

To Whom This May Concern:

My name is Mike Penskar, and I'm a retired professional botanist, having served as the Lead Botanist for the Michigan Natural Features Inventory (MNFI) in Lansing from 1988-2013. Currently I'm continuing in my appointment at the University of Michigan Herbarium, and must note that my comments here do not represent the herbarium or any aspect of U-M, and comprise only my personal and professional opinions on the matter.

One of the major responsibilities in my former job was the development and oversight of the statewide database on the rare plant taxa of Michigan, comprising more than 400 native species of plants that collectively represent between 20-25% of the state's indigenous flora. I attended undergraduate and graduate school at the University of Michigan School of Natural Resources, and taught field classes in and around Ann Arbor, thus I am familiar with the environs in question. I'm also quite familiar with the Huron River valley in general, and particularly via the statewide natural features database, and thus I have knowledge of the diversity and richness of the natural features of the Huron River riparian corridor and adjacent areas.

I have not had extensive time to devote to studying the available materials related to the proposed development, nor all of the issues raised concerning the project. I have had, however, a fair amount of experience with such circumstances, owing to another one of my former responsibilities as the Lead Botanist for MNFI, namely the many years of conducting literally hundreds and hundreds of environmental reviews on similar projects, as a task for the DNR Endangered Species Coordinator in order to provide pertinent comments on potential impacts to rare species and high quality natural communities. I draw heavily upon that well of experience to make some pointed comments here. With the deadline and time looming, I will necessarily keep this brief.

Primarily, with what I currently know about the proposed development and the environmental assessment done thus far, I don't feel that the developer has conducted sufficient field studies or surveys to adequately assess the area, which is necessary to fully understand the potential impacts to South Pond and its natural features. The main reason I assert this is based on the richness of natural features in the river valley; even a cursory review of the natural features known within and adjacent to the project area (which I wonder if the developer ever queried as a starting point) should give an indication of the kind of biological and ecological surveys that likely should be done (I have not had time to explore any existing assessments by environmental consultants). There are many unique features (e.g. wet prairie) and rare taxa in riparian corridor, and thus my personal bar for due diligence to adequately assess biodiversity and native plant communities would be higher than for most other areas, and I'm a little surprised that the developer may not have leaned in this direction through the hired environmental consultants, particularly in view of the well demonstrated environmental and sustainability interests of the entire Ann Arbor community and its officials.

I have been involved in the extensive issues related to an extensive gravel mine proposed in Chelsea, and in many ways this sounds like *deja vue* (all over again) to me; in that case the developer did a horrid, cursory environmental/biological assessment that could not stand up to any sort of scrutiny, and the citizenry responded in a very logical fashion. At the very least, the proposed South Pond project should meet state and local environmental standards in order to adequately assess potential impacts for all concerned.

I wish you well in your deliberations over this proposed project.

Mike Penskar

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