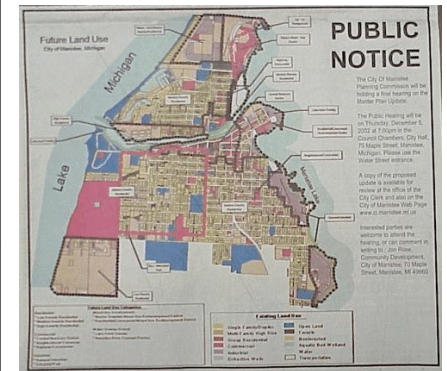
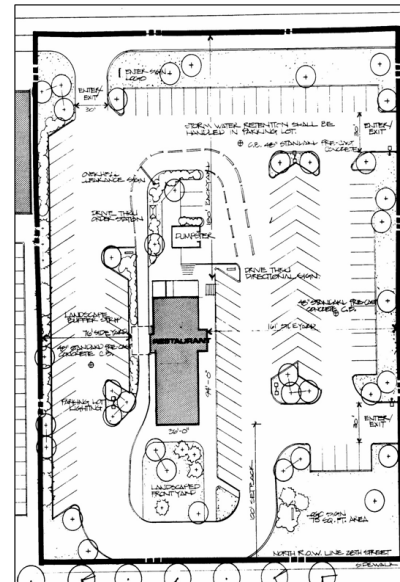


E-3058 PLANNING AND ZONING*A*SYST #8
A community planning and zoning assessment system.

Community Planning & Zoning Audit Site Plan Review

July 14, 2010



MICHIGAN STATE
UNIVERSITY
EXTENSION
Land Use Team

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Chapter 1: Introduction

The *Community Planning and Zoning Audit* is a comprehensive assessment of local government planning and zoning in Michigan. It covers basic topics and practices that members of every local planning and zoning entity should understand and should be doing. Each chapter of the *Community Planning and Zoning Audit* contains key points in the format of questions, checklists, and tables to assess your community's land use planning and zoning, including the adoption and amendment process, day-to-day administration and record keeping, and decision making about special land uses, planned unit developments, and site plan reviews.

Purpose of the Audit

The *Community Planning and Zoning Audit* is intended for use by local units of government in Michigan to help perform a self-evaluation of the basics of the community's planning and zoning system. The reason for doing an assessment is to learn of shortcomings and problems before they become controversial issues. As a result of going through this booklet, local officials will be alerted to things that need "fixing" and deficiencies in the community's files. The document helps accomplish three objectives:

1. Identify liability risks from not following proper procedures and practices, and not having adequate documentation of those procedures and practices.
2. Learn to better manage the planning and zoning administration in your community.
3. Take corrective steps to improve your planning and zoning system.

Organization and Content

This publication is one of a series of 11 Michigan State University Extension *Community Planning and Zoning Audits* available to walk a community through a performance audit. Topics are:

1. **Basic Setup** (MSU Extension bulletin number E-3051) makes sure that your planning commission and zoning board of appeals

Authors:

Brad Neumann, LAND POLICY EDUCATOR, MSU Extension, St. Joseph County,
612 E. Main Street, Centreville, MI 49032-9627

E-mail: neuman36@msu.edu

Kurt H. Schindler, REGIONAL LAND USE EDUCATOR, Northwest Michigan, MSUE
Wexford County, 401 N. Lake Street, Suite 400, Cadillac, MI 49601

E-mail: schindl9@msu.edu

Jasneet Sharma, LAND POLICY EDUCATOR, Hillsdale and Lenawee counties,
MSUE Hillsdale County, 20 Care Drive, Suite B, Hillsdale, MI 49242;
MSUE Lenawee County, 1040 S. Winter Street, #2020, Adrian, MI 49221.

