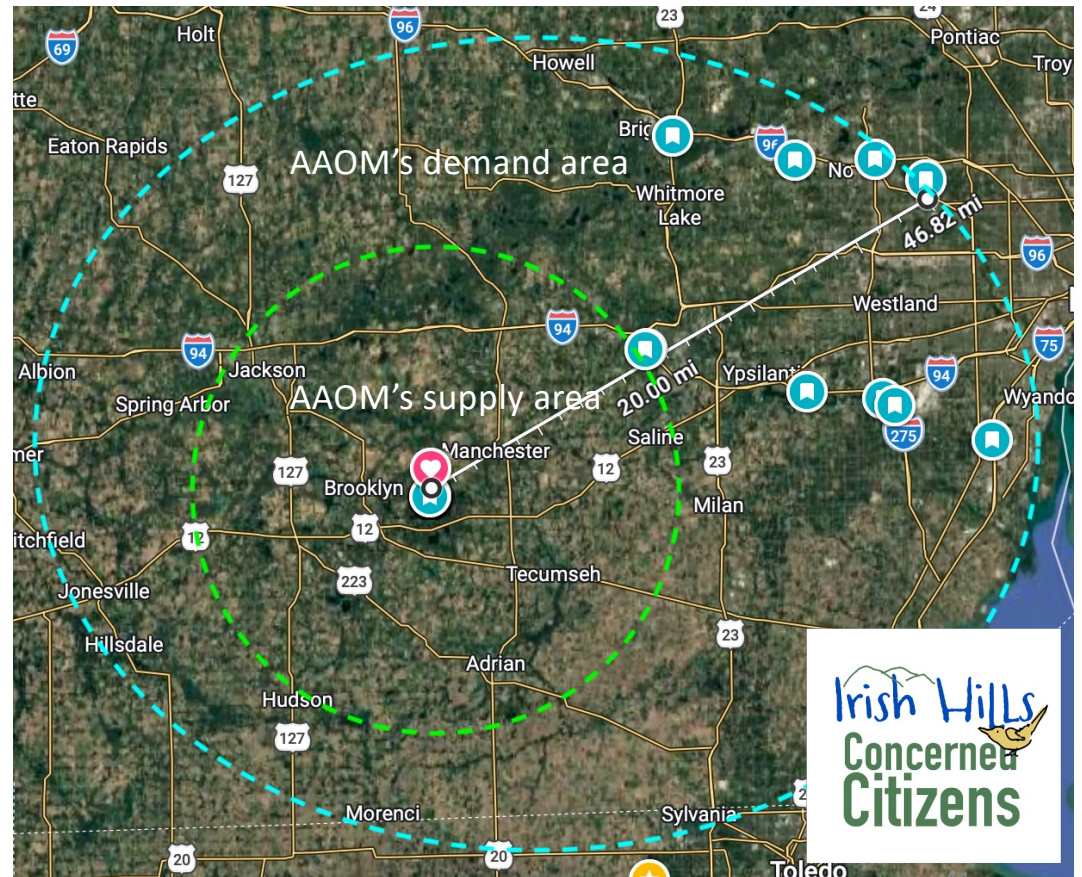
# Additional Review - Need

- AAOM's application identifies the market area served by the proposed Project in Norvell Township as extending "to the I-275 corridor to the east, I-96 corridor to the north, the western line of Jackson County to the west, and the Michigan / Ohio state line to the south."
- Subsequently, in its discussion of supply, they recognize only "five active sand and gravel operations within a 20-mile radius of the Norvell site."



# Additional Review - Need Cont.

- EGLE's database identifies 119 sand and gravel operations in Washtenaw County, 101 in Livingston County, 26 in Wayne County, 232 in Oakland County, and 37 in Monroe County. The application fails to account for any of these facilities in estimating the market demand for gravel, and GEI never asked for them to be included in the analysis.



# Additional Review - GEI Addendum

- On February 25<sup>th</sup>, GEI submitted an Addendum to their report.
- In it, GEI asked AAOM to address the following:
  - ❑ **Traffic:** Justification should be provided 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 to reflect expected near-peak traffic flow (including vehicle, bicycle, and pedestrian traffic) for the area surrounding the proposed mine.
  - ❑ **Natural Resource Setbacks:** 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”. 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.”



# Where are we now?

- On February 26<sup>th</sup>, IHCC Vice President Andy Buchsbaum met with Township Supervisor Bill Sutherland.
- Our concerns that have not yet been addressed are being considered for incorporation as part of the Township's request for additional information from AAOM.
- The Township is also consulting with EGLE regarding air quality and pollution control, as well as Jackson and Michigan Departments of Transportation regarding haul routes.



# Where do we go from here?

- **Investigate unanswered questions:** We will continue carefully reviewing the mining application to identify gaps, inconsistencies, and claims that require further verification.
- **Verify key claims and conduct independent research:** We are examining statements made by AAOM and comparing them with scientific research, expert input, and information from similar mining operations.
- **Collect and communicate community concerns:** We are actively gathering questions and concerns from residents, park users, and neighbors and making sure those concerns are clearly communicated to decision makers.
- **Keep the community informed:** As we learn more, we will continue sharing clear summaries, updates, and resources so community members can better understand the proposal and stay engaged in the process.



