

HOLLY TOWNSHIP
PROPOSED AGENDA
PLANNING COMMISSION
September 5, 2023 at 6:30 PM
Holly Area Schools Board Room – Karl Richter Community Center
920 E. Baird St., Holly, Michigan 48442

CALL TO ORDER – PLEDGE OF ALLEGIANCE

ROLL CALL: Pam Mazich Ray Kerton Ryan Matson Glen Mitchell
Derek Burton Mike McCanney Kelly Fletcher

AGENDA APPROVAL

PUBLIC COMMENT – For Items on the Agenda Only.

PUBLIC HEARINGS:

Special Land Use Application from Trilogy Health Services 303 N. Hurstbourne Parkway, Suite 200, Louisville KY 40222 to operate a convalescent home on parts of Parcels Number 01-25-101-013 and 01-25-101-014 in in a RM -1: Multiple-Family Residential District.

APPROVAL OF MINUTES – August 1, 2023.

COMMUNICATIONS: None.

OLD BUSINESS:

1. Master Plan Review/Update.

NEW BUSINESS:

1. Special Land Use Application from Trilogy Health Services 303 N. Hurstbourne Parkway, Suite 200, Louisville KY 40222 to operate a convalescent home on parts of Parcels Number 01-25-101-013 and 01-25-101-014 in in a RM -1: Multiple-Family Residential District.
2. Site Plan Application from Trilogy Health Services 303 N. Hurstbourne Parkway, Suite 200, Louisville KY 40222 for parts of Parcels Number 01-25-101-013 and 01-25-101-014.
3. Riverside Village Conceptual Plan for Planning Commission Review and Comment.

REPORTS

PUBLIC COMMENT

ADJOURNMENT

Public Hearing Rules – see other side

RULES FOR PUBLIC PARTICIPATION

Welcome to this public hearing. We appreciate your taking the time to present your opinions. Everyone will be given an opportunity to speak. In order for us to have an effective public hearing, we ask that you abide by the following rules:

1. Please wait for the Chairperson to acknowledge you before you speak.
2. Begin by stating your name and address.
3. Give us your comments, opinions, and concerns. Each speaker will have **3 minutes** to present during the public hearing.
4. Do not talk or interrupt while another person is speaking at the microphone.
5. The **commission does not respond directly to questions** during a public hearing. This is because the purpose of the public hearing is to provide time for the public to speak, not for the commission to discuss or debate the item at hand.
6. Please be respectful of the board, the applicant, and your neighbors.

Again, thank you for attending.

Holly Township
Planning Commission – Regular Meeting
Minutes of August 1, 2023

CALL TO ORDER: Commissioner Mazich called the regular meeting of the Holly Township Planning Commission to order at 6:31 p.m. Located at the Karl Richter Campus, Holly Area Schools Board Room, 920 E. Baird St, Holly, Michigan 48442.

PLEDGE OF ALLEGIANCE

ROLL CALL

Members Present

Pam Mazich
Ray Kerton
Ryan Matson
Glen Mitchell
Derek Burton
Mike McCanney

Others Present

Karin Winchester, Township Clerk
Alexis Farrell, McKenna & Associates

Members Absent

Kelly Fletcher

- **Motion by Mitchell to excuse Kelly Fletcher. Supported by Burton. The motion was carried by a 6/0 voice vote.**

AGENDA APPROVAL

- **Motion by Burton to approve the agenda as presented. Supported by Matson. The motion was carried by a 6/0 voice vote.**

➤

PUBLIC COMMENT: None.

PUBLIC HEARINGS

1. Special Land Use Application from Joshua Cheff to operate a Campground on N. Holly Rd., on Parcel Number 01-04-200-007 in the AGRE District per Holly Township Zoning Ordinance, Section 32-148.

- **Motion by Burton to open the public hearing at 6:40 pm. Supported by Matson. The motion was carried by a 6/0 voice vote.**

Alexis Farrell, McKenna & Associates, presented an overview of their review of the special land use application.

The following individuals addressed the board with their comments against the Special Land Use during the public hearing:

- Derek Sommer, 2015 N. Holly Rd.

- Kyle & Carolyn Clarke, 3211 Belford Rd.
- Jeff Mumper, 11319 Ravenswood
- Jennifer Harvala, 3154 Ray Rd.
- Lesa Neuwirth, 3240 Ray Rd.
- Judy Brewer, 4035 Evans Rd.
- Scott Freimark, 11277 N. Holly Rd.
- Karen & Mitchell Gray, 3376 Ray Rd.
- Patrick Edwards, 3352 Ray Rd.
- Janet Nelson, 4007 Belford Rd.
- Jamie Wascher, 11309 Ravenswood
- Corwin Armstead, 3251 Ray Rd.
- Lisa Steigerwald, 3382 Ray Rd.
- Tom Metz, 3402 Ray Rd.
- Terry Schaible, 11463 N. Holly Rd.
- Scott Dennis, 11311 Great Barrington

- **Motion by Mazich to close the public hearing at 7:22 pm. Supported by Burton. The motion was carried by a 6/0 voice vote.**

APPROVAL OF MINUTES: July 6, 2023.

- **Motion by Matson to approve the minutes of July 6, 2023 as presented. Supported by Mitchell. The motion was carried by a 6/0 voice vote.**

COMMUNICATIONS: None.

OLD BUSINESS

I. Master Plan Review/Update.

Alexis Farrell, McKenna & Associates, updated the board members regarding the number of surveys received. The board asked to re-open the surveys until Aug 31 to get additional responses. The survey link will be posted on the Township website, and paper surveys will be available at the Township Hall and Library.

- Stakeholder meetings are being scheduled
- After the surveys are closed on Aug. 31:
 - McKenna & Associates will compile the data for the board
 - The board has the option of holding public meetings (at an additional cost)

NEW BUSINESS

1. Special Land Use Application from Joshua Cheff to operate a Campground on N. Holly Rd., on Parcel Number 01-04-200-007 in the AGRE District per Holly Township Zoning Ordinance, Section 32-148.

Alexis Farrell, McKenna & Associates, stated that the application complies with regulations and addressed the concerns presented by residents in writing and during the public hearing.

- **Motion by Mazich to postpone action on the Special Land Use Permit application from Joshua Cheff to operate and Campground on the unaddressed parcel on N Holly Road, Parcel Number 01-04-200-007 in the AGRE District per Holly Township Zoning Ordinance, Section 32-148 for 6 months from today's date to allow the applicant to submit the following additional information for consideration: a complete site plan with additional information on wetlands, buffers, fencing, and property encroachments, a traffic study, revised plan for the Fire Department to meet the access requirement, a wetlands delineation survey, parking plan, lighting plan and a property valuations study showing the on the effect on property values. Supported by Mitchell. The motion was carried by a 6/0 roll call vote.**

REPORTS: None.

PUBLIC COMMENT

The following individuals addressed the board with their comments:

- John Neuwirth, 3240 Ray Rd.
- Gretchen Summer, 11105 N. Holly Rd.
- Patrick Edwards, 3325 Ray Rd.
- Jennifer Harvala, 3154 Ray Rd.
- Judy Brewer, 4035 Evans Rd.
- Theresa Schaible, 11463 N. Holly Rd.
- Karen Gray, 3376 Ray Rd.
- Tom Metz, 3342 Ray Rd.
- Lesa Neuwirth, 3240 Ray Rd.
- Doug Smith, NOCFA
- Matt Weil, NOCFA

ADJOURNMENT

Commissioner Mazich adjourned the meeting at 8:58 pm.

Diane M. Hill, Recording Secretary

Karin S. Winchester, Clerk

HOLLY TOWNSHIP

102 Civic Drive • Holly, Michigan 48442 • Phone (248) 634-9331 • Fax (248) 634-5482

APPLICATION FOR SPECIAL LAND USE

Instructions to Applicant:

Answer each question completely. Please read the additional instructions provided for this application. Incomplete submittals will not be processed.

For Township Use Only:

Date Received: _____
File No.: _____
Administrative Fee Paid: _____
Escrow Fee Paid: _____

1) Applicant Information:

Name: **Joe Nawrocki**
Address: **303 N Hurstbourne Parkway, Suite 200**
City: **Louisville** State: **KY** Zip: **40222**
Phone: (Home) _____ (Office) **616 216 0019** (Fax) _____
Interest: **Director of Development for Trilogy Health Services**

2) All Parties of Interest (Title Holder, Contract Purchaser, Partners):

Name: **Trilogy Health Services, LLC.**
Address: **303 N Hurstbourne Parkway, Suite 200**
City: **Louisville** State: **KY** Zip: **40222**
Phone: (Home) _____ (Office) **616 216 0019** (Fax) _____
Interest: **Land developer and operator of proposed site**

(If the applicant/petitioner is not the owner of record, a notarized letter of authority or Power of Attorney must be included as part of this application)

3) General Property Information and Description:

General Location: **Located on the east side of Fish Lake Road, approximately 850 feet north of Grange Hall Road**
Acreage: **13.7 acres**
Sidwell Number: _____
Legal Description: **Proposed parcel will be made up of parts from two parcels: 01-25-101-013 and 01-25-101-014**

(Attach metes and bounds description where applicable)

Site Plan Application
Submitted:

Yes ☒ No ☐

4) Zoning:

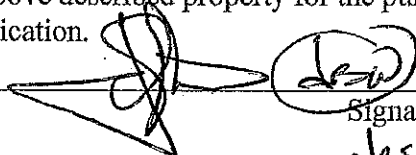
Current Zoning: RM-1

5) Special Land Use Requested:

Per Township Code Section 32-98.c.2 - allow the site to be used as assisted senior living campus.

6) Signature:

I, the undersigned, state that the foregoing answers herein contained and the information herewith submitted are in all respects true and correct to the best of my knowledge and belief. I hereby grant permission for members of the Township Board of Trustees, Township Planning Commission and the Township's Zoning Administrator, Township consultants, or other Township agents or employees, to enter the above described property for the purposes of gathering information related to this application.



