

**APPROVED  
EMPIRE TOWNSHIP PLANNING COMMISSION  
REGULAR MEETING & PUBLIC HEARING MINUTES**

**May 16, 2023**

The Empire Township Planning Commission held a regular meeting on Tuesday, May 16, 2023. The meeting was held at the Empire Township Hall.

**CALL TO ORDER:** Duane Shugart, Chair, called the meeting to order at 7:00 p.m.

**ROLL CALL:**

Members Present: Dale DeJager, Duane Shugart, Micah Deegan, Larry Krawczak

Members Absent: Dick Figura

Staff Present: Dana Boomer, Tim Cypher

**Krawczak moved, Deegan seconded to excuse Dick Figura from the meeting. All in favor, motion carried.**

**APPROVAL OF AGENDA:** The PC briefly discussed the agenda. **Motion by Deegan, second by DeJager to approve the agenda as presented. All in favor, motion carried.**

**ANY CONFLICT OF INTEREST** – None

**APPROVAL OF MINUTES:** The PC briefly discussed the minutes of April 18, 2023. **Motion by Deegan, second by Krawczak to approve the April 18, 2023 Regular Meeting Minutes as presented. All in favor, motion carried.**

**COMMUNICATIONS:** Cypher received a communication from Rowan Brady regarding the Master Plan, and communication from legal counsel regarding the same. Those were distributed to the PC prior to the meeting.

**PUBLIC COMMENT:** None

**PUBLIC HEARING – MASTER PLAN:**

The public hearing was opened by Chairman Shugart at 7:03 p.m. Shugart summarized the process of amending the Master Plan and welcomed the members of the public (4) in attendance. Shugart thanked Boomer, Cypher, and Dick Figura for their work on the Master Plan over the past few years.

Boomer and Cypher gave an overview of the proposed changes to the Master Plan. Red-line and final drafts of the Master Plan were posted on the website for public review. A summary document regarding the major changes to the Master Plan had been developed and distributed, and copies were available for the public at the meeting. Cypher stated that one written comment had been received from Rowan Brady, and distributed to the PC for review. After the previous meeting, it was noted that state law requires a public hearing to be held after the initial 42 day review process for Master Plan amendments. This goes against previous precedent in the county, and requires some changes to the previously discussed process.

Shugart opened the floor for public comment at 7:13 pm.

Zach Hillyer – Housing North – He is the Leelanau County Housing Ready Program Coordinator. He thanked the PC for the addition of discussion and actions related to housing in the draft Master Plan. With Zoning Ordinance changes going forward from this draft Master Plan, he encouraged the PC to review the Housing Toolkit, available through Housing North. At the end of 2022, four new housing bills were passed by the State of Michigan. One of those is a payment-in-lieu-of-taxes bill, which encourages housing investment in smaller communities. He distributed a one-page summary of that bill to the PC. He thanked the PC for their work on the subject. Boomer will be in touch with Hillyer by email to get electronic versions of their toolkit and checklist to distribute to the PC.

Susan Rife – Empire – She asked how frequently the Master Plan is reviewed and how long that process usually takes. Shugart replied that the Master Plan has to be reviewed every five years, and this review has taken longer than usual due to COVID and a number of long-term zoning projects. The PC and staff described the process for the review of the Master Plan, which will then lead into a review of the Zoning Ordinance.

With no further public comment, Chairman Shugart closed the public hearing at 7:25 p.m.

**ZONING ADMINISTRATOR'S REPORT:** Cypher had previously distributed his monthly reports for April 2023. Cypher reported that he has been in contact with the applicant and Tim Figura regarding the Glen Lake Manor SUP. The application has become substantially more complete, but there are a few details left that require information to be formally completed. He is expecting the application to be complete prior to the June meeting.

He followed up on the initial conversation he had regarding a solid waste facility in the township that he initially mentioned at the February meeting. There has been no additional information submitted; he is not expecting any further movement on this until fall. **Motion by Deegan, second by Krawczak to acknowledge receipt of the April 2023 reports. All in favor, motion carried.**

#### **OLD BUSINESS:**

- **Master Plan Review** – The PC discussed the Master Plan and public comment received. The PC discussed the comments received from Mr. Brady and whether any changes need to be made based on those. The PC does not feel they have had enough time to review the comments, and so would prefer to hold a special meeting to discuss these points and determine which should be addressed in the Master Plan. Many of them also have value for the purposes of amendments to the Zoning Ordinance. The PC discussed the overall timeline for the review process for the Master Plan.

