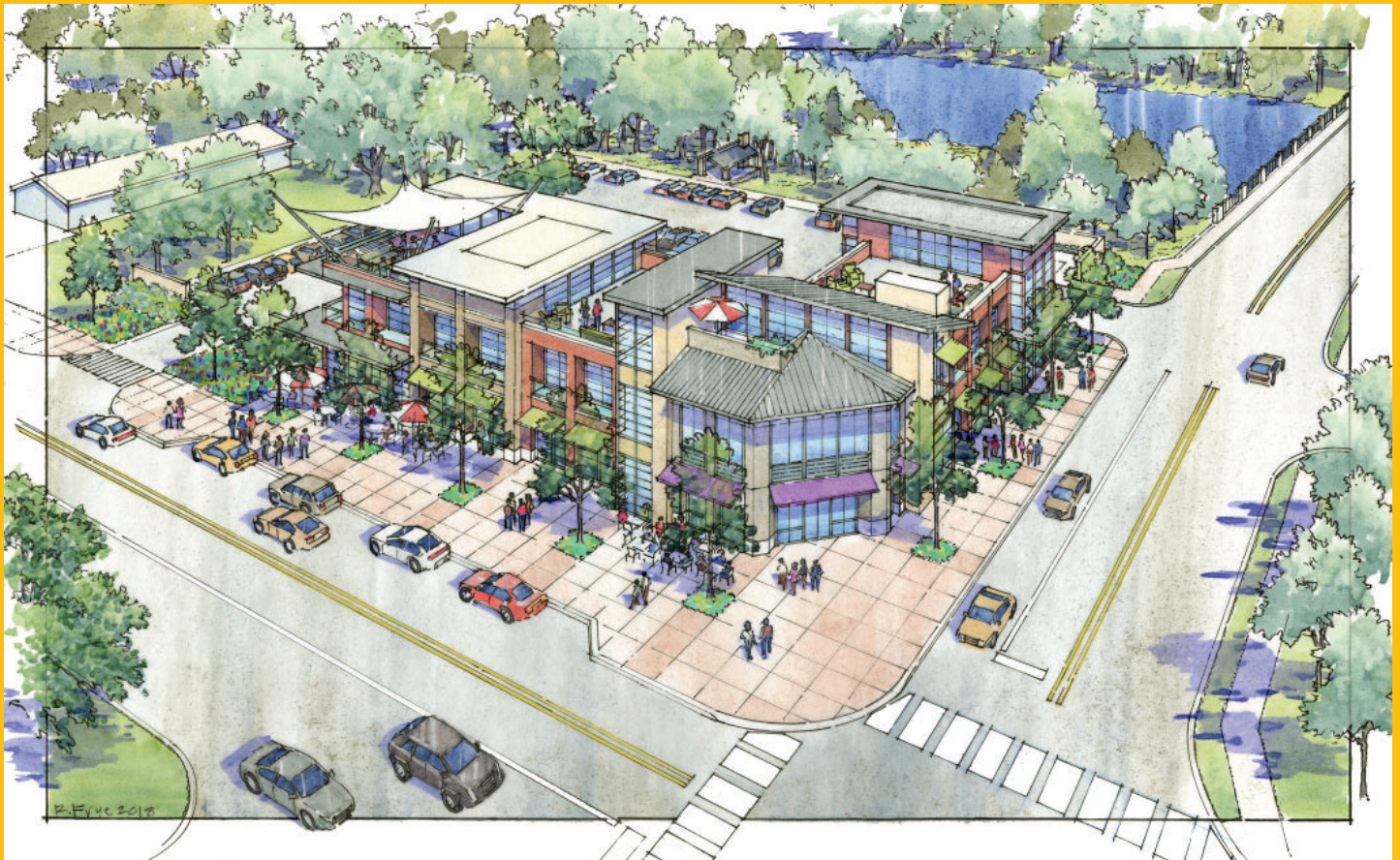


Charter Township of Comstock
Comstock Center
PLACE PLAN FOR REDEVELOPMENT and PROSPERITY



Acknowledgments

The Comstock Center Place Plan initiative was sponsored by the Charter Township of Comstock and administered by the Comstock Township Planning Commission

The Charter Township of Comstock Planning Commission

Sandra Katje, Chair
David Burgess, Vice Chair
Jennifer Jones-Newton, Secretary
Randy Beister
Allan Faust
Robert Pratt, Trustee and Planning Commission Liaison
Ronald Sportel

Jodi Stefforia, Planning & Zoning Administrator

The Charter Township of Comstock

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Robert Pratt

Community and Economic Development Assistance provided by:

B R 
Beckett&Raeder

Scope and Outcomes

In November 2017, the Charter Township of Comstock issued a Request for Proposal (RFP) for the Comstock Center Design Study. The intent of the RFP was to take a more detailed look at the area known as Comstock Center and determine “the realistic potential for and value of enhancements and physical redevelopment.” If the outcome determined the need for a Downtown Development Authority then a development plan would be prepared.