Signature of Applicant

JOSEPH B. NAWROCKI

5-1-23

Date

Instructions to Applicant:

- 1) All applications must be accompanied by a site plan prepared in accordance with Chapter 32 Article 2 of the Holly Township Code of Ordinances.
- 2) For a special use application to be considered, fourteen (14) copies of the application, site plan and legal description must be submitted four (4) weeks prior to a regularly scheduled Planning Commission meeting.
- 3) Applications must be submitted with the application fees as set by resolution "Res 2008-02".
- 4) The Township Planning Commission will review the proposed use in terms of the standards stated within Chapter 32 Article 2. The applicant may provide a narrative describing the conformance of the proposed special use to the Holly Township Code of Ordinances, particularly in response to the Basis of Determinations set forth in Section 32-33(c).
- 5) Discussions with the Township Planner as it concerns the proposed special land use and its conformity with the Township Master Land Use Plan, are suggested prior to submitting a formal petition to the Planning Commission.

HOLLY TOWNSHIP

102 Civic Drive • Holly, Michigan 48442 • Phone (248) 634-9331 • Fax (248) 634-5482

APPLICATION FOR SITE PLAN REVIEW

Instructions to Applicant:

Answer each question completely. Please read the additional instructions provided for this application. Incomplete submittals will not be processed.

For Township Use Only:

Date Received: _____
File No.: _____
Administrative Fee Paid: _____
Escrow Fee Paid: _____

1) Applicant:

Name: **Joe Nawrocki**
Address: **303 N Hurstbourne Parkway, Suite 200**
City: **Louisville** State: **KY** Zip: **40222**
Phone: (Home) _____ (Office) **616 216 0019** (Fax) _____
Interest: **Director of Development for Trilogy Health Services**

2) All Parties of Interest (Title Holder, Contract Purchaser, Partners):

Name: **Trilogy Health Services, LLC.**
Address: **303 N Hurstbourne Parkway, Suite 200**
City: **Louisville** State: **KY** Zip: **40222**
Phone: (Home) _____ (Office) **616 216 0019** (Fax) _____
Interest: **Land developer and operator of proposed site**

(If the applicant/petitioner is not the owner of record, a notarized letter of authority or Power of Attorney must be included as part of this application)

3) Designer: (Registered Engineer, Architect, Surveyor, Landscape Architect or Planner)

Name: **Greg Schunck, P.E., P.S.**
Address: **20600 Chagrin Blvd, Suite 500**
City: **Shaker Heights** State: **Ohio** Zip: **44122**
Phone: (Home) _____ (Office) **216 378 1490** (Fax) _____
Interest: **Mannik & Smith Group is Civil Engineer, Surveyor and Landscape Architect for the Trilogy Project**

4) General Property Information and Description:

General Location: Located on the east side of Fish Lake Road,
Acreage: approximately 850 feet north of Grange Hall Road
Sidwell Number: 13.7 acres
Legal Description: Proposed parcel will be made up of parts from
two parcels: 01-25-101-013 and 01-25-101-014

(Attach metes and bounds description where applicable)

Site Plan Attached: Yes X No

5) Zoning:

Current Zoning: RM-1

6) Proposed and Intended Use:

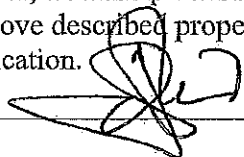
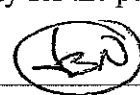
Trilogy Health Services is proposing to construct a 62,000 square feet
senior living building and 24 senior living town-homes.

Construction Trailer or
Mobile Office on site: Yes No

Requested Location:

7) Signature:

I, the undersigned, state that the foregoing answers herein contained and the information herewith submitted are in all respects true and correct to the best of my knowledge and belief. I hereby grant permission for members of the Township Board of Trustees, Township Planning Commission and the Township's Zoning Administrator, Township consultants, or other Township agents or employees, to enter the above described property for the purposes of gathering information related to this application.

Signature of Applicant

JOSEPH B. NALROCK

5-1-23

Date

Instructions to Applicant:

SILVERMAN HOLLY PROPERTIES, L.L.C.
S-HQZ, L.L.C.

121 W. Long Lake Road, Suite 190
Bloomfield Hills, MI 48304

LETTER OF AUTHORIZATION

April 28, 2023

Holly Township
102 Civic Drive
Holly, MI 48442

RE: Approximately 13.7 acres located on the east side of Fish Lake Road, approximately 850 feet north of Grange Hall Road, being part of Tax Parcel Nos. 01-25-101-013 and 01-25-101-014 (the "Property")

Dear Sir/Madam:

I write this letter as the sole member of Silverman Holly Properties, L.L.C., a Michigan limited liability company, and as the sole member of S-HQZ, L.L.C., a Michigan limited liability company (collectively, the "Owner"), which entities own the Property.

This letter shall serve as confirmation that Owner approves of the proposed site plan of Trilogy Health Services, LLC or its affiliate (the "Applicant") and as authorization to the Applicant to proceed with all property entitlements for the Property including, without limitation, the execution and filing with the Township of an Application for Site Plan Review and an Application for Special Land Use.

Please do not hesitate to contact me should you have any questions. Thank you for your attention to this matter.

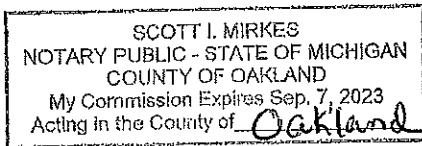
Very Truly Yours,



Gilbert "Buzz" Silverman, Sole Member of
Silverman Holly Properties, L.L.C. and S-HQZ, L.L.C.

STATE OF MICHIGAN)
)ss
COUNTY OF OAKLAND)

On April 28th, 2023, before me, a Notary Public in and for the County and State above written, personally appeared GILBERT "BUZZ" SILVERMAN, Sole Member of Silverman Holly Properties, L.L.C., a Michigan limited liability company and S-HQZ, L.L.C, a Michigan limited liability company, to me known to be the person described in and who executed the foregoing Letter of Authorization and acknowledged that he executed the same as his free act and deed.



Scott I Mirkes
_____, Notary Public
_____, County, Michigan
Acting in _____ County, Michigan
My Commission Expires on: _____

MCKENNA



Special Land Use Review

TO: Holly Township Planning Commission
FROM: Nani Wolf, AICP, Associate Planner
Ashley E. Amey, Assistant Planner
SUBJECT: Special Land Use Review #2 - Trilogy Health
DATE: August 25, 2023

Dear Commissioners,

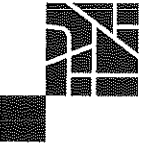
We have reviewed the Trilogy Health special land use application dated 08/11/2023 for a proposed convalescent home (proposed use as defined in the Township's Zoning Ordinance) which would consist of a single-story, building with 78 units (91 beds), as well as 28 duplexes. The project is proposed to be located on a 13.7-acre property located on the east side of Fish Lake Road and 850 feet north of Grange Hall Road, zoned RM-1, Multi-Family Residential. The proposed convalescent home use is a special land use in the RM-1 district and requires a Special Land Use approval from the Planning Commission.



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235 East Main Street
Suite 105
Northville, Michigan 48167

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Intent of the RM-1 Multiple Family Residential District.

1. RM-1 and RM-2 multiple-family residential districts are intended to provide sites for low-rise multiple-family dwellings and related uses. The RM-1 and RM-2 districts shall be located in areas that can be adequately supplied with utilities and public services. It is also the intent of the RM-1 and RM-2 districts to encourage the provision of recreational amenities and facilities designed to serve the needs of residents of multiple-family dwelling developments.
2. The RM-1 district is intended to allow low-density multiple-family development in otherwise higher-density single-family areas. The density and character of development in the RM-1 district shall be consistent within and compatible with single-family uses in the surrounding area.
3. The RM-2 district is intended to allow medium-density multiple-family development in close proximity to and compatible with higher-intensity commercial, office, and light industrial development. The RM-2 district is also intended to provide a zone of transition between areas of higher and lower-intensity development.

SPECIAL USE STANDARDS

Below are the criteria for which the Township considers special land use application:

1. **Will be harmonious and in accordance with the general objectives or any specific objectives of the township master plan and will be compatible with the natural environment.**

The proposed use is harmonious and in accordance with Holly Township's master plan: Holly Township: Master Plan 2040. The master plan designates the subject parcel as "Rural Town Center" and Multi-Family Residential, which allows for higher-density residential. Complies.

2. **Will be designed, constructed, operated, and maintained so as to be harmonious and appropriate in appearance with the existing or intended character of the general vicinity and will not change the essential character of the area.**

The proposed use and design of the site layout is generally designed to be in character and keeping with the area. Given the planned residential development north of the site, the proposed site design and operations are aligned with the future of the immediate area. However, the essential rural character of the area is not sufficiently protected by the proposed landscaping for the site. The proposed landscape plan includes the unnecessary removal of numerous existing tree stands and does not include provisions for replacement. For more details, see the site plan letter dated August 25, 2023.

3. **Will not be hazardous or disturbing to existing or future nearby uses.**

There is no indication based on the submittal packet that there will be any hazardous or disturbing components from this use.

4. **Will be compatible with adjacent uses of land and will promote the use of land in a socially and economically desirable manner.**

The proposed use of a convalescent / nursing home would aid in meeting the needs of aging residents and their families, as there are currently none within the Township. As a special use in the multi-family residential zone, this provides a good buffer between the commercial uses to the south and the anticipated residential uses to the north of the site.



5. **Will be served adequately by essential public services and facilities or that the persons responsible for the establishment of the proposed use will provide adequately any such service or facility.**

Fire lanes and proposed vehicle routing (dump trucks and fire engines), a grading plan, and retention basin capacity have been provided at this time. We believe this standard can be met. Additional items may be required should they be deemed necessary by the Township Engineer and Fire Marshal.

6. **Will not create excessive additional public costs and will not significantly decrease property values of surrounding properties.**

Multiple family uses, including assisted and independent senior housing, are compatible with the surrounding uses and allow additional housing options for Holly Township's aging residents. While any new development will require a degree of public service, the proposed use is consistent with the anticipated demands as expressed in the Township's master plan. We do not anticipate that the proposed use will result in excessive additional public costs or decrease the value of the surrounding properties.