E-mail: sharmaj@msu.edu

The authors would like to thank the following individuals for their review and assistance with this publication:

- Jason Ball, MSU GRADUATE STUDENT in Urban & Regional Planning.
- Ryan Coffey, NEWAYGO COUNTY LAND USE EDUCATOR.
- Bill Hokanson, TOWNSHIP PLANNING COMMISSION CHAIR EMERITUS, Fabius Township (St. Joseph County).
- Leslie Johnson, EDITOR, MSU Agriculture and Natural Resources Communications.
- Mary Lou Millard, TOWNSHIP PLANNING COMMISSION SECRETARY, Onekama Township (Manistee County).
- Patricia E. Norris, MSU PROFESSOR OF AGRICULTURAL ECONOMICS, GUYER-SEEVERS CHAIR IN NATURAL RESOURCE CONSERVATION.
- Curt Penny, PLANNING COMMISSION CHAIR, City of Three Rivers.
- Lincoln Sweet, MSU GRADUATE STUDENT in Urban & Regional Planning.

are set up properly and a system is in place to make sure the community keeps up-to-date.

2. **The Plan** (E-3052) reviews the process of plan and plan amendment adoption (to make sure that it was done properly) and reviews of an existing plan to determine if it needs to be updated, and reviews what should be in a plan.
3. **Planning Coordination** (E-3053) covers the process of coordination with neighboring government planning (review of each other's plans); coordination with state, federal and other government agencies; coordination practices; and joint planning commissions.
4. **The Zoning Ordinance** (E-3054) reviews the process of zoning ordinance and zoning amendment adoption (to make sure that it was done properly) and what needs to be in the file to document that the proper steps were taken. This publication also reviews what should be in a zoning ordinance.
5. **Administrative Structure** (E-3055) provides a performance audit for the operation of the planning commission, zoning administrator, and zoning board of appeals. It covers office procedures, job descriptions, filing systems, bylaws, rules of procedure, compliance with the Open Meetings Act, minutes, and process for meetings and decision making.
6. **Special Land Uses** (E-3056) provides a review of the administrative structure for handling special use permits: pre-applications, applications, public notification, record keeping, and use of standards in making decisions.
7. **Planned Unit Development** (E-3057) provides a review of the administrative structure for handling planned unit development handled as a special use permit and as a zoning amendment: pre-applications, applications, public notification, record keeping, and use of standards in making special use decisions or basis in the plan for zoning amendment decisions.

8. **Site Plan Review** (E-3058) provides a review of the administrative structure for handling site plan reviews: applications, public notification, record keeping, and use of standards in making decisions.
9. **Capital Improvement Program** (E-3104) provides a review of the process of creating an annual capital improvement program (CIP).
10. **Subdivision and Land Splitting Reviews** (E-3105) provides a review of the administrative structure for handling land divisions, subdivisions or plats, site-condominiums, lot splits, and certified plats: preapplication meetings with the developer, public notification, plat review, record keeping, and use of standards in making decisions.
11. **Capital Improvements Review** (E-3106) provides a review of the process for the planning commission to review and comment on local government construction projects (which are otherwise not subject to zoning), and outlines how this review can be used as a constructive way to ensure that government-funded projects comply with the adopted plan and local ordinances.

Each of these *Community Planning and Zoning Audits* is available at <http://web2.msue.msu.edu/bulletins/subjectsearch.cfm> and www.msue.msu.edu/lu, and from your county Extension office.

How to use the Audit

The *Community Planning and Zoning Audit* is not difficult to complete. However, it does take time and the ability to search for and find various records in your local government. The actions taken as a result of this exercise should help reduce liability risk and improve your community's planning and zoning program.

The *Community Planning and Zoning Audit* can be utilized by local units of government in a variety of ways. A community can go through this booklet as a group (e.g., the planning commission or a

subcommittee) or a community can have an individual do so. The advantage of performing the assessment as a group is that reviewing the community's documents and files in detail is a great educational experience for local officials. Alternatively, a staff person within the planning department may be able to perform the audit quicker because of having greater familiarity with how the unit or government maintains its records.

