



Dorr Township,
Michigan

Master Plan Consistency Review

Presented by Courtney Cardosa

Introduction

Review of Documents:

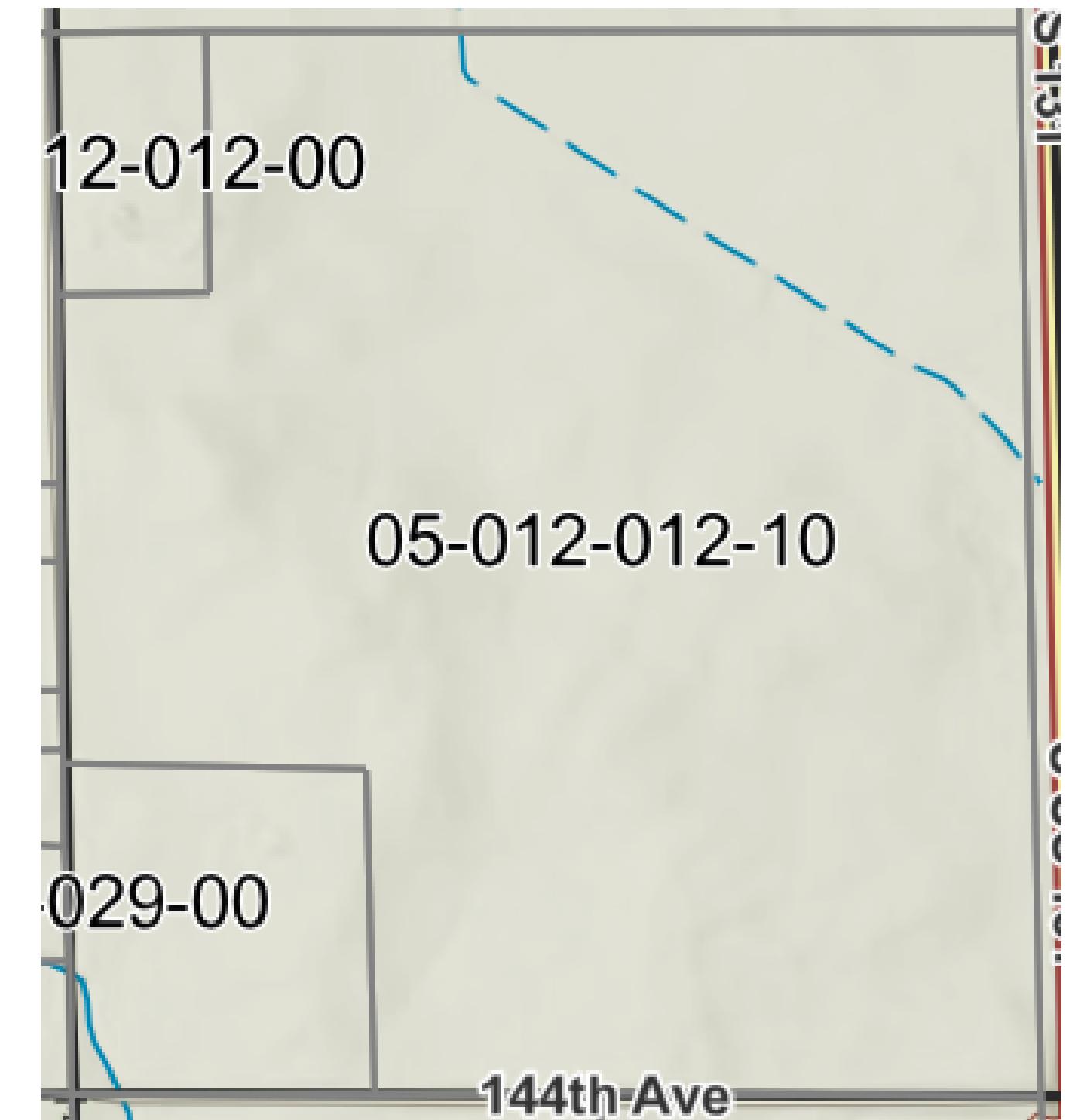
- **Dorr Township Master Plan (2022)**
- **Documents related to the February 21, 2023 Rezoning Request**
- **Documents related to the June 18, 2024 Rezoning Request**

Legal Basis for Review

The Master Plan sets forth recommendations for what type of land uses can be established in the Township, where they can be established, and under what conditions they can be established. The Master Plan is a requirement under the Michigan Planning Enabling Act (MCL 125.3801 et seq).

