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OLSON, BZDOK & HOWARD

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April 11, 2016

The Board of Trustees  
Metamora Township  
730 W Dryden Rd  
Metamora, MI 48455

**Via email** to Township Clerk  
Jennie Dagher  
[clerk@metamoratownship.com](mailto:clerk@metamoratownship.com)

ATTORNEYS

RE: Levy Petition Regarding Gravel Moratorium

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Dear Supervisor Best and Members of the Township Board:

I write to you on behalf of the Metamora Land Preservation Alliance (MLPA), regarding a petition by the Edward Levy Company dated January 8, 2016, which objects to the Board's moratorium resolution of December 14, 2015. This letter will respond for the record to certain untrue statements contained in Levy's petition. For brevity's sake, I am only responding to statements Levy (through counsel) makes concerning MLPA. That does not mean we agree with the rest of Levy's petition – we disagree with all of it.

The first untrue statement made in the Levy petition that we respond to is that “the MLPA once again has arisen – not in response to any particular aspect of Levy's proposal, but rather in opposition to any effort to mine sand and gravel in the Township, no matter how thoughtful the proposal.” To the contrary. MLPA is opposed to Levy's proposal for very specific reasons that have been summarized in the newsletter that the Levy petition mentions, as well as on the MLPA website.

These reasons will be further articulated, documented, and supported in detail at the appropriate time in the Township's review process. We are confident that the gaping factual holes in the materials submitted by Levy will be exposed in the fullness of time. We believe that if anything, the scale and severity of the potential harm this project may cause is not as widely understood now as it will be in the near future.

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The second untrue statement or implication in the Levy petition is that the purpose of the moratorium was to provide MLPA with “additional time to mount an opposition to Levy’s application.” To the extent Levy (or its counsel) are stating or implying that the moratorium was enacted in coordination with MLPA, or that its purpose was to assist MLPA, such a statement or implication is false and potentially reckless.

To set the record straight: MLPA supports the moratorium. We also support extension of the moratorium for another three months, as the Township is contemplating. But neither MLPA nor myself had any role in developing it; nor any participation in or review of it; and we neither suggested it to the Township nor requested that the Township enact it.

Thank you for this opportunity to clear the record. I look forward to seeing you Monday night.

Sincerely,



Christopher M. Bzdok  
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xc via email: Doug Piggott  
Mike Nolan  
Gerald Fisher  
MLPA