

February 14, 2025

Mr. Andrew Hartz

Mr. John Jones

Mr. Jeremy Richardson

Mr. Andrew Hartz

Michigan Department of Environment, Great Lakes, and Energy

Water Resources Division - Warren District Office

27700 Donald Court Warren, MI 48092

Re: Top Golf Wetland Permit Application #HQ6-2QBJ-6DAMW

Dear Mr. Hartz,

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 39 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 for the issuance of a permit for application #HQ6-2QBJ-6DAMW, which would allow the construction of a Top Golf facility in valuable forested wetlands in Canton Township. The proposed use of the site is not wetland dependent and there are a number of feasible and prudent alternatives which would avoid the loss of these wetlands. We urge EGLE to deny this permit.

Wetlands serve as fish and wildlife nurseries, filter pollutants before stormwater is discharged into Willow Creek, and help to store stormwater flows, reducing flooding in the area. Wayne County has already lost 90% of its original wetlands and cannot afford to lose an additional 7.12 acre loss. The proposal to purchase wetlands outside of the watershed, in the River Raisin watershed results in a net loss to the Rouge River watershed. The proposal to create new forested wetlands at the site is unlikely to be successful as your own studies found that site-specific mitigations have had a very significant failure rate. Additionally, green spaces and forests are incredibly important for improving air quality, and overall well being. Communities benefit from having greenspace nearby, and both physical and mental health improves when humans experience green spaces.

In addition to destroying these forested wetlands, the proposed Top Golf facility will fill in the floodplain on the site. Willow Creek will be impacted with increasing stormwater flow, particularly during heavy rainfall events. This, in turn, can lead to more flooding in Canton, a region which already experiences

heavy flooding. According to [SEMCOG's Flooding Risk Tool Dashboard](#) the area around the proposed facility is already at a high risk for flooding (see screenshot below). Given the growing intensity and frequency of storm events, the replacement floodplain may be insufficient to accommodate stormwater flows from intense rainfall events.

We have concerns about the increase in heavy stormwater flows from the golf facility being discharged into Willow Creek. This will likely occur and become common if the detention ponds cannot handle the stormwater flow from the increasingly common intense rainfall events. The destroyed wetlands will no longer be able to retain stormwater flows and the detention ponds will likely overflow. This will lead to increased flow into Willow Creek, increased soil erosion of the Creek's banks, and likely flooding in downstream communities. This increase in flow and sediment will negatively impact the organisms that live in and around the creek.

For all of these reasons, we urge EGLE to deny the above referenced wetland permit application. Preserving these wetlands is critical to help manage stormwater and flooding in a region that already experiences CSO outfalls, flooded basements, and water flowing over major roadways during major storm events which are becoming more and more frequent. Additionally, preserving greenspace in an urban area should be of utmost importance to EGLE, as there is so little wetland acreage remaining in the region.

Rather than compromising such a valuable natural resource, Top Golf should select a location that does not involve the destruction of wetlands. Their proposal is not wetlands dependent and they have feasible and prudent alternatives, as outlined in Jack Smiley's letter to you.

Thank you for your time to consider our comments

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley Flintoff", written over a horizontal line.

Ashley Flintoff  
Executive Director, Friends of the Rouge

