

May 30, 2019

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

**Subject: File No. 19-018 Genisys Credit Union;
Wetland Use Permit Review #2;
Plans received by the City of Rochester Hills on
May 28, 2019**

Applicant: Genisys Credit Union (Thomas Alter)

Dear Ms. Roediger:

The above referenced project proposes to construct a commercial building on approximately 1.74 acres located along Rochester Road, south of Eddington Drive, and north of Hamlin Road. The subject site includes wetland regulated by the City of Rochester Hills and likely the Michigan Department of Environment, Great Lakes, and Energy (EGLE).

ASTI has reviewed the site plans received by the City on May 28, 2019 (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 the Applicant's wetland consultant, PEA, Inc., which was verified in the field by ASTI on April 22, 2019. One wetland was found in the southwest corner of the site. All flagging applied by PEA, Inc. in the field are shown on the Current Plans to ASTI's satisfaction.
3. **Use Permit Required (§126-561).** This Section establishes general parameters for activity 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. No wetland or watercourse impacts are shown on the Current Plans.
 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 and Watercourse Use Permit from the City is not required for this project as proposed on the Current Plans. Because no impacts to any wetland or watercourses are proposed, it is likely that neither a Part 303 nor Part 301 permit from EGLE are required. However, EGLE should be contacted 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. Previous plans did not show any on-site Natural Features Setback areas as required. The Current Plans now show all on-site Natural features Setback areas to ASTI's satisfaction.
 - b. Approximately 300 linear feet of impacts to the on-site Natural Features Setback will occur from proposed grading along the southern portion of the site and near the southwest corner of the site. The Natural Features Setback in this area is mainly comprised of herbaceous vegetation with scattered small shrubs. The herbaceous vegetation is dominated by the common native species annual grass (*Poa annual*) and the invasive species of smooth crabgrass (*Digitaria ischaemum*). The shrub layer is dominated by the invasive species of Callery pear (*Pyrus callerana*) with supporting native species of cottonwood saplings (*Populus deltoides*). The on-site Natural Features Setback is of poor

floristic quality, and it is ASTI's opinion that it offers minimal buffer quality to the on-site wetland. Moreover, all impacts appear to be temporary. All areas of temporary Natural features Setback must be final-graded with on-site soils, if possible, stabilized, and seeded with a City-approved seed mix upon completion to prevent sedimentation in to the on-site wetland. Revised plans must show calculated impacts to Natural Features Setback areas stated in linear feet on revised plans, not square feet as shown on the Current Plans.

RECOMMENDATION

ASTI recommends the City approve the Current Plans on the condition that all items in Comment 5.b are addressed and shown on revised plans.

Respectfully submitted,

ASTI ENVIRONMENTAL



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