



CHARTER TOWNSHIP OF PLYMOUTH

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April 8, 2024

Mr. Tom Braum
Water Resources Division, EGLE
Part 41 EGLE WWTP Construction
Lansing District Office
PO Box 30242
525 W. Allegan, Lansing 48909

RE: Proposed Sewage Plant in Salem Township/Schostak Urban Services District; MI0060338

Dear Mr. Braum:

On behalf of the 28,000 residents of Plymouth Township I want to thank you and your team for a very productive and informative Public Hearing on the above matter on April 4. More than 700 residents from Plymouth, Canton, Northville, and Salem attended, and I am sure your office has received hundreds more emails and letters in opposition. I don't think a single person who attended the Public Hearing spoke in support of the proposed Salem Sewer Plant.

Today, it is not my intention to reiterate the points we have already heard, but to provide some additional information and points that were raised by some of the residents who spoke. I would also like to make a suggestion on where we go from here, as the proposed Sewage Plant is, in my opinion, dead on arrival.

First, I am attaching for your review a hydrologic study for Fellows Creek that I requested from our Township Engineers, Spaulding-DeDecker. While I am not a Civil Engineer, I have been told by Jeremy Schrot, our Township Engineer, that their preliminary analysis indicates that flow in the Fellows Creek in normal rain events would increase by 24 percent if the plant were operating at the discharge rates being permitted by EGLE. This number would increase another 10 percent in a more significant wet weather event before considering any future infiltration and inflow that many sanitary sewer systems across the State experience today. This also does not consider how that volume of discharge would impact erosion along the banks of Fellows Creek that are already distressed due to limited maintenance, but we can assume it would be significant. We all know that Fellows Creek has seen several flood events that have impacted numerous properties. Adding another 840,000 gallons (or more) to this already overwhelmed waterway is socially and environmentally unacceptable.

Another point I tried to make at the Hearing was that stormwater runoff from a completed "Salem Springs USD" will not be addressed by the sewage plant; while I know Washtenaw County has a strong stormwater management ordinance, the fact remains that new, additional stormwater runoff from the USD zone will continue to impact Canton and Superior Townships. There has been no analysis to my knowledge about the stormwater discharge into the creek that would be caused by the overall Salem Springs development.

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Another item that came up at the Hearing was the fact that the Salem Sewer Plant, while allegedly employing current technology, will still generate sludge that will have to be taken away by truck to a landfill. There are few landfills that take sludge, so those trucks will likely be travelling through Plymouth, Canton, and Salem Townships. Our communities are already burdened with massive trash haulers going to the landfill in Salem, which again is right on our borders.

While a wastewater treatment plant of this magnitude is being proposed, has anyone considered the specialized staffing such a plant would require ensuring that it receives not only routine maintenance but also is able to address mechanical failures in the event of an emergency? To our knowledge Salem Township does not employ any such expertise and relying on a private organization and/or HOA to maintain such a facility seems questionable especially considering that the consequence for not maintaining properly could lead to untreated wastewater discharges which would not only be an ecological disaster but a social one as well.

With that in mind, I would also like to address the Anti-Degradation element of your analysis. Prior to the Public Hearing, we were told by EGLE, through our legislators, that you would be focusing on environmental, and not social degradation. While I don't have hard data at this time to quantify my statements, I am confident that a Sewage Plant across the street from hundreds of homes in Plymouth Township, most valued well over half a million dollars, would see significant diminution of value and overall lowering of our residents' quality of life. Hundreds more homes downstream of the Plant in Plymouth Township would experience flooding of the Fellows Creek and stormwater detention basins, which I am sure were never designed to accept this significant additional flow.

Clearly the proposed siting for this facility (at M-14 and Napier) is punitive to the people of Plymouth Township, designed by politicians, developers, and lobbyists to create a regional crisis while ignoring the real reasons we are here - because Salem wanted to create a city within a quiet rural township, an "Urban Services District" – a city with no water, no sewer, no roads, no Police, no full-time Fire, and no Public Works.

Salem's political leaders created this crisis that they are now pushing onto Plymouth, Canton, and Northville – not to mention their own residents.

