

Blue Heron Headwaters Conservancy

P.O. Box 285

Clarkston, MI 48347

www.blueheronheadwaters.org

June 9, 2025

Springfield Township Planning Commission

12000 Davisburg Road

Davisburg, MI 48350

CC Springfield Township Board

CC Springfield Township Supervisor - Richard Davis

Re: Concerns Regarding Proposed Gravel Mining Operation near Ormond Road

Dear Members of the Springfield Township Planning Commission,

On behalf of Blue Heron Headwaters Conservancy (BHC), I write to express our deep concern regarding the proposed gravel mining operation near Ormond Road and its potential impact on one of Michigan's rarest and most ecologically sensitive landscapes.

The proposed site lies within what ecologists recognize as the Jackson Interlobate Region—an area of glacially-formed kames and kettles that supports an assemblage of rare plants and wildlife. Further disruption from gravel mining in this geologically and ecologically unique area risks irreparable loss to a region already under significant environmental pressure.

The scale of the proposed extraction suggests a long-term industrial presence in the Davisburg area, with gravel washing anticipated due to the site's sand-to-gravel ratio. Yet the potential environmental effects of this process—including hydrological disruption and water quality degradation—remain undisclosed.

Moreover, the mine's dewatering process, along with the eventual creation of an artificial lake, poses risks to the hydrology of the nearby **Shiawassee Basin Reserve**—a critically important groundwater-fed fen located just north of the proposed site. This fen sits 154 feet below the surface elevation of the farmland above and is highly vulnerable to changes in groundwater volume, temperature, and chemistry due to the high permeability of the surrounding sand and gravel substrate.

Most importantly, this fen is one of only **three remaining habitats in the world** for the **critically endangered Poweshiek skipperling butterfly**, as listed by the International Union for Conservation of Nature (IUCN). This species relies on the stability of cold, calcareous fens, whose basic pH is sustained by cool groundwater percolating through limestone-rich glacial deposits. Exposing and removing gravel can warm this groundwater, disrupting the chemical

balance essential to the fen's survival and threatening both the Poweshiek skipperling and other rare fen-dependent species.

Research on similar fens in Michigan has shown groundwater sources can originate up to ten miles away. Given the proposed mine's proximity— 1.4 miles from the fen—it is highly probable that local hydrological changes would negatively affect this globally significant ecosystem.

Blue Heron Headwaters Conservancy owns 15 acres of this fen and holds a conservation easement on an additional 40 acres. We are actively working to conserve more of this irreplaceable landscape, including its surrounding uplands. As a core partner in the International Poweshiek Collaborative, led by the U.S. Fish and Wildlife Service, BHHC is committed to restoring and protecting the habitat necessary for this species' survival. We take this role seriously, particularly in light of recent evidence of pesticide contamination in the fen's groundwater—an indicator of growing environmental stress.

We also recall that when BHHC raised concerns during the planning of the Hills of Davisburg subdivision, the Rose Township Planning Commission, in cooperation with Springfield Township, acted prudently by requiring larger lot sizes to reduce potential adverse effects on the fen. These concerns included groundwater drawdown, septic system leachate, and contamination from herbicides and pesticides—all of which would be amplified many times over by the post-mining residential development proposed for the Ormond Road site.

Furthermore, the geology of the Ormond Road site lacks the deep, calcite-rich till that underlies other local developments. Without this natural buffering layer, proposed septic systems and agricultural land use will have a significantly reduced capacity to neutralize acidic or nutrient-rich leachate, increasing the risk of groundwater contamination.

In light of these substantial and well-documented ecological risks, we as an organization have grave concern with this gravel mining proposal and its potential impact on our region's extraordinary natural heritage, Michigan's last remaining stronghold of the Poweshiek skipperling, and the properties we protect.

Thank you for your attention to this critical matter. We request the opportunity to provide further information and participate in future discussions, as we are a clear stakeholder in this proposed development.

Sincerely,

Jason Meekhof

Executive Director

Blue Heron Headwaters Conservancy

jason@blueheronheadwaters.org

(248) 795-2808