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September 4th, 2009

Greetings:

Thank you for asking the Friends of Starkweather Creek (FSC) to make comments on the Northeast Neighborhoods Development Plan. FSC's mission is to improve the health of Starkweather Creek and to benefit the communities in its watershed.

We understand that Phase 1 of the Plan encompasses only a small part of our watershed. Most of it is located within the neighboring watershed of Door Creek. However, Door Creek faces similar threats as the Starkweather, so our comments address all parts of the planning area:

- 1. P. 19 The paragraph under "a) The Goal" lists green roofs along with other practices to infiltrate stormwater into the ground. However, green roofs do not directly increase groundwater recharge; instead, they mostly rely on evaporation and transpiration to return water to the atmosphere.
 - Green roofs could have a role in reducing stormwater runoff volumes, but should be considered as a complement to, and not a substitute for, infiltration measures necessary to replenish aquifers and maintain clean, cold streamflow.
- 2. P. 38 The second paragraph under "a) Open Space Corridors" states that open space corridors following drainagways, which will be retained in their natural state and may be up to 75 feet wide, may be "part of private lots".

We are very supportive of mapping and protecting these corridors. However, we believe it is critical that they include public walking and/or biking trails, e.g. the proposed "Town Center Path". These will be more difficult to build if parts of the corridors are private. Wide publicly-owned corridors are needed to provide enough space for trail construction, for the corridors are often flood-prone and wet, and the upper margins are normally drier and more suitable for trail construction.

Friends of Starkweather Creek works for a healthy urban stream to benefit the community through stewardship, education, and advocacy.

- 3. P. 50 Under "c) Pedestrian and Bicycle Paths": We support construction of an off-street path connecting the Seminary Springs area with adjoining neighborhoods. No such path is shown on Map 9. This path should be tied to the Town Center and North/Northeast Pipeline Paths. The Seminary Springs area contains a unique ecosystem, due to the interspersion of habitats marsh, wet meadow and mature forest, and, if it is easily accessible by foot or bike, provides neighborhood residents with the opportunity for wildlife observation, environmental education and passive enjoyment of nature.
- 4. P. 58 Green roofs are listed as an infiltration practice. To the extent that they delay the release of some amount of stormwater over time, they can facilitate infiltration, but should not be considered a substitute for robust infiltration practices. See comment #1.
- 5. P. 60 The second paragraph under "2. Open Drainageways" states that some of the corridors will "remain as private property". As noted above under comment 2, we believe the full 75 foot width should be publicly held to facilitate trail construction.
- 6. P. 61 "3. Streambank and Wetland Improvements" uses the term "selective tree pruning" with regard to managing streambank vegetation. We suggest "pruning" be replaced with "removal". Based on our experience managing streambank vegetation along the Starkweather, significant selective removal of trees is necessary to increase light and allow dense soil-stabilizing ground cover to flourish.
 - Also in this section, the sentence, "Measures should also be taken to improve the function of wetlands within the planning area" is too vague. We suggest you replace it with this sentence: "Measures should also be taken to enhance and protect wetlands, like removal of invasive brush and trees, dredging of accumulated past sediments and careful management of land disturbance and runoff in their vicinities to prevent further degradation."
- 7. P. 41 We support the planned locations for schools because they adjoin planned open space areas. It is essential the environmental education be part of class curricula. Close proximity of school children to natural areas facilitates this.

Please contact me if you have any questions: 608-444-7483.

Respectfully,

The Friends of Starkweather Creek, Inc.

Scott Taylor, Member