And finally, while I heard a lot last Thursday on 'cooperation' and 'trying to find a regional solution,' the outrageous, desperate comments and writings of Salem Attorney Ed Plato have poisoned the well between our communities to the point that productive discussions may be fruitless. To assert that I and/or the Township of Plymouth are the reasons why Salem is proposing a sewage plant is ridiculous. Perhaps Mr. Plato wants to conceal the fact that he lost in Circuit Court twice and in the Court of Appeals on the Superior sewer line fiasco.

While this crisis was not our doing, Plymouth, Canton, and Northville are still expected to fix it. How? By letting Salem 'tie in' to the Western Townships Utilities Authority (WTUA), a sewer system conceived in the 1980's by Canton, Plymouth and Northville designed to service our three communities. I serve as the Chairman of WTUA; my two Board colleagues are Supervisor Graham-Hudak of Canton, and Supervisor Abbo of Northville Township. WTUA is valued at \$250 million, and it was paid for by our residents. Our three communities are still growing, and we still have capacity needs of our own. Under our WTUA bylaws, the three Supervisors must unanimously agree to allow a new community into the system. Plymouth Township also has a separate ordinance requiring Board of Trustee review and approval of any new entrant, as well as a defined public comment period.

Another item not mentioned last Thursday was the very real possibility of Salem Landfill seeking entry into WTUA to dump more of their landfill leachate into the system. I am sure the landfill will want a 'me too' deal to dump more leachate, and likely more PFAS, through our communities.

There is no secret floodgate or button we can push to allow Salem or any other community into the WTUA system. Again, I am not an engineer, but what I have been told by our experts is that we do not have the capacity to allow Salem into the system, and that even if it were possible, the cost for Salem and the upgrades necessary would likely be cost prohibitive, would still have to meet stringent EGLE standards, and would still require approval by Canton, Plymouth and Northville.

So, here is what I propose. We all know that Schostak Brothers Development Company is the proverbial Elephant in the Room. I would recommend that Schostak get their civil engineers, consultants and experts assembled and meet with our team at WTUA to see what is even feasible, and what it would cost.

We also need to find out once and for all what is going to be built in the Salem USD, the number of buildings, and the estimated number of residents, so we all have real numbers to deal with. I'm tired of playing a guessing game.

It's time to get the politicians, lobbyists, and lawyers out of the room and see where the data and engineering take us. Trust the Science, remember?

Again, thanks for your time and efforts in this matter.

Sincerely,



Kurt L. Heise, Esq.
Supervisor, Charter Township of Plymouth

attachment

cc: Plymouth Township Board of Trustees
Congresswoman Debbie Dingell
State Senator Rosemary Bayer
State Representative Jason Morgan
State Representative Matt Koleszar
Canton Township Supervisor Anne Marie Graham-Hudak
Northville Township Supervisor Mark Abbo
Salem Township Supervisor Gary Whittaker
Superior Township Supervisor Kenneth Schwartz
Attorney Kevin Bennett
Attorney David Landry
Aaron Sprague, Director, WTUA
Jeremy Schrot, PE, Spalding DeDecker

April 4, 2024

Mr. Kurt Heise, JD, LL.M,
Supervisor
Charter Township of Plymouth
9955 N. Haggerty Road
Plymouth, MI 48170-4673

Re: Salem Springs Urban Service District Wastewater Treatment Plant

Dear Mr. Heise,

Spalding DeDecker has completed a preliminary assessment of the impact of the proposed Salem Springs Urban Service District (USD) Wastewater Treatment Plant (WWTP) effluent discharge on Fellows Creek upstream of Plymouth Township.

According to the Salem Township WWTP permit application filed with EGLE (Submission No. HPD-TFNW-2RCJK), the WWTP would discharge up to 840,000 gallons per day at the upstream tributary of Fellows Creek. The watershed that the proposed WWTP resides in is approximately 393 acres based on USGS 5-Foot contour data. The runoff generated within this watershed area crosses into Plymouth Township at A2 Outfall shown in Figure 1 below.