7. **Will meet all the requirements and standards of this chapter and any other applicable laws, standards, ordinances, and/or regulations.**

For further details on site plan review, please see the Site Plan Review letter dated August 25, 2023. At this time, there are numerous outstanding errors regarding landscaping and signage. Additionally, the applicant will need to seek dimensional variances for the setbacks on the site, and ha indicated their intention to do so. However, we offer the following comments based on the plan provided. The proposed site plan meets some but not all requisite standards, laws and/or regulations.

RECOMMENDATION

We recommend the Planning Commission postpone the proposed application to allow the applicant to address the outstanding site plan comments, as noted in the Planning and Fire review letters from August, 2023.

Note on Land Division: The proposed parcel is to be made up of two parcels: 01-25-101-013 and 01-25-101-014. However, the proposed southern parcel does not meet the requirements of the Michigan Land Division Act nor the standards of Sec. 14-35 of the Holly Township code of ordinances – the proposed depth exceeds the maximum depth-to-width ratio of 4-to-1. We are working with the applicant to explore other options.

Regards,
McKenna

Nani Wolf, AICP, CAPS
Associate Planner

Ashley E. Amey
Assistant Planner



MCKENNA

Site Plan Review

TO: Holly Township Planning Commission
FROM: Nani Wolf, AICP, CAPS, Associate Planner
Ashley E. Amey, Assistant Planner
SUBJECT: Site Plan Review #2 - Trilogy Health
DATE: August 25, 2023

Dear Commission Members,

We have reviewed the Trilogy Health site plan application dated 08/11/2023 for a proposed convalescent home which would consist of a single-story, 50,835± square foot building with 78 units (91 beds), as well as 28 townhomes, aka villas. The project is proposed to be located on a 13.7-acre property (Parcel Nos. 01-28-101-014 and 01-28-101-013) located on the east side of Fish Lake Road and 850 feet north of Grange Hall Road. The subject site is zoned RM-1, Multi-Family Residential, where the requested use is considered a special land use.



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SUMMARY OF COMPLIANCE

This project is reviewed against the Township's Zoning Ordinance, Master Plan, existing site conditions, and sound planning and design principles to provide constructive and helpful feedback for the development of this site. A summary of our findings and compliance is detailed in the table below.

Further specifications, review, and recommendations are detailed on the following pages.

Ordinance Standard	Compliance
Required Submission Materials	Can comply <i>Some elements are missing required seals from licensed professionals; details are provided in the review below.</i>
Zoning and Use	Can comply <i>Additional details needed on recreation space sub-totals.</i>
Schedule of Regulations	Does not comply
Grange Hall / Fish Lake Overlay District	Does not comply
Architecture and Design	Complies <i>See note on façade color discrepancy between renders and missing dimensional items.</i>
Pedestrian Circulation and Sidewalks	Complies
Parking	Complies
Landscaping, Natural Features, and Screening	Does not comply
Outdoor Trash Area	Complies
Stormwater Management	Complies
Lighting	Complies <i>See note on table calculation requiring correction.</i>
Ingress / Egress	Complies
Fire	Approved, with conditions
Engineering and Utilities	N/A



SITE PLAN REVIEW

We offer the following comments for your consideration. Items requiring correction or more information are underlined and highlighted.

1. **Zoning and Use (Sec. 32-98).** Proposed use of the site as a convalescent home requires a special land use application and evaluation. For notes on the proposed use, please see the Special Land Use letter dated August 25, 2023.

Use-Specific Standards. All multiple-family developments in an RM district must contain an area or areas provided for common recreation of 300 square feet per dwelling unit. Such common recreation areas shall be located and designed in a manner which is appropriate to meet the recreational needs of the prospective residents of the development. Such recreational facilities may include, but not be limited to, swimming pools, tennis courts, playgrounds, picnic areas, playfields, and jogging trails.

At 28 units, the townhome side of the development requires 8,400 sf of common recreation space. At 78 units, the convalescent side of the development requires 23,400 sf of common recreation space. The applicant proposes to provide 52,781 sf of recreation space, but it is unclear which portions of the site are dedicated for recreation. The applicant must provide a more detailed recreation space breakdown: the total square footage of 1) the convalescent courtyards, 2) the clubhouse and patio, and 3) the open area devoted to recreation space on the villa side.

Additionally, if the lawn between the villas is to serve as recreation space it must have more amenities which enhance it beyond being a lawn, such as a winding path, benches, and trees. We recommend the inclusion of a gravel bocce ball court near the clubhouse to help meet this requirement, as it has a low stormwater impact as is popular among the senior demographic.

Further, the applicant must clarify if the townhomes (villas) will be leased, sold as site condos, or sold as traditional condos, as this may warrant the review of Sec. 2-113 (Site condominium regulations).

2. **Schedule of Regulations (Section 32-98 & 32-104).**

Per Sec. 32-98 of the Zoning Ordinance, "Nursing homes shall provide a minimum of 3,000 square feet of site area for each bed." The applicant proposes 91 beds, requiring 6.2 ac of site area. The applicant is also proposing 12 one-bedroom townhomes and 16 two-bedroom townhomes; together, this equates to a required 4.95 ac of site area. Combined, the two uses require 11.15 ac of site area, and the subject site is 13.7 ac in total area. *Complies.*

The site area calculations on the cover page are incorrect and must be adjusted.

Unit	Square Feet of Site Area Per Dwelling Unit (min)
Efficiency/1-bed	6,000 sf
2-bed	9,000 sf
3-bed	12,000 sf
Each additional bed	3,000 sf



Overall Setbacks. No building shall be located closer than 50 feet from, and no nursing homes shall be located closer than 100 feet from, any perimeter property line in the RM-1 district. *Complies.*

Internal Setbacks and Dimensions. The following setbacks and dimensional requirements apply to the site, per Sec. 32-98 of the Zoning Ordinance. In general, the setbacks from the internal drives/streets and from the parking/service drives does not meet ordinance requirements. Additionally, the clubhouse setback must be specified

Standard	Required	Proposed	Meets Standard?
Building Height	30 ft./2.5 story (max.)	1.5 Stories <u>*The tallest point of the convalescent home building must be provided in feet.</u>	Yes*
Lot Width	None	-	-
Lot Area	See table above	-	-
Lot Coverage	None	-	-
Setback from Internal Drive/Streets	40 ft. (min.)	31ft. (townhomes) 18 ft. (convalescent)	No No
Setback from Parking/Service Drives	10 ft. (min.)	Max: 14.5 ft Min: 6 ft	No
Setbacks Between Buildings			
Side/Side	40 ft. (min.)	88.5 ft.	Yes
Side/Front Side/Rear	50 ft. (min.)	Undetermined <u>*Must show distance between clubhouse and nearest side of townhomes</u>	Unknown
Front/Front Front/Rear Rear/Rear	70 ft. (min.)	Front/Front: 86 ft. Front/Rear: n/a Rear/Rear: 55ft	Yes n/a No

- Grange Hall/Fish Lake Overlay District (Section 32-162).** In addition to the standards set forth in Sec. 32-162 regarding lighting, landscaping, and uses (which are addressed in other parts of this letter) the following standards shall apply in the Grange Hall/Fish Lake Overlay District.

Development Pattern. The intent of the overlay district is to create a coordinated development pattern that is consistent with the character of Holly Township and provides a smooth transition between uses and properties. Transition may be created through coordination of building styles and setbacks, landscape buffers, and cross-access between properties.

The proposed landscaping plan does not meet the intent of the Grange Hall/Fish lake overlay district. The site plan shows a 25-foot buffer along the site perimeter on sheet C1001 for tree preservation, but the landscape plan on sheet C601/602 show that the applicant is proposing to remove all of the existing trees and replace them with lawn. The plan states that "trees on the north and east that can be retained... [are] to be determined during construction. This would eliminate the existing buffer between the site and adjacent properties and result in the unnecessary destruction of highly desirable natural features. Additionally, the tree survey has not been signed and sealed by a licensed arborist, landscape architect or engineer, as required by Sec 32-204. For additional details on landscaping deficiencies, see Item #7 below. In general, the proposed development pattern does not align with the character of Holly Township due to the inadequate site landscaping and tree preservation.



Site Access, Parking, and Loading. Overall street and/or driveway design and layout shall be an integral component of site design providing for both internal access to service the development of properties and cross-access between individual properties. In addition, off-street parking for nonresidential uses shall be located predominantly within the side or rear yard areas. Up to 40 percent of the off-street parking may be permitted within the front yard, outside of the front yard setback, when abutting a public right-of-way. *Complies.*

Pedestrians Pathways and Sidewalks. Emphasis shall be placed on providing a pedestrian circulation system which promotes safety and connects neighborhoods with open space, community facilities and commercial/office/mixed use areas. Vehicular access and circulation shall be planned to ensure safe pedestrian movement within the development. Pedestrian pathway connections to parking areas, buildings, other amenities and between on-site and perimeter pedestrian systems and safety paths shall be planned and installed wherever feasible. Appropriate provisions shall be included to ensure that the pedestrian pathways and sidewalks are appropriately maintained.

The proposed site plan includes a complete sidewalk network to allow residents to circulate within the site. The "proposed" paths on the east side of the site must be shown as definite, 5-foot concrete paths, as they will be used to connect with Phases 4 and 5 of the Riverside project. A mid-block crosswalk must be provided on the far east side of the loop, to safely connect the interior townhome residents to the exterior sidewalk.

The site plan does not clearly show if benches or seating amenities will be provided in the convalescent courtyards; this must be specified. If there is no planned seating in this area, we recommend the addition of a seating patio next to the detention pond, similar to the Maumee OH campus (provided a safe crossing and ramp is provided to access the area).

Signage (ref: Article X): All signs shall be designed so as to be integral and compatible with the architecture and landscaping component of the development.

Entry Sign: Complies with the requirements for freestanding signs.

Directional Signs: Must be reduced, not to exceed two square feet in size.

