

# MYTHS v. FACTS from Concerned Citizens

## About This Document

AAOM (American Aggregates of Michigan) has applied to open a large-scale industrial sand and gravel mine adjacent to Watkins Lake State Park & County Preserve in Norvell Township, Michigan. This document addresses common assumptions about the project.

## About Irish Hills Concerned Citizens (IHCC)

IHCC's mission is to protect Watkins Lake State Park & County Preserve, its birds and wildlife, and the rural character of the surrounding region. We are an all-volunteer organization registered with the state of Michigan as a nonprofit. We have no financial stake in the outcome of this application.

---

### **MYTH: “The mine will be a financial windfall for the township and its residents.”**

**FACTS:** Despite promising future benefits to the community, AAOM's application provides no supporting evidence for this claim. Instead we know:

- The mine would employ only 6 to 8 people, including some existing employees.<sup>1</sup>
- Studies of property values near other Michigan gravel mines found reductions of up to 30%,<sup>2</sup> which can reduce taxable property values and, in turn, local tax revenues over time.
- The application proposes 9 inbound and 9 outbound gravel trucks per hour – one truck passing every three to four minutes.<sup>3</sup> Heavy truck traffic accelerates road damage, with repair costs that may exceed any financial benefits the township receives.<sup>4</sup>

**BOTTOM LINE:** *Any potential tax revenue must be weighed against likely costs to local roads, nearby property values, and the rural character of the community. A gravel deposit is finite, while its impacts on roads, land use, and community character may persist long after extraction ends.*

---

### **MYTH: “The land has already been degraded; a gravel mine wouldn't make it worse.”**

**FACTS:** Farmland and gravel mines are not equivalent land uses. A large industrial mine would fundamentally alter the landscape to the detriment of the rural character of the entire area around it.

- The proposed mine would convert hundreds of acres of rural land into an industrial extraction site, changing the character of the surrounding community for at least the next 20 years.
- Unlike agriculture, gravel mining removes the land itself. Even after extraction ends, the impacts on land use, viewsheds, and community character can persist for generations.
- The proposed site borders the Marsh Brook Prairie Fen Complex, a rare groundwater-fed ecosystem that is highly sensitive to changes in groundwater flow.<sup>5</sup> These ecosystems protect water quality for more than 178,000 Michiganders living within the River Raisin Watershed.<sup>6</sup>
- Prairie fens harbor high levels of biodiversity and provide critical habitat for numerous rare plant and animal species. Watkins Lake State Park and the adjacent Arnold Fen supports numerous rare and protected plant and animal species, and AAOM's own application identifies multiple state or federally listed species with suitable habitat nearby.<sup>7</sup> AAOM's own application identifies 11 state or federally listed species with suitable habitat nearby.<sup>8</sup>
- Groundwater doesn't respect property boundaries. Hydrogeological analyses indicate that groundwater flowing through the proposed mining area helps sustain nearby wetlands and fens. Changes to groundwater recharge or flow patterns may threaten these sensitive ecosystems, even when mining does not occur directly within the wetlands themselves.<sup>9</sup>

- Michigan's ecological assessments recommend maintaining natural buffers around prairie fens to protect their hydrology and ecological integrity.<sup>12</sup> Industrial mining along the fen boundary is inconsistent with that recommendation.

**BOTTOM LINE:** *The question at hand isn't about this land's past use, it's about its future use. Is replacing rural land with a large industrial mine an appropriate land use next to a state park and sensitive wetlands? We believe the answer is an unequivocal "no".*

---

### **MYTH: "We need gravel and it has to come from somewhere."**

**FACTS:** The issue isn't "gravel or no gravel." The question is whether a large industrial mine belongs next to a state park, near sensitive wetlands and wildlife habitat, with a haul route along busy lake communities.

