

July 30, 2020

RE: Johnson Creek –Arbor Hills Landfill NPDES Permits

To Whom it May Concern:

Friends of the Rouge (FOTR) has become aware that the Arbor Hills Landfill (Advanced Disposal Services) submitted two National Pollution Discharge and Elimination System (NPDES) permit applications to the State of Michigan's Department of Environment, Great Lakes, and Energy (EGLE) for permission to discharge to the Johnson Creek, located in Northville Township, Michigan. The permit applications in question are MIS210766 and MI00045713. These permits propose discharges from Arbor Hills Landfill and compost area to Johnson Creek, which is the only cold water tributary to the Rouge River watershed.

FOTR is a nonprofit 501(c)(3) organization founded in 1986 to raise awareness about the need to clean up the Rouge River. In existence for 34 years, we operate under the mission, "To restore, protect, and enhance the Rouge River watershed through stewardship, education, and collaboration." We envision a future where a clean and vibrant Rouge River is the center of our community. Individual and community actions protect and improve the health of the Rouge River, assuring that its natural, economic, and recreational value enhances the quality of life in the Rouge River ecosystem.

It is with our mission in mind that we address you in this letter to express our opposition to the permits referenced above or any modifications to existing permits involving discharges from the Arbor Hills Landfill to Johnson Creek.

Johnson Creek, in addition to being the only cold water tributary to the Rouge River, is home to the most diverse aquatic ecosystem in the Rouge River watershed, and has a unique assemblage of benthic macroinvertebrates and fish. This Rouge River subwatershed has consistently demonstrated good water quality based on its benthic macroinvertebrate community, which FOTR and its trained volunteers monitor three times a year during its Winter Stonefly Search, Spring, and Fall Bug Hunts.

FOTR has benthic macroinvertebrate data on Johnson Creek dating back to 2002, which demonstrates its diversity as having some of the highest scoring sites based on MiCorps stream quality protocols, and sites where sensitive macroinvertebrate families in the Rouge watershed are consistently found. Johnson Creek has the habitat and cold water necessary to support sensitive macroinvertebrates such as stoneflies, caddisflies and mayflies, such as the perlid stonefly, pronggill mayfly, and freelifing caddisfly, among others.

FOTR also monitors fish populations in the Rouge River and its tributaries, including Johnson Creek. Johnson Creek was at once home to the rare and endangered red side dace, a species that is sensitive to disturbance, where individuals were found as late as 2012. Other cold water specific and sensitive species such as mottled sculpins, johnny darters, green darters and rainbow darters are also found in

Johnson Creek. For more information on the FOTR benthic macroinvertebrate monitoring and fish monitoring please refer to the following link: <https://therouge.org/our-work/river-monitoring/>

The concerns regarding the discharge to Johnson Creek, if it is permitted, is what impact(s) will the leachate discharge, the increased volume and temperature of flow that Johnson Creek would be absorbing from the proposed discharge, and the impact these factors will have on the Creek's aquatic life, morphology, habitats and overall water quality.

FOTR requests the permit reviewers/approvers consider that Johnson Creek is the only cold water tributary to the Rouge and is also its highest quality and most ecologically diverse stream in the Rouge River watershed. Given the ecological and geological uniqueness of Johnson Creek, it needs to be preserved and protected. Due to this Creek's unique importance as an ecological resource, FOTR recommends alternative means of leachate disposal other than discharge to Johnson Creek as proposed by Arbor Hills Landfill.

Thank you for your time and consideration of the viewpoints of FOTR, based on data it has collected over eighteen years, in the review of the proposed permits.

If you have any further questions, please feel free to contact me directly at mmccormick@therouge.org.

Thank you for taking the time to consider our comments

Sincerely,

Marie McCormick
Executive Director, Friends of the Rouge