**Deegan moved to hold a special meeting on May 22, 2023 at 7 pm for the purposes of discussing the Master Plan. DeJager seconded. All in favor, motion carried.**

#### **NEW BUSINESS:**

- A. **Pleasure of the Board** – None

**PUBLIC COMMENT:** None

**BOARD COMMENT:** Deegan thanked the public for their attendance.

**ADJOURNMENT:** **Motion** by Krawczak to adjourn at 7:51 pm. With no objection, Shugart adjourned the meeting.

Respectfully Submitted,

Dana Boomer  
Recording Secretary

Dear Empire Township Planning Commission,

My name is Rowan Brady (6008 W. Woods Dr) and the following are my comments on the 2023 Empire Township Master Land Use Plan.

I would like to begin my comments with a discussion on the Master Planning process. The Michigan Planning Enabling Act of 2008 outlines specific processes for creating and adopting a Master Plan. Based on the information I have been able to discern from the meeting minutes of the Planning Commission I am unsure if this process is being followed to the letter of the law. A brief summary of important and required steps is provided below. Based on the meeting schedule of the Empire Township Planning Commission and Township Board of Trustees, I believe item 4, in the list below, was skipped.

1. Intent to Plan Notices
  - a. Prior to preparing a Master Plan the Planning Commission must send notice to the following entities:
    - i. The Planning Commission, or Legislative Body if no Planning Commission exists, of each surrounding municipality
    - ii. The County Planning Commission
    - iii. The Regional Planning Agency (Networks Northwest)
    - iv. Each public utility within the Township (gas, electric, telecommunications)
    - v. Each public transportation agency operating in the Township (BATA)
    - vi. Any governmental agency that registers its name with the Township
    - vii. The County Road Commission (if the Master Plan includes a street plan)
2. Planning Commission Recommends Approval for Distribution
  - a. The Planning Commission recommends to the Township Board of Trustees the approval of distribution for public review of the Master Plan
3. Township Board of Trustees Approves Distribution
  - a. The Township Board of Trustees approves the Master Plan for public review
  - b. A copy of the Master Plan must be sent to all entities listed under item 1(a)(i)
4. 63-Day Public Review
  - a. The public review period must last for a minimum of 63 days, counted from when the Township Board of Trustees authorized the document for distribution
5. Public Hearing on the Proposed Master Plan
  - a. Only after the conclusion of the 63-day public review may the Planning Commission hold a public hearing
6. Planning Commission holds a Public Hearing on the Proposed Master Plan
  - a. Notice of a public hearing must be sent to all entities listed under item 1(a)(i)
7. Planning Commission recommends the Township Board of Trustees adopt the Proposed Master Plan
8. Township Board adopts the Master Plan
9. Adopted Master Plan sent to entities listed under item 1(a)(i)

### **General Comments on the Master Plan**

- There are a lot of interesting ideas in the Master Plan, many of which I support.

- The Proposed Master Plan is a good starting point, but I think that this document is a long way from a complete and actionable Master Plan.
- This document is extremely text heavy, I would appreciate more graphs, tables, images, and maps to support the text and make the document easier to read.
- Overall, I found the Master Plan very difficult to follow. In the 100s of Master Plans I have read, I have never seen one structured like this.
  - I would recommend the following structure for the Empire Township Master Plan. Text in **bold is a chapter**, text in *italics is a heading* of a chapter, text in **blue are the existing sections/pages** of the Proposed Master Plan, and text in **red are items that I believe warrant discussion in the Master Plan** (see additional comments later in this document). Some pages/sections may be missing from the proposed reorganization, this was not intentional. Any content in the Master Plan should be able to be placed in the proposed structure below.
    - **Table of Contents**
    - **Introduction**
      - Page 1
      - Page 31 – 34
      - *Guiding Principles*
        - Pages 2 – 6
    - **Demographics**
      - *Population*
        - Page 35 (Population)
      - *Age*
        - Page 35 (Population)
      - *Households*
      - *Education*
      - *Disability*
      - *Income*
      - *Poverty*
      - *Employment*
    - **Housing**
      - Page 47 - 49
    - **Natural Features**
      - *Climate*
        - Page 37 (Climate)
      - *Watersheds*
        - Page 10 – 11
        - Page 15 (Watershed Management)
      - *Wetlands*
      - *Hydrology*
        - Page 37 (Lakes and Wetlands)
        - Page 37 (Groundwater Availability)
      - *Coastal Resilience*
      - *Geology*
        - Page 38 (Surface Geology)

