To: Centerville Township Planning Commission From: Nicole Coonradt (5680 E Amore Rd)

RE: Zoning Ordinance (ZO) revisions for Ag Tourism

18 February 2024

## Dear Planning Commissioners:

I think it bears repeating that according to the current ZO as regards Ag Tourism section 3.20.1.C.4, the specified provisions do not apply to businesses whose primary revenue is from the sale of alcohol. Thus, regardless of any updates to the ZO during the moratorium, it would appear that a winery (distillery, or other alcohol-producing business) *never* qualified under ag tourism to being with. I am hard pressed to understand why a winery would even attempt to apply given that fact, nor how things progressed as far as they did as with the Amoritas/Under Canvas proposal. Perhaps like missing the tree for the forest there was such an inundation of information and a minutiae of detail *not* related to 3.20.1.C.4 that this fact was simply overlooked during the meetings that occurred prior to the public PC meeting of 4 December 2023.

Nevertheless, I think moving forward such language should be retained. As well, given the current situation, the ZO should state clearly that Campgrounds and Camping Facilities, including RV Parks, and Commercial Resorts, do not fall under the banner of Agricultural Tourism. This should be obvious anyway since "Article IV: Land Use Districts" is clear about the separate nature of each district as also depicted visually in the map on page 65.

Additionally, in the current ZO at 3.20.2.A before the list of acceptable ideas for ag tourism, it reads, "Agriculturally related uses include the following, as well as other *substantially similar* uses or activities" [emphasis added]. I cannot fathom how a commercial resort would ever be considered *substantially similar* to the activities listed thereafter, which are all quaint, small-scale and in keeping with the purpose of 3.20.1.A (especially items 2 and 3) and the Master Plan guidelines of maintaining the rural character and agricultural heritage of the township, and, ultimately, the peninsula. But perhaps that language needs to be amended. Furthermore, "Article VI: Commercial Resort District" and/or "Article VII: Recreational District" would be the relevant sections of the ZO for any proposed commercial resorts. Remember, however, that EGLE has noted that any proposal that includes individual plumbing and heating for multiple, separate lodging units does not fall under the definition of camping.

There should also be greater clarity at Section 3.20.3. It does not currently allow for commercial resorts. The citizens of Centerville Township need to think hard about whether they want additional resorts. We already have two, which seems like enough. Should anyone wish to make the claim that the local economy could not exist without tourism and thus would argue that we need more, I would draw attention to the Leelanau County "2022 Taxable Value Real by Class" (see attached), which indicates that 91.57% is Residential. Only 5.04% is Commercial (which would include tourism), and 3.09% Agricultural. We do not need more commercial resorts. I think it is important to keep a sense of perspective here regarding these figures.

Many thanks for your diligence in serving our township.