

March 3, 2026

State of Michigan
Department of Environment, Great Lakes, and Energy
Water Resources Division
Warren District Office

RE: MiEnviro Site: 82-46441 Five Mile Road-Plymouth Twp
Submission Number: HQC-9QEG-R7Q1Q

Since its founding as a 501(c)(3) organization in 1986, Friends of the Rouge has worked to restore, protect, and enhance the Rouge River watershed in metropolitan Detroit. We are submitting this comment in response to the Section 301 of NREPA permit application requesting permission to enclose approximately 252 feet of a tributary to Tonquish Creek in the Rouge River watershed.

Enclosing 252 feet of this tributary to Tonquish Creek will cause an unacceptable decline in aquatic life in this headwater stream. Enclosure of any portion of a stream destroys habitat that fish and benthic macroinvertebrates require to survive, eliminating the natural streambed, the riffles, the runs, the pools, woody debris and overhanging vegetation these animals require. Tubing a river can cause the temperature to increase and dissolved oxygen levels to drop below the level needed to support fish. It can prevent fish from passing upstream due to increased velocities or lack of depth. It also will disrupt the natural sediment transport.

The Tonquish Creek supports a diverse assemblage of benthic macroinvertebrates and fish including rare and sensitive species such as stoneflies and least darter. Just down the road in Northville, more than \$2 million is being spent to daylight 1,200 feet of the Johnson Creek, rectifying a problem that this project is proposing to create. The Rouge River has come a long way since catching fire in 1969 and being declared an Area of Concern (AOC) by the EPA in 1987. Enclosing streams and further degrading environments only serves as a step backwards in an otherwise encouraging story of resilience and revitalization.

Friends of the Rouge urges EGLE to deny the request to enclose any portion of this stream and require other options to ensure this stream is not permanently damaged.

Thank you,



Ashley Flintoff
Executive Director