



April 26, 2023

Charter Township of Garfield
Planning Commission
3848 Veterans Drive
Traverse City, MI 49684

Dear Planning Commissioners,

I am writing to provide some general thoughts on the township's Draft Master Plan that will be discussed at your April 26, 2023, meeting. The Watershed Center (TWC) advocates for clean water in Grand Traverse Bay and acts to protect and preserve its watershed. We appreciate that Garfield Township is undergoing a public input campaign as you rewrite your Master Plan. We've reviewed the Draft Natural Resources Chapter and offer the following points for your consideration.

1) Description of Specific Waterbodies and Waterways

We believe Master Plans that comprehensively describe a community's natural features, and the threats they face, are the best suited to influence land use policy and zoning. While we appreciate that the Draft describes the Boardman-Ottaway River Valley and Silver Lake to some extent, we encourage the township to include additional details on all the township's cherished waterways and waterbodies. In addition, we encourage the township to provide maps graphically depicting the township's lakes, streams, and wetlands.

a) Mitchell Creek

Wetland fill, channelization, stormwater runoff, degraded road-stream crossings, *E. coli* pollution, and loss of riparian vegetation are some of the many issues that have degraded water quality in Mitchell Creek. There is a community-wide interest in tracking water quality in the Mitchell Creek watershed and coordinating needed restoration efforts. Mitchell Creek is on the State's Impaired Waters list due to *E. coli* pollution. The Watershed Center, in partnership with the Township and several other organizations and agencies, is currently conducting a bacterial source tracking project to determine the source (e.g., human, gull, cow, pig, etc.) of the bacterial pollution. This study will help the community better address the bacterial pollution in the stream and develop strategies to reduce *E. coli*.

b) Kids Creek and its Watershed

Kids Creek is a tributary of the Boardman-Ottaway River with headwaters in Garfield Township. A four-mile portion of Kids Creek is currently on the State of Michigan's Impaired Waters List due to a poor macroinvertebrate community. This is due to sedimentation, flow regime alteration, and other human-caused sources. Kids Creek is an important spawning stream, nursery stream, and coldwater contributor to Grand Traverse Bay and has self-sustaining populations of brook trout and brown trout, as well as migratory populations of Chinook salmon, coho salmon, and steelhead. The impaired section of Kids Creek lies entirely within City of Traverse City limits. The Watershed Center and our partners, including Garfield Township, have invested more than \$9 million into the restoration of Kids Creek and its tributaries over the last 20 years. Kids Creek is a cherished urban stream.

c) Boardman-Ottaway River

Several miles of the Boardman-Ottaway River, a Michigan Department of Natural Resources designated "Natural River" and "Blue Ribbon" trout stream, run through the township. The Boardman-Ottaway River has immense cultural, spiritual, and recreational value. The township may reference the 2018 EGLE- and EPA-approved [Boardman River Watershed Prosperity Plan](#) in describing this cherished river and the threats the watershed faces.

d) Silver Lake

Located in the southwestern portion of the township, Silver Lake drains to the Boardman-Ottaway River. Surrounded by hardwoods and pines, the lake has experienced intense residential development pressure over the last several decades. Silver Lake provides a plethora of recreational opportunities including fishing, boating, paddling, and swimming. As a result of increased recreational use, Silver Lake has been plagued with invasive species such as Eurasian Watermilfoil and phragmites. The Silver Lake Improvement Association has been spearheading invasive species treatment in recent years on Silver Lake.

2) Wetland Ecosystem Services

We believe the Draft should better describe the ecosystem services and community benefits that wetlands provide. Further, mapping wetland loss across the township illustrates how threatened these ecosystems are. Wetlands are among the most ecologically rich and diverse habitats in the world. According to Michigan Sea Grant, nearly 90% of Great Lakes fish species depend on wetland habitats at some point during their life cycle. A variety of mammals, birds, amphibians, and reptiles also depend on wetland habitats. Wetlands provide fish and wildlife habitat, sequester carbon, attenuate floods, stabilize shorelines, and recharge groundwater. Communities across the Grand Traverse Bay watershed are stepping up to fill the gap in wetland protections. Many communities have added local wetland

protection above the State's Part 303 program. Garfield Township's wetland setback (Zoning Ordinance Section 534(B)) is serving as a model for others in the region.

We understand this meeting represents the first of many to review subject chapters of the Draft Master Plan and that the township is continuing to solicit feedback on the subject chapters. As always, The Watershed Center looks forward to working with the township to ensure waterways and waterbodies are protected. We hope this letter is useful in strengthening the next draft of the Natural Resources Chapter. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Smith".

Heather Smith
Grand Traverse BAYKEEPER®