



Washtenaw County
Department of Planning & Environment

9/12/2007

Trudy Feldkamp, Planning Commission Secretary
7887 Klager Rd.
Saline, MI 48176

Re: General Development Plan for Saline Township Review

Dear Ms. Feldkamp:

Thank you for the opportunity to comment on the General Development Plan for Saline Township (Township Plan) update. In accordance with the Township Planning Act, Public Act 168 of 1959 as amended, the Township Plan was reviewed by Washtenaw County Planning Advisory Board and the Board of Commissioners. The Washtenaw County Department of Parks and Recreation, Road Commission, Department of Public Health, Office of the Drain Commissioner and the Washtenaw Area Transportation Study (WATS) were also given the opportunity to comment on the update.

Worth commending is the inclusion of an Urban Service District, as well as creating Lands Designated for Agricultural Preservation through an overlay. Establishing such limits on services while providing strong protective measures for agricultural land and open space minimizes the negative impacts of development while increasing service efficiency. Language encouraging clustering of residential areas and utilizing density transfers also strengthen this goal. Such planning allows for the needs of existing and future residents to be met, while also addressing sustainable growth and natural resource protection.

Staff reviewed the proposed update in the context of A *Comprehensive Plan for Washtenaw County (County Plan)*, plans of contiguous local units of government and the current Saline Township General Development Plan (Township Plan). Staff found the proposed amendments would be consistent with the County Plan and the plans for the contiguous communities with the following recommendations:

- **In most cases, the planned density of land uses is less than what is suggested by the *Comprehensive Plan for Washtenaw County*. For example, the Urban/Suburban Residential Area is set for 2-4 dwelling units/acre, while the County Plan suggests this area to be an average of 6 dwelling units/acre. Saline Township should consider increasing the allowable density within the Urban Service District in order to concentrate development in a way that provides for projected populations**

while preserving natural resources, allowing for more efficient use of services and infrastructure, and creating a strong community identity.

Although the following recommendations are not applicable to the consistency with the County Plan, we strongly encourage the incorporation of the following to enhance the overall plan:

- The Township Plan mentioned designated “Environmental Conservation Areas.” Further description should be included to show where these areas are, for example by referencing the related natural features maps.
- The incorporation of the Washtenaw Area Transportation Study (WATS) Non-motorized Plan for Washtenaw County by reference.
- A major concept of the plan is the establishment of an interconnected natural features system, as well as pedestrian and bicycle linkages. Developing a regional greenway plan that combines a natural features inventory with a regional recreation trail would satisfy multiple goals set by the Township Plan. This point is supported by Public Health and WATS.
- In order to support the Township’s efforts to maintain its rural character and to use resources efficiently as development progresses, gravel road capacity should be considered. A study of gravel road capacities as a means to manage growth was prepared by the Huron River Watershed Council and can be found at http://www.hrwc.org/pdf/PAL_Guidebook.pdf. If you would like assistance in completing such an analysis, please contact the Washtenaw County Planning Services.
- The Township Plan communicates a strong grasp of its unique character, giving reference to historic resources in various sections of the plan. Language regarding the importance of historic preservation to the community’s character should be more strongly articulated in the final draft. Saline Township should consider the addition of a goal to seek protection and preservation of historic resources through local, state and national programs.
- Designating lands for agricultural preservation through an overlay and stating “these lands should not be considered land banks for future rural or urban development or as low density residential areas” is a strong aspect of this plan. In addition, the amendments to the Township Plan could make Saline Township eligible for additional points from the State of Michigan PDR Program, however necessary maps were not included in the draft Township Plan. Specific requirements are included in more detail in the attached Staff Review and Statement of Consistency with MAPF (State PDR Program).

The opportunity for and importance of agricultural preservation is also supported by Washtenaw County Public Health.

The attached staff report provides additional detail and background regarding county comments. Additionally, agency comments are provided containing additional detailed recommendations and should be reviewed. On behalf of the Planning Advisory Board and the Board of County Commissioners, I would like to thank you for your contribution to promoting a shared vision for Washtenaw County.

If the Department may be of assistance to the Township as you work to implement the policies included in your plan, please call me at (734) 222-6888.