- *Soils*
  - Page 38 – 40 (Soil Association)
- *Pollution*
  - Page 38 (Pollution)
- **Existing Land Use**
  - Page 7 – 9
  - *Agricultural Land*
  - *Residential Land*
  - *Commercial Land*
  - *Public/Institutional Land*
- **Transportation**
  - *Motorized Network*
    - Page 41 (Highways)
    - Page 41 (Road Standards)
    - Page 42 (Access Management)
    - Page 41 (Road Design)
  - *Non-Motorized Network*
    - Page 42 (Road Improvements)
  - *Public Transportation*
    - Page 43 (Public Transportation)
- **Community Facilities and Services**
  - Pages 44 – 46
- **Economic Development**
  - *Agricultural Base*
    - Page 35 (Agriculture in Empire Township)
    - Page 13 (Purchase of Development Rights)
    - Page 14 (Transfer of Development Rights)
  - *Resource Base*
    - Page 13 (Resource Base)
    - Page 13 (Mineral Extraction)
  - *Tourism Base*
- **Future Land Use & Implementation**
  - *Future Land Use*
    - Pages 16 – 30
  - *Implementation*
    - Pages 51 – 54

## **Specific Comments on the Master Plan**

### **Page 1**

I think the introduction to the Master Plan should include a discussion about the relationship between the Master Plan and the zoning ordinance. As the Master Plan drives changes to the zoning ordinance it would be helpful to the reader to introduce this concept at the beginning. Below is some sample text to that effect:

*“The Master Plan is not a binding agreement but rather a planning framework. The Zoning Ordinance, on the other hand, is local land use law. The Zoning Ordinance is a set of regulations that provide exacting specifications as to how and where development may take place. The Zoning Ordinance implements the Master Plan; and, as outlined in the Michigan Planning Enabling Act (MPEA), a direct relationship between the two documents is required. For example, if it emerges through community engagement and research that the housing types available do not adequately serve the population, a municipality would revisit the Zoning Ordinance to determine if the land use code is preventing a particular type of development through height restrictions or lot size requirements. Only when the two documents are in sync can they be effective planning tools.”*

## **Page 2**

The three guiding principles provide a good framework for the Empire Township Master Plan. However, the difference between the guiding principles, subheadings under the guiding principles, and long-term objectives elsewhere in the Master Plan is unclear. What is a guiding principle? What is a goal? What is an action? I strongly encourage the Planning Commission to trim the guiding principles section and move many of the subheadings and actions to the body of the Master Plan where they can be supported by data and narrative. It is essential that the actions are supported with content.

### Guiding Principle 1: Maintain the Rural Character of the Township

*Locate future growth near existing development areas.*

*“Focus population growth in the areas adjacent to the populated areas, and [try] to match or compliment lot size and density to that of the Village on adjacent lands wherever possible.”*

I am strongly in support of this [policy/action/goal/recommendation], as concurrency is good planning policy. However, there are no areas designated for future growth on the future land use map (FLUM). The “Residential” designation on the FLUM only covers existing residential development and does not designate any areas for future growth, as the item above states. Therefore, the FLUM needs to be revised or this [policy/action/goal/recommendation] needs to be removed.

## **Page 3**

*Maintain open spaces and natural resources.*

*“Protect the water quality and beauty of the lakes and streams by establishing buffer areas along the water’s edge that consist of natural vegetation and undisturbed open space...”*

The Empire Township Zoning Ordinance requires a shoreline protection area, does this [policy/action/goal/recommendation] intend to change that? The word “establish” creates a sense that a similar regulation is not already in place.

“Minimize the loss of quality vegetation and grading on steep slopes.”

The Empire Township Zoning Ordinance has steep slope regulations (Section 4.20), does this [policy/action/goal/recommendation] intend to revise those standards? If so, what revisions?

“Preserve valuable natural resources by encouraging the clustering of housing with no loss of density.”

The phrase “no loss of density” is confusing, based on the tone/goal of the Master Plan I am assuming it means that while cluster housing is encouraged it should not be a tool for increasing residential density in agricultural/natural areas. “No loss of density” means that moving from higher to lower density would be discouraged as that would be a loss, so this [policy/action/goal/recommendation] is encouraging higher residential density through cluster housing. I am in support of higher residential density through cluster housing, but I do not believe that this was the intent of the [policy/action/goal/recommendation].

