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Joint City of Traverse City and Garfield Township Planning Commission
c/o Russ Soyring
400 Boardman Ave.
Traverse City, MI 49684

Brad Kaye
Charter Township of Garfield
3848 Veterans Dr.
Traverse City, MI 49684

RE: Comments on the Grand Traverse Commons Master Plan

Dear Commissioners,

We are writing to comment on the Grand Traverse Commons Master Plan. The Watershed Center advocates for clean water in Grand Traverse Bay and protects and preserves its watershed. We have over 600 current supporters.

In 2005, the Michigan Department of Environmental Quality (DEQ) and the US Environmental Protection Agency approved the Grand Traverse Bay Watershed Protection Plan, which includes an extensive list of implementation activities. Among those activities are stream bank stabilization and stormwater management issues in the Kids Creek watershed. The DEQ has listed Kids Creek as an impaired stream because sediments have negatively impacted macroinvertebrate habitat, resulting in reduced fish habitat. At the moment, the Watershed Center is working with the City of Traverse City and the Grand Traverse Conservation District through two different DEQ grants on vegetated buffers for Kids Creek and stormwater management in the Commons area to address this issue. Thus, the Grand Traverse Commons Master Plan is of immediate interest and relevance to our current work.

Our comments are designed to help address sediments in Kids Creek and its tributaries within the Commons boundaries. Generally, we fully support the existing references to the use of low-impact design methods, preserving native vegetation, and the use of porous or pervious surface. Below are our specific additional comments.

- In the objective addressing protected natural areas, features, patterns and systems on page 51, we would suggest including Kids Creek and its tributaries by name and adding a strategy of installing, increasing or protecting existing buffers

vegetated with trees and shrubs to help stop or slow the flow of sediments into the stream.

- In the objective addressing new buildings that are sustainable and compatible with the character of the surrounding built and natural environment on page 52, we would suggest adding a strategy of using low-impact design features that help reduce and manage the amount of stormwater generated by the built environment. A copy of our guidebook entitled “A Natural Solution,” which addresses low-impact design is available on our website at www.gtbay.org.
- In the objective addressing a comprehensive street plan for the Grand Traverse Commons on page 53, we would suggest adding strategies that include narrow private streets (no wider than 16-18 feet) to minimize imperviousness, avoiding all wetlands and water resources in siting of new roads, and improving the 11th Street crossing with Kids Creek, which currently drains stormwater directly from the street surface to the creek below through a drain.
- In the objective addressing alternative, low-impact surface parking areas on page 56, we would suggest adding a strategy to set a maximum parking stall size (9 feet by 18 feet) and to set low maximum parking requirements to minimize the amount of impervious surface. For example, changing the parking stall size from 10 feet by 20 feet to 9 feet by 18 feet reduces the amount of paved surface by 20 percent.
- In the objective addressing safe, aesthetically pleasing, accessible, unobtrusive and pedestrian-friendly parking areas on page 56, we would suggest that part of the strategy of discouraging large expansive surface parking areas is setting a low maximum parking requirement. We would also suggest adding a strategy to address management of stormwater on site by installing rain gardens, planting trees, and installing and maintaining buffers around water resources.
- In the parking section of the character plan on page 81, we would suggest including stormwater management as part of planning for parking areas in addition to the use of porous pavement (i.e. reducing the amount of paved area, installing vegetated swales, rain gardens or similar structures to intercept stormwater as it leaves parking areas, etc.).
- In the circulation section of the action policies on page 92, we would suggest including avoidance of water resources, minimizing the amount of paved surface, and stormwater management as part of the circulation planning.
- In the future development section of the action policies on page 93, we would suggest including use of low-impact design and stormwater management as part of the capital improvement plan.
- In the landscape and the natural environment section of the action policies on page 93, we would suggest including protection or installation of vegetated

buffers on the banks of Kids Creek, around all wetland and other water resources. We would also suggest adding remediation of the road- stream crossing at 11th Street.

The creation of the Commons and the cooperation between the City of Traverse City and Garfield Township to manage this area are important positive steps in the protection of the Kids Creek watershed. The future envisioned in this master plan for this area will be substantially better for water quality than other possible futures. We appreciate the efforts of all those involved in protecting these important natural and cultural resources, and we appreciate the opportunity to comment on this draft Master Plan.

Thank you for your time and consideration.

Sincerely,

Andy Knott
Executive Director

Sarah U'Ren
Program Director