Sincerely,

Anthony VanDerworp, Director
Department of Planning and Environment
Washtenaw County

Attachments

Staff Report

Staff Review and Statement of Consistency with MAPF (State PDR Program)

Washtenaw County Department of Public Health comments

Washtenaw County Drain Commission comments

Washtenaw Area Transportation Study (WATS) comments

Cc: Don Pennington



Washtenaw County Department of Planning & Environment

Staff Report

RE: General Development Plan Update for Saline Township – Washtenaw County Review

Staff Report Date: 9/10/2007

Background

The Washtenaw County Department of Planning and Environment (P&E) received the draft General Development Plan for Saline Township (Township Plan) on August 14, 2007. In accordance with the Township Planning Act, Public Act 168 of 1959 as amended, the County is to provide comments to the Township, which must include two statements of consistency:

- A statement as to whether, after considering any comments received by contiguous local units of government, the proposed update is consistent with the plan of contiguous communities, and;
- A statement as to whether the proposed update is consistent with the County Plan.

The proposed update was reviewed for consistency with *A Comprehensive Plan for Washtenaw County* (County Plan). The Washtenaw County Department of Development Services, Department of Parks and Recreation, Road Commission, Department of Public Health, Office of the Drain Commissioner and the Washtenaw Area Transportation Study (WATS) were also given the opportunity to comment on the document.

Summary of Update/Review in context of County Plan

In most cases, the planned density of land uses is less than suggested by the Comprehensive Plan for Washtenaw County. For example, the Urban/Suburban Residential Area is set for 2-4 dwelling units/acre. Even when considering that the Township Urban area is expected to be less dense than in more developed areas of Washtenaw County, the County Plan recommends this area to be an average of 6 dwelling units/acre. The Washtenaw County Comprehensive Plan encourages the inclusion of provisions for higher density, as well as infill development to support the efficient use existing infrastructure as an effective way of relieving pressures for sprawling development and improving the quality of life for Saline Township residents. Concentrating development in this way allows projected populations to be accommodated while increasing a community's ability to leave agricultural and rural lands less developed. In addition to preserving natural resources and allowing for more efficient use of services and

infrastructure, this pattern limits sprawl and creates a strong community identity.

The Township Plan mentioned designated "Environmental Conservation Areas." Further description should be included to show where these areas are, for example by referencing the related natural features maps.

Designating lands for agricultural preservation through an overlay and stating "these lands should not be considered land banks for future rural or urban development or as low density residential areas" is a strong aspect of this plan. Such an overlay could act as a buffer between the Cities of Saline, Milan, and Tecumseh (Lenawee County), and the Villages of Manchester and Clinton (Lenawee County), and development in the Irish Hills area (Southwestern Washtenaw, Northwestern Lenawee, Southeastern Jackson and Northeastern Hillsdale Counties) [Consistent with County Plan's Landscape Recommendation 4.2, Buffers: Encourage local governments of urban, suburban, smaller cities and villages and the areas surrounding them to incorporate open space buffers around their communities in their master plans. Buffers are to be part of their open space plan]

The amendments to the Township Plan could make Saline Township eligible for additional points from the State of Michigan PDR Program, however necessary maps were not included in the draft Township Plan. Without having either of these maps, it is not possible to determine if the Township's Growth Management Plan would meet the state PDR program requirements due to incomplete information. Specific requirements under the Michigan Agricultural Preservation Fund Standards and Guidelines to qualify for the State's PDR Program are included in more detail in the attached Staff Review and Statement of Consistency with MAPF (State PDR Program).

Language on the importance of pedestrian and bicycle infrastructure is found throughout the plan. A non-motorized transportation system within and connecting commercial and residential land uses help to create a safe and enjoyable community for residents. The incorporation of the Washtenaw Area Transportation Study (WATS) Non-Motorized Plan for Washtenaw County by reference would strengthen this community goal.

A major concept of the plan is the establishment of an interconnected natural features system, as well as comprehensive pedestrian and bicycle linkages. Policies such as "residential development shall be organized around natural features or recreational amenities" demonstrate the Township's awareness that non-motorized transportation, recreation and natural resources conservation can be coordinated to be mutually beneficial, as well as provide public health benefits to a community. Developing a regional greenway plan that combines a natural features inventory with a regional recreation trail would satisfy multiple goals set by the Township Plan. The Township should consider the inclusion of a greenways and trails map and language addressing the designation and protection of greenways and non-motorized

transportation. Washtenaw County Department of Planning and Environment can provide technical assistance in this matter.