- Michigan law (MCL 125.3205) requires the township to consider the relationship of the proposed extraction to existing land uses and its impact on land uses in the vicinity.<sup>13</sup> The proposed site borders Watkins Lake State Park & County Preserve, a waterfowl refuge with a documented bald eagle nest,<sup>14</sup> and is adjacent to globally rare prairie fens supporting endangered and threatened species.<sup>15</sup>
- AAOM argues that only large parcels like this one can support a viable modern mining operation.<sup>16</sup> But using AAOM's own measure of activity applied to their stated market area, IHCC identified at least 14 active sand and gravel operations – of varying sizes – currently producing and serving that market.<sup>17</sup> This analysis uses Mine Safety and Health Administration (MSHA) production and employment records to identify operations with recent reported activity, applying a consistent methodology to AAOM's own market-area assumptions. AAOM acknowledged only five operations, drawn from a far narrower 20-mile radius.<sup>18</sup>
- What AAOM is describing when it insists on large-scale operations isn't a public necessity – it's a business model. Michigan law requires the township to weigh the overall public interest in the extraction, not the applicant's return on investment.<sup>19</sup> A site that maximizes AAOM's profitability is not necessarily a site that serves this community's interests.

**BOTTOM LINE:** *This dispute isn't over whether Michigan needs gravel. What this community is asking is whether this particular location – next to irreplaceable public land, above a sensitive groundwater system, along residential roads and a state park — is where that gravel should come from. AAOM hasn't answered that question. They've answered a different one: whether this location is profitable for them.*

---

### **MYTH: "There's nothing we can do to stop the mine."**

**FACTS:** In reality, the legal framework supports a well-grounded denial:

- Under MCL 125.3205, the township may deny a mining permit if "very serious consequences" would result. The applicant bears the burden of proof – not the township.<sup>19</sup>
- In 2022, the Norvell Township Board, following advice from the township attorney, adopted an updated mining ordinance governing permit applications for mineral extraction, using the more mandatory phrasing that a permit "shall be denied" if an applicant like AAOM fails to demonstrate that "no very serious consequences" would occur.<sup>20</sup>
- Sharon Township recently denied a similar mining application and has successfully defended that decision. The court upheld the denial in part because the applicant failed to demonstrate genuine market need within a feasible delivery radius – one of the same weaknesses present in AAOM's application.<sup>21</sup>

**BOTTOM LINE:** *Norvell Township has real legal tools to deny this permit – and a recent precedent showing those tools work. As concerned citizens, our goal is to make sure*

---

*decision-makers have the information and credentialed expert evidence to make a legally defensible decision. The greatest risk here isn't fighting this mine – it's being intimidated into making an ill-considered decision that would ultimately harm our community.*

---

**MYTH: “Fighting the mine would bankrupt Norvell Township, and we’d still end up with a gravel pit.”**

**FACTS:** AAOM and its parent company Levy Co. are indeed large companies with substantial resources. But that doesn’t mean Norvell Township is powerless.

- Norvell Township carries commercial insurance through the Michigan Township Participating Plan to cover risks of losses, including torts and errors and omissions.<sup>22</sup>
- IHCC is raising funds for a legal defense fund. The township’s legal team has verified that outside entities can help it support their decision, if additional legal or technical support is needed in the event AAOM challenges the decision in court.
- The Sharon Township denial demonstrates that a permit denial grounded in the law and the factual record is defensible. It is essential that evidence is presented by credentialed experts in order for it to stand up in court. Sharon Township officials have confirmed that their insurance has covered all litigation costs to date following their denial of a similar permit.<sup>23</sup>
- *The Township is also likely to be sued if they approve the permit. Lawsuits are common when permits for large extraction projects are decided – whether the decision is to approve or deny.*

**BOTTOM LINE:** *Michigan townships carry insurance, and recent experience shows that a well-supported denial can withstand legal challenges. The best defense against these lawsuits is for the Township’s decision to be grounded in evidence and arise from a legal process – not fear of litigation itself.*