Number of Signs: The number of freestanding signs currently exceeds the number allowed by Article 10. Signage should be directly discussed with the Zoning Administrator.

4. **Architectural and Design Standards (Section 32-163).** Architectural renderings have been submitted this time. The applicant must submit building elevations (including heights in feet) so it can be determined if the proposed building design and architecture are in full compliance with the Zoning Ordinance. The following standards are from Section 32-163 of the Zoning Ordinance:

i. *Building Facades and exterior walls.*

- a) The ordinance requires that building facades greater than 100 feet in length incorporate architectural interest. The unique shape of the building is adequate to meet this requirement. *Complies.*
- b) The proposed building facades incorporates repeating patterns of color change and texture change. However, we believe that the building could incorporate more projections, recesses, color deviations, or windows to create more architectural interest; we recommend the Planning Commission provide guidance on this item. These features must make up at least 20% of the façade.



- ii. *Roofs.* Because the applicant has proposed a pitched roof, building elevations must depict compliance with 32-163.2.b, which states, "Overhanging eaves, extending no less than three feet past the supporting walls; an average slope greater than or equal to one foot of vertical rise for every three feet of horizontal run and less than or equal to one foot of vertical rise for every one foot of horizontal run; and three or more roof slope planes".
- iii. *Materials and colors.*
 - a) At this time the applicant is proposing metal and shingle roofing, horizontal vinyl siding, vinyl trim, cast stone, and mountain stone as their building materials. These materials comply with zoning ordinance standards as they are attractive, durable, and maintainable.
 - b) Façade colors are low reflectance, subtle, neutral, and earth tone colors. However the ordinance prohibits the use of black on building facades. The facades submitted are inconsistent between the renderings – some appear as black, and others as grey. This discrepancy must be resolved. Additionally, the metal roofing must be changed to a gray or other non-black color.



- c) The building's trim and accent areas feature neutral colors. This complies with ordinance standards.
 - d) Exterior materials do not consist of smooth-faced concrete block, tilt-up concrete panels, or prefabricated steel panels and therefore comply with zoning ordinance standards.
 - iv. *Modifications.* The Planning Commission may approve modifications to the above standards either in whole or in part. In order to do so, the proposed project must demonstrate one or more of the following:
 - a) A demonstrated architectural objective or purpose.
 - b) A practical difficulty created by the standard.



- c) Colors, facades, and architectural features that are consistent with those in the immediate area.

5. **Parking.** Parking and loading area and interior circulation and access drives shall conform to the front yard setback and greenbelt requirements of the zoning district in which the property is located. See Item #2 above.

Off Street Parking Requirements (Section 32-424). Parking requirements are determined based on the various uses of a proposed building and/or site. The pavement materials must be specified.

Each one- or two-family home is required to provide 2 parking spaces. *Complies.*

The convalescent portion of the site plan includes 123 parking spaces, 11 of which are ADA accessible, and 25 banked parking spaces. The parking requirement for convalescent homes is 1 per 5 beds + 1 per staff doctor + 1 per employee. With an anticipated staffing level of 40 employees and 91 beds, the proposed parking meets ordinance requirements. *Complies.*

6. **Landscaping and Screening (Section 32-192).** A landscaping plan has been included as a part of the most recent submission. The proposed landscaping plants for the convalescent courtyards are all acceptable species. However, the plant schedule on Sheet 34 / 36 is missing the sizes and calipers for many of the rows – these must be provided. Additionally, the proposed plantings for the stormwater detention area are all acceptable species. The applicant proposed to surround the detention ponds with an evergreen screen. While the evergreen screen separating the commercial property on the south is desirable, we recommend the applicant replace the evergreen screen on the north edge, obscuring the ponds from the convalescent facility, with the farm-style fence shown in the sample photos. This replacement would allow residents to observe the ponds as a natural amenity while still providing security for walkers and those with memory issues. Additionally, a screening fence sample was shown as a part of the site plan package but there is no note showing where this fence would be located on the site. This discrepancy must be reconciled.

Requirement	Proposed	Meets Standard?
10% of site area shall be landscaped with a combination of preserved tree cover and new landscaped plazas, gardens, and planting beds.	30,178 sf (5.05%)	No, deficient by 5%
A greenbelt must be provided along the road frontage with 1 tree per 30 ft, and ground cover of grass, shrubs, or other natural materials. <i>17 trees required.</i>	16 trees	No, deficient by 1
Parking lots must have: 1 tree per every 8 spaces. Landscaped islands of no less than 50 sf each. 3-ft setback of plantings from curb. <i>16 trees required.</i>	16 trees	Yes



A landscaped screen of 6ft or higher between the convalescent home and the adjacent single-family residence.	The applicant proposes to establish an evergreen screen between the dumpster and the northern property line, but it is not clear how many evergreens will be used, the species, or the height of each. Additionally, no screen is proposed directly adjacent to the single family home's property boundary.	No
On internal streets on the townhome side, 1 tree per 50 ft.	No street trees are proposed. The applicant must also clarify whether the townhomes will be leased, site condos, or traditional condos.	No

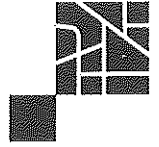
Natural Features (Section 32-204). Tree removal and replacement requirements are governed by the non-single family residential tree and woodlands protection ordinance. As mentioned under Item #3 above, the proposed landscape plan does not provide sufficient information on tree preservation and replacement. The site plan does not make an effort to protect the existing woodlands to the north and east of the proposed development impact area, nor does it specify the totals of the regulated trees to be removed. Rather, it simply states that as many trees as possible will try to be conserved during construction. This statement is not adequate – the number, species, and diameter of trees to be removed must be provided in order to determine the required replacement ratios. Additionally, the tree inventory has not been signed and sealed by a licensed arborist, landscape architect, or engineer. We recommend that the applicant re-examine Section 32-204 for additional details, including the following standards:

- "The developer may not clear cut woodland areas on the property and must consider routes for sewer and utilities that preserve the established woodlands on the property." e(2)(b)
- "Where the proposed activity involves residential development, the residential structures shall, to the extent reasonably feasible, be designed and constructed to use the natural features of the site." e(2)(d)

The applicant has provided documentation from EGLE to show that no regulated wetlands exist on the site.

- Outdoor Trash Storage Area Screening.** A trash enclosure is identified on the north side of the site plan, and a detail sheet has been provided which meets the requirements of Sec. 32-192 (i). The provided truck turning diagram must be signed and sealed by a licensed engineer.
- Stormwater Management (Sec. 32-200).** The site plan identifies several proposed retention ponds, and the applicant has provided a utility plan showing the stormwater detention piping for the site. *Complies.* Further review is subject to the Township Engineer and Oakland County.
- Lighting (Section 32-197).**

The applicant has submitted a photometric plan and lighting cut sheets. Subject to the Zoning Ordinance, lighting levels adjacent to residential areas must not exceed 0.5 footcandles along property lines or 1.0 footcandles for nonresidential properties. Additionally, the maximum lighting levels at ground level must not exceed 20.0 footcandles. *Complies.*



Note: the lighting statistics table for the average FC at the property limits does not appear to be correct.

10. **Ingress/Egress.** The site will be accessed by a boulevard entrance off Fish Lake Road. The site circulation is almost entirely two-way, with the exception of the pick-up/drop-off porticos on the convalescent building. Given the proposed use of the site, we find the circulation to generally be acceptable.

Further review is subject to the Fire Marshall's report.

11. **Fire.** The proposed internal 26-ft drive width generally meets the standards for safe passage of emergency vehicles.

Further review is subject to the Fire Marshall's report.

12. **Engineering and Utilities.** Please see the Township Engineer's review for site plan review comments.

RECOMMENDATION

We recommend that the Planning Commission postpone the proposed application to allow the applicant to revise the landscaping plan for the site and address the outstanding comments herein.

Should the applicant choose to pursue a dimensional variance for any of the items listed herein, they must first meet with the Zoning Administrator to discuss the application. All dimensional variance applications must meet the following criteria, as strictly applied:

"A variance may be granted by the zoning board of appeals where, due to special conditions, a literal enforcement of the provisions of this chapter would result in practical difficulty. A variance shall not be granted by the zoning board of appeals unless all of the following conditions are met:

- a. Special conditions and circumstances exist which are peculiar to the land, structure, or building involved and which are not applicable to other lands, structures, or buildings in the same zoning district.*
- b. Literal interpretation of the provisions of this chapter would deprive the applicant of rights commonly enjoyed by other properties in the same zoning district under the terms of this chapter.*
- c. The special conditions and circumstances referenced in subsection (d)(1)a of this section do not result from the actions of the applicant.*
- d. The variance is the minimum variance that will make possible the reasonable use of the land, building, or structure.*
- e. The granting of the variance will be in harmony with the general purpose and intent of this chapter and master plan, and will not be injurious to the neighborhood, or otherwise detrimental to the public welfare."*

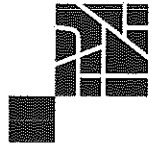
Should you have any questions or need any further information, please feel free to contact us.

Respectfully submitted,

McKENNA

Nani Wolf, AICP, CAPS
Associate Planner

Ashley E. Amey
Assistant Planner



Appendices

COMPLETENESS REVIEW

Subject to Section 32-234 of the Holly Township Zoning Ordinance, a site plan submitted for review and approval shall contain all the following data prior to its submission to the planning commission for review. Missing items are highlighted in red.

1. **General Information.** General information included on the site plan shall be as follows:

- a) Proprietors', applicants', and owners' names, addresses and telephone numbers.
- b) Date (month, day, year) of submissions, including revisions.
- c) Title block.
- d) Scale.
- e) North point.
- f) Location map drawn at a scale of one inch equals 2,000 feet with north point indicated.
- g) Architect, engineer, surveyor, landscape architect, or planner's seal.
- h) Existing lot lines, building lines, structures, parking areas, etc., on the parcel, and within 100 feet of the site.
- i) Proposed lot lines, property lines, and all structures, parking areas, etc., within the site, and within 100 feet of the site.
- j) Centerline and existing and proposed right-of-way lines of any street.
- k) Zoning classification of petitioner's parcel and all abutting parcels.
- l) Gross acreage figure.
- m) Proximity to major thoroughfares and section corners.