A policy stated in the Plan is “access to new development shall be from existing paved roads wherever feasible.” Without proper planning, rural residential development can have a sprawling affect. This development and associated traffic can overburden gravel roads and threaten rural character as well as natural resources such as water quality. In order to support the Township's efforts to maintain a rural character, as well as to use resources efficiently as development progresses, gravel road capacity should be considered. A gravel road capacity analysis can help to determine density limitations on gravel roads will provide useful information for refining land use plans, reviewing development proposals, and prioritizing road projects in order to minimize the negative impacts of development along gravel roads. A study of gravel road capacities as a means to manage growth in rural and suburban communities was prepared by the Huron River Watershed Council and can be found at http://www.hrwc.org/pdf/PAL_Guidebook.pdf. If you would like assistance in completing such an analysis, the Washtenaw County Department of Planning and Environment can help.

The Township Plan aptly communicates a strong grasp of the Township's unique character, giving reference to historic resources in various sections of the plan. The Washtenaw County historic resources database on the web, known as HistWeb, returned 132 individual historic sites recorded within Saline Township. These landmarks and everyday structures are worthy of specific discussion in the Township Plan. Language regarding the importance of historic preservation to the community's character, particularly the importance of rural and agricultural sites, “picturesque” viewsheds, and infill development standards should be more strongly articulated in the final draft. Saline Township should consider the addition of a goal to seek protection and preservation of historic resources through local, state and national programs.

Contiguous Community Land Uses

- East (York Township): The western portion of York Township is Primary Agriculture and Rural Residential. The Primary Agriculture land use also has an Agricultural Preservation Overlay. This does not conflict with Saline Township's planned Rural Residential and Agricultural land uses.
- Southeast (Milan Township): The northwest corner of Milan Township is planned as Prime Agricultural land and is consistent with the adjacent Saline Township planned land use.
- West (Bridgewater Township): The portion of Bridgewater Township adjacent to Saline Township is Agricultural-Residential land use and is compatible with the planned land use for Saline Township.
- Northwest (Freedom Township): The southeast corner of Freedom Township contiguous with Saline Township is Agricultural land use and is compatible with the future land use of the northwest portion of Saline Township.

- North (Lodi Township): The southern boundary of Lodi Township is Agricultural land, with some small sections of Rural and Suburban Residential. These land uses are in agreement with those planned for adjacent land in Saline Township.
- Northeast (City of Saline): The portion of the City of Saline which touches the Saline Township boundary has a variety of planned future uses. Most of the adjacent land is Low Density Residential, City Density Residential and Open Space – Recreation. Along Michigan Ave (US-12) Office and General Commercial are planned. This is consistent with the planned commercial area along Michigan Ave. in Saline Township.

Contiguous Community Comments

None received

Review of Plan in Context of Contiguous Community Master Plans

The proposed Township Plan update is consistent with the master plans of adjacent communities.

Applicable County Department Comments

Washtenaw County Public Health: See attached

Washtenaw County Drain Commission (WCDC): See attached

Washtenaw Area Transportation Study (WATS): See attached

Staff Review and Statement of Consistency with MAPF (State PDR Program)

Staff reviewed the amendments to the Saline Township Growth Management Plan for consistency with *A Comprehensive Plan for Washtenaw County* (County Plan) and the *Michigan Agricultural Preservation Fund Standards* (Standards):

- The proposed Lands Designated for Agricultural Preservation Overlay area may closely align with the Recommended Proposed Future Landscapes in the County Plan: Open Space and Rural (5+ acre lots), although see number “1. Requirement” below.
- The amendments could make Saline Township eligible for additional points from the State of Michigan PDR Program. [Consistent with County Plan’s Agriculture Recommendation 2.1, Farmland Preservation Funding: Encourage landowners to apply for state and federal programs and encourage local governments to identify funding methods for farmland preservation including...PDR program].
- A proposed Lands Designated for Agricultural Preservation Overlay could act as a buffer between the Cities of Saline, Milan, and Tecumseh (Lenawee County), and the Villages of Manchester and Clinton (Lenawee County), and development in the Irish Hills area (Southwestern Washtenaw, Northwestern Lenawee, Southeastern Jackson and Northeastern Hillsdale Counties) [Consistent with County Plan’s Landscape Recommendation 4.2, Buffers: Encourage local governments of urban, suburban, smaller cities and villages and the areas surrounding them to incorporate open space buffers around their communities in their master plans. Buffers are to be part of their open space plan].
- Below are the five master plan requirements under the Michigan Agricultural Preservation Fund Standards and Guidelines to qualify for the State’s PDR Program. The amendments to Saline Township’s Growth Management Plan meet the requirements for the program with recommendations provided to more competitively position Saline Township for the program.

