



Memorandum

To: Norvell Township Planning Commission members
CC: Norvell Township Trustees
From: Irish Hills Concerned Citizens
Re: Proposed gravel mine abutting Watkins Lake State Park
Date: February 4, 2026

Irish Hills residents have concerns and questions about a proposed gravel mine adjacent to Watkins Lake State Park and County Preserve and the report of the consultant, GEI Consulting, retained by the Township to review the mining proposal. As described in more detail below, 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 significance of the mine's impacts and the need for the gravel from the mine. We ask the Planning Commission to require GEI to redo its analysis, or in the alternative, retain another consultant.

American Aggregates of Michigan filed an application with Norvell Township in November, 2025, to mine gravel on a 900-acre site immediately abutting the park and Watkins Lake itself. According to the application, the company would mine 625 acres of the site; they would not dig under the water table; they would process the aggregate on-site; and the haul route would travel down residential roads, roads with bike lanes, roads that cross another state park (Hayes State Park), and roads that serve popular vacation and summer recreation areas like Wampler's Lake, Round Lake and Mud Lake.

The application alleges that the mine's gravel is needed in the market and that the mine would cause no very serious consequences, the standards the Township ordinance requires a mining company to prove before issuing a permit to mine. The application includes some studies by consultants that concluded there would be little to no impacts on nearby wetlands or endangered and threatened species, or problems from dust, noise, groundwater shortages or contamination, runoff or traffic. The studies also claimed there would be no impact on the surrounding community's property values or from traffic.

The Township hired an outside consulting firm, GEI Consulting, to review the application. GEI raised multiple questions about the sufficiency and accuracy of many of the studies (particularly noise and hydrogeology), but nevertheless concluded that the mine would cause no "very serious

consequences,” that it would “increase local tax base, diversify the local economy, and provide job opportunities,” and that it would fill a market need for construction-grade gravel. It provided no basis or reason for those conclusions.

At a public meeting sponsored by Irish Hills Concerned Citizens (IHCC), many Norvell Township and other Irish Hills residents raised concerns and asked important questions that neither the application nor the GEI report addressed. Many of these questions go to whether the proposed mine causes very serious consequences; some addressed the market need for the gravel to be mined. IHCC is providing these questions and concerns here on a preliminary basis. We expect additional questions and concerns will arise as we and other Irish Hills citizens do more research and learn more about the proposal. Here are our major questions and concerns so far.

Very Serious Consequences:

State law defines the factors that must be considered when assessing whether a proposed mine will have “very serious consequences:”

(5) In determining under this section whether very serious consequences would result from the extraction, by mining, of natural resources, the standards set forth in *Silva v Ada Township*, 416 Mich 153 (1982), shall be applied and all of the following factors may be considered, if applicable:

- 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.
- d) The impact on pedestrian and traffic safety in the vicinity of the property and along the proposed hauling route serving the property.
- 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.

Michigan Zoning Enabling Act, MCL 123.3205(5)

Each of the issues below addresses one or more of those factors.

- **Impact of the mine on the park:** Watkins Lake State Park and County Preserve 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. 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. 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. They purportedly address potential water pollution to Watkins Lake and impacts on hydrogeology (more on that below), but those 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.

- **Noise from the mine and the aggregate processing:** GEI raises significant questions about the mine's plan to lower noise to the levels allowed by the Township ordinance, and those need to be addressed. But GEI and the mining company are using the wrong measuring stick. The Township ordinance is the legal standard for everywhere in the township, but it doesn't address the special noise concerns of a state park that serves as a bird refuge. The mining company 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.
- **Dust from the facility:** 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, what is the impact on birds, birders and park users? A 900-acre dust plume immediately abutting Watkins Lake is likely to have substantial impacts, even if it is kept within the 900 acres (which has yet to be demonstrated).
- **Groundwater:** The application promised to keep at least 5 feet above the water table while mining and included summaries of data from boreholes drilled on the proposed mining site to establish that such mining would be possible given existing groundwater levels. 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. And they would like to see a chemical analysis of the well water being used by the company 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.
- **Surface water runoff:** The application stated that all process water and stormwater runoff would be infiltrated back into the soils on-site. GEI wanted more detail in the stormwater and process water plans, especially the closed loop system they plan to use, and the experts we consulted agree. They question whether the on-site soils will have the capacity to infiltrate all the process and stormwater on the site, which could lead to runoff into Watkins Lake or the need to construct a drainage pond.
- **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 500 feet from the border of the park, which are minimum distances required by the 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.” 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. Will the Township use that authority?

- **Traffic:** The American Aggregates 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 Wampler’s Lake Road and other area roads on February 13, 2023. The company’s traffic study stated that traffic would be at a peak during that period and based all its conclusions on the February 13 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. This is a lake region, with populations and traffic that increase dramatically in the summer. The 4th of July week would be a far better measure of peak traffic conditions. In addition, the traffic study makes no projections on increased accidents, pedestrian safety or bike safety, especially on Wampler’s Lake Road. Nor does it assess the increased traffic and impacts on Hayes State Park. Finally, it does not address in any way the increased road construction and maintenance costs that would ensue. The Township’s consultant, GEI, signed off on the traffic study without asking any of these questions.
- **Property values:** The mining company’s application included studies from three consultants—one in Michigan and two national—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. Yet GEI approved of the mining company’s studies without considering the Michigan studies or the flawed methodology of the mining company’s studies.

Need for the gravel to be mined:

The application measures the need for the gravel by assessing the gravel-producing capabilities of five facilities within a 20-mile radius of the proposed mine, and comparing those with needs of customers in locations including Romulus, Ann Arbor and Novi. Without further analysis, GEI approved of the application’s conclusions. But many of the locations identified as customers are far beyond the 20-mile supply radius; they would

receive aggregate from facilities the application never considered. For example, Romulus customers are far more likely to buy gravel from facilities closer to Romulus than the proposed mine, which is 50 miles from Romulus, but the application ignores those facilities. It likewise ignores the facilities closer to the Novi and Ann Arbor customers identified in the application. In fact, there are hundreds of gravel mines as close or closer to the Romulus, Novi and Ann Arbor customers identified in the application. 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.

The concerns and questions described above, although preliminary, are significant. Some were raised by GEI, but a disturbing number were not. At a minimum, GEI should do another, more thorough analysis of the application and resubmit its report. It should also stop making conclusions (about very serious consequences and the completeness of the application) that are contradicted by the questions it raises and the concerns above. Finally, it should refrain from making conclusions on the economic and job consequences of the proposed mine when there is so much data missing.

Once GEI does a re-review of the application, we believe it is highly likely that the American Aggregates proposal will indeed demonstrate very serious consequences.

We will continue to collect questions and research from concerned Irish Hills residents and supplement this memo as we receive additional information.

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