

February 13, 2023

Supervisor Kurt Heise
Plymouth Township
9955 N Haggerty Rd,
Plymouth, MI 48170

Attn: Plymouth Township, Northville Downs Proposed Development

Dear Mr. Heise,

Friends of the Rouge (FOTR) has recently become aware that the owners of Northville Downs are proposing to relocate their horse racing track to Plymouth Township to a 40-acre parcel on the easterly portion of a 128-acre swath of the broader site near Five Mile and Ridge. This proposed development would run directly along Johnson Creek, the last remaining cold water tributary in the entire Rouge 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 concern regarding the potential developments along the Johnson Creek Tributary of the Middle Rouge River.

The concerns Friends of the Rouge has regarding the development are as follows:

1. Development of this parcel will result in vegetation removal and creation of more impervious surface, which increases stormwater runoff that can lead to increased water temperatures, sedimentation, and habitat loss in Johnson Creek.
2. This parcel is directly adjacent to Johnson Creek, the only cold-water tributary of the Rouge River and Blue Ribbon Trout stream that is home to the endangered red side dace, and cold water fish such as mottled sculpins and johnny darters.
3. Friends of the Rouge has monitored Johnson Creek benthic macroinvertebrates and fish for decades. Johnson Creek is a tributary of the Rouge River that has a rich diversity of aquatic macroinvertebrates, including sensitive stoneflies, caddisflies and mayflies. There is data that demonstrates that increased impervious surface in the watershed decreases diversity in aquatic biota.
4. There is a concern about the pollutant load that racetrack operations/housekeeping could have on Johnson Creek. Runoff of pollutants such as nutrients from horse manure, horse washing, and gravel fines from the track surface would be a detriment to Johnson Creek water quality.

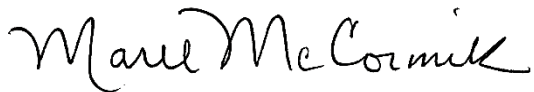
5. Plymouth Township does not have dedicated green space referenced in its Master Plan. Green space is necessary for the well-being of Township residents as well as to provide climate islands to offset climate change.

Friends of the Rouge asks that the Plymouth Township leadership acts cautiously when beginning this new era of development. Please consider the consequences of removal of vegetation within the floodplain and replacing it within more impervious surfaces. Due to Johnson Creek's unique importance as an ecological resource, FOTR recommends that the developer employ a stormwater strategy that is greater than the minimum requirements of the local, county, and state standards. Additionally, it is important to note that FOTR's position follows the recommendations found in the [State of Michigan's MI Healthy Climate Plan](#) to protect Michigan's land and water by restoring existing wetlands and waterways.

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

Wetlands, waters, soils, forests – Avoid land-use conversion that causes a net increase in GHG emissions and prioritize land uses that reduce GHG emissions. Protect and restore existing wetlands and waterways and create new wetlands where appropriate. Adopt policies to protect the state's soils and enhance their capacity to capture and store carbon. Maintain and develop healthy forests across public and private lands. Support and promote tools that expand the use of mass timber as a sustainable building material.