

September 8, 2021

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



Dear Planning Commissioners,

I am writing to comment on the Marengo 31 (M Brothers Northern, LLC) Special Use Permit that will be discussed at the September 8, 2021, meeting. The Watershed Center advocates for clean water in Grand Traverse Bay and acts to protect and preserve its watershed. We voiced concerns with potential wetland impacts associated with this project nearly a year ago when the plans underwent Conceptual Review in October 2020; these concerns remain. We applaud the applicants for preserving nearly 9.5 acres of wooded wetland, but we fear that allowing wetland fill and snow storage adjacent to the wetland could impact water quality and set a dangerous precedent.

We recognize that Garfield Township values wetlands, and we further acknowledge that the Planning Commission is well-suited to ensure wetlands are protected and preserved through Section 534 of the Zoning Ordinance. Wetlands provide a number of ecosystem benefits including flood attenuation, water filtration, groundwater recharge, carbon sequestration, and fish and wildlife habitat. While we are pleased to see site plans indicate that much of the onsite wetlands will be preserved, we raise three wetland-related concerns.

First, site plans suggest that a portion of the proposed building will require wetland fill. While we understand that applicants have received a permit from the Department of Environment, Great Lakes, and Energy to fill a portion of onsite wetlands for construction, it does not waive the township from upholding the zoning code. The proposed wetland fill does not comply with Section 534(B) of the Zoning Ordinance that states "no structure or parking lot shall be constructed within twenty-five (25) feet of such wetland." This could necessitate the need for a dimensional variance; however, we suggest alternate building configurations to ensure all onsite wetlands are protected and all zoning provisions are adhered to.

Secondly, it appears snow storage areas are proposed in proximity to onsite wetlands. Poor snow storage practices adversely impact water quality as snow piles contain contaminants such as salt, sand, heavy metals, petroleum products, pathogens, and pesticides. The Department of Environment, Great Lakes and Energy states that snow piles should be stored at least 50 feet away from wetlands. The Planning Commission should ensure that these best practices are employed at this site.

Finally, we understand the importance of a connected non-motorized trail system in Garfield Township and know the applicants are interested in connecting to the Miller Creek Nature Preserve. We urge the township to require open-pile trail systems where appropriate through the wetland network. Open-pile systems such as boardwalks are

the least impactful type of wetland trail systems as they prevent the need to compact, fill, or dredge wetland soils or remove wetland vegetation. In addition, open-pile systems do not impede the natural surface flows within a wetland.

Wetlands have a tremendous capacity to provide benefits in our community and local units of government have the ability to ensure they stay protected. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Smith". The signature is stylized and cursive.

Heather Smith  
Grand Traverse BAYKEEPER®