1. Requirement: A New “Agricultural Preservation” Future Land Use Plan Category, Map Amendment

Discussion: On page 72 of the draft Growth Management Plan, under “1. Lands Designated for Agricultural Preservation” two maps are referenced that are meant to illustrate the areas that designated under this category. The two maps are called “Map ____ Saline Township Land Use Strategy” and “Map ____ Land Use Strategy – Agricultural – Lands Designated for Agricultural Preservation Overlay,” however, neither of these two maps are provided. Additionally there is a blank that is meant to indicate the Sections of the Township in which this designation is located, however the listing of these sections is not provided. The text does indicate that the “Lands Designated for Agricultural Preservation” consists entirely of “Prime Agricultural Lands” of the Township Land Use Strategy. Without having either of these maps, it is not possible to determine if the Township’s Growth Management Plan would meet the state PDR program requirements due to incomplete information.

2. Requirement: PDR and Other Agricultural Preservation Strategies (Policies) must be included in the Goals, Objectives, Policies Section of the Master Plan

Discussion: Text referring to the strategies intended to preserve agricultural land should include PDR, but also other techniques. Saline Township's General Development Plan contains within the "Agricultural Land Use Chapter" under Sections 7.03 and 7.04 objectives and implementation strategies which address farmland preservation. Under the "B. Residential Land Uses in Agricultural Areas" on page 75, includes the following objectives to address this goal. These include:

- a. In accordance with the procedures contained within the A -1 Agricultural district regarding sliding scale densities;
- b. Taken from land unsuited for farming where available
- c. Allowed through rezoning to PUD as specified within the Zoning Ordinance
- d. Clustered to allow continued agricultural use of the remainder of the acreage.

Objectives were also identified for recreational land uses, land ownership, extension of utilities, and roads as it relates to Agricultural land uses

Section 7.04 on page 76 identified six Implementation Strategies, which include:

1. Adopt zoning that designates farming and farming related activities as the primary land use for areas of the Township specified as Lands Designated for Agricultural Preservation.
2. Encourage and approve applications for PA 116.
3. Adopt assessment policies that reflect the agricultural value of land in agricultural use by designating farmed parcels in the agricultural land classification.
4. Encourage and support Township properties for inclusion in Purchase of Development Rights (PDR) programs.
5. Consider the Transfer of Development Rights (TDR) for selected portions of the Township.
6. Recognize and encourage the 5-county Food System Economic Partnership effort between Washtenaw, Monroe, Lenawee, Wayne, and Jackson Counties.

These objectives and strategies fit in very well with the state's PDR requirements, and these strategies also fit in with the Agriculture strategies found in Chapter 4 of *A Comprehensive Plan for Washtenaw County*. Additionally, sliding-scale agricultural zoning has been identified by the state PDR program as a land use planning technique that the state program would consider for awarding points under the Local Agricultural Planning scoring criteria of the *Policies and Procedures* of the Michigan Agricultural Preservation Fund. Saline Township is one of very few jurisdictions in the state that utilize sliding-scale agricultural zoning.

3. Requirement: Include a paragraph describing why farmland should be preserved in Saline Township.

Discussion: The text on pages 67-71 including Sections 7.01 and 7.02, as well as meets this requirement. In Section 7.03 in the Agricultural Land Use section of the Goals, Objectives and Policies section, under 7.03.A. -- "Agricultural Land Use" and 6.03.A.1 – "Lands Designated for Agricultural Preservation" there is discussion that meets this requirement quite well. The reasons include retaining the use of prime agricultural soils, the importance of the sustenance and economic benefits provided by the agricultural industry to the residents of Saline Township, and that there continues to be suitable lands for long-term agricultural uses.