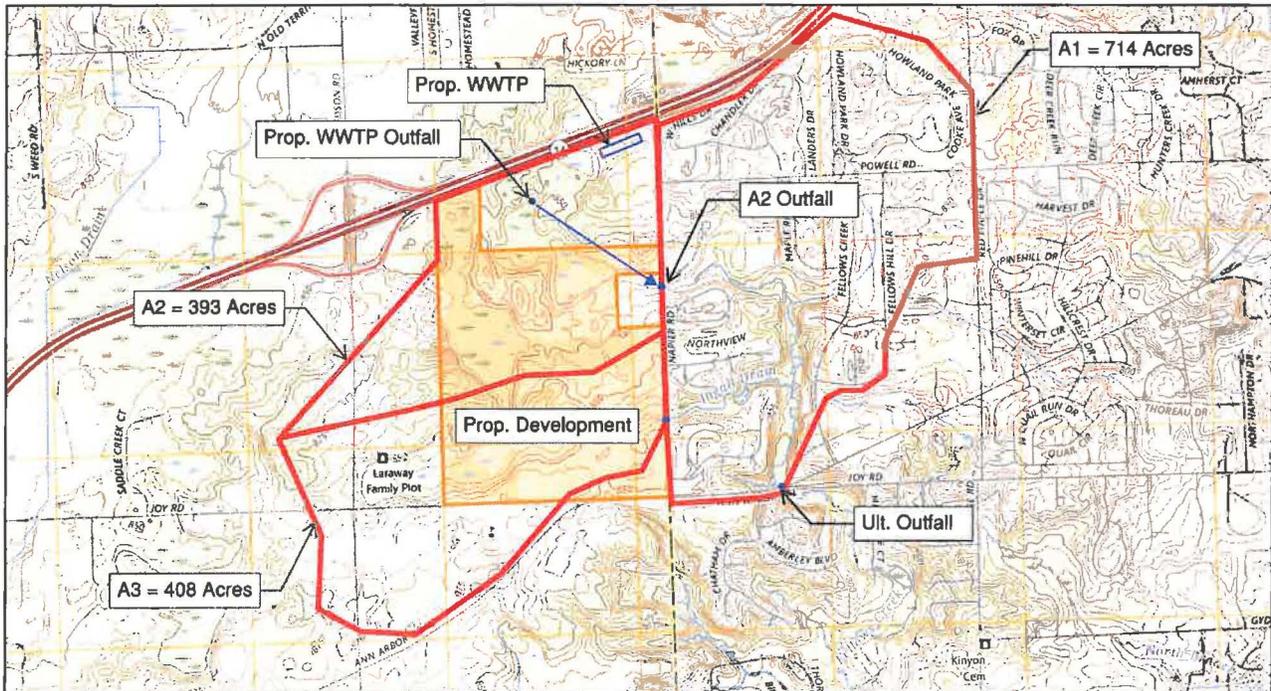


Figure 1- Fellows Creek and WWTP Watersheds

Stream gauge data is not available at this location; therefore, approximate flows were calculated using the TR-55 method. For the 24-hr 10-yr and 1-yr rainfall events, the creek would expect a runoff volume of approximately 10 Mgal, and 3.5 Mgal, respectively. (Shown in Table 1 below)

Table 1 - Stormwater Runoff and WWTP Impacts

Storm Interval	P – Rainfall (in)	Q - Runoff (in)	A - Areas (Ac)	Q – Flow (Gallons)	WWTP Discharge Percent Increase
10-yr	3.33	0.9	393	10,091,428	8%
1-yr	2.1	0.3	393	3,489,846	24%

The WWTP discharge would increase the existing flows within the creek by approximately 8% and 24%, respectively during these commonly occurring rainfall events, potentially exacerbating downstream flooding.

The proposed Urban Service District Wastewater Treatment Plant design capacity is for the ultimate future build out of the surrounding area and not just the proposed Salem Springs development. The outfall location of this WWTP discharges at an upstream point of a relatively small watershed and greatly increases the total flows along the small creek. Fellows Creek is a tributary to the Lower Rouge River, which has experienced flooding in the Canton and Plymouth Townships. Due to the concerns this presents to the downstream neighbors, further hydraulic study on the impact of the increased discharge to the creek may be warranted.

Sincerely,
Spalding DeDecker



Jeremy Schrot, PE
Vice President/Director of Public Engineering

Attachments:
Exhibit A – Drainage Calculations