

Sent Via Email Only

August 23, 2024

Chris McLeod, Planning Manager
Department of Planning and
Economic Development
City of Rochester Hills
1000 Rochester Hills Drive
Rochester Hills, MI 48309-3033

**Subject: Pine Trace Golf Course
Driving Range Relocation Project
Site Plan Review #1,
Plans dated August 6, 2024, as received by the
City of Rochester Hills
ASTI File No. A24-1482.83**

Applicant: Pine Trace Golf Course

Dear Mr. McLeod:

The above-referenced project proposes to construct a new golf driving range on 7.46 acres of land located along at 3600 Pine Trace Boulevard (Project Area). The Project Area includes wetland not regulated by the City of Rochester Hills and not likely regulated by the Michigan Department of Environment, Great Lakes, and Energy (EGLE).

ASTI has reviewed the site plans, dated August 6, 2024, as received by the City (Current Plans) for conformance to the Wetland and Watercourse Protection Ordinance and the Natural Features Setback Ordinance and offers the following comments for your consideration.

COMMENTS

- 1. Applicability of Chapter (§126-500).** The Wetland and Watercourse Protection Ordinance is applicable to the subject site because the subject site is not included within a site plan which has received final approval, or a preliminary subdivision plat which received approval prior to January 17, 1990, which approval remains in effect and in good standing, and the proposed activity has not been previously authorized.

2. Wetland and Watercourse Determinations (§126-531). This Section lists specific requirements for completion of a Wetland and Watercourse Boundary Determination.

a. This review has been undertaken in the context of a Wetland and Watercourse Boundary Determination completed on the site by ASTI on July 2, 2024. One wetland was found within the Project Area; Wetland A was observed in the southwestern portion of the site. Wetland boundaries seem to be shown on the Current Plans per ASTI's flagging in the field. However, no alpha-numeric flagging as applied in the field by ASTI is shown on the Current Plans. Moreover, the Current Plans do not indicate who completed the delineation and the date it was completed. Revised plans must show all alpha-numeric flagging for Wetland A and the date that ASTI completed the wetland delineation.

b. Wetland A Quality Assessment

Wetland A is a forested and open water/emergent wetland. The forested portion's tree layer was dominated by the common native species of silver maple, red maple, and swamp white oak, generally 20-40 years in age. The shrub layer was sparse and was dominated by the invasive species of glossy buckthorn. The herbaceous layer was sparse to thick and was dominated by the common native species of path rush (*Juncus tenuis*), woodland sedge (*Carex blanda*), and fowl manna grass (*Glyceria striata*), all of which comprised approximately 75% of the total species within the herbaceous layer. Reed canary grass, a non-native species, comprised the remainder of the herbaceous layer. The primary wetland hydrology indicator of oxidized rhizospheres on living roots, was observed throughout Wetland A. The open water portion of Wetland A appears to be in direct contact with groundwater. The open water portion appears to be a man-made pond constructed in the early 1960s per ASTI's review of historical aerial photography. As such, the open water portion of Wetland A likely detains small amounts of seasonal localized surface water runoff; it also likely provides some water filtration benefits, but due to its small size, these benefits are likely minimal. Soils within Wetland A were comprised of sandy loams and generally appeared to be in a natural state.

Wetland A is situated within a residential yard, which is near South Boulevard and Pine Trace Boulevard. Residential developments and the Pine Trace Golf Course surround Wetland A; this urban setting could likely cause noise disruptions to wildlife. Consequently, Wetland A likely supports only small wildlife and birds common to suburban backyards. Based on these factors, it is ASTI's opinion that although Wetland A is dominated by common native species, it is very small and does not offer significant benefits to the City. Therefore, it is ASTI's opinion that Wetland A should be considered a low-quality natural resource to the City.

3. **Use Permit Required (§126-561).** This Section establishes general parameters for activities requiring permits, as well as limitations on nonconforming activity. This review of the Current Plans has been undertaken in the context of those general parameters, as well as the specific requirements listed below.
 - a. On-site wetland boundaries appear to be shown accurately on the Current Plans. Wetland A is not regulated by the City under the City's Wetland and Watercourse Protection Ordinance or likely EGLE under part 303 because it is less than two acres in size and is not within 500 feet of, or directly connected to, and inland lake or stream as defined under Part 301 and Article IV.
4. **Use Permit Approval Criteria (§126-565).** This Section lists criteria that shall govern the approval or denial of an application for a Wetland Use Permit. The following items must be addressed on a revised and dated Wetland Use Permit application and additional documentation submitted for further review:
 - a. A Wetland Use Permit from the City will not be required for this project. It is also ASTI's opinion that a Part 303 permit from EGLE will not be required for this project as proposed on the Current Plans. However, the applicant should contact EGLE to confirm this assertion.
5. **Natural Features Setback (§21.23).** This Section establishes the general requirements for Natural Features Setbacks and the review criteria for setback reductions and modifications.
 - a. No City-regulated wetland is present within the Project Area and, thus, no Natural Features Setbacks are required to be shown on the Current Plans or enforced by the City.

RECOMMENDATION

ASTI recommends the City approve the Current Plans based on the condition that the applicant fulfills the requirements in Comment 3.a on revised plans.

Respectfully submitted,

ASTI ENVIRONMENTAL



Kyle Hottinger
Wetland Ecologist
Professional Wetland Scientist #2927



Dianne Martin
Director of Ecological Services
Professional Wetland Scientist #1313