4. Requirement: A paragraph describing why the new "Agricultural Preservation" future land use plan category, was chosen/designated.

Discussion: The text in the proposed subheading "1. Lands Designated for Agricultural Preservation" on pages 72-73 states reasons for its designation:

The Lands Designated for Agricultural Preservation were chosen for the following reasons:

- (1) The area is comprised on prime agricultural soils according to the USDA-NRCS Washtenaw County Soil Survey
- (2) There are several 80+ acre parcels in this area
- (3) The area is comprised mostly of active agricultural according to the 2000 SEMCOG land use inventory
- (4) This area is comprised mostly of agricultural lands according to the Agricultural Lands Map, Figure 4-1 of the Washtenaw County adopted *A Comprehensive Plan for Washtenaw County*
- (5) Several PA 116 enrollments exists in the area

This designation comprises all of the areas designated "Prime Agricultural Lands" according to the Township Land Use Strategy. However, neither of the Saline Township Land Use Strategy, nor the Land Use Strategy – Agricultural – Lands Designated for Agricultural Preservation Overlay are provided (see Number 1 above). While the two maps are not present that would illustrate the location of the Overlay, these reasons for selecting the Agricultural Preservation Overlay Area do fit in very well with the state's PDR requirements.

5. Requirement: Farmland preservation goal(s).

Discussion: The goal found under Section 7.03 on page 71 serves as the required farmland preservation goals. It states the following: "The preservation of agricultural and open space land use." The objectives on page 72-76 also support this goal, as well as the Implementation Strategy found under Section 7.04 on page 76.



**Public Health Checklist for Review / Comment of
Washtenaw County Planning Documents**

	Not Addressed	Somewhat Addressed	Adequately Addressed	Not Applicable To this review
1. The plan includes elements that increase access to physical activity.				
A. Opportunities for use of non-motorized transportation are evident in the plan (bikeability, walkability, Multi-use paths)	1	3	5 X	N/A
B. Connectivity between schools and residential areas are promoted in the Plan (Safe Routes to School).	1	3	5 X	N/A
C. Preservation of green/open Space including parks is Evident in this plan.	1	3	5 X	N/A

Comments: _____ Interconnection between streets, sidewalks and bike paths is very evident in the plan; land for neighborhood parks is clearly articulated as well as the need for open space areas conveniently located for all residents.

	Not Addressed	Somewhat Addressed	Adequately Addressed	Not Applicable To this review
2. The plan includes elements that increase access to healthy eating resources.				
A. The plan promotes mixed use development (retail including access to grocery stores and residential).	1	3 X	5	N/A
B. Grocery stores and super-markets can be accessed by non-motorized transportation.	1	3	5 X	N/A
C. The plan includes elements that support or improves the local food system (including preservation of agricultural land / urban agriculture and community gardens)	1	3 X	5	N/A

Comments: _Connectivity between streets, sidewalks and bike paths is clearly articulated which would increase opportunities for accessing grocery stores and markets using non-motorized transportation ; there is a clear emphasis on agricultural activities and viable farming activities

	Not Addressed	Somewhat Addressed	Adequately Addressed	Not Applicable To this review
3. The plan includes elements that promote emotional well-being and social connectivity.				
A. The plan includes elements that promote the use of, and access to, public transportation.	1	3	5	N/A
B. The plan includes elements that promote connectivity between residential development and retail.	1	3	5 X	N/A
C. The plan incorporates affordable housing options into residential developments.	1	3	5	N/A X
D. The plan includes built elements that increase community cohesion and neighborhood activities.	1	3	5 X	N/A

Comments: Community cohesion is clearly evident in the plan.

References:

- 1) Washtenaw County Public Health comments for Environment and Planning Master Plan.
- 2) Design guidelines for Active Michigan Communities, 2006.
- 3) Robert Wood Johnson: Active Living Research
 - a. Designing for Active Recreation: February 2005
 - b. Designing for Active Transportation: February 2005



JANIS A. BOBRIN
DRAIN COMMISSIONER
705 North Zeeb Road
P.O. Box 8645
Ann Arbor, MI 48107-8645
email: drains@ewashtenaw.org
<http://drain.ewashtenaw.org>

DENNIS M. WOJCIK, P.E.
Chief Deputy Drain Commissioner

Telephone 734 222 6860
Fax 734 222 6803

September 13, 2007

To: Adrienne Dale

From: Dennis M. Wojcik, P.E.