# What's Next in the Process?

- **The ball is in AAOM's court.** They will need to respond to GEI's 28 points (25 + 3 added), as well as additional information the Township is requesting.
- Once the Township deems the application complete, the findings will be presented to the Norvel Township **Planning Commission**.
- The Planning Commission will host one or more **Public Hearings** where residents will have the opportunity to express support, concerns, or ask questions about the proposed project.
- After the public comment period, the Planning Commission will make a **recommendation to the Board of Trustees**.
- The Norvell Township Board of Trustees will make the **final decision** on whether to **approve or deny** the permit.

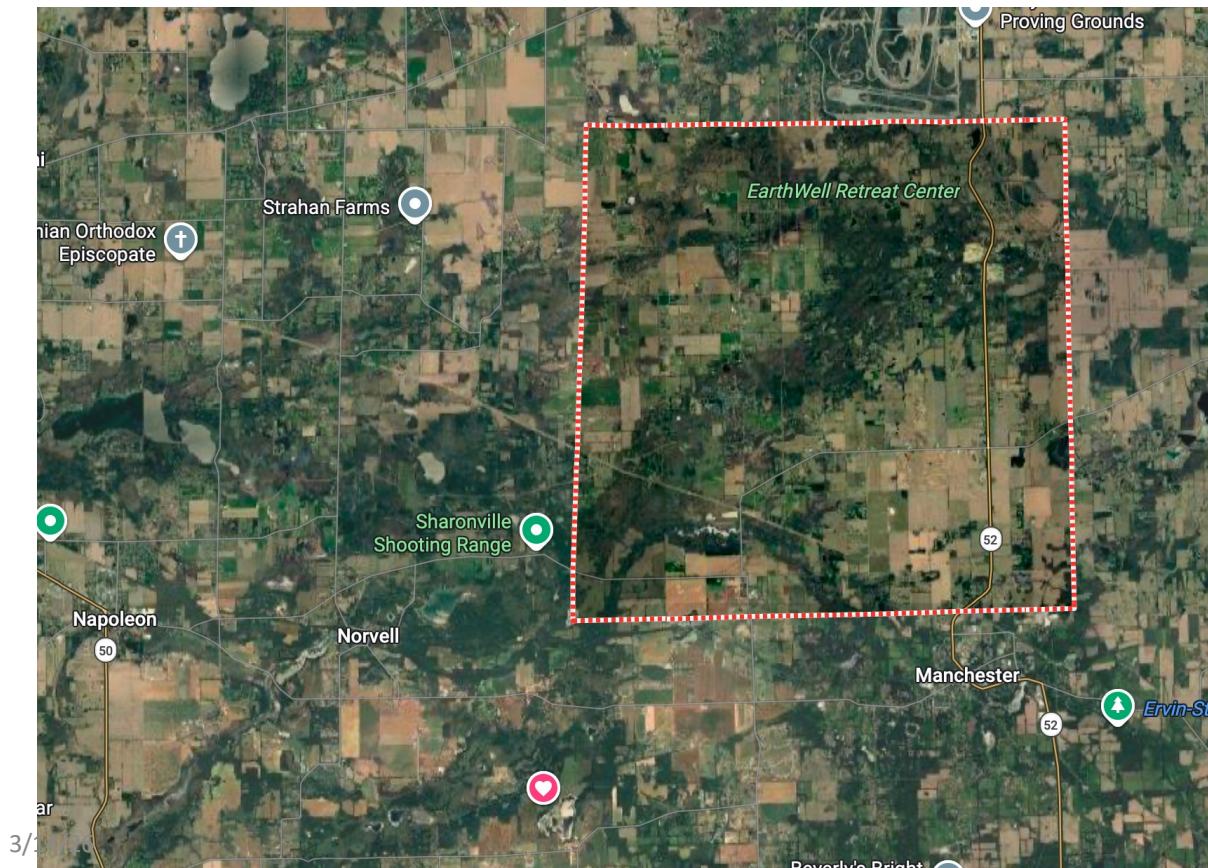


**What happens if...  
the permit is denied?**

**What happens if...  
the permit is approved?**



# Lessons from our Neighbors



Peter Psarouthakis,  
Former Sharon  
Township Supervisor



# Fundraising



## Sign brigade



Members of Irish Hills Concerned Citizens distributed yard signs last week in Brooklyn. Cathy King, Diane Merritt and Alicia DeCaria, members of the IHCC Community Outreach Committee handed out more than 100 signs from the All Saints Episcopal Church parking lot. American Aggregates of Michigan Inc. of Dearborn is seeking a conditional use permit for an aggregate mining operation on Horning Road. Photo courtesy Cathy King.



[IHCCinfo.org](http://IHCCinfo.org).

[protectpark@ihccinfo.org](mailto:protectpark@ihccinfo.org)