“Interconnect valuable natural resources... providing incentives to do so”

What incentives does the Planning Commission intend to offer? How do they intend on offering them?”

*Maintain views along major roads.*

Which roads are considered major? Section 4.15 of the Township Zoning Ordinance states M-72, M-22, County Road 616, and County Road 677.

“Cluster development within wooded areas....”

Cluster development has already been mentioned in the Master Plan and will be mentioned several more times. Given the importance the Master Plan is putting on cluster development, there should be a [policy/action/goal/recommendation] to adopt cluster development standards in the zoning ordinance. The following standards from the zoning ordinance are insufficient as cluster development standards:

“No more than one dwelling per acre, except for lots in excess of ten (10) acres in size, in which case the Planning Commission may increase such density by no more than 50% where dwelling units are clustered and no less than 50% of the lot will remain perpetually as a conservation area. Density may be increased by an additional 25% where the dwelling units are clustered and set back no less than 500 feet from M-72 and screened from view by landscaping approved by the Planning Commission as part of site plan review.”

*Value and encourage agricultural uses.*



“Encourage the incorporation of existing agricultural structures such as barns, silos, ...”

How does the Planning Commission intend to implement this [policy/action/goal/recommendation], if a property owner has an old barn on their property and wants to build a house on the property are they prohibited from tearing the barn down? How many existing agricultural structures are present in the Township, is this worth including as a [policy/action/goal/recommendation]?

#### Page 4

*Plan for recreational uses.*

“Support tourism based on natural resources as an economic industry, while [ensuring] that natural resources are not over-burdened.”

The ensure v. insure grammatical error was corrected throughout the Master Plan, this was an additional spot I noticed.

“Encourage different types of recreational uses that are low impact in terms of noise, and crowds and do not adversely impact natural resources.”

How does the Planning Commission intend to encourage these uses? Does the Planning Commission intend to solicit companies or people to open and operate these businesses? They are already considered special land uses in the public recreation district.

#### Guiding Principle 2: Plan for Growth Compatible with the Existing Rural Character of the Township

*Think design, not density.*

If the Planning Commission maintains that the design of a development is more important than the density of said development (a view which I am in agreement with), the statement on Page 3 “encouraging the cluster of housing with no loss of density” is antithetical to this viewpoint, as the “encouraging the cluster of housing with no loss of density” is tying design and density together.

“Avoid a ‘one size fits all’ mentality for regulating land uses.

I am unsure what this means... Zoning is inherently a ‘one size fits all’ approach as all land zoned X must conform to the standards of zoning district X. Is this [policy/action/goal/recommendation] intending to revise how the Township regulates land use (i.e. zoning)?

“Minimize excessive widening, paving, and curbing of roads, designing roads to follow the natural contour of the land or the character of the neighborhood.”

How does the Township intend to implement this [policy/action/goal/recommendation]? Through the zoning ordinance, later in the Master Plan the planning and design of roads is stated as the county's responsibility. Does the Township intend to adopt road standards?

“Encourage developments designed around a common element, such as a park, open space, or civic building.”

This [policy/action/goal/recommendation] needs additional clarification, specifically “Encourage developments [to be / that are] designed around ...” The inclusion of “to be” changes the intent of the [policy/action/goal/recommendation] so that when development does occur the design around common elements is encouraged. The inclusion of “that are” changes the intent of the [policy/action/goal/recommendation] so that the Township is actively encouraging development in the Township that is designed around a common element. Additionally, how does the Township intend to implement this action as no such standards for development design exist in the Zoning Ordinance?

*Create a mixture of commercial activities.*

“Promote home grown businesses, family-owned businesses, and local entrepreneurship.”

How? Does the Planning Commission intend to give incentives to just those groups?

“Discourage drive-in or drive-through businesses, especially in areas visited frequently by tourists.”

Discourage or prohibit? If either, how does the Planning Commission intend to implement this [policy/action/goal/recommendation]?

“Encourage mixed-use development that provides compact places for people to live, work, play, and shop.”

I am strongly in support of this [policy/action/goal/recommendation] but there is no future land use category that supports this [policy/action/goal/recommendation] and no zoning standards that support it either. The gateway “mixed-use” future land use designation does not “provide compact places for people to live, work, play, and shop.” This [policy/action/goal/recommendation] needs to be removed or an additional future land use category needs to be added and designated on the map.

