

Attn: Springfield Township Planning Commission Members  
February 3, 2026

Dear Planning Commission Members,

I am writing to respectfully clarify the record regarding the Township's retained geological and hydrogeological experts Brian O'Mara of Agate Harbor Advisors LLC, and Mike Wilczynski of Pangea Environmental LLC, as statements made during recent meetings do not reflect what is documented in Fact-Finding Committee proceedings.

At the January 8, 2026, Township Board meeting, the following statements were made publicly:

*"What we're getting and what we're paying for, it is not very good."*

— Treasurer Jamie Dubre

*"We have paid \$8,700 to Brian O'Mara and Mike Wilczynski without anything that we can deliver to the Planning Commission."*

— Supervisor Ric Davis

These statements were later echoed during the January 27, 2026, Planning Commission meeting, where commissioners stated:

*"I've seen no work product from this person or this firm."*

*"So far, with three different invoices... nothing has been delivered for the Planning Commission's review."*

I believe it is important for the Planning Commission to be aware that these statements are **incomplete and misleading when viewed against the full record.**

At the Fact-Finding Committee Traffic Study Review on October 16, 2025, Levy's representative, Reuben Maxbauer, acknowledged that progress was paused because required information had not yet been provided by the applicant, stating:

*"He [Reuben] suggested the township slow down as to not burn through the escrow money too quickly before Levy has a chance to provide all the needed information in approximately three months with a new submittal." (FFC Meeting Minutes 10/16/2025)*

At the November 3, 2025, Fact-Finding Committee meeting, the experts explicitly confirmed that they had completed a preliminary review and submitted a list of information required from Levy in order to proceed.

Brian O'Mara stated:

*"Their role is to advise the township as to the adequacy, deficiencies, or data gaps. It is on Levy to provide any missing information."*

Mike Wilczynski stated:

*"There was a list of items that Levy may have that could be provided to the Township without a lot of work needing to be done."*

Importantly, **Township Trustee Kevin Sclesky acknowledged on the record that this information had been provided and that follow-up was required**, stating:

*"There was a list made up at the last meeting of the information that the Township would want the applicant to produce for review."*

and further:

*"I'll need to follow up and find out where we're at with obtaining the information that was requested."*

Mike Wilczynski also clarified why no final conclusions had yet been issued:

*"This should be considered a preliminary review because we don't have all the information."*

In professional environmental and mining review, identifying data gaps and requesting additional information is itself a deliverable. It is a necessary and foundational step before final analysis can responsibly occur. The absence of Planning-Commission-facing reports at that stage was not due to inaction by the experts, but to **missing applicant-provided information**.

I would also like to address statements suggesting that the experts were "pro-mining." During my time working directly with Mr. Wilczynski and Mr. O'Mara, **at no point did either of them characterize themselves as pro-mining, anti-mining, or aligned with any outcome**. Their discussions were consistently framed around regulatory standards, scientific sufficiency, and risk evaluation — not advocacy.

I have growing concerns about the accuracy of meeting summaries that have been released publicly. I have personally been misquoted in meeting minutes, and entire substantive discussions have been omitted from the record. Mr. Wilczynski has, on multiple occasions, requested that draft summaries be reviewed by him prior to public release when the Township

chooses to publish narrative summaries rather than verbatim minutes, particularly where technical content is involved.

When summaries are prepared by administrative staff who are not trained in geology or hydrogeology, there is a real risk that technical nuance is lost or misrepresented. This affects not only public understanding, but how expert work is later characterized and evaluated.

Trustee Kevin Sclesky's statement about the 11/3/25 fact-finding committee meeting at the planning commission meeting January 27, 2026:

*“Basically, what took place that day was a review in the history of how the minerals were deposited in our area”*

**This is not supported by the Township's own minutes.**

Glacial history was used as context to explain:

- aquifer structure
- groundwater flow
- wetland sensitivity
- mining feasibility

The meeting was, in substance and in record, a technical scoping and deficiency review covering geology, hydrogeology, environmental risk, regulatory compliance, and next-step data requirements. It included:

**Documented Topics Discussed (per Township-posted minutes)**

- Purpose of the meeting:
  - Initial technical review of the Levy sand and gravel mining application
  - Identification of deficiencies and data gaps
  - Clarification of what additional information the applicant must provide before further review
- Explanation of the Michigan Zoning Enabling Act and the “very serious consequences” criteria used to evaluate mining applications
- Discussion of mining–land use conflicts, including:
  - Impacts on existing land uses
  - Property value impacts
  - Traffic and safety considerations
  - Health, safety, and welfare considerations
  - Public interest factors
- Overview of geologic setting, including glacial till and outwash, *as context for aquifer behavior and mining feasibility* (not as a standalone topic)
- Discussion of aquifer characteristics, including:

- Interbedded sands, gravels, and clays
- Perched groundwater conditions
- Confined vs. unconfined aquifers
- Implications for groundwater flow and drawdown
- Identification of missing geological cross-sections in Levy's submitted reports
  - Explanation that cross-sections are necessary to interpret borings and groundwater behavior
  - Statement that cross-sections are a basic requirement for hydrogeologic review
- Discussion of hydrogeologic data gaps, including:
  - Insufficient depth of borings relative to proposed mining depth
  - Lack of clarity regarding which aquifers monitoring wells are screened in
- Discussion of groundwater quality risks, including:
  - Naturally occurring arsenic
  - Agricultural nitrates
  - Potential mobilization of contaminants due to dewatering
- Identification of wetlands and surface water concerns, including:
  - Expired wetland delineation (last valid through 2005)
  - Need for updated wetland studies during the growing season
  - Importance of stable hydrology for wetlands and fens
- Discussion of Eastern Massasauga / fen-related habitat sensitivity and the potential for indirect hydrologic impacts
- Discussion of nearby contamination sites, including:
  - Proximity of the Springfield Township Dump Superfund site
  - Risk of altered groundwater flow pulling contamination plumes toward the mine
- Explanation of mining methods, including:
  - Dry mining vs. wet mining
  - Use of dredging
  - Slimes/fines generation and management issues
  - Water handling that does not constitute a closed-loop system
- Discussion of water withdrawal volumes, including:
  - 30 gpm vs. 70 gpm thresholds
  - When Part 327 review is triggered
  - Why withdrawal screening tools do not guarantee aquifer sustainability
- Emphasis on the need for an aquifer pumping test, including:
  - Purpose of pumping tests
  - Duration and design
  - Use of observation wells
  - Ability to predict impacts to wetlands, wells, and surface waters
- Discussion of monitoring well data, including:
  - Existence of ~25 wells on site

- Length of monitoring history
  - Gaps in water quality sampling (arsenic, nitrates, herbicides)
- Discussion of traffic, dust, noise, and vibration issues as part of “very serious consequences”
- Discussion of property value and diminution-of-value studies, and the distinction between market value and impact analysis
- Discussion of reclamation planning, including:
  - Proposed end uses
  - Feasibility of residential development without municipal water/sewer
  - Importance of detailed reclamation plans tied to financial assurance
- Discussion of financial assurance and bonding, including:
  - Need for detailed cost assumptions
  - Risks of insufficient reclamation guarantees
- Clarification that the review conducted was a desktop / preliminary review, standard at this stage
- Explicit statement that further analysis could not proceed without additional applicant-provided information
- Confirmation that a list of required information had been prepared and provided to the Township
- Acknowledgment that the Township would need to follow up with Levy to obtain the requested information

I am also concerned that discussion has drifted toward personalities, billing optics, or whether experts “needed the money.” Financial independence is not a liability in an expert; it is a safeguard against influence. Mining and hydrogeologic review necessarily requires professionals with real-world mining and permitting experience, and such experience should not be misconstrued as advocacy.

I would also like to place on the record that I personally witnessed Township Supervisor Ric Davis repeatedly interrupting, criticizing, and interrogating Mr. Wilczynski during meetings, in a manner that went beyond facilitation and into direct influence. Rather than allowing Mr. Wilczynski to explain technical concepts or the basis for his professional conclusions, Mr. Davis frequently cut him off, challenged him mid-statement, reframed his explanations, and pressed him in a confrontational manner that I would not characterize as neutral or collegial. As someone present in the room, this did not resemble a good-faith scientific discussion; it resembled an attempt to control the narrative, limit expert explanation, and undermine credibility in real time. That conduct matters, because experts cannot provide independent, technically sound input when they are being interrupted, corrected, or cross-examined by the very official responsible for overseeing the process.

If the Planning Commission wishes to make an informed, defensible recommendation, I respectfully urge you not to rely solely on secondhand summaries or selective characterizations. Independent decision-making requires direct engagement with the experts, review of the full Fact-Finding Committee record, and a clear understanding of what was requested, what was delivered, and what remains dependent on applicant response.

This process is too important — scientifically, legally, and for the community — to be reduced to impressions rather than evidence. I offer this clarification in the interest of accuracy and procedural integrity.

**Please explain how the Planning Commission intends to correct these inaccuracies and ensure that expert review is conducted and represented accurately going forward.**

Respectfully,

Sincerely,  
**Kara Okonewski**