---

**MYTH: “Opposition is mostly coming from people outside Norvell Township.”**

**FACTS:** Opposition to this mine has come mostly from within Norvell Township, as well as beyond it:

- Over 800 Norvell Township property owners have signed petitions opposing this mine – representing 36% of unique private property owners in the township.<sup>24</sup>
- The proposed site sits on the township border, directly affecting residents in adjacent Manchester Township as much as, if not more than, many residents of Norvell Township. Additionally, the site borders Watkins Lake State Park, a public resource belonging to all Michigan residents, and the proposed haul route passes through Hayes State Park as well as multiple townships along US-12.<sup>25</sup>
- Michigan law recognizes this reality. Under MCL 125.3205, the township is explicitly permitted – and in some cases required – to consider impacts in the “vicinity of the property” and along “proposed hauling routes.”<sup>26</sup>
- Norvell’s own Master Plan includes strategies to coordinate planning with neighboring communities regarding shared resources.<sup>27</sup>

**BOTTOM LINE:** *This is not an “us vs. them” issue. Hundreds of Norvell residents oppose the mine, and its impacts would extend to neighboring townships, state parks, and communities along the haul route.*

---

**MYTH: “Those opposing the mine must be making money from this fight.”**

**FACTS:** This claim is false:

- IHCC is an all-volunteer organization currently applying for 501(c)(4) nonprofit status with the IRS. We have no financial stake in the outcome of this application.
- We are raising funds primarily to hire credentialed experts – because if the mining company sues the township for denying the permit, expert opinions must hold up in court.
- AAOM has been developing this application for several years and has invested substantial resources in the project. Our fundraising goal of \$150,000 is relatively modest in comparison.
- We are thoughtful and transparent about every dollar spent. Any community member with questions about our finances is welcome to meet with us directly.

**BOTTOM LINE:** *Attacking who is speaking up doesn't answer whether the mine is a good idea. The real questions are about impacts – to roads, property values, water, parkland, and community character.*

---

## THE BIG PICTURE

The existence of gravel does not automatically justify mining it at this location. Michigan law requires decision-makers to weigh the public value of extraction against its impacts on neighboring land uses, natural resources, public infrastructure, and the broader community.

This proposal would place a large industrial mine next to a state park, near rare wetlands, above a sensitive groundwater system, and along roads used daily by residents and visitors. It would decrease the values of hundreds of properties in the Township. The question before Norvell Township is whether the benefits of this mine outweigh those impacts. That decision should be based on facts, expert evidence, and the public interest – not assumptions, pressure, or fear of litigation.

IHCC remains committed to ensuring that residents and decision-makers have access to the facts, expert analysis, and public participation needed to make that decision wisely.