Additionally, a community can perform the *Community Planning and Zoning Audit* with certain chapters reviewed by various groups or individuals. For instance, the planning commission could review a few chapters of the audit while the zoning board of appeals addresses another set, and the legislative body performs the evaluations in the remaining chapters. Regardless of the approach taken, the main idea is to take the time to find out where various documents are and to make sure that proper documentation is on file. Then, where necessary, take action to correct any shortcomings.

Upon completion, if your community still has questions or wants help, please contact your county Extension office. They can contact the Michigan State University Land Use Team to provide further assistance and educational programming.

Organization and Content

The *Community Planning and Zoning Audit* contains the following chapters:

1. Introduction.
2. Site Plan Review.
3. Smart Growth.

The audit is based on Michigan Public Act 110 of 2006, as amended (the Michigan Zoning Enabling Act, M.C.L. 125.3101 *et seq.*), Public Act 33 of 2008 (the Michigan Planning Enabling Act,

M.C.L. 125.8101 *et seq.*), recommendations from members of the MSU Extension Land Use Team, and intergovernmental coordination and plan content “best planning practices” derived from a proposed Coordinated Planning Act developed by the Michigan Association of Planning.

The *Community Planning and Zoning Audit* is not designed to be a substitute for reading and understanding the Michigan Zoning Enabling Act or the Michigan Planning Enabling Act. Nor is this document a substitute for legal advice or for professional planner services. It is important to document each step of the process in planning and zoning a community. Keep detailed minutes, affidavits of publication and mailing, open meeting notices, letters of transmittal, and communications all on file so that years from now they are still available.

Defined Terms

“*Appeals board*” means the zoning board of appeals (ZBA).

“*Certified*” (resolution, minutes, ordinance, etc.) means the keeper of the records for the local unit of government (secretary of the planning commission or clerk of the local unit of government for the planning commission or the clerk of the municipality for the legislative body) provides an affidavit that the copy provided is a true and accurate copy of the document.

“*Elected official*” means a member of a legislative body.

“*Legislative body*” refers to the county board of commissioners of a county, the board of trustees of a township, the council of a city or village, or any other similar duly elected representative body of a county, township, city, or village.

“*Local unit of government*” means a county, township, city, or village.

“*Municipality*” means a city, village, or township.

“*Plan*” means any plan or master plan adopted under the Michigan

Planning Enabling Act or one of the three former planning acts, regardless of what it is titled.

“*Planning commission*” means a zoning board, zoning commission,¹ planning commission, or planning board.²

¹On or before July 1, 2011, the duties of the zoning commission or zoning board shall be transferred to a planning commission. Thus, the zoning commission or zoning board will no longer exist (M.C.L. 125.3301(2)).

²Starting on Sept 1, 2008, “planning boards” need to be named “planning commissions” even if a charter, ordinance, or resolution says otherwise (M.C.L. 125.3811(1)).

Chapter 2: Site Plan Review

The purpose of this chapter is to review the process for reviewing and administering site plans. It covers operations and practices at public meetings, the office procedures of the zoning administrator, and more.

To conduct this review, you will need the following things:

1. The minutes of the planning commission for the past year.
2. A copy of the current zoning ordinance

3. Access to case files for permits.
4. Access to the zoning administrator's office records and file (including site plan files) system.
5. A copy of the zoning administrator's office policies or procedure manual(s).
6. A copy of the Michigan Zoning Enabling Act.