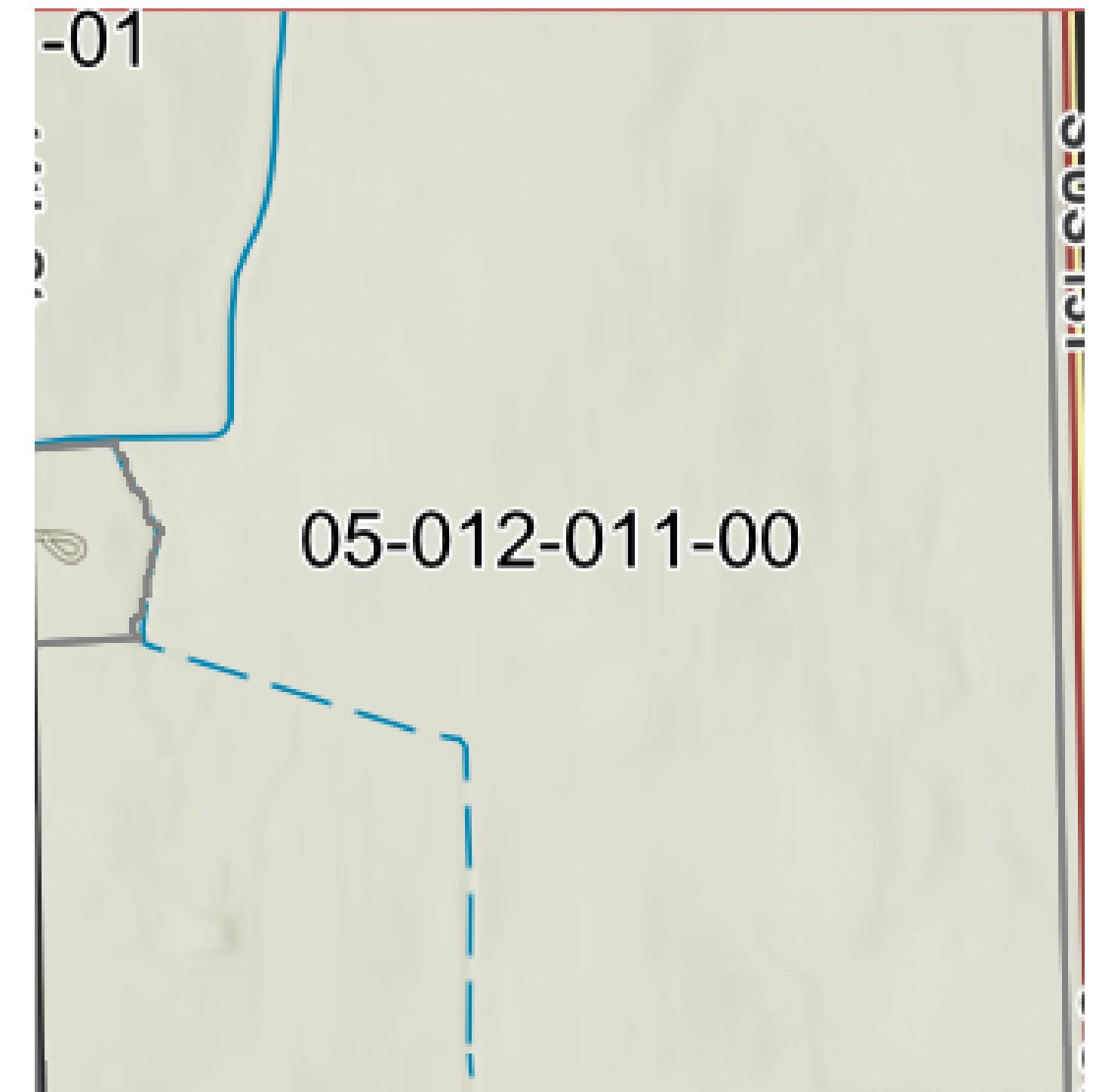
Parcel 05-012-012-10

- 2/21/23 Rezoned Ag to MXPUD
- Southernmost of two parcels bought
- 128.28 acres



Parcel **05-012-011-00**

- 6/18/24 Rezoned Ag to MXPUD
- Northernmost of two parcels bought
- 144.22 acres



Problems



Problem 1 - Future Land Use Designation (Map Only)

The 2022 Master Plan identifies land along US-131 as appropriate for **Mixed Use Planned Unit Development (MXPUD)**, which may include light industrial, warehousing, and related non-residential uses due to highway visibility and access.
— *Dorr Township Master Plan (2022), p. 55*

The rezoning requests both correctly note that the subject parcels are shown within this MXPUD Future Land Use area.