## SOURCES & CITATIONS

---

1. SmithGroup, Project Report: Norvell Sand and Gravel Site (Ann Arbor, MI: SmithGroup, November 14, 2025), 49, submitted to Norvell Township, MI.
2. George A. Erickcek, "An Assessment of the Economic Impact of the Proposed Stoneco Gravel Mine Operation on Richland Township" (Kalamazoo, MI: W.E. Upjohn Institute for Employment Research, August 15, 2006), prepared for the Richland Township Planning Commission, available at <https://research.upjohn.org/reports/222>
3. Fishbeck, Inc., "Traffic Impact Study," Exhibit 3 of American Aggregates of Michigan's Application for Site Plan Approval, Conditional Use Permit and Mining Permit, November 17, 2025, Section 3.2, p. 7.
4. Allan Bradley and Papa-Masseck Thiam, "Analysis of car and truck pavement impacts" (FPInnovations Info Note, October 2018).
5. Michigan State University Extension, "About Fens," Restoring Fens Educational Resources, June 2026, [msu.edu](https://msu.edu).
6. Legacy Land Conservancy, "Letter to Norvell Township Planning Commission re: AAOM Conditional Use and Mining Permit Application," February 11, 2026.
7. See citation 6 (Legacy Land Conservancy letter, February 11, 2026).
8. American Aggregates of Michigan (AAOM). Application for Special Land Use Permit, Norvell Township, Jackson County, Michigan. November 2025. On file with Norvell Township.
9. Pangea Environmental LLC (Michael Wilczynski, Principal Geologist). Initial Hydrogeological Desktop Study of Watkins Lake State Park and Nature Preserve. Prepared for Irish Hills Concerned Citizens. May 9, 2026.
10. See citation 8 (AAOM application).
11. See citation 9 (Pangea Environmental LLC, May 9, 2026).
12. Michigan Natural Features Inventory (MNFI). Natural Features Inventory and Management Recommendations for Watkins Lake State Park. Report 2017-03. Michigan State University, 2017. Available: [mnfi.anr.msu.edu/reports/MNFI-Report-2017-03.pdf](https://mnfi.anr.msu.edu/reports/MNFI-Report-2017-03.pdf)
13. Michigan Compiled Laws (MCL) 125.3205. Michigan Zoning Enabling Act – Natural Resources Extraction. Available: [legislature.mi.gov](https://legislature.mi.gov)
14. ASTI Environmental, "Threatened and Endangered Species Survey and Habitat Assessment," Exhibit 7 of American Aggregates of Michigan's Application for Site Plan Approval, Conditional Use Permit and Mining Permit, November 17, 2025, pp. 5, 14.
15. See citation 12 (MNFI Report 2017-03).
16. SmithGroup, "Project Report," American Aggregates of Michigan's Application for Site Plan Approval, Conditional Use Permit and Mining Permit, November 17, 2025, Section 3.4.2, p. 17.
17. MSHA Employment/Production Dataset (Yearly) and MSHA Mines Dataset. U.S. Dept. of Labor, Mine Safety and Health Administration. Accessed June 5, 2026. [arlweb.msha.gov/opengovernmentdata/ogimsha.asp](https://arlweb.msha.gov/opengovernmentdata/ogimsha.asp). Methodology: filtered for active Michigan sand and gravel operations reporting employee hours within AAOM's stated market area; government-owned operations excluded by operator/controller name review; 16 qualifying operations identified (14 with substantial hours; 2 with under 200 employee hours).
18. SmithGroup, "Project Report," American Aggregates of Michigan's Application for Site Plan Approval, Conditional Use Permit and Mining Permit, November 17, 2025, Section 3.4.2, p. 18.
19. See citation 13 (MCL 125.3205).
20. Norvell Township Board of Trustees, Special Meeting/Work Session Minutes, May 4, 2022.
21. Michigan Materials and Aggregates Co. d/b/a Stoneco of Michigan v. Sharon Township. Case No. 23-1102 AV. Washtenaw County 22nd Judicial Circuit Court, Hon. Timothy P. Connors. Decided August 9, 2024.
22. Norvell Township 2024–25 Amended Budget, General Fund Expenditures, Dept. 101.000 (Township Board), Account 101-101.000-912.000 (Liability Ins).
23. Psarouthakis, Peter. Former Supervisor, Sharon Township. Statement regarding insurance coverage of litigation costs following mining permit denial. IHCC Community Meeting, March 14, 2025.
24. Irish Hills Concerned Citizens, petition records, June 10, 2026.
25. SmithGroup, Project Report: Norvell Sand and Gravel Site, November 14, 2025, pp. 3, 44, 46, 60.
26. Michigan Zoning Enabling Act, MCL 125.3205(5)(b)–(d).
27. Norvell Township, "Norvell Township 2024 Master Plan," June 19, 2024, Future Land Use Chapter, Goal Table. Available: [norvelltpw-mi.gov/wp-content/uploads/2024/06/Norvell-Township-2024-Master-Plan-Reduced.pdf](https://norvelltpw-mi.gov/wp-content/uploads/2024/06/Norvell-Township-2024-Master-Plan-Reduced.pdf)