Administrative Structure

Question	Affirmative (we are doing it) answer	Negative (need to correct) answer	Action to correct has been done
1. Does the zoning ordinance clearly specify the body or official responsible for reviewing site plans and granting approvals (e.g., planning commission, zoning administrator)? (M.C.L. 125.3501(1))	<p>Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p>No <input type="checkbox"/></p> <p>This is required by the Michigan Zoning Enabling Act. Amend the zoning ordinance to include such a provision.</p>	<p>Check this box: <input type="checkbox"/></p> <p>to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/></p> <p>to indicate when improvement is done.</p>
2. Does the ordinance indicate who is to be the reviewing authority depending on the extent of construction proposed (such as internal changes to a building, a change of use that requires no alteration of the building or site, structures under certain square footage, new construction, etc.)?	<p>Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p>No <input type="checkbox"/></p> <p>This is recommended but not required. If desired, amend the zoning ordinance to include this provision.</p>	<p>Check this box: <input type="checkbox"/></p> <p>to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/></p> <p>to indicate when improvement is done.</p>

Application

Question	Affirmative (we are doing it) answer	Negative (need to correct) answer	Action to correct has been done
<p>1. Are forms and information available on the application process, what needs to be shown on the site plan, and supporting material required for the application that include, at a minimum, the following:</p> <ul style="list-style-type: none"> a. Application form. b. Requirements for site plans. c. Application and other fee schedules. 	<p>Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p>No <input type="checkbox"/></p> <p>This is recommended but not required. If desired, design and make available various forms and information bulletins for site plan submissions.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>2. Does the zoning ordinance stipulate the criteria/method to be used to determine which uses must submit to the site plan review process? (M.C.L. 125.3501(3)-125.3501(4))</p>	<p>Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p>No <input type="checkbox"/></p> <p>This is required by the Michigan Zoning Enabling Act. Amend the ordinance to include this. Consider requiring site plans for all zoning permits, with different levels of detail required for various types of land use.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>3. Is the site plan review process required for changes in land use, business expansions, and increases in intensity of uses?</p>	<p>Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p>No <input type="checkbox"/></p> <p>This is recommended but not required. If desired, amend the ordinance to include this. Consider requiring site plans for all zoning permits, with different levels of detail required for various types of land use.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>

Question	Affirmative (we are doing it) answer	Negative (need to correct) answer	Action to correct has been done
<p>4. Is the site plan review process required for single-family and two-family homes?</p>	<p>Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> This is recommended but not required. If desired, amend the ordinance to include this. Consider requiring site plans for all zoning permits, with different levels of detail required for various types of land use.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>5. Is a simpler site plan, such as a simple sketch plan, required for single-family and two-family homes?</p>	<p>Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> This is recommended but not required. If desired, amend the ordinance to include this. Consider requiring site plans for all zoning permits, with different levels of detail required for various types of land use.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>

Process (Minutes, Finding of Facts, etc.)

Question	Affirmative (we are doing it) answer	Negative (need to correct) answer	Action to correct has been done
Ordinance Standards			
<p>1. As authorized under the Michigan Zoning Enabling Act, (M.C.L. 125.3101 <i>et seq.</i>), does the zoning ordinance include requirements for site plan review?</p>	<p>Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> Requiring site plans is a recommended practice and a powerful zoning tool. Consider amending the zoning ordinance to include site plan requirements.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>2. Does the zoning ordinance utilize the site plan review process, a main technique to ensure compliance with the zoning ordinance?</p>	<p>Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> Requiring site plans is a recommended practice and a powerful zoning tool. Consider amending the zoning ordinance to include site plan requirements.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>3. If yes, do you have procedures and requirements for the submission and approval of site plans clearly stated in the zoning ordinance? (M.C.L. 125.3501(3))</p>	<p>Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> This is required by the Michigan Zoning Enabling Act. Amend the ordinance to include this. Consider requiring site plans for all zoning permits, with different levels of detail required for various types of land use.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>