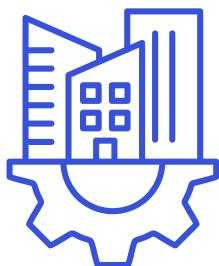
“Lori explained it is planned for MPUD (mixed) – ranges from retail to light industrial usage.”
— *February 21, 2023 Planning Commission Minutes, p. 2*

“Based on the parcel’s designation as MXPUD within the Future Land Use Map, the zoning of various nearby parcels, and the text contained in the Master Plan...”
— *June 18, 2024 Planning Commission Packet, p. 4*

Conclusion:

The *map designation alone* supports consideration of non-residential use in this corridor. **However, the Master Plan expressly conditions when rezoning should occur, as outlined ahead...**

Problems



Problem 2 - Mandatory Infrastructure Preconditions for Rezoning (Key Conflict)

The Master Plan places a clear prerequisite on rezoning land within the MXPUD corridor:

“Before rezoning to the MX, Mixed Use district, utilities and improvements to area roads should be made or in progress.”

— *Dorr Township Master Plan (2022), p. 56*

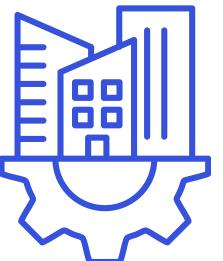
What the February 2023 record shows instead:

- PCI and applicant acknowledge the parcel is farmland between 14th and US-131 and **that they want the rezoning now to “take one step out of the equation,”** with the actual industrial proposal later at site plan. No showing that utilities/roads were “made or in progress.”
- Roads: Commissioner Dolegowski asks whether 14th Street will be updated; PCI says she’s “not sure” and the applicant says they’re “not banking on that coming about & it doesn’t influence their plans.” That is the opposite of “improvements ... made or in progress.”
- Its noted there is sewer there but not water.

— *February 21, 2023 Planning Commission Minutes, p. 2*

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Problems



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— Dorr Township Master Plan (2022), p. 56

What the June 2024 record shows instead:

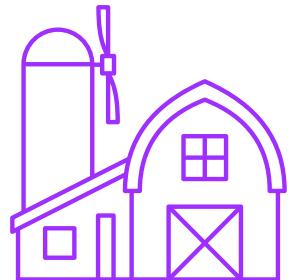
- The packet references future intent to connect utilities, not existing or in-progress infrastructure.
- During public comment commissioners reference “talk of paving 146th” and “speculation of an interchange at some point” and “intention to hook up to sanitary sewer”...

— June 18, 2024 Meeting Minutes, p. 1-2

Conclusion:

At the time of BOTH rezonings, the Master Plan’s stated requirement — *utilities and road improvements made or in progress* — **is not demonstrated in the record**. Rezoning prior to satisfying this condition is inconsistent with the Plan’s implementation framework (and should have flagged at least one TRUE response on spot-zoning worksheet).

Problems



Problem 3 - Prime Farmland Preservation (Substantive Policy Conflict)

The Master Plan repeatedly emphasizes **preservation of prime agricultural soils**, identifying them as a defining feature of the Township:

“Soils within the Township which are considered prime or unique farmland.. are best suited to food, feed, forage, fiber, and oilseed crops.” (p.71)

“Preservation of prime farmland will continue to be an important goal.” (p.51)

Both rezone requests acknowledge to different degrees the prime farmland that these parcels are:

“It is currently all farmland right now.”

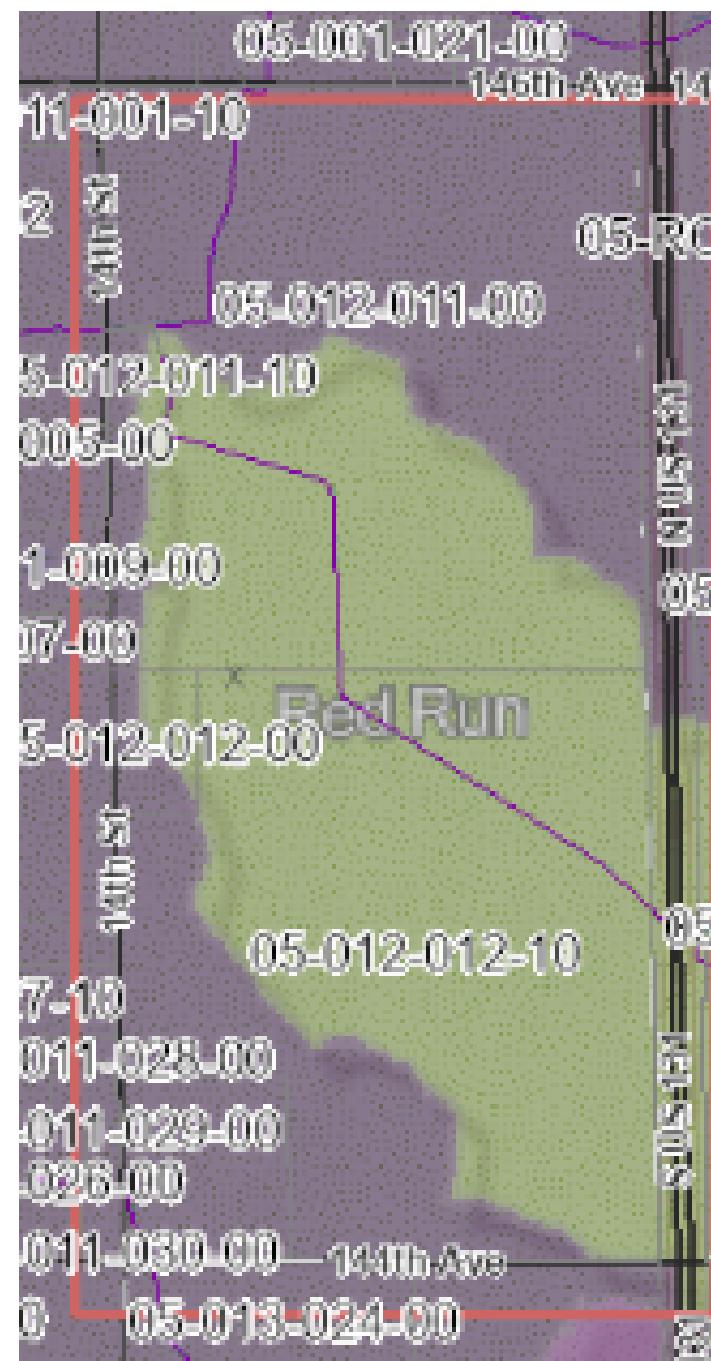
— *February 21, 2023 Planning Commission Minutes*, p. 2

“The parcel is shown as Prime Farmland Soils on the Master Plan mapping.”

— *June 18, 2024 Planning Commission Packet*, p. 4

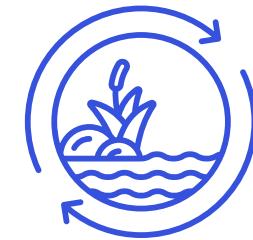
Conclusion:

Rezoning almost 300 acres of acknowledged prime farmland for an intensive industrial use directly undermines the Plan's stated agricultural preservation goal, Also should have triggered a TRUE response on spot-zoning worksheet!



green = Red Run Drainedhshed
 purple line=Red Run Drain
 source: Allegan GIS Map 1.16.26

Problems



Problem 4 - Drainage, Wetlands, & River Corridor Protection (Policy Misalignment)

The Plan identifies the Rabbit River watershed and its tributaries, including Red Run, as areas requiring protection and proposes a River Corridor Protection overlay with vegetative buffers and setbacks.

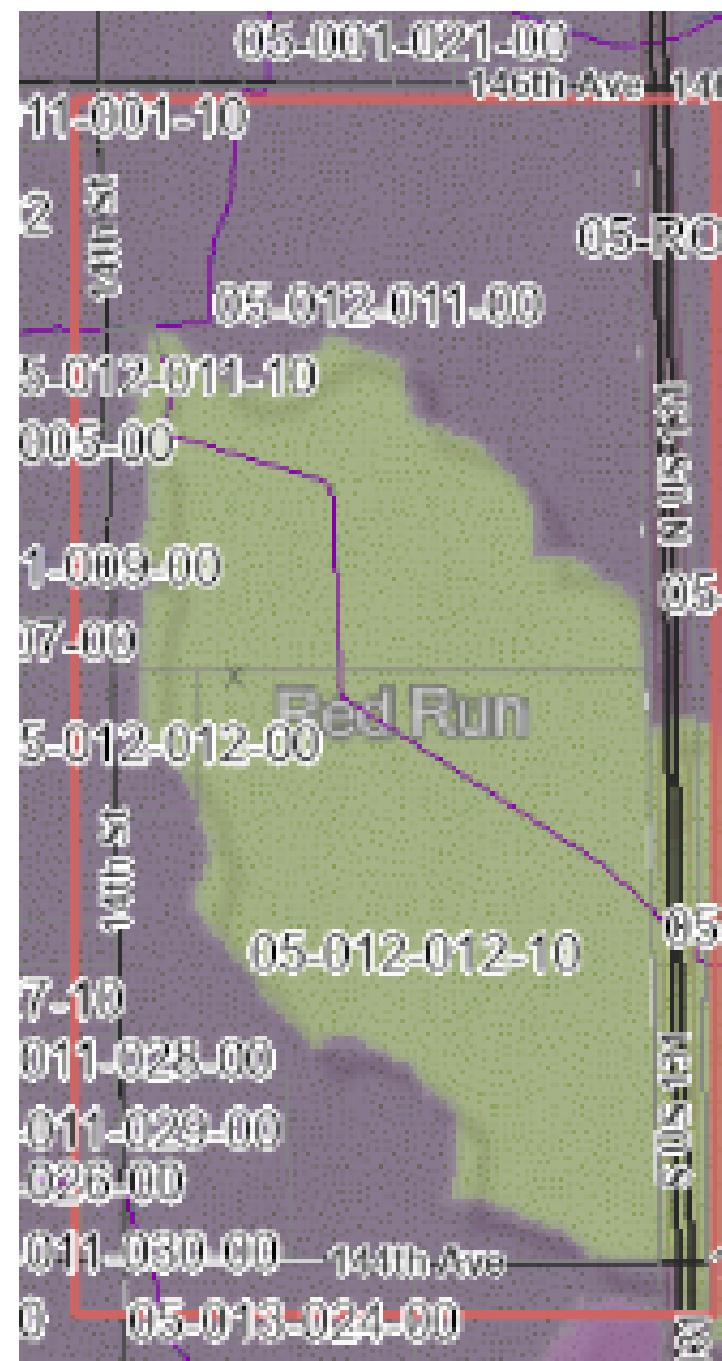
The Rabbit River and its tributaries, including Red Run, should be protected through setbacks, vegetative buffers, and careful land use planning. (paraphrased)
 — Dorr Township Master Plan (2022), p. 56

The Plan also cites “[The leading causes of groundwater contamination in Michigan are from small businesses and agriculture. More than 50% of all contamination comes from small businesses that use organic solvents, such as benzene, toluene, and xylene, and heavy metals, such as lead, chromium, and zinc. Recently, PFAS and PFOS has also become an identified groundwater contaminant.](#)” (p.11)

What the February 2023 record shows:

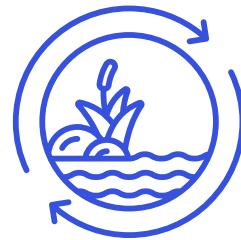
- No mention of drains, wetlands, groundwater sensitivity, stormwater impacts, or river-corridor concepts at all in the rezoning deliberation.
- The rezoning record did not engage at all with the Plan’s water-resource framework

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green = Red Run Drainshed
 purple line=Red Run Drain
 source: Allegan GIS Map 1.16.26

Problems



Problem 4 - Drainage, Wetlands, & River Corridor Protection (Policy Misalignment)

What the June 2024 record shows:

- “The Hydrology Map... indicates that the Sink and Red Run County Drains cross the west side of the property. There are also patches of suspected wetlands...”
 — June 18, 2024 Planning Commission Packet, p. 4
- *There is a piece of the land that would likely be considered a wetland.*
 — June 18, 2024 Planning Commission Meeting Minutes, p. 2