*Encourage a Variety of Housing Types*

“Encourage the development of housing to satisfy the lifecycle housing needs of residents of all income levels.”

This is an excellent [policy/action/goal/recommendation] that I am in strong support of. However, throughout the Master Plan the predominant land use approach, specifically regarding residential development is for large-lot single-family residences. Large lot-single family is one of the least affordable/attainable housing options. The statement above and the preferred land use approach prescribed throughout this Master Plan are in conflict.

“Encourage the development of affordable housing in suitable areas throughout the Township.”

This is also an excellent [policy/action/goal/recommendation], however, the statement is unclear on what is considered affordable housing or what is considered a suitable area. Additionally, how does the Township plan to encourage the development of affordable housing?

“Allow accessory dwelling units throughout the Township where compatible with surrounding land uses.”

What are considered to be compatible surrounding land uses? Additionally, the Empire Township currently allows accessory dwelling units under Section 5.4 Guest Houses. However, the standard to have a guest house is that the lot must be twice the minimum size of the lot, which means that the ordinance is not permitting an accessory use, just two homes on one (two) undivided lot.

## **Page 6**

### Guiding Principle 3: Collaborate with Residents and Other Jurisdictions

“Become familiar with the vision, Master Plan, and zoning regulations of the Village and surrounding Townships.”

It is concerning to me that this item has to be included in the Master Plan. I would hope that the Planning Commissioners who are charged with guiding the future land use direction of our Township are already aware of the Master Plan and zoning regulations of the surrounding planning jurisdictions.

## **Page 7**

I would appreciate a table showing the breakdown of existing land uses in the Township by acreage and total percent. It is also unclear to me how assessment classifications delineated “wetlands”, as wetlands are not delineated for tax purposes.

## **Page 12**

The framing of influencing factors for future land use planning does not make sense to me. Are these factors how future land use categories were delineated? If so, what does a TDR and PDR program have to do with designating future land use? These programs are strategies to encourage

land preservation but should not influence FLU unless the Planning Commission is specifically stating “Area X should be preserved through a PDR or TDR program.” Additionally, I think there are a LOT more influencing factors when determining future land use, housing needs, availability of utilities, slope and grade, etc. are all factors that should be considered when future land use planning. Again, this framing of influencing factors is incredibly confusing and unclear.

## **Page 13**

### *Purchase of Development Rights*

Has the Township had any substantial discussion on a PDR program? This item looks like it was a holdover from the previous Master Plan so in the past decades has any progress been made on this item?

Additionally, a PDR program does not have to go through a governmental agency. The Leelanau Conservancy will enter into conservation agreements with landowners, which is a form of PDR. This should be mentioned in the Master Plan.

### *Transfer of Development Rights*

This section does not actually detail what a TDR program is, just what it does. There is no mention of sending and receiving zones or that a TDR program will have to be instituted through the Zoning Ordinance. Acme Township in Grand Traverse County has a TDR program.

## **Page 16**

I strongly encourage the Planning Commission to reevaluate the effectiveness of future land use “layers.” The Master Plan is correct that lands serve more than one purpose but that does not mean that each use/function should have its own “layer.” Future Land Use is intended to guide future zoning classifications, so if the Planning Commission was to revise the zoning ordinance according to the future land use, the zoning map would consist of a bunch of overlapping zoning districts that each have a very specific and narrow use, this approach does not conform to best future land use planning practices. Additionally, this approach completely ignores the fact that some uses are compatible with each other. The outlined future land use “layers” and the future land use map create numerous incompatibilities between land uses. See discussion below. Furthermore, the future land use map does not illustrate these “layers” because it does not show where future land use areas overlap with each other. This incomplete and misguided approach to future land use planning could create future development inconsistent with the goals of this Master Plan, see discussion below.

### *Agricultural/Residential*

“In addition, the intent of this layer is to maintain, promote, and allow existing farming operations to continue and grow by protecting them from encroachment by other incompatible land uses.”

As described on page 18 “this later includes the entire Township”, if that is the case the two statements above are in conflict with each other. For example, the industrial areas designated on the future land use map may be considered to be incompatible with the agricultural/residential land use layer. But since this layer includes the entire Township there are areas that are both designated “Agricultural/Residential” and “Industrial’ on the future land use plan.

## **Page 18**

“Land-owners in this layer should be encouraged to utilize their properties for agricultural activities...”

How does the Planning Commission intend to encourage these operations? Does the Planning Commission intend to offer some form of incentives to achieve this?

