

Irish Hills Concerned Citizens

To: Julie Clark, Chair, State Parks Advisory Committee
From: Irish Hills Concerned Citizens
Re: Proposed gravel mine abutting Watkins Lake State Park
Date: April 12, 2026

We are writing today on behalf of Irish Hills residents who are concerned about the DNR's refusal to participate in the assessment of a proposed gravel mine in Norvell Township, adjacent to Watkins Lake State Park and County Preserve (WLP). The 625-acre mining project would abut Watkins Lake and its unique prairie fens, which famously attract migratory birds—and bird watchers from all parts of Michigan and beyond. In addition to leveling the hills next to the lake and park, the mining project would house an aggregate processing plant that would generate additional dust and noise less than 1200 feet from the lake and the park.

If approved, the mining activity would, without doubt, be detrimental to WLP's conservation goals and to the recreation goals of Walter J. Hayes State Park, which would straddle the haul route. As a neighbor of the proposed mine and as a steward of state land, the DNR has a clear responsibility to consider the potential risks to both parks and to bring concerns to the attention of the Norvell Township Board during its review process. The Norvell Township supervisor, township residents, our own organization and other park users have asked the DNR to participate, but the official DNR response has been to deny, implausibly, that it has a role to play (see letter).

We ask the Advisory Committee to demand that the Parks and Recreation Department uphold its mission to “protect, and preserve the natural, historic, and cultural features of Michigan's unique resources” by assessing the impacts of the proposed mine on the two state parks.

Here's what's at stake at WLP, as described in its General Management Plan:

“Natural Features

The variety of habitats within WLP, including wetlands and a large Prairie Fen complex of exceptional quality, create a heightened potential for the presence and observation of rare or threatened and endangered species. The eastern massasauga rattlesnake, bald eagle, Mitchell's satyr butterfly, and rare grassland birds make their homes here. The park is another link in a chain of protected lands in the region.” GMP, p. 11

“Peaceful Recreation

The rolling topography and expansive undeveloped areas within this park create beautiful vistas that are easily accessible from the former rail corridor running through the property. Such vantage points are rarely found on public land in the region. The scenic Watkins Lake provides a calm-water paddling and fishing experience with the absence of shore development. These recreation opportunities at WLP complement the more developed amenities and experiences offered at nearby Walter J. Hayes State Park.

“Waterfowl Viewing

WLP’s waterfowl refuge provides an excellent opportunity to see a wide variety of Michigan’s waterfowl, including diving ducks, such as scaup, canvasbacks, and wading birds. The refuge draws birders from the surrounding area and beyond, boosting the park’s attendance, particularly during the spring and fall migration. The road bisecting Watkins Lake provides easy access to exceptional waterfowl viewing opportunities.

“Community Connectivity

Within the greater Irish Hills area, between the urban centers of Jackson and Ann Arbor, WLP is situated in a region long associated with recreation and tourism. The preservation of WLP for public benefit and use reinforces and perpetuates the region’s character. The former rail corridor that runs through the park not only provides connectivity within the park, but creates the potential for future trail connections to the nearby village centers of Manchester and Brooklyn.

“Rural Michigan History

WLP’s history represents a well-documented example of the pioneering spirit in rural Michigan, providing many opportunities for interpretation. Its settlement story begins when the Watkins family moved to Michigan in 1834 and farmed their 800 acres of land, growing crops and raising livestock. The Watkins farm has close ties to the Underground Railroad network that operated in the area, assisting a number of those fleeing slavery.”
GMP, p. 22

Management zones described in the plan detail the park’s sensitive features (GMP pp. 26-29):

- Nine percent of the park is zoned "Ecologically Sensitive" and includes a rare prairie fen where “native species and natural processes take precedence over visitor accommodation.. and the overall character is pristine.” **This zone lies at the northern edge of the proposed mine site and the prairie fen is 100 feet from the project site.**
- Another ten percent, zoned “Primitive”, includes land abutting Watkins Lake to the east and north, and is managed with the same priorities. **It directly abuts the mine site.**
- A “Backcountry” zone – 38% - includes land north of the lake. “The character of the Backcountry Zone is natural, with minimal evidence of human impact through recreational use. **Much of it lies within half a mile of the proposed mine.**
- An “Ecologically Sensitive” overlay encompassing the area around Watkins Lake is protected by a Land Use Order of the Director. “This seasonal overlay prohibits public access in the vicinity of Watkins Lake...during the spring and fall migration. The purpose of this seasonal overlay is to protect waterfowl from human disturbance and to provide

exceptional waterfowl viewing opportunities. “ **This area is just across the road from the mining area.** . GMP p. 32

The Parks Department and the DNR may not have permitting authority over the mine under state law, but regardless, as an impacted neighbor of the proposed mine, they have an important role to play. Aggregate mining proposals are subject to the Michigan Zoning Enabling Act (MZEAA), the legal framework for local governments to regulate land development. Townships may deny a proposal if the project would produce “very serious consequences.” Among the factors that must be considered are:

- **The impact on existing land uses in the vicinity of the property and along the proposed hauling route serving the property, based on credible evidence.**
- **The impact on pedestrian and traffic safety in the vicinity of the property and along the proposed hauling route serving the property.**

Michigan Zoning Enabling Act, MCL 123.3205(5)

Clearly, a mine of the scale proposed in close proximity (adjacent to WLP on three sides) would impact the existing park land uses as detailed in its plan. Here are some concerns that Parks and Recreation could be voicing with authority - and on behalf of Michigan residents - as the owner of land in the vicinity of the project:

- **Impact of the mine on the park:** The application briefly addresses impacts of the proposed mine on a short list of threatened and endangered species known to exist on the mine property, but does not mention impacts on other wildlife on the mine property or in the park, where many special plants, insects, reptiles, amphibians, and birds have been documented. Nor does it address in any way the impact of the mine on people who use the park or on the revenues and jobs such park use creates. 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.
- **Water Pollution:** The application states that all stormwater runoff would be infiltrated back into the soils on-site. Experts who have reviewed the proposal question whether the on-site soils will have the capacity to infiltrate all the stormwater on the site, which could lead to runoff into Watkins Lake or the need to construct a drainage pond. Those experts also have questioned whether the gravel excavation will reach the water table, with potential impacts to the groundwater connection to Watkins Lake.
- **Distance of the mine from Watkins Lake and the park:** The application proposes mining at a distance of 150 feet or more from wetlands and 300 feet from the border of the park, which are minimum distances required by the Township ordinance. However, the Township 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.” Ordinance, Section 7.2.A.2. 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 feet of them. The question of whether the Township will exercise that

authority is a critical one for the state park, and the DNR's perspective would be highly informative for the Township.

- **Traffic:** The application proposes up to 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 haul route would run through Hayes State Park, where families and children often walk across the road from the campgrounds on one side to the beach at Wamplers Lake on the other. The application's traffic study, which determined that the increased truck traffic would have no serious consequences on the roadways, is based on an analysis of traffic present on February 13, 2023 (when the Hayes Park campgrounds were closed and there was little recreational activity in the area) and does not consider impacts on seasonal park traffic nor impacts on bike and pedestrian safety, even where the route bisects the park.

The concerns described above are significant. The DNR has a responsibility to care for its parks. If a project on the park boundary would harm the park, the DNR has no choice but to assess the risks and inform those who will make the decision -- in this case, the township. To remain silent is to abdicate its responsibility, **setting a precedent that could leave all Michigan parks vulnerable to damaging industrial development projects.**

For questions or follow-up, please contact Andy Buchsbaum, IHCC, at buchsbauma@gmail.com.