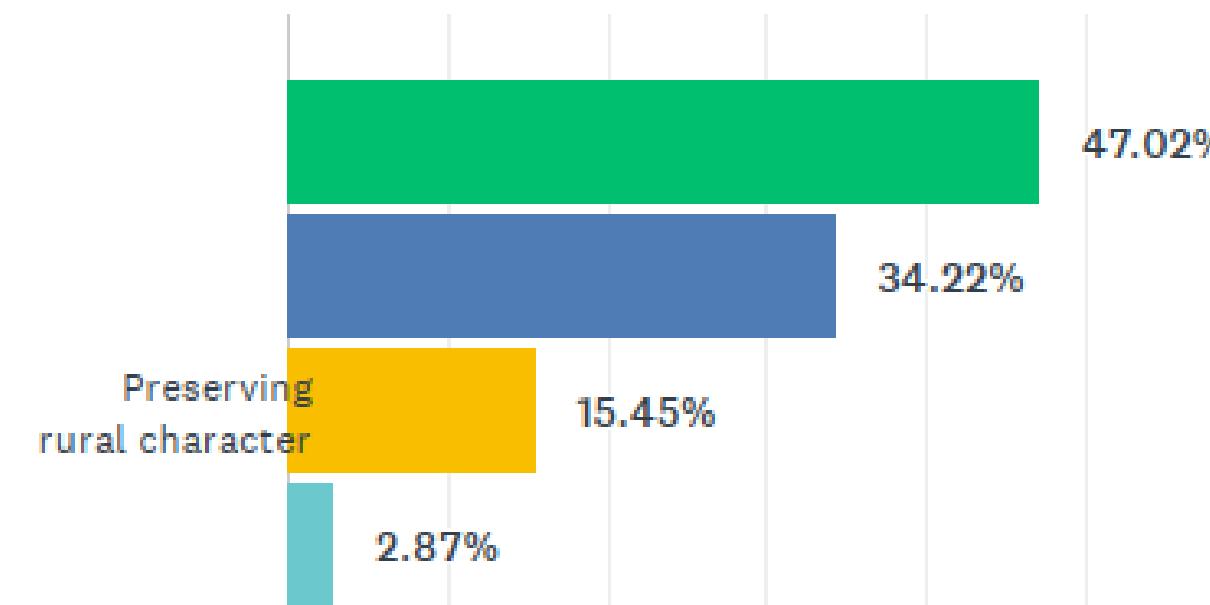
Conclusion:

The Master Plan explicitly identifies Red Run for protection. Allegan County GIS confirms both rezoned parcels lie within the Red Run drainage basin. Yet the February 2023 rezoning record contains no analysis of Red Run, drainage impacts, or river corridor protections.” Further the 2024 rezone briefly touches on the topic, but rezones anyway with mitigation deferred to later site plan review.

Advancing rezoning without addressing corridor protections is inconsistent with the Plan’s environmental implementation strategy.

Problems

Plan survey response to how important are various township priorities (p. 107)



Problem 5 - Community Character & Rural Identity

The Master Plan emphasizes maintaining Dorr Township's **rural, agricultural character** while managing growth intentionally--it's literally one of the goals! (p. 48)

"The Master Plan provides direction for Township officials in managing growth while retaining the **desired community character and providing the best quality of life possible for current and future residents.**"

— Dorr Township Master Plan (2022), p. 6

Conclusion:

An intensive data-center-scale industrial use on open farmland represents a fundamental shift in land use character that the Plan contemplates only after infrastructure readiness and protective measures are in place.

Overall Determination

The proposed rezoning are *map-consistent* but **policy-inconsistent** with the adopted 2022 Dorr Township Master Plan.

Specifically they:

- Precede required infrastructure readiness
- Convert acknowledged prime farmland
- Advance rezoning ahead of river/drainage protections
- Conflict with stated rural-character preservation goals

Absent a formal Master Plan amendment, the rezoning requests do not fully align with the Plan's text, conditions, or implementation strategy. Not to mention, the 2023 one didn't even use a spot-zone checklist in accordance with the township's very own protocols:

“Dan Beute clarified this is master planned and so spot zoning checklist not needed.”

— February 21, 2023 Planning Commission Minutes, p. 2

WE IMPORE YOU

Repeal Rezonings

Review the rezonings and exercise your authority under the Michigan Zoning Enabling Act where corrective action is warranted; namely, repeal the rezonings of these parcels and revert to Agricultural designations.

Enact Moratorium

Commit to placing a minimum one-year moratorium and zoning review for large-scale industrial uses on the next agenda or a special work session