“Single-family residential uses should be located at a safe distance and buffered from normal farming operations...”

What is considered a safe distance? How does the Planning Commission intend to enforce this?

## **Page 22**

“adequate buffering and spacing between these uses and residential uses is highly recommended”

Recommended but not required? If required this would require a revision to the Zoning Ordinance.

“intensity of use should be scrutinized through a special review process”

What is the special review process described here? Is this in addition to site plan review or is this site plan review?

## **Page 23**

### *Single Family Residential*

“The primary use should be standard single-family residential uses”

The focus on single-family residential development does not achieve the goals of this Master Plan regarding providing housing to all residents at all stages of life and income levels.

“Residential density near the Village should allow for more dense residential use, including multi-family construction, while maintaining the existing character of the Village.”

This statement appears to be in direct conflict with the goal that primary uses in this future land use category should be single-family. Additionally, this is the only place in the Master Plan that

mentions multi-family. There needs to be a much more substantial discussion on non-single-family housing types to achieve the housing goals as outlined in this Master Plan.

“A mixture of architectural styles to prevent homogenous-appearing housing developments should be encouraged”

How does the Planning Commission intend to encourage this?

#### **Page 24**

“building design recommendations in this layer are intended for enlarged renovated homes and new construction”

What design recommendations? How does the Planning Commission intend to enforce this?

“There should be sufficient setback distance from the high-water mark”

Is this item intended to expand the setbacks currently in the zoning ordinance?

#### **Page 26**

“any proposed commercial land use should be supported by an impact analysis”

Impact analyses can be very expensive for applicants, if commercial uses are permitted by right in this district, why are applicants required to provide this information? It seems like it should be the judgment of the Planning Commission to determine the impact.

“This area includes the parcels that are located along M-72”

All of the parcels along M-72 are in this future land use layer, meaning that theoretically, this Master Plan supports commercial development on every parcel along M-72.

#### **Page 35**

Overall I found the discussion on demographics very bare bones, the Master Plan is intended to support the needs of the community but a one-page analysis of demographic factors is insufficient on illustrating what those needs may be. There is no discussion on gaining in place, poverty, etc. This information is all available on data.census.gov

#### **Page 36**

“Statistics for agriculture in Empire Township are not readily available”

The United States Department of Agriculture does an agricultural census every 5 years. While the statistics are detailed at a county level it would provide some information on area agricultural operations.

#### **Page 37**

I believe that climate change and its impact on Empire Township warrants significant discussion in the Master Plan.

“Flooding has not been a major problem in Empire Township”

Source?

“Pollution of ground or surface water is not significant in Empire Township.”

Source?

#### **Page 41**

“Road designers should give priority to environment, historic preservation, and neighborhood protection concerns, instead of opting from standard road designs that give priority to vehicle capacity”

How does the Planning Commission intend to enforce this?

#### **Page 42**

“The Township encourages the addition or inclusion of bicycle paths when major roadwork takes place.”

Does Empire Township have a non-motorized plan? If not, encouraging the inclusion of non-motorized infrastructure seems inefficient and improper if there is not a proper plan for where improvements are needed and what type of infrastructure is needed. Additionally, there is limited discussion about the Sleeping Bear Heritage Trail, the major non-motorized path in the County, which has a termination point in Empire Township.

#### **Page 47**

“Promote a range of housing types and prices while maintaining the quality of the environment.”

If this is truly a goal of the Township, then why does the future land use plan reinforce the dominant residential land use pattern of large-lot single family development?

I would appreciate the Planning Commission relying on census figures to provide context to current levels of affordability, not the survey results which are based on the perceptions of survey respondents, not data.

“Input received from local government stakeholders indicated that public opposition plays a large role in the ability of local governments to plan and zone for affordable housing.”

What does the Planning Commission intend to do about this critical issue?

**Page 50**

“Zoning changes may be considered that allow for smaller homes, more concentrated development, incentives for diverse housing options, and multi-family housing.”

What changes specifically? The Master Plan is supposed to outline these changes in detail, not “may be considered.”

Thank you to the Planning Commission for taking the time to review my comments on the proposed draft Master Plan. However, I do have more comments beyond what I was able to provide during the accelerated public review period. I would appreciate the Planning Commission observing the required 63-day public review process so I could provide my comments in full.

Thank you,  
Rowan Brady, AICP  
6008 W Woods Dr.  
Empire, MI 49630