



February 17, 2016

To: Wendy Woods, Chair
Ben Carlisle, Interim Planning Manager
City Planning Commission
Planning & Development Services
City of Ann Arbor
301 E. Huron St.
Ann Arbor, MI 48104

Dear Ms. Woods and Mr. Carlisle,

The Sierra Club, Huron Valley Group is a 2,300 member organization representing individuals throughout Washtenaw, Monroe, and Lenawee Counties dedicated to the protection and enjoyment of the wonders of the natural environment of the land for future generations.

We write to urge the Planning Commission to concur with the current staff recommendation regarding the Ann Arbor Manchester LLC South Pond Village Proposal as it will damage an existing wetland that is the site of an important nature area designated by the City of Ann Arbor that is in close proximity to the Huron River.

The developer wishes to build 77 homes on steep slopes abutting the wetland. In all iterations of the project, the developer wishes to construct a retention basin towards the northwest area of homes built by Mr. Furnari and his contractors. This will require moving and rebuilding slopes that will, during construction, damage the wetland, despite existing city ordinances and minimal oversight. We are concerned that this mitigation will not improve stormwater run-off, and that it would have a detrimental effect upon the wetland. In all iterations of the project, we cannot emphasize enough that the number of units built and the proposed retention basin would have a disastrous impact on South Pond, South Pond Nature Area, and Mallett's Creek.

Furthermore in the project's current iteration, the construction of the proposed South Pond Way would carry additional impacts as well as the ones mentioned above.

Although only 0.2 acres of the wetland are directly suggested to be disturbed under the proposal, we have every reason to believe that during construction considerably more destruction of the wetland will be required to construct the road to meet fire and other safety standards. In addition, as this is indeed a wetland, this road will need to be improved over time. Where is the wisdom in building directly into a wetland where the road may sink over time, requiring reconstruction?

South Pond Nature Area is a special place, and bears considerable protection. As the petitioner requested a wetland permit use by the MDEQ, the petitioner commissioned a study by King and McGregor regarding potential impacts on flora and fauna species of concern.

It should be noted that this is habitat for the Dukes's Skipper, a species of interest, and special consideration should be made. While the King and MacGregor report did not come up with active observation of the skipper, they did note that better control of invasives would improve the small patches of suitable habitat. They also noted, "This site may provide important habitat to other important species associated with southern wet meadow such as state special concern reptiles like Blanding's turtle (*Emydoidea blandingii*) and Eastern box turtle (*Terrapene carolina carolina*)."

Furthermore, the Sierra Club strongly concurs with both the Floodplain Coordinator and the Urban Forestry and Natural Features Coordinator recommendations that this project should not be recommended for approval under its current configuration. As noted in the staff comments, the floodplain disturbance "is in direct conflict with the NF Guidelines." The staff comments also note that this site "contains all of the natural features regulated by the City of Ann Arbor," and "This wetland complex is of highest concern for protection per the City's Land Development Regulations." If we as a city ignore our guidelines in an area such as this, when would we apply them?

In conclusion, we believe better options exist instead of pursuing 77 units on this site which will destroy an important natural area park and wetland, and further damage the Huron River.

We concur with parcel's neighbors that dedicating it as an important piece of parkland that could be a gateway to the city would be a more suitable use for this land.

As we have iterated before, the land use recommendations under the Northeast Area Plan require review, as many of the proposals of the remaining larger parcels just have overwhelming impacts on the natural features as well as creating a detriment to the public safety and welfare to existing nearby neighborhoods and homes. The difficulties that the petitioner as well as all neighborhoods surrounding the property have here, despite their conflicting opinions and missions on the issue, reflect the errors of this Master Plan. We strongly recommend a revision of this portion of the City's Master Plan.

We thank you for considering our comments.

Sincerely,

Nancy Shiffler, Chair
Executive Committee

James D'Amour
Vice-Chair, Executive Committee
Sierra Club, Huron Valley Group, Michigan Chapter