Question	Affirmative (we are doing it) answer	Negative (need to correct) answer	Action to correct has been done
<p>4. Are site plan review standards included in the ordinance that include the following elements?</p> <ul style="list-style-type: none"> a. Measurable and based on facts. b. Producing consistent results irrespective of the administering body/individual. c. Providing equal protection to similarly zoned properties within the same zoning district. d. Addressing unique local land use characteristics. e. Interpreted in the same way by both the regulator and the regulated. f. Integrated into application processes for various zoning approvals (special use permits, zoning permits, planned unit developments, etc.). 	<p style="text-align: center;">Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p style="text-align: center;">No <input type="checkbox"/></p> <p>This is recommended but not required. If desired, amend the ordinance to include this. Consider requiring site plans for all zoning permits, with different levels of detail required for various types of land use.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>5. Does the ordinance provide a procedure for amending an already approved site plan? (M.C.L. 125.3501(2))</p>	<p style="text-align: center;">Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p style="text-align: center;">No <input type="checkbox"/></p> <p>This is required by the Michigan Zoning Enabling Act. Amend the ordinance to include provisions for amending an approved site plan.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>6. Does the ordinance contain a time limit after which the approved site plan expires?</p>	<p style="text-align: center;">Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p style="text-align: center;">No <input type="checkbox"/></p> <p>This is recommended. Consider amending the ordinance to include such a provision.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>

Question	Affirmative (we are doing it) answer	Negative (need to correct) answer	Action to correct has been done
Minutes and/or the Record			
<p>7. If the site plan review is done by a public body (e.g., the planning commission), are minutes, record, and review based on standards done in the same way as for a special use permit? (See and review questions in <i>PLANNING AND ZONING* A*SYST #6: Community Planning & Zoning Audit</i> “Chapter 2 Special Land Uses” section on “Application” and “Process”.)</p>	<p>N/A or Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> Review of a site plan should be very formal. Start the review of site plans in this manner as soon as possible.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>8. If the site plan review is done as part of or in conjunction with an existing permit review process (e.g., special use permit, planned unit development, land use permit), are the site plan review, minutes, and record created and done according to the process and procedures for that other process?</p>	<p>N/A or Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> Review of a site plan should be very formal. Start the review of site plans in this manner as soon as possible.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>9. If the site plan review is done by an individual officer (e.g., the zoning administrator), is a record and his or her review based on standards? (See questions on procedure on the job, office process, and filing system for the zoning administrator in <i>PLANNING AND ZONING* A*SYST #5: Community Planning & Zoning Audit</i> “Chapter 2 Administrative Structure”). (M.C.L. 125.3501(4))</p>	<p>N/A or Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> This is required by the Michigan Zoning Enabling Act. Even if a site plan is reviewed by an individual, the basis of review on standards and record keeping must still be done. Change policy, office manual, or job description or scope of service to include these duties.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>

Question	Affirmative (we are doing it) answer	Negative (need to correct) answer	Action to correct has been done
<p>10. Regardless of which review process is used, does the record reflect the following items in writing?</p> <ul style="list-style-type: none"> a. Final decision of the reviewing and approving body (to approve, not approve, approve with conditions). b. Reasons (conclusions) for the decision. c. Findings of fact upon which the reasons are based. d. Conditions of approval (optional). e. If performance security (e.g., letter of credit, bonds, cash on deposit, or certified check) is required. 	<p>Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p>No <input type="checkbox"/></p> <p>This is recommended but not required. If desired, take steps to include this protocol as standard operating procedure as soon as possible.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>

General Process

<p>11. Are affected parties – such as school districts, police and fire departments, county drain commission, county road commission, soil erosion and sedimentation control agencies, county health department, etc. – sent a copy of the site plan to inform them of possible future impacts?</p>	<p>Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p>No <input type="checkbox"/></p> <p>This is recommended but not required. If desired, take steps to include this protocol as standard operating procedure as soon as possible.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>12. Does a staff member make site visits to the property for which the site plan review is being done to verify existing conditions, confirm progress during construction, and ensure compliance with the approved site plan?</p>	<p>Yes <input type="checkbox"/></p> <p>Good. Go to the next question.</p>	<p>No <input type="checkbox"/></p> <p>This is recommended but not required. If desired, take steps to include this protocol as standard operating procedure as soon as possible.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done.</p> <p>Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>