2. **Physical features.** Physical features included on the site plan shall be as follows:

- a) Acceleration, deceleration and passing lanes and approaches.
- b) Proposed locations of access drives, street intersections, driveway locations, sidewalks, safety paths as identified in the Holly Township Master Plan, curbing and areas for public use.
- c) Location of existing and proposed service facilities above and below ground, including:
 - Well sites.
 - Septic systems and other wastewater treatment systems. The location of the septic tank and the drain field (soil absorption system) should be clearly distinguished.
 - ~~Chemical and fuel storage tanks and containers.~~
 - ~~Storage, loading, and disposal areas for chemicals, hazardous substances, salt, and fuels.~~
 - Water mains, hydrants, pump houses, standpipes, and building services and sizes.
 - Sanitary sewers and pumping stations.
 - Stormwater control facilities and structures including storm sewers, swales, retention and detention basins, drainageways, and other facilities, including calculations for sizes.
 - Location of all easements.
- d) All structures with dimensioned floor plans, setback and yard dimensions and typical elevation views.



- e) Dimensional parking spaces and calculation, drives, and method of surfacing.
- f) Exterior lighting locations and illumination patterns.
- g) Location and description of all existing and proposed landscaping, berms, fencing and walls.
- h) Trash receptacle pad location and method of screening.
- i) Transformer pad location and method of screening.
- j) Dedicated road or service drive locations.
- k) Entrance details including sign locations and size.
- l) Designation of fire lanes.
- m) Any other pertinent physical features.
- n) A fire protection plan indicating how the fire protection features required by chapter 12 of this Code shall be addressed.

3. **Natural features.** Natural features included on the site plan shall be as follows:

- a) Soil characteristics of the parcel to at least the detail provided by the U.S. Soil Conservation Service "Soil Survey of Oakland County, Michigan," 1980.
- b) Existing topography with a maximum contour interval of two feet. Topography on the site and beyond the site for a distance of 100 feet in all directions should be indicated.
- c) Grading plan, showing finished contours at a maximum interval of two feet, correlated with existing contours so as to clearly indicate required cutting, filling, and grading.
- d) Location of existing drainage courses and associated bodies of water, on-site and off-site, and their elevations.
- e) Location of existing wetlands.
- f) Location of natural resource features, including woodlands and areas with slopes greater than ten percent (one foot of vertical elevation for every ten feet of horizontal distance).

4. **Additional requirements for residential developments.** Additional requirements for residential developments to be included on the site plan shall be as follows:

- a) Density calculations by type of unit by bedroom counts.
- b) Designation of units by type and number of units in each building.
- c) Carport locations and details where proposed.
- d) Specific amount and location of recreation spaces.
- e) Type of recreation facilities to be provided in recreation space.
- f) Details of community building and fencing of swimming pool if proposed.

5. **Additional requirements for adult foster care facilities.**

- a) The subject parcel shall meet the minimum lot area requirements for the zoning district in which it is located, provided there is a minimum site area of 3,000 square feet per adult, excluding employees and/or caregivers.
- b) The property is maintained in a manner that is consistent with the character of the neighborhood.
- c) One off-street parking space per employee and/or caregiver shall be provided.

6. **Parking standards.**

- a) *Convalescent Homes.* 1 parking spot per 5 beds, plus 1 per each staff doctor, plus 1 per each employee.
- b) *Senior Citizen Housing.* 1 parking spot per each dwelling unit, plus 1 per each 10 dwelling units, plus 1 per each employee.



GENERAL SITE PLAN REVIEW STANDARDS

Standards for site plan review are set forth in Sec. 32-233 of the Zoning Ordinance. Fifteen (15) criteria shall be reviewed for every site plan submission.

- 1) **Use:** The proposed use will not be injurious to the surrounding neighborhood.
- 2) **Vehicular Traffic:** There is a proper relationship between major thoroughfares and proposed service drives, driveways and parking areas and provisions have been made for acceleration, deceleration and passing lanes or approaches so as to preserve the safety and convenience of pedestrian and vehicular traffic.
- 3) **Neighborhood Impact:** The location of buildings, outside storage receptacles, parking areas, screen walls and utility areas is such that the adverse effects of such uses will be minimized for the occupants of that use and surrounding areas.
- 4) **Utilities:** It provides for proper development of roads, easements and public utilities and protects the general health, safety, welfare and character of the township.
- 5) **Engineering:** It meets the requirements and standards for grading and surface drainage and for the design and construction of storm sewers, stormwater facilities, parking lots, driveways, water mains, sanitary sewers and for acceleration, deceleration and passing lanes or approaches as determined by the township engineers and set forth in the township design and construction standards.
- 6) **Access:** Proper access to all portions of the site and all sides of any structure is provided. All structures or groups of structures shall be so arranged as to permit emergency vehicle access by some practical means to all sides. Site features such as, but not limited to, trees and other plant materials, fences, retaining walls, berms, outdoor furniture, outdoor structures, and natural and artificial water bodies shall be arranged to permit adequate emergency vehicle access.
- 7) **Natural Features:** Natural resources will be preserved to the maximum extent possible in the site design by developing in a manner which will not detrimentally affect or destroy natural features such as lakes, ponds, streams, wetlands, steep slopes, groundwater and woodlands.
- 8) **Topography:** The proposed development respects the natural topography to the maximum extent possible by minimizing the amount of cutting, filling and grading required.
- 9) **Soil Erosion:** The proposed development will not cause soil erosion or sedimentation.
- 10) **Stormwater:** Stormwater management systems and facilities will preserve the natural drainage characteristics and enhance the aesthetics of the site to the maximum extent possible, and will not substantially reduce or increase the natural retention or storage capacity of any wetland, water body or water course, or cause alterations which could increase flooding or water pollution on or off-site.
- 11) **Wastewater:** Wastewater treatment systems, including on-site septic systems will be located and designed to minimize any potential degradation of surface water or groundwater quality.
- 12) **Waste:** Sites which include storage of hazardous materials or waste, fuels, salt, or chemicals will be designed to prevent spills and discharges of polluting materials to the surface of the ground, groundwater or nearby water bodies.
- 13) **Layout and Dimensions:** The location of buildings, parking, drives, landscaping and other improvements on the site is appropriate and consistent with good design standards for the lot size, shape and general location.
- 14) **Landscaping:** Landscaping, including grass, trees, shrubs and other vegetation is provided to maintain and improve the aesthetic quality of the site and area.
- 15) **Other Laws:** The proposed use is in compliance with all township ordinances and any other applicable laws.

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Matthew J. Weil

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Clerk Karin Winchester, Planning and Zoning Administrator
102 Civic Drive
Holly, MI 48442
via: karin@hollytownship.org

August 23, 2023

Ref: Trilogy site plan review

Dear Clerk Winchester and Honorable Planning Commission,

Today I write at the request of the township to provide a site plan review for the above project. Over the course of the past few months this department has been in contact with the township, planner, and developer of the Trilogy project. We have had meetings with them, provided letters and correspondence with recommendations and this has been a very collaborative effort to this point, it is greatly appreciated.

From this activity, the Developer has addressed most of this site plan's concerns to this department's satisfaction. Please understand, there are still some outstanding concerns, these however do not impact the site plan or this review, these concerns are related to:

- Operation of the facility
- Impacts on the department's resources.
- Ability of the FD to provide equipment (future apparatus needs)
- Items that can be addressed during the construction plan review.

There are still a few additional Site Plan Concerns that need clarification.

We originally raised the concerns of the parking lot on the north side of the building. This is a double row, against the building sidewalk and across the circulation road / Fire Lane. We feel that parking against the building/sidewalk will impede the work area needed by the fire department in the event of an incident.

All of the High Hazard areas of the facility are central to and on the north side, utilities, kitchen, storage and the like including the Fire Department Connection.

From that original submittal, parking was removed from an access courtyard area providing clear access into that small portion of the building and they have removed additional parking across the Fire Lane near the remote Fire Department Connection and Dumpster. However, we prefer that all the parking

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next to the building on the north side be removed and parking allowed on the entire north side of the fire lane.

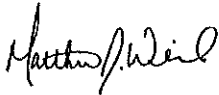
This appears it could be done without a net reduction in spaces and may even increase the number of spaces by adding parking to the north between the 50 and 100 foot setback area; it would require an additional access from the circulation road, it may impact the runoff calculations, increase lighting requirement - In other words- We understand there may be mitigating factors that would disallow this. We ask that the planner and developer work with us for an alternate solution to this concern.

Still outstanding is the request for hydraulic calculations and proofs for the water supply proposed based on; the needed fire flow of the suppression system and firefighting demands in the 62,000 SF facility, required fire flow for the hydrants, needed fire flow for the town houses, and finely the domestic demand- all taking into consideration the proposed residential and commercial development that is currently being reviewed for the property adjacent to this project- this is all supplied to our knowledge from an 8" main and may not be adequate for all parties involved.

Overall, this department approves the plan with the additional conditions:

- An acceptable and agreeable plan to address the parking concerns/ access on the north side of the building.
- The water demands can be met for this development and others proposed adjacent to this project. Both Projects can NOT negatively impact the other.

Respectfully Submitted,



Matt Weil CFI
Assistant Fire Chief

C. Douglas Smith CSP CFPS
Deputy Fire Chief

Attached:

8/11/23 Mannik Letter response to preliminary review
7/26/23 FD response Letter preliminary review
4/21/23 FD response letter to discussion points with email



August 11, 2023

Matt Well, CFI
Assistant Fire Chief
North Oakland County Fire Authority
P.O. Box 129
Holly, MI 48442

**RE: Trilogy Health Care of Holly
Fire Dept. Review Response**

Dear Mr. Well:

Please accept the following letter as disposition of comments associated with the Site Plan Review letter prepared by North Oakland County Fire Authority (NOCFA) dated July 26, 2023. NOCFA comments and corresponding responses are provided below:

"We oppose the large back to back parking areas that are up against the building, with the area of most concern being the north side of the building.. This restricts access to the building for emergency work and circulation of emergency vehicles. However, we understand there may be zoning restrictions that drive this design."