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

Re: Saline Township Proposed General Development Plan

The subject plan has been reviewed and the following comments are offered on behalf of the Washtenaw County Drain Commissioner's Office

1. The Township is commended for the multiple references within the plan that will protect and foster the environment and natural features of the Township.
2. The language of Section 6 10.A.1.b.3 is recommended to be revised. The following language is recommended: Wetlands shall be protected from impacts caused by development.
3. References to the Washtenaw County Drain Commission should be changed to the Washtenaw County Drain Commissioner (WCDC).
4. Section 11.02.C.b.2 indicates that within residential developments the drainage systems shall be dedicated to the WCDC. The term residential development is too broad and should be defined more explicitly. Discussion with this office in regard to this matter is requested to assure that the goals of the Township and policies of the WCDC are met.
5. The language of Section 11.02.C.d is recommended to be revised to the following: On-site drainage systems shall be adequate to deliver surface run-off to established drainage courses without adverse impacts.
6. It is recommended that in Section 12.04.C the term retention be revised to storage.
7. The second sentence in Section 12.04.C should be revised to: Large-scale storage areas serving several properties will be encouraged, in place of storage areas on each property when deemed appropriate for ease of maintenance and protection of natural resources.
8. It is recommended that language be added to the plan regarding the impact of high ground water tables on developments and that these shall be taken into account in the design of the development. Numerous homeowners throughout the county have been negatively impacted by construction within areas of high ground water tables.

Please contact me with any questions you may have

Planning Reviews

Community: Saline Township

Date Received:

Complete Master Plan Update:

Complete Zoning Plan Update:

Master Plan Amendment:

Zoning Plan Amendment:

Other: Growth Management Plan Update

Sections reviewed: Goals Policies Land Use Recommendations

Transportation Recommendations Other

General comments:

The Township should be commended for its inclusion of a transportation section as well as the inclusion of a Pedestrian/Bicycle Circulation section. The transportation portion of the plan should consider the transportation facilities in adjacent communities for the provision of a consistent system serving the Township.

Comments by Section:

Transportation Section

Page 99, Section 10.01 First Paragraph, last sentence: The Washtenaw County Road Commission recently completed a right of way plan which should be referenced in the plan as well as checked periodically so that the needs of the WCRC and the development of Saline Township do not work against each other.

Page 100, Part X Policies, Collector Roadways, Policy B, page 100: consider adding “and sidewalks” at the end of the first sentence. The WATS Non-motorized plan which the WCRC collaborated on, requires sidewalks for all urban streets as described in this section (some exceptions apply). Also, consider including the requirement of sidewalks in sections C and F. Incorporating sidewalks as connections between adjacent developments as well as in new developments are specifically discussed in the WATS non-motorized plan. If the Township needs a copy of the WATS non-motorized plan, please contact the WATS office at 994-3127.

Page 100, Part X Policies, Collector Roadways, Policy B, last sentence: It is unclear what area “designated urban parts of the Township” is referencing. If it is referring to the USD or the Federal Aid Urban Area, it would be clearer if it was specifically stated.

Page 104: Please add a legend to make the map more understandable.

Page 105 Section D: In order for a road to be eligible for federal funding it must be included as part of the National Functional Classification System. The NFC is reviewed and updated every ten years, however, if an upgrade of a road is warranted between the regular reviews, this can be accomplished by working with the Road Commission and WATS.

Page 106 Number 3: Consider adding the provision of sidewalks to this section to ensure pedestrian access in, around and through residential and commercial developments.

Page 107 Policy 1, part b: consider changing the word “within” to “in and around”. This would promote circuitous pedestrian travel not only within but also around new developments giving the development a stronger sense of place.

Page 107 Policy 1, part c: The Township should consider adding “to residential areas” to the end of this last sentence. Accommodations for bicycles with a minimum of three feet of paved shoulders for rural roads consistent with the WCRC Policy should be included as part of all paving or repaving projects. Even on rural roads a paved shoulder of more than three feet should be included. This is also consistent with the Washtenaw County Road Commission’s policy.