Question	Affirmative (we are doing it) answer	Negative (need to correct) answer	Action to correct has been done
<p>13. Does the site plan review process require information on major elements such as vehicular and pedestrian circulation, setbacks, parcel boundaries, existing and proposed buildings, natural features, landscaping, infrastructure, lighting, and signs?</p>	<p>Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> This is recommended but not required. If desired, amend the zoning ordinance to list what shall be included on site plans. Consider requiring site plans with different levels of detail required for various types of land use.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>14. Upon approval, does the file include copies of site inspection reports, memos, communications, and all other documentation?</p>	<p>Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> This is recommended but not required. Try to recover the documentation and include it in the files. Take steps to include this protocol as standard operating procedure as soon as possible.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>
<p>15. Upon completion of the project, does the file document that everything has been done as required?</p>	<p>Yes <input type="checkbox"/> Good. Go to the next question.</p>	<p>No <input type="checkbox"/> This is recommended but not required. Try to recover the documentation and include it in the files. Take steps to include this protocol as standard operating procedure as soon as possible.</p>	<p>Check this box: <input type="checkbox"/> to indicate this is an improvement that needs to be done. Check this box: <input type="checkbox"/> to indicate when improvement is done.</p>

Chapter 3: Smart Growth

The purpose of this section is to provide basic information and introduce communities to the 10 tenets of smart growth. Covered here are the basics necessary for the administration and operation of zoning. If your community is interested in incorporating the principles of smart growth into its ordinances and develop according to the smart growth principles, the Smart Growth Readiness Assessment Tool (SGRAT) can be used to guide your community through an evaluation of the plans and implementation tools currently used to guide growth. This assessment can also help your community identify tools that may help produce a smart pattern of growth in the future.

This document represents the first stage of a community assessment. To go on to the next step in assessing your community's planning and zoning, you should review the Smart Growth Readiness Assessment Tool on the Internet. Go to <http://www.landpolicy.msu.edu/sgrat/>.

1. The Governor's Land Use Leadership Council used the following smart growth tenets³ for many of the recommendations contained in its report on land use in Michigan. These 10 tenets can form the basis for establishing a set of state land use goals.
 - a. Mix land uses.
 - b. Compact building design.
 - c. Increase housing choice.
 - d. Encourage walking.

- e. Offer transportation variety.
 - f. Create a sense of place.
 - g. Protect farms, unique natural features, open spaces.
 - h. Direct new development to existing communities.
 - i. Make development process fair, predictable, efficient.
 - j. Involve stakeholders.
2. What is smart growth?
 - a. Smart growth is development that serves the economy, the community, and the environment.
 - b. It provides a framework for communities to make informed decisions about how and where they grow.
 3. Why smart growth? It makes dollars and sense because it is financially conservative, environmentally responsible, and socially beneficial.
 - a. Financially conservative
 - i. Makes responsible use of public money.
 - ii. Reuses existing buildings.
 - iii. Uses existing roads and highways.
 - iv. Uses existing water/sewer infrastructure.
 - v. Uses higher density to maximize the value of publicly funded facilities and services.
 - vi. Keeps taxes and public service costs low.
 - b. Environmentally responsible
 - i. Uses and/or reuses developed areas.
 - ii. Keeps impervious surfaces to a minimum by concentrating dense development.
 - iii. Builds to fit existing land rather than changing the land to fit what is built.
 - iv. Avoids oversized lots and yards to reduce excessive mowing, fertilizing, etc.

³Smart Growth Network. *Getting to Smart Growth*. Washington, D.C.: Smart Growth Network. [Online, cited 8/3/03.] Available at: <http://www.smartgrowth.org/PDF/GETTOSG.pdf>.

For more detail and examples, see <http://www.smartgrowth.org/pdf/gettosg.pdf>.

- c. Socially beneficial
 - i. Encourages people to live close enough to one another for comfortable interaction.
 - ii. Designs residential areas for conversation from the sidewalk

- iii. Encourages “eyes on the street” at all hours to reduce crime and fear of crime.

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