A portion of proposed parking along the north side of the building was inadvertently shown across the access driveway/courtyard. The revised site plan shows free access from the north side driveway into the building through the service courtyard.

"Parking spaces need to be sized to accommodate pick-up trucks and SUVs. These are preferred and common modes of transportation in our area."

The parking space dimensions for the Proposed Trilogy Development are 9.5' wide x 20' deep. The parking dimensions are prescribed by Holly Township Zoning Requirements, Section 32-425.

"The entire roadway for circulation and Fire Lane use needs to be 26.5 wide from the face of the curb and include a mountable curb. The dimensions of the "thru lanes" in the back-to-back parking areas are not identified, Proper signage and marking is required"

The ring road around the Campus Building and the private street around the villa development are proposed to be 26.5' wide from face of curb to face of curb, with a 4" rolled style, mountable curb. Typical Pavement Section Detail has been included in the site plan package.

Fire Lane has been denoted on the Site Plan.

"The single 24' access from Fish Lake Road needs to be a split boulevard type entrance or another means of ingress and egress needs provided. We understand there may not be available access to another roadway from this parcel without further development of the surrounding land. This should be designed into the overall plan of the area."

The entrance driveway geometry has been updated to align with request from NOCFA, the County commercial driveway detail and the site island.

"The parking areas for the townhouses are not clearly identified."

Each villa unit has individual garage and driveway for parking. See site plan and Villa elevation Exhibits.

"Location of Hydrants and FDC are not identified"

The Hydrants and FDC have been circled in blue and the distance between hydrants has been provided.

Height of canopies are not identified - they need to accommodate apparatus - which we assume they are at min 13'-6" height.

The canopy clear heights are 13'-6". We have attached an architectural section view of the proposed canopies.

Sincerely,



Greg Schunck, P.E., P.S.
Senior Project Manager

CC: File

Joe Nawrocki – Trilogy Director of Development
Karin Winchester- Holly Township Administrator

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The Mannik & Smith Group, Inc.
20600 Chagrin Blvd, Suite 500
Shaker Heights, Ohio 44122
216 378 1490 X8010 (Office)
216 598 3579 (Cell)

Greg Schunck, P.E.,P.S.

July 26, 2023

Ref: 20230412 Trilogy Fire Dept. Coordination T1730071

Dear Sir;

This department has taken some time to review the proposed preliminary site plan included in the application package. This review is only as detailed as that drawing allows. There are many things void of this drawing to allow a more in-depth review.

In our letter dated April 21, 2023, we provided you with much of the information needed to produce this site plan, we greatly appreciate the preemptive ask. We hope these further comments assist in moving forward, producing a plan that is agreeable to the community.

At first blush and with the limited information provided we offer the following comments to the

- We oppose the large back to back parking areas that are up against the building, with the area of most concern being the north side of the building.. This restricts access to the building for emergency work and circulation of emergency vehicles. However, we understand there may be zoning restrictions that drive this design.
- Parking spaces need to be sized to accommodate pick-up trucks and SUVs. These are preferred and common modes of transportation in our area.
- The entire roadway for circulation and Fire Lane use needs to be 26.5 wide from the face of the curb and include a mountable curb.
 - The dimensions of the "thru lanes" in the back-to-back parking areas are not identified
 - Proper signage and marking is required

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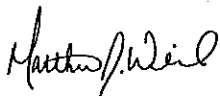
Cell: 248-459-8313

- The single 24' access from Fish Lake Road needs to be a split boulevard type entrance or another means of ingress and egress needs provided.
 - We understand there may not be available access to another roadway from this parcel without further development of the surrounding land. This should be designed into the overall plan of the area.
 - The parking areas for the townhouses are not clearly identified.
 - Location of Hydrants and FDC are not identified.
-
- Height of canopies are not identified - they need to accommodate apparatus- which we assume they are at min 13'6" height.
 - This site is very congested but flows well.

Outside the scope of the fire lanes, access roads, parking and general site circulation: hydraulic calculations are needed that include; domestic, suppression system and Firefighting demands at the buildings and the site. We want to be confident there is enough water for current and future development based on the existing 8" main.

Again, we commend you for preemptively seeking recommendations and comments.

Respectfully yours,



Matt Weil CFI
Assistant Fire Chief

C. Douglas Smith CSP CFPS
Deputy Fire Chief

Cc; File FD

Greg L. Schunck

From: Matt Weil <mweil@nocfa.com>
Sent: Friday, April 21, 2023 10:49 AM
To: Greg L. Schunck
Cc: Karin Winchester; Jeremy Lintz; Doug Smith
Subject: 20230412 Trilogy Fire Dept. Coordination T1730071
Attachments: Trilogy dicussion 4-21-23.pdf

EXTERNAL EMAIL: Open with EXTREME caution!

Greg-

Good Morning. The attached letter is our response to the questions you Emailed Clerk Winchester. If you need any further clarification or information regarding this letter do not hesitate to contact Deputy Chief Smith (248-459-8322 he is Cc on this email) or I.

Regards,

Matt

Matt Weil

North Oakland County Fire Authority

248-459-8313 cell

248-634-4511 station

248-634-3817 fax

www.nocfa.org

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Matthew J. Weil

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The Mannik & Smith Group, Inc.
20600 Chagrin Blvd, Suite 500
Shaker Heights, Ohio 44122
216 378 1490 X8010 (Office)
216 598 3579 (Cell)

Greg Schunck, P.E., P.S.

VIA: GSchunck@manniksmithgroup.com

April 21, 2023

Reference: 20230412 Trilogy Fire Dept. Coordination T1730071

Dear Sir,

We do sincerely apologize for not being able to attend the meeting on April 11th. We have, however, taken your questions verbatim from the email request and added them to this letter: your questions are in RED and our commentary follows each question.

1. Are there any published site related fire requirements / regulations that may affect the site?

The North Oakland County Fire Authority follows the Codes listed below:

Sec. 12-71. Adoption of the 2021 International Fire Code by reference.

The International Fire Code, 2021 edition, together with appendices A, B, C, D, E, F and G, H, I, J, K, L, M and N as promulgated by the International Code Council

Sec. 12-72. Adoption of additional fire protection standards by reference.

The American Water Works Association (AWWA) manual, M31 Distribution System Requirements for Fire Protection, Fourth Edition and M17 Fire Hydrants: Installation, Field Testing, and Maintenance, Fifth Edition.

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NFPA 1: Fire Code, 2021 Edition, including annexes, A, B, C, D, E, F, G, F are also adopted by reference in their entirety herein. (Gives details, illustrations and diagrams on how to do these improvements.)

NFPA 101: Life Safety Code®, 2021 Edition, including annexes, A and B, are also adopted by reference in their entirety herein.

NFPA 1141: Standard for Fire Protection Infrastructure for Land Development in Wildland, Rural, and Suburban Areas, 2022 Edition, including annexes, A and B are also adopted by reference in their entirety herein.

NFPA 1142: Standard on Water Supplies for Suburban and Rural Fire Fighting, 202217 Edition including annexes, A, B, C, D, E, F, G, H, I, J are also adopted by reference in their entirety herein.

2. Are there defined:
 - a. Fire lane widths?

503.2 Specifications.

Fire apparatus access roads shall be installed and arranged in accordance with Sections 503.2.1 through 503.2.8.

503.2.1 Dimensions. Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4115 mm).

503.2.2 Authority. The fire code official shall have the authority to require or permit modifications to the required access widths where they are inadequate for fire or rescue operations or where necessary to meet the public safety objectives of the jurisdiction.

503.2.3 Surface. Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all weather driving capabilities.

503.2.4 Turning radius. The required turning radius of a fire apparatus access road shall be determined by the fire code official.

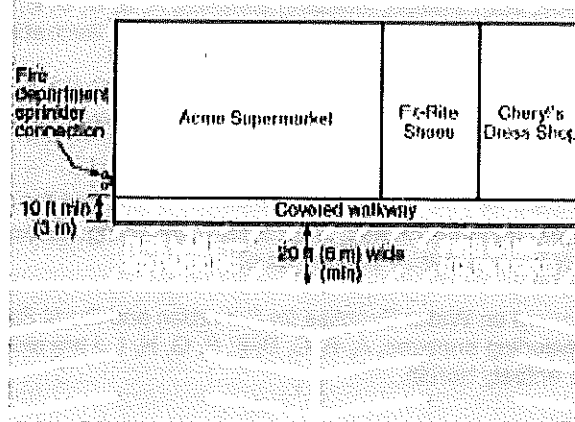
503.2.5 Dead ends. Dead-end fire apparatus access roads in excess of 150 feet (45 720 mm) in length shall be provided with an approved area for turning around fire apparatus.

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b. Driveway widths?

Depends on configuration for parking plan.

c. Signage requirements?

Knox Box required at entrance.

NO Parking Fire Lane is required.

Road Name sign and Stop signs at exits to public roads.

- 3. Will there need to be a separate submittal to the Fire Department**
a. If yes, how do we make the submittal?

Submit through Holly Township

- b. Is there a fee for fire department plan review?**

Yes. Based on review time, meetings, and site visits for The Site Plan review. Most are under \$200. Sprinkler plan and alarm system review is separate and a similar fee.

- 4. Does the fire department have requirements for:**
a. Fire hydrant spacing?

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400 feet plus additional hydrants within 100 feet of fire department connections to sprinkler systems or standpipe connections. Refer to the above Codes.

Considerations – Fire Hydrants

- Position: Orient the pumper outlet toward the access lane or street.
- Height: Center of lowest outlet should be 18 inches above grade.
- Location: Within 5 feet of an access lane or street; preferably with no intervening parking. Avoid crossing Ditches unless a walkway and culvert are supplied.
- Protection: Provide bollards if there is no curb between the road surface and the hydrant; located at least 3 feet from the hydrant.
- Obstructions: Locate 3 feet from any surrounding obstructions.
- Consider fire department approach directions and hose-laying procedures when locating hydrants.
- Avoid locations likely to be blocked, such as loading docks.
- Position hydrants at least 40 feet from buildings they serve and conveniently space them to cover buildings.

b. Fire department connection (FDC) location:

- i. Remote? <- requirements?
- ii. Building mounted? <- requirements?

Either, but on front or near the main entrance to the building and easy access for fire apparatus and in an area that will not be blocked. Additionally, within 100 feet of the hydrant.

5. Fire truck access?

- a. Does the fire department have a specific truck size for truck turn model?
- b. Does the fire department have a template or can they provide dimensions for truck turn model?

Yes, please use a wheelbase of 264 inches for the turn model, this represents the longest Ladder truck that is on our Box Card for Mutual Aid. This is for a Tandem Rear Drive Chassis.

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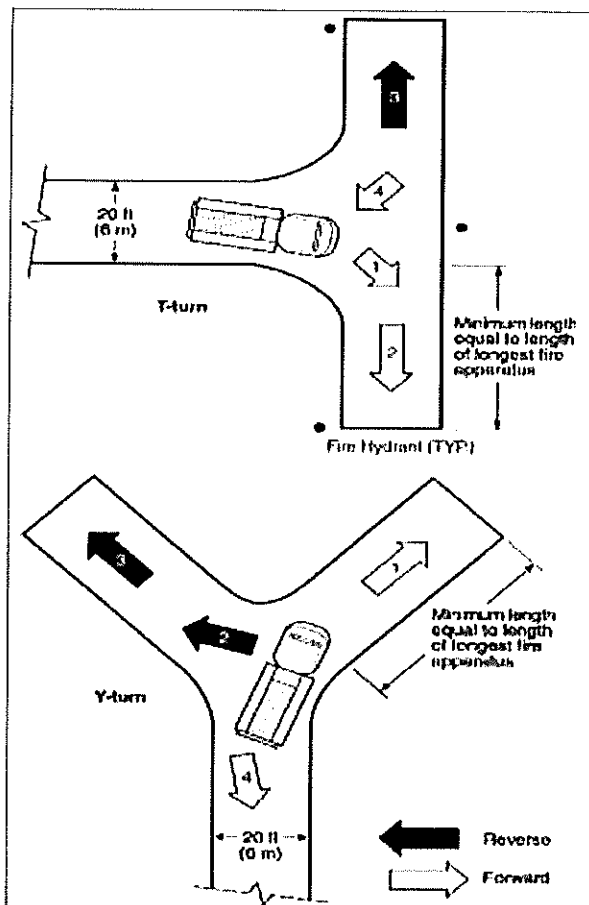
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The Fire Department uses the following guidance when reviewing a proposed development:

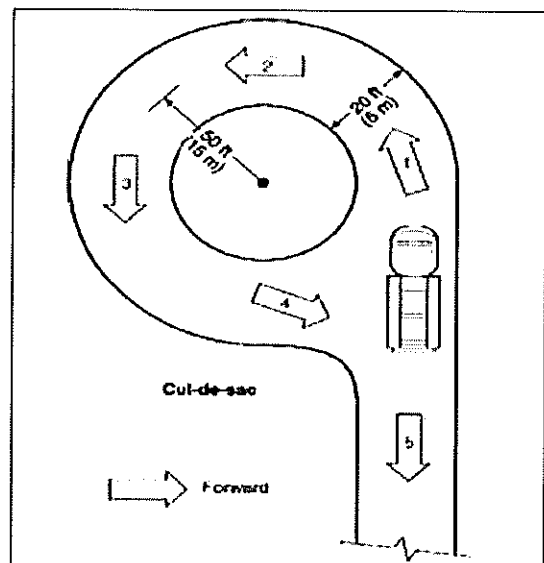
Turnarounds Long, dead-end fire lanes or roads should provide a means for fire apparatus to turn around. Both NFPA 1 and the IFC require turnaround space for dead ends that are more than 150 feet long.

There are several configurations that facilitate turning maneuvers. These include, "T-turn," "Y-turn," and round cul-de-sac style arrangements (Figures 2.4 and 2.5 for NFPA diagrams). NFPA 1141 requires a 120-foot turnaround at the end of dead ends more than 300 feet long. Turnaround diagrams also can be found in Appendix D of the IFC.



Height

The basic requirement for clear height of fire lanes in the IFC, NFPA 1 and NFPA 1141 is 13 feet 6 inches. Some modern aerial apparatus may require 14 feet of clearance. Potential for accumulation of snow and ice should be factored into height requirements. The NFPA 1 handbook recommends at least 14 feet in colder climates. Newer aerial apparatus may also require additional height. Finally, avoid overhead wires or other obstructions when determining fire lane locations.



(Fig. 2.4) Fire apparatus "Y-" and "T-turnarounds." (Fig. 2.5) Fire apparatus cul-de-sac turnaround.

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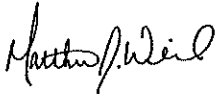
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6. Do any of the surrounding buildings / developments have fire pumps?

No, none near this site or connected to public water.

Respectfully yours,



Matt Weil CFI
Assistant Fire Chief

C. Douglas Smith CFPS CSP
Deputy Chief

Cc; File FD Clerk Winchester/Holly Township via clerk@hollytownship.org



August 11, 2023

Karin Winchester, MMC
Clerk/Zoning Administrator – Holly Twp.
102 Civic Drive
Holly, MI 48442

**RE: Trilogy Health Care of Holly
Site Plan Review Response**

Dear Ms. Winchester:

Please accept the following letter as disposition of comments associated with the Site Plan Review letter prepared by McKenna dated May 16, 2023. Comment and corresponding responses are provided below:

Comment 01 - "Additionally, all multiple-family developments in an RM district must contain an area or areas provided for common recreation of 300 square feet per dwelling unit. Such common recreation areas shall be located and designed in a manner which is appropriate to meet the recreational needs of the prospective residents of the development. Such recreational facilities may include, but not be limited to, swimming pools, tennis courts, playgrounds, picnic areas, playfields, and jogging trails."

A recreation area summary table has been added to the Cover Sheet in the Site Civil Plan Package. Based on the proposed dwelling unit (du) count of 78 campus + 28 villa = 106 du:

Required recreation area equals 106 X 300 square feet / du	= 31,800 square feet.
Proposed recreational area	= 50,835 square feet.

Comment 02 - "The plans do not specify the number of bedrooms that will be provided per duplex. This data must be provided to determine the maximum density of the site."

The Trilogy Development will consist of a combination of assisted living beds in the Campus building and one or two bedroom villas. The duplexes (Villas) will be comprised of either a one or a two-bedroom unit. The bedroom type has been noted on the site plans. The Villas are comprised of 12 one-bedrooms and 16 two bedrooms. The Main Campus building will have 91 beds. Area summary calculation has been added to the Cover Sheet of the Site Plans.

Minimum lot size calculation:

91 bed (campus bldg..) x 3,000 sq-ft/bedroom	= 273,000 sq-ft
12 one bedroom villas x 6,000 sq-ft/bedroom	= 72,000 sq-ft
16 two bedroom villas x 9,000 sq-ft/bedroom	= 144,000 sq-ft
Required Total Parcel Area	= 489,000 sq-ft / 43560 = 11.22 acres
Proposed Parcel Area	= 13.70 acres

Comment 02 - "Additional information on some of the setbacks are required to determine compliance with these standards."

Setback from internal driveway for Convalescent homes shall be 40 feet (minimum).

The driveway and site configuration is typical Trilogy campus layout. We will not be able to provide 40 setback from driveway to building.

Setback from Parking / Service driveway shall be 10 feet (minimum).

There appears to be two locations that have a parking-to-service drive setback less than 10' (6'±), located in the vicinity of the two canopy driveways. We would not be able to move the driveway further from the building, as the proposed driveway geometry is required to service ambulances.

Setbacks between rear/rear of villa shall be 70 feet (minimum).

The setback between rear of villas is proposed at 50'. This is typical for Trilogy developments. The areas between the villas will typically be used as common area to be shared by the residence.

Comment 04 - "Architectural renderings must be provided to determine compliance with this section."

Color Architectural renderings of the Campus Building, Community Center and Villas have been included in the Planning Commission Submittal Package.

Comment 05a - "We encourage the developer to consider provided a sidewalk connection to Rolling Hills Drive, which would provide residents with improved connectivity, walking options, and safe access to downtown Holly via bike or by foot."

As the layout / configuration for the future Residential Development to the North and Retail Development to the east have not in the process of being designed, the location for sidewalk connecting said developments cannot be confirmed at this time, Trilogy proposes to grade areas around the north and east side of the site such to allow the construction of future sidewalk.

Comment 05b - "Additional details on sidewalk widths, ramps, crosswalks, or other sidewalk features will have to be provided to demonstrate adequate safety in design."

As the sidewalks, ramps and crosswalks will service retirement community. All will be designed and constructed to align with 2010 American with Disabilities Act (ADA) requirements

The width of the sidewalk will be either 5' or 7' depending on walk location relative to the parking lot.

Comment 06a - "Setbacks must be 10 feet from any internal parking area, and these must be specified on the site plan."

Setback dimensions from building to parking areas have been added to the site plan.

There appears to be two locations that have a parking-to-service drive setback less than 10' (6'±), located in the vicinity of the two canopy driveways. We would not be able to move the driveway further from the building, as the proposed driveway geometry is required to service ambulances.

Comment 06b - "With an anticipated staffing level of 40 employees and 99+ beds, the proposed parking does not meet ordinance requirements. The applicant may be able to enter into an agreement with the developer of the adjacent property to provide the additional parking required. The proposed site plan does not include any parking dimensions."

As the site is divided into two uses, the required parking stall count was calculated using the following two sections of the code: Section 32-424.A.2 (Multi-Family Dwelling) plus Section 32-424.B.4 (Convalescent Homes):

Multi-Family (Villa) Parking:
2 spaces per dwelling + 1 spaces per 10 units
28 dwelling units x 2 spaces / unit + 28 / 10 = 59 parking spaces required

Convalescent Home:
1 space per 5 beds + 1 space for doctor + 1 per employee
91 beds/5 + 1space/doctor & employee x 40 total employees = 59 parking spaces required
Required parking spaces = 118 spaces
Proposed parking spaces = 123 spaces

Comment 07 - "No landscaping plan has been provided; a complete landscape plan must be provided in compliance with the requirements of Sec. 32-192."

A Preliminary Landscape Plan and associated Detail Sheet have been included in the Planning Commission Submittal Package.

Comment 08 - "A trash enclosure detail must be provided, along with a truck turning diagram demonstrating adequate pickup space."

A Trash Enclosure Detail Sheet and Truck Turn Exhibits have been included in the Planning Commission Submittal Package.

Comment 09 - "Details on the capacity and infiltration rates of these ponds must be provided, as well as details on how they connect to the drainage system for the site. Further review is subject to the Township Engineer and Oakland County."

A copy of the Trilogy Holly Geotechnical Report has been included with the Planning Commission Submittal Package. Infiltration rate is less than 0.1 inches per hour in the location of the proposed pond. See infiltration testing summary for Soil Bore (SB-24) on the last page of the report.

A Preliminary Utility Plan and Pond Design Detail Summary has been included in the Planning Commission Submittal Package.

Comment 10 - "A complete lighting plan has not been provided and must be submitted."

Photometric Plan and associated Detail Sheet have been included in the Planning Commission Submittal Package.

Comment 12 - Fire Department Review

An Overall Site Plan was submitted to NOCFA for review and comment. A copy of our comment response letter has been attached to the Planning Commission Submittal Package.

COMPLETENESS REVIEW RESPONSE:

Comment 1b - "Date (month, day, year), including revisions."

Revision date has been updated on the Title block

Comment 1f - "Location map drawn at a scale of one inch equals 2,000 feet with north point indicated."

Location map has been added to the Cover Sheet

Comment 1g - "Architect, engineer, surveyor, landscape architect, or planner's seal"

Professional Engineer seal and signature has been added to the cover sheet

Comment 1h – *“Existing lot lines, building lines, structures, parking areas, etc., on the parcel, and within 100 feet of the site.”*

Aerial image has been included in the Overall Site Plan and Existing Conditions Survey has been incorporated into the Site Plan Package.

Comment 1i – *“Proposed lot lines, property lines and all structures, parking areas, etc., within the site, and within 100 feet of the site”*

Aerial image has been included in the Overall Site Plan and an Existing Conditions Survey has been incorporated into the Site Plan Package that shows lot & parcel Lines, structures and area within 100 feet of the site.

Comment 1k – *“Zoning classification of petitioner's parcel and all abutting parcels”*

Subject and neighboring parcel zoning information has been incorporated into the Overall Site Plan.

Comment 2a – *“Acceleration, deceleration and passing lanes and approaches.”*

The team previously submitted entrance site layout to the Oakland County Roadway Commission and North Oakland County Fire Authority (NOCFA). The team received responses from both agencies and have revised the geometry of the drive entrance accordingly. The entrance geometry is outlined in the intersection detail which has been included in the Planning Commission Submittal Package. Copies of the Oakland County Roadway Commission and NOCFA comment response letters have been included with this submittal package.

Comment 2c – *“Stormwater control facilities and structures including storm sewers, swales, retention and detention basins, drainage ways and other facilities, including calculations for sizes.”*

Stormwater Design Summary Sheet and associate Stormwater Design Summary letter has been included in the Planning Commission Submittal Package.

Comment 2c – *“Location of all easements.”*

Boundary Survey with existing easements has been included in the Site Plan Package.

Comment 2d – *“All structures with dimensioned floor plans, setback and yard dimensions and typical elevation views.”*

Architectural Floor Plans and Color Elevation Views have been included in the Planning Commission Submittal Package.

Setback and site dimensions are on the Site Plans.

Comment 2e – *“Dimensional parking spaces and calculation, drives and method of surfacing.”*

Parking stall dimesons per Township Code Section 32-425: 9.5' wide x 20' deep. Pavement section will be per the Geotechnical Investigation report pavement recommendations, copy of the report has been attached to the submittal package.

As the site is divided into two uses, the required parking stall count was calculated using the following two sections of the code: Section 32-424.A.2 (Multi-Family Dwelling) plus Section 32-424.B.4 (Convalescent Homes):

Multi-Family (Villa) Parking:

2 spaces per dwelling + 1 spaces per 10 units

28 dwelling units x 2 spaces / unit + 28 / 10

= 59 parking spaces required

Convalescent Home:

1 space per 5 beds + 1 space for doctor + 1 per employee

91 beds/5 + 1space/doctor + employeeex40 total employees = 59 parking spaces required

Required parking spaces = 118 spaces

Proposed parking spaces = 123 spaces

Comment 2f – *"Exterior lighting locations and illumination patterns."*

Photometric Plan and associated Detail Sheet have been included in the Planning Commission Submittal Package.

Comment 2g – *"Location and description of all existing and proposed landscaping, berms, fencing and walls"*

A Preliminary Landscape Plan and associated Detail Sheet have been included in the Planning Commission Submittal Package.

Photos of Trilogy' typical three-rail fence have been included in the Planning Commission Submittal Package.

Comment 2h – *"Trash receptacle pad location and method of screening."*

A Trash Enclosure Detail Sheet and Landscape plan have been included in the Planning Commission Submittal Package.

Comment 2i – *"Transformer pad location and method of screening"*

Transformer pad location has been shown on the Site Plan. Landscape Plan is included in the Planning Commission submittal package.

Comment 2k – *"Entrance details including sign locations and size."*

The team previously submitted entrance site layout to the Oakland County Roadway Commission and North Oakland County Fire Authority (NOCFA). The team has received responses from both agencies and have revised the geometry accordingly. The entrance geometry is outlined in the intersection detail which has been included in the Planning Commission Submittal Package.

Comment 2j – *"Designation of fire lanes"*

Fire lane has been denoted on the Site Plans

Comment 2n – *"fire protection plan indicating how the fire protection features required by chapter 12 of this Code shall be addressed."*

An Overall Site Plan was submitted to NOCFA for review and comment. A copy of our comment response letter has been attached to the Planning Commission Submittal Package.

Comment 3a – *"Soil characteristics of the parcel to at least the detail provided by the U.S. Soil Conservation Service "Soil Survey of Oakland County, Michigan," 1980."*

Soil types and delineation have been added to the Overall Site plan. Geotechnical Investigation Report has been included with the Planning Commission Submittal Package.

Comment 3c – *"Grading plan, showing finished contours at a maximum interval of two feet, correlated with existing contours so as to clearly indicate required cutting, filling and grading."*

Preliminary Grading plan with mass grading and finish floor elevations has been included in the civil plan set.

Comment 3d – *"Location of existing drainage courses and associated bodies of water, on-site and off-site, and their elevations."*

Have shown the proposed swale, fore bays and detention basin on the civil plans set.

Comment 3e – *"Location of existing wetlands"*

Wetland response letter from State of Michigan EGLE has been included in the Planning Commission Submittal Package. The non-regulated wetlands have been shown on the Overall Site Plan.

Comment 3f – *"Location of natural resource features, including woodlands and areas with slopes greater than ten percent (one foot of vertical elevation for every ten feet of horizontal distance)."*

Outline of the onsite wooded area has been shown on the Overall Site Plan. A Tree Inventory Exhibit has been included with the Planning Commission Submittal Package.

There are a few existing areas within the footprint of the Villa Development that have existing slopes exceeding 10%. These areas are going to be re-graded for the villas and associated surrounding site, proposed slopes will be less than 10%.

Comment 4a – *"Density calculations by type of unit by bedroom counts."*

The Trilogy Development will consist of a combination of assisted living beds in the Campus building and one or two bedroom villas. The duplexes (Villas) will be comprised of either a one or a two-bedroom unit. The bedroom type has been noted on the site plans. The Villas are comprised of 12 one-bedrooms and 16 two bedrooms. The Main Campus building will have 91 beds. Area summary calculation has been added to the Cover Sheet of the Site Plans.

Minimum lot size calculation:

91 bed (campus bldg.) x 3,000 sq-ft/bedroom	= 273,000 sq-ft
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16 two bedroom villas x 9,000 sq-ft/bedroom	= 144,000 sq-ft
Required Total Parcel Area	= 489,000 sq-ft / 43560 = 11.22 acres
Proposed Parcel Area	= 13.70 acres

Comment 4b – *"Designation of units by type and number of units in each building"*

- Campus building includes 91 beds
- One-bedroom Villas = 12 units
- Two Bedroom Villas = 16 units

Comment 4d – *"Specific amount and location of recreation spaces "*

A recreation area summary table has been added to the Cover Sheet in the Site Civil Plan Package. Based on the proposed dwelling unit (du) count of 78 campus + 28 villa = 106 du:

Required recreation area equals 106 X 300 square feet / du	= 31,800 square feet.
Proposed recreational area	= 50,835 square feet.

Comment 4e – *"Type of recreation facilities to be provided in recreation space."*

Recreation Facility Space (Activity Space) Summary has been included on the Architectural Floor Plan (A1.3), attached to the PC Submittal Package.

Comment 4f – “Details of community building and fencing of swimming pool if proposed.”

Color Elevation View Exhibits and Architectural Floor Plan of the Community Center has been included in the Planning Commission Submittal Package. A swimming pool is not proposed with this development.

Comment 6 – *Parking Count*

As the site is divided into two uses, the required parking stall count was calculated using the following two sections of the code: Section 32-424.A.2 (Multi-Family Dwelling) plus Section 32-424.B.4 (Convalescent Homes):

Multi-Family (Villa) Parking:

2 spaces per dwelling + 1 spaces per 10 units

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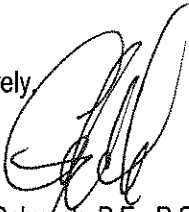
1 space per 5 beds + 1 space for doctor + 1 per employee

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Sincerely,



Greg Schunck, P.E., P.S.
Senior Project Manager

CC: File

Joe Nawrocki – Trilogy Director of Development

