

To: Centerville Township Planning Commission

From: Stephen Hamilton and Emma Rosi, 5685 E Amore Rd., Lake Leelanau, MI 49653

Re: Zoning Ordinance revisions for Agricultural Tourism

17 February 2024

Dear Commissioners,

We wish to express our thoughts regarding the ongoing revisions of the Zoning Ordinance, and specifically Agricultural Tourism. The Amoritas Vineyards / Under Canvas Application for Site Use Review exemplifies how a commercial resort can try to fit under Agricultural Tourism as currently described, and underscores the need for more specificity to be sure that Agricultural Tourism is consistent with our Master Plan's stated vision of maintaining the rural character of our township and supporting our local farmers.

We believe the original intent of the Agricultural Tourism section of the township's Zoning Ordinance was to allow for activities that augment farm income in creative ways, which we unequivocally support, but not to effectively rezone agricultural land for commercial enterprises that can easily dominate the agriculture practiced on site.

The Amoritas Vineyards / Under Canvas Application for Site Use Review is a case where the vineyard on the parcel would be dwarfed by the proposed 75-unit glamping resort operated by an outside corporation, whether measured by spatial footprint or economic investment and return. This kind of development—effectively a commercial resort—on agricultural lands would not be consistent with the goals of the Centerville Township Comprehensive Master Plan, which directs the Township to “retain the township's rural and scenic character (page 7-2).” It would set a precedent that would lead to other proposals for similar developments, particularly with the nearby Sleeping Bear Dunes National Park as an attraction.

Furthermore, in this particular case, the existence of tents close to and downhill of vineyards that have to be sprayed using aerial application of pesticides throughout much of the growing season seems problematic, and may well lead to the eventual cessation of commercial grape growing at the site after Under Canvas customers start protesting. Once the infrastructure is in place, the company may well argue that the vineyards are costing them business, and that the little demonstration garden of grapes they propose is sufficient to educate visitors. We are given no information about the terms of the lease of the land to Under Canvas, which might address this potential scenario and may contain other contingencies that the Planning Commission should know about.

Furthermore, as we have repeatedly noted, the 2023 Zoning Ordinance currently in effect states very clearly in section 3.20.1.C.4 that in regard to Agricultural Tourism, “Agricultural operations whose gross revenues are solely or primarily derived from alcoholic products are not included under these provisions.” Therefore, it is unclear to us why the Amoritas Vineyards resort was ever considered to potentially qualify for Agricultural Tourism, and how it got to this stage of review.

The Amoritas case is just a first example of what corporate developers are likely to come up with. Most important for the future protection of our agricultural lands against inevitable interest by resort developers is to make the Agricultural Tourism section more specific by not only listing various activities that could be allowed, but also noting what should *not* be allowed. We suggest that campgrounds, which in the Zoning Ordinance are defined as five or more units and are regulated by EGLE, should not be permitted. Glamping tents and other structures designed for lodging and having amenities such as plumbing and heat could be included in our township's campground definition, but EGLE would not regulate those as campgrounds, so it is best to define them and call them out separately. Resorts, traditionally defined as tourist destinations offering entertainment and food as well as lodging, should also be excluded (and the term resort would also need to be defined), and should only be permitted by properly rezoning a parcel as a commercial resort. Assuming definitions are added as needed, potential language is offered here:

“Commercial resorts with campgrounds, glamping facilities, RV parks, or cabins are not permitted under Agricultural Tourism.”

Lest somebody complain that we are shutting out tourists so we can enjoy the township by ourselves, we note that Centerville Township already houses a substantial fraction of local tourists. The 2020 census indicated that Centerville Township has 591 residential households. We also have two commercial resorts. The Lake Leelanau RV Park has 249 sites. The Leelanau Pines Lakeside Camping Resort has 170 sites and is seeking to add another 150 sites, which if approved would bring their total to 320 sites. Thus, Centerville Township has 419 resort units now and may expand to 569, in which case accommodations for tourists would nearly equal the number of residential households. That estimate does not factor in an unknown number of our housing units that are being offered as short-term rentals, although we understand that estimates of the number of those are forthcoming from your citizens' committee. Most spending by these visitors occurs outside of our township.

We appreciate your attention to this matter, and thank you for your service to our community!