The Comstock Center area includes a combination of commerce, institutional, and residential properties. Comstock Center, although an unincorporated area within the Township, has all the attributes of a typical Village with a definable downtown area, adjacent residential neighborhoods, public spaces, and institutional uses. The commercial areas exist along King Highway from Henning Street to the intersection of King Highway and Michigan Avenue. In addition, there are several commercial establishments along Michigan Avenue between Packard and Parcom Streets.

The study area has the context of a small historic settlement within a larger suburban setting. The roots of the “Center” have a foundation in the agricultural sector. In 1831 the first sawmill in Kalamazoo County opened in Comstock located along Comstock Creek. Shortly thereafter a grist mill and U.S. Post Office were opened when Michigan was still a territory. Today, Comstock is known as the “Bedding Plant Capital of the World” due to the number of greenhouses and largest plant cooperative in the United States.

The design study leverages the information in the Vision 2025 Master Plan, adopted in 2016, which called for the redevelopment of properties within the core area of the study area into a walkable downtown area. Since there is no public redevelopment authority overseeing the redevelopment process the evolution from a single-site, vehicular-oriented commercial district to a walkable downtown would take many years to fulfill.

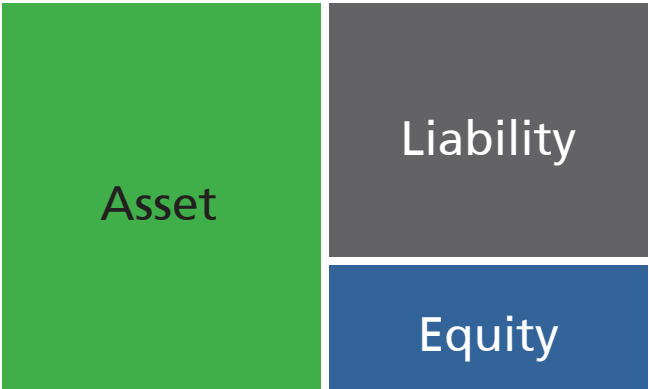
Based on fieldwork and information gleaned from the May 31, 2018 stakeholder input session there are five themes that need to be addressed. These themes include: retail, housing, appearance, branding and investment. Actions needed to address these themes have, in some instances, overlapping strategies. Collectively, the themes and their respective strategies are focused on improving the quality of the residential neighborhoods and the vitality of the business district.

Study Area Balance Sheet

In accounting, a balance sheet consists of the enumeration of assets minus the disclosure of liabilities to derive a net worth. It can be summarized as:

Assets = Liabilities + Net Worth (shareholders equity)

A community balance sheet is very similar. The assets are what attracts a person to the community, the liabilities include factors that create barriers that influence decisions not to consider a community as a place to reside or work, and the net worth is outcome of determining if the assets outweigh the liabilities, or vice versa. The type of liability determines if it is a local or regional issue. For example, utility costs (gas and electric) are typically regional in nature where on the other hand, lack of potable water and sewer capacity is a local issue. Addressing and resolving local liabilities better positions the community for economic development. The assessment of assets and liabilities needs to be honest evaluation in order to have value.



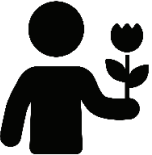




Comstock Center Balance Sheet

ASSET	LIABILITY
Location on the Kalamazoo River	More communication with property owners
Proximity to downtown Kalamazoo	Enforce codes, eliminate blight
Township Library	Floodplain
Parks	Improve appearance
Access to Kalamazoo River for kayaking/canoeing	Tear down boarded up buildings
Several local and successful businesses	Encourage homeownership instead of rentals
Home of Bell’s Brewery	Building facades in need of updating
Kalamazoo River Valley Trail (KRVT)	More programs and events
Available property; i.e. former school	Encourage bike trail amenities; water refill station(s)
Local greenhouses and garden operations	Improve the reputation of the local school system
Residential neighborhoods close to business district	Create a destination
Grid street network	EQUITY
Available sewer, water and public transit	Interested property owners and residents
52,400 people within 10-minute drive time	Proactive Planning Commission
Median household income \$39,200	Available market potential
107 businesses with 1,163 employees within 1 mile	Available disposable income

Stakeholder Themes and Actions

Stakeholder Suggested Strategies for Improvement

THEME	<i>Strategy 1</i>	<i>Strategy 2</i>	<i>Strategy 3</i>
 <p>Retail</p>	Code enforcement focused on building maintenance, blight and removal of buildings; if deemed dangerous per code	Establish a Downtown Development Authority as the entity that champions redevelopment of the district	Improve the appearance; lighting, sidewalks, consistent signage.
 <p>Housing</p>	Code enforcement and blight removal program.	Housing improvement, rehabilitation program to maintain existing housing stock and neighborhoods	Improve appearance with sidewalks and lighting
 <p>Appearance</p>	Code enforcement and blight removal program.	Carry forward the "greenhouse" community theme and design public improvements that accommodate flowers and landscaping (requires volunteers and commitment from Township)	Improve the appearance; lighting, sidewalks, consistent signage.
 <p>Branding</p>	Agree upon a name - "River Center" "Comstock River Center" "Comstock Center"	Carry forward the "greenhouse" community theme and design public improvements that accommodate flowers and landscaping	Position the district as a "Trail Town" (land and water access)
 <p>Investment</p>	Code enforcement and blight removal program.	Establish a Downtown Development Authority as the entity that champions redevelopment of the district	Procure funding; grant, loans and possibly local bonding.

Market Opportunities

Retail Market Qualifications

Small merchants retail space should not be developed within Comstock Center on speculation alone. Rather, it should be developed in a public-private partnership and collaboration with a build-to-suit anchor, such as a new grocery store, pharmacy, dollar store, auto parts supply store, or general hardware store. An anchor is essential for drawing shoppers into the Center and to generate cross-shopping activity for the smaller local merchants. This is key to ensuring that small merchants can generate enough retail sales to cover their costs while being profitable. A microbrewery or brew pub is supportable, but should not be considered a substitute for an anchor store.

Market Gaps and Needs by Category	
Business Type	Square Footage
Dairy Queen or A&W	500
Chinese Takeout	1,000
Subway or Similiar Sub Shop	1,000
Graphics & Printing	1,000
Hobby, Craft and Supply	1,500
Micro Brewery or Brew Pub	1,500
Party Store, Wine & Spirits	1,500
Cafe, Garden Gifts, Florist	1,500
Paints & Sealants Supply	1,500
Vintage Restored Furniture	2,000
Urgent Care Center	4,000
Auto Value, Pep Boys or NAPA	6,000
Ace Hardware or Do-It Center	6,000
Family Dollar or Dollar Tree	8,000
Walgreens or CVS	14,000
Hardings Market or Gils Expanded	15,000

source: Land Use | USA; May 2018

Retail Key Observations

1. Comstock Charter Township has about 16,000 residents, but less than 3,000 are living within one (1) mile of the Comstock Center or downtown. There is a need to attract more resident households that will help generate expenditures for retail anchors and merchants.
2. Comstock Township's residents have a per capita income of about \$30,000, which helps generate an aggregate resident expenditure potential of \$70 million. However, at least 80% of these retail expenditures will take place along Gull Road, or will be exported to other shopping destinations like the Westnedge Avenue corridor in the City of Portage.
3. Assuming that Comstock Center can capture 20% of total retail expenditures by established households, then it has a capacity \$15 million in total retail sales annually. Assuming an average productivity of \$350 per square foot suggests a capacity for two or three new anchor stores (sharing 30,000 square feet), and up to 10 small merchants averaging 1,500 square feet each. These figures have been adjusted for some visitor import and represent not-to-exceed maximums.

Retail Key Recommendations

LandUseUSA recommends that Gil's Market expand into a new facility with a facade, storefront, and windows that faces traffic. The new store could also consider operating under a new brand, such as Harding's Friendly Market. Ideally it would relocate into the Comstock Center and serve as an anchor for local merchants.

The township should be proactive in anticipating future interest from chain stores like pharmacies (Walgreens, CVS): grocery stores (Harding's Friendly Market): dollar stores (Family Dollar, Dollar Tree): general hardware stores (Ace Hardware, Do-It Center): automotive parts stores (AutoValue, Pep Boys, Napa): credit bureaus: and urgent care centers. LandUseUSA does not typically advocate chain stores in small downtowns. This is an exception because they will inevitably locate into the township - so they could be recruited to anchor the Center.

Chain stores could be viewed as anchors and opportunities for Comstock Center, or as competitors. If they are not recruited as small anchors, then they could open at the fringes of the township and siphon shoppers away from the Center and its local merchants.

Traffic Volumes Key Observations

1. Advertising for Comstock Center should be placed along Interstate 94, which has 60,000 to 65,000 vehicles daily. This traffic has the capacity to generate at least 23 million advertising exposures annually for the Center and its downtown merchants and businesses.
2. Regional shopping destinations along Gull Road to the north and Westnedge Avenue to the southwest have impressive traffic volumes of 23,342 and 31,501 daily vehicles, respectively. These volumes are typically needed to attract anchor stores with 20,000+ square feet.
3. Traffic volumes in the Comstock Center (along River Street) were approaching 9,000 vehicles daily in 2007 - the most recent year of data provided by MDOT. This was prior to improvements to Sprinkle Road, which now encourages north-south commuters to bypass the Comstock Center. LandUseUSA estimates that volumes may have fallen below 6,000 vehicles daily since 2007.
4. Most retail anchors (green grocers, pharmacies, dollar stores, hardware, and auto parts supply stores) will prefer traffic volumes of at least 10,000 vehicles daily. LandUseUSA estimates that the Comstock Township Center has a potential to regain traffic volumes by offering these and other retail conveniences in an enjoyable environment.

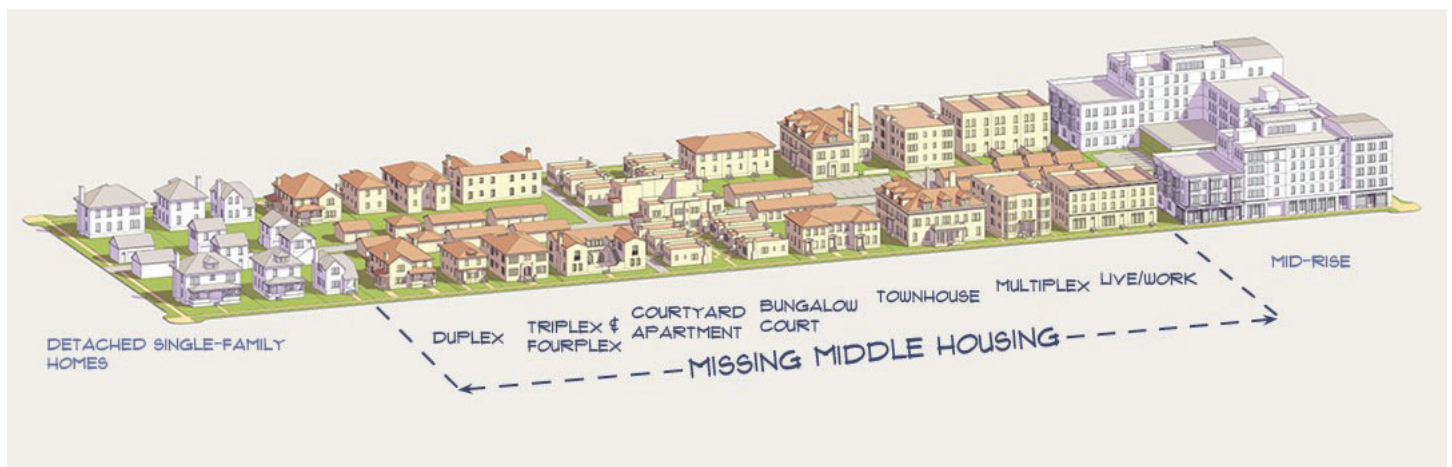
Residential Target Market Analysis

LandUseUSA speculates that the township and its developers should focus on semi-attached row houses, smaller mansion-style houses, and some detached cottages arranged in compact riverfront settings. A small number of attached for-sale townhouses could be tested, perhaps as a duplex, tri-plex, or four-plex. All of these formats must be developed overlooking either the river or Merrill Park. Attached owner-occupied units must not be developed above the street-front retail. LandUseUSA theorizes that the market potential for attached products is no more than 6 units annually over the next five years.

Detached houses with scenic views of the river should be allowed to develop accessory dwelling units, such as apartments above garages or small cottages on long-lots. All heights must be limited to two levels, plus optional rooftop decks.

All lofts above the street-front retail in the Center should be designed as for-lease units. They should also be designed for flexible uses, with a mix of residential lofts and small office suites. Live-behind, live-above, and other live-work formats should not be included.

Missing Middle Housing Types



Redevelopment / Conceptual Site Plans

Regional Real Estate Summary

The July 2018 retail - commercial summary for the Kalamazoo - Portage market found 188 active sale and lease listings with an aggregate square footage of 1.3 million gross square feet. The annual lease rate was \$11.59 per square foot (PSF) which was on average 22% below listing price.

During this same period lease listings were numbered at 119 which was in the same range as the 3-month, 12-month and 2-year assessment period. The asking lease price of \$11.59 PSF was higher than the 3-month and 12-month periods but lower than the 2-year average of \$12.16 PSF.

Properties for sale reported a rate of \$108.19 PSF which was higher than the 2-year average. An interesting trend is the days on market which for the month of July 2018 was 152 days. The 2-month average was 310 days, and the 2-year average was 415 days.

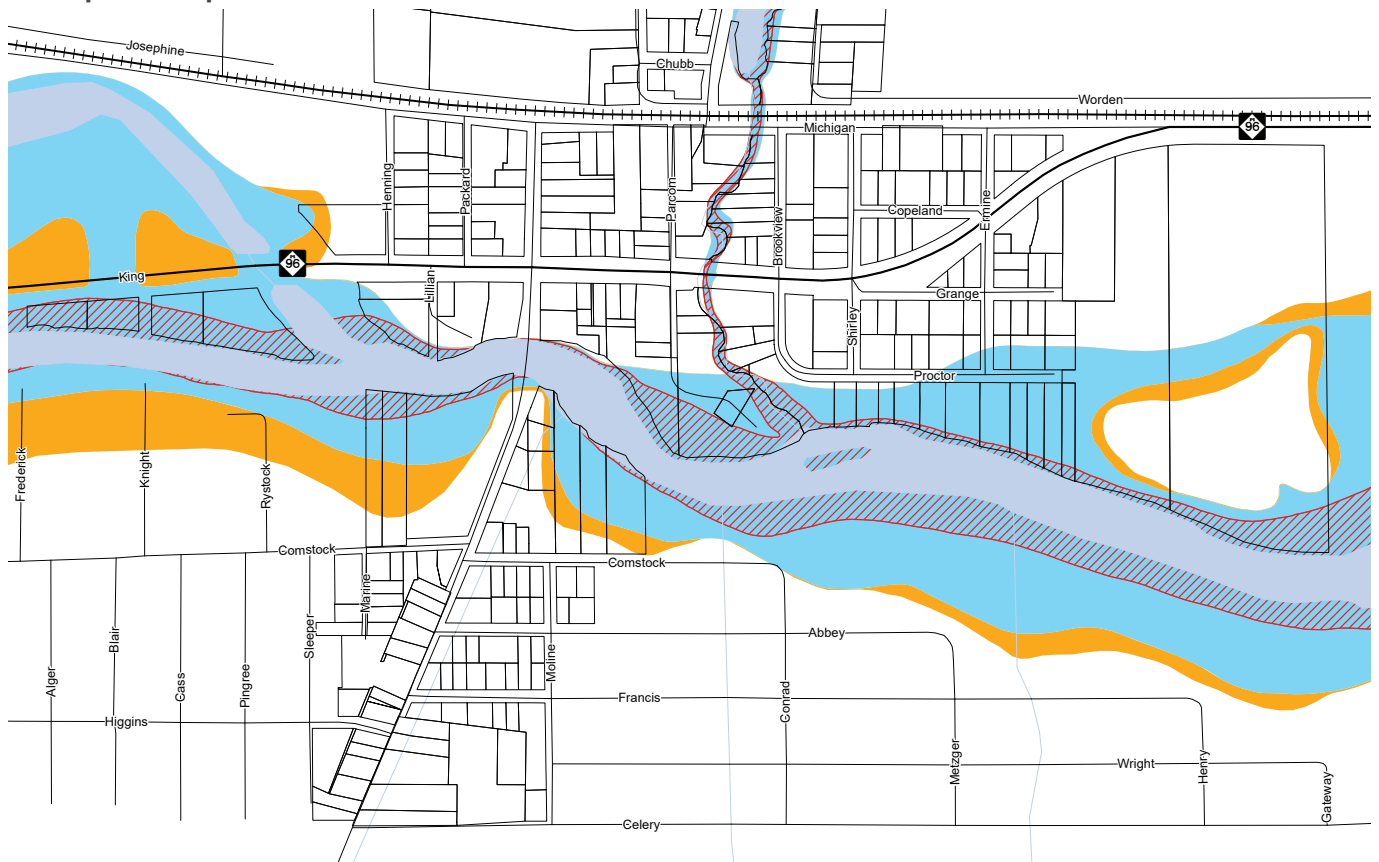
Due to the location of Comstock Center and its lower traffic counts it would be safe to conclude that lease rates PSF would need to be lower to attract tenants, unless the business is filling a large market gap, like a Walgreens or CVS.

Local Site Constraints

There are several constraints that impact redevelopment opportunities in the Comstock Center study area. These include:

1. Floodplain - properties that abut the Kalamazoo River have portions of their respective sites either in the 100-year (blue) or 500-year (gold) floodplain. Further, to a minor degree, but still relevant, is the regulatory floodway (cross-hatched) which isn't buildable. This is primarily along the north bank of the river.
2. Lot size - due to historic development patterns the lots in Comstock Center, including commercial properties, are dimensionally small. For redevelopment to occur the purchase of multiple parcels will be required.
3. Property condition - redevelopment is subject to market, construction and development costs, and viability of adjacent properties. Unfortunately, there is no blight or existing property maintenance enforcement which impairs redevelopment interest. A developer can't be expected to make a financial commitment to a district when other adjacent properties languish.

Floodplain Map



Redevelopment Sites

Through field assessment, stakeholder engagement and discussions with the Comstock Township Planning Commission, four sites were identified as potential redevelopment sites. These sites include the following.







Parcel ID	Property Owner / Parcel Number	Size (acreage)	Current Zoning	Suggested Reuse Options
A	James Dean Sutton 07-17-354-040	3.93	R-1B Single Family	The former school may be too costly to adaptively reuse. As a potential brown-field project demolition may be an option. Mixed housing, especially market rate apartments should be considered.
B	Sokolowski Collision Center 07-19-230-121	0.61	B-3 General Business	Currently used for auto related business. The lot is wide enough and has sufficient depth to accommodate several small businesses like those identified in the market gap table.
C	Speedway LLC 07-19-226-190	0.66	B-2 Community Business	This is the current Speedway site which was identified in the Vision 2025 Master Plan as a redevelopment site. The location on the corner would make a desirable business / restaurant site.
D	Howard Kerney 07-19-234--045 07-19-234-070 07-19-234-060 Larry Dopp 07-19-234-080 07-19-234-090 07-19-234-100	1.36	B-2 Community Business	This site includes several properties that are owned by two different property owners. The redevelopment site includes the commercial building on the corner, the building on the south along River Street and two parcels to the east.
E	Rick Woodward 07-19-290-075 07-19-290-031	1.25	B-2 Community Business	Properties within this area are currently for sale and are under one ownership. The site includes the former office and the vacant parcel to the north of the office building. This site is desirable location for residential use due to the location across from the park.

Suggested Redevelopment Sequence

Each of the five properties was reviewed by the Planning Commission and through the use on an Internet survey prioritization of the sites was completed and consensus reached through discussion. The results of the survey help determine the sequence for redevelopment and served as a basis for a conceptual design that melted the site information with market potentials. Once the design concepts were prepared they were analyzed against the current zoning to determine if they would be accommodated or the zoning code needed to be modified.

The suggested redevelopment sequence follows the Redevelopment Ready® Site Process used by the MEDC. The table below evaluates the two selected sites against the program criteria.

RRC® Best Practice 5.0

Best Practice		D	E
1	IDENTIFY & PRIORITIZE SITES Compile a list of known public and private properties that would be available for redevelopment. Determine which parcels have a high priority for redevelopment.		
2	GATHER SITE INFORMATION Compile site information for each parcel that includes ownership, dimensions, zoning, building size (if any), utilities, broadband, and desired development outcome.		
3	CREATE A VISION Based on the site information and input from interested stakeholders, pull together a vision for the property. In some instances, community engagement may be required. Part of this process includes the identification of a “champion” that spearheads the redevelopment vision.	Redevelopment as a small retail establishment with upper story apartments	Redevelopment for townhomes and single family residential
4	IDENTIFY RESOURCES This stage of the redevelopment process is the identification of resources that can be utilized to implement the vision. These can include tax incentives, working with the developer on historic tax credits, leveraging assistance through the DDA or Brownfield Authority.	Brownfield; assist with demolition, and site clearance.	DDA; frontage streetscape improvements
5	ASSEMBLE PROPERTY INFO PACKAGE Compile all applicable information on the redevelopment site including property information, environmental reports, traffic information, market feasibility and assessments, infrastructure availability and costs, property survey, GIS parcel information, and zoning.		
6	ACTIVELY MARKET Publish the information in print and online. Online applications including posting through Lake Superior Partnership, and Zoom Prospector through MEDC. Conduct an informational meeting with the local Board of Realtors and/or Home Builders Association.	Realtor and developer brochure; personal contact	Realtor and developer brochure; personal contact

Evaluated and Prioritized Redevelopment Sites



Redevelopment Site D - Small Retail Center with Upper Story Residential

The proposed concept includes a total of 11,700 square feet of retail space. Upper story space could accommodate 8 to 11 apartments. The site plan includes 46 off-street parking spaces, interior landscape islands and one screened collective dumpster pad.

Under the current zoning ordinance the site size of 1.36 acres could accommodate upwards of 15 apartments. Based on the market gap table this combination of building and parking needs would accommodate most of the categories with the exception of a Walgreen's. A grocery store / specialty market would still be a viable tenant, as well as, a brewpub and/or restaurant.

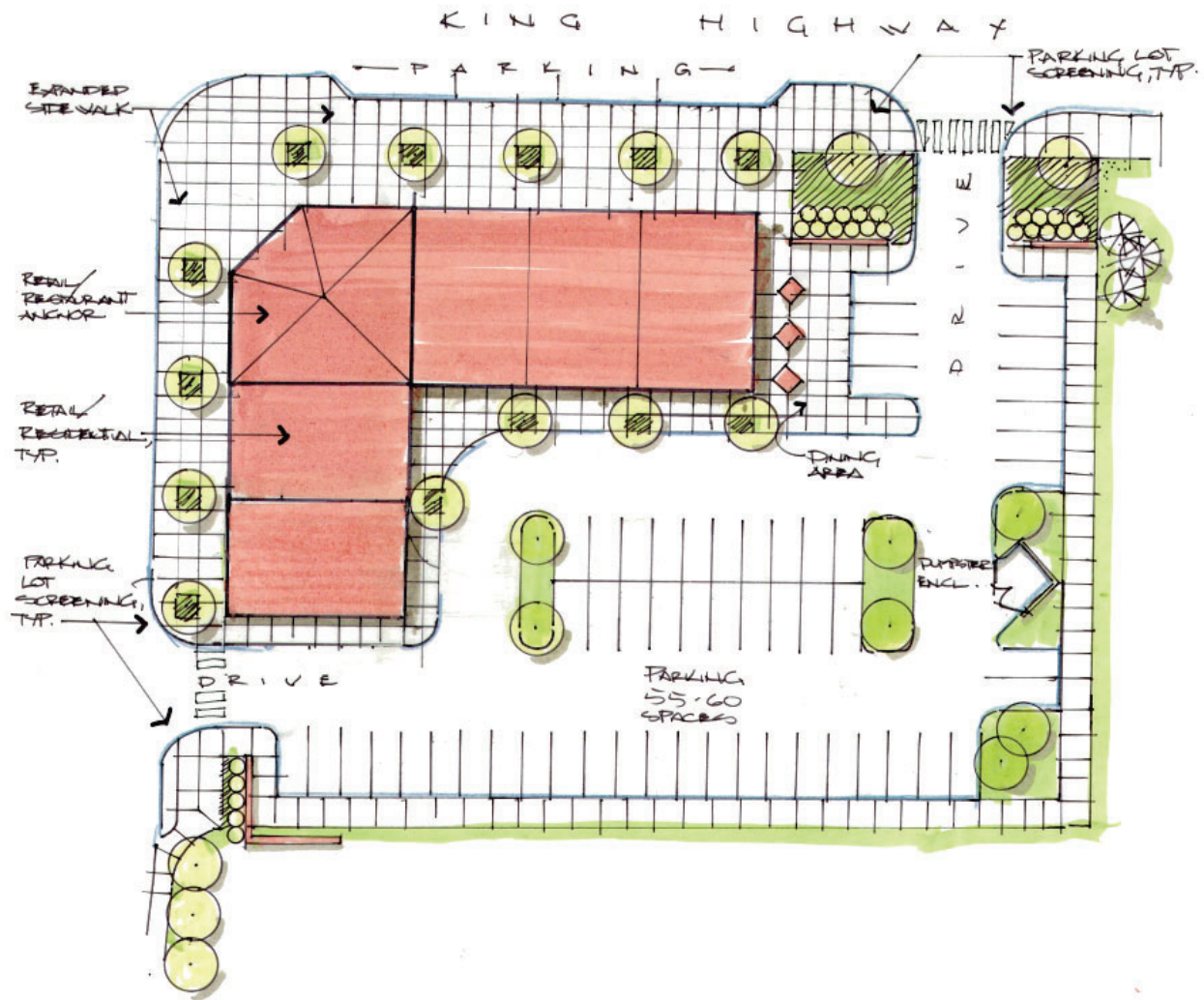
		Current Zoning Regulations	Zoning Regulations Needed to Accommodate Redevelopment
Site Size	1.36	B-2	B-2
Building Size		The concept includes 11,700 square feet of building space with upper story apartments.	
Permitted Use		Retail (300.1602; b.)	Allow Upper Story Apartments; Outdoor Dining
Dimension Regulations		Front Yard Setback 40'	Front Yard Setback 25' and allow pedestrian walkways within the setback.
Dwelling Unit Lot Size		2,800 sq.ft. per efficiency or 1-bedroom apartment 3,850 sq.ft per 2-bedroom apartment	Permit upper story apartment above retail and office first floor space. Exempt requirements for Upper Story Apartments
Dwelling Unit Size		350 sq.ft. per efficiency apartment; 580 sq.ft. per 1-bedroom apartment; 720 sq.ft. per 2-bedroom apartment; 960 sq.ft. per 3-bedroom apartment	No Change
Parking		1 space per 150 gross square feet; requires 100 parking spaces	Require a reduction in off-street parking to 1 space per 250 square feet and include a shared parking provision depending on the mix of first floor retail and professional office space. Upper story apartments should be exempt from off-street parking requirements.

Evaluation of Concept

The redevelopment concept works well with the site and maximizes the frontage along King Highway and River Street. The layout of the building would support upper story apartments and outdoor dining areas on both sides of the building. Revisions to the current zoning ordinance are recommended as follows:

1. Revise the off-street parking requirements to reduce retail parking from 1 space per 150 square feet (6.66 per 1,000 sqft.) to 1 space per 250 square feet (4.00 per 1,000 sqft.).
2. Include a shared parking requirement similar to the Urban Land Use Institute (ULI) shared parking table.
3. Exempt upper story residential apartments from off-street parking requirements.

Concept Plan - Retail Mixed-Use Building



Redevelopment Site E - Townhomes and Single Family Residential

The proposed concept includes a total of eight (8) townhomes and one (1) detached single family house. Each townhome is approximately 2,100 which includes a 1 1/2 car garage on the first level. The site includes 10 exterior parking spaces, interior walkways, common open space and sidewalks along River Street. The building footprints would allow for a 3rd floor if a second floor exterior deck was included in the design. The units could be two or three bedrooms depending on height. The current professional office would be demolished as part of the project.

		Cuurent Zoning Regulations	Zoning Regulations Needed to Accommodate Redevelopment
Site Size	1.25	B-2	B-2
Permitted Use		Residential only permitted that meets the four conditions outlined in Section 16.03 (g). The proposed concept would not be allowed.	Rezone property to Residential
Dimension Regulations		Front Yard Setback 40'	Front Yard Setback 20' and allow pedestrian walkways within the setback.
Dwelling Unit Lot Size		Not permitted	Modified lot size or rezone property to Residential; establish a Residential PUD provision
Parking		2 per dwelling unit;	No Change

Evaluation of Concept

The current zoning would not allow the development because it is not a permitted use nor fails to meet the conditions outlined in Section 16.03 (g). The following would be required to facilitate the concept.

1. The property should be rezoned for multiple family residential or,
2. The zoning ordinance should be revised to include residential planned unit developments.
3. The front yard setback needs to be reduced.

Concept Plan - Townhomes and Single Family Residential



Perspective - Retail Mixed-Use Building-King Highway



Perspective- Townhomes and Single Family Residential-River Street



Public Realm Improvements

Defined - Public Realm Improvements

The public realm belongs to everyone. It consists of the public right-of-way and various improvements located within a zone, including sidewalks, street, light fixtures, and street trees. Public realm also includes parks, plazas, non-motorized trails, and public owned open space and green areas. In Comstock Center this includes King Highway, River Street, the neighborhood side streets that connect King Highway and Michigan Avenue, Merrill Park and River Villa Park.

Existing Pedestrian Facilities

In the context of this study the public realm is focused on the right-of-way of King Highway and River Street, the primary traffic corridors through the business district. King Highway runs through the business district but lacks uniform sidewalks on both sides of the street. However, the Kalamazoo River Valley Trail is located on the south side of the road and serves as a non-motorized route and pedestrian walkway. On the other hand, River Street has sidewalks between Comstock Avenue and King Highway. North of King Highway sidewalks are only provided on the east side of River Street. On the west side of the street there is a paved asphalt shoulder.

The recently adopted Vision 2025 Master Plan noted that the Township is largely underserved with sidewalks although many residents have indicated a need to connect neighborhoods with schools and other facilities. The master plan indicated the presence of only 3.6 miles of sidewalk in the entire Township and most of this was along Gull Road in the upper northwest corner of the Township.

Character

The character of the public realm is a combination of rural and urban Village. For the most part, streets are paved with no curb and gutter with standard roadway lighting. Although the residential neighborhood has a variety of small lots and a density similar to urban counterparts in the City of Kalamazoo, the public infrastructure lacks the typical amenities such as curb and gutter, lawn panels, street trees, and sidewalks. The Michigan Avenue / King Highway intersection is an acute intersection which allows traffic heading westbound on Michigan Avenue to split off onto King Highway or continue on Michigan Avenue without a significant reduction in speed.

The character of the public realm, defined by pedestrian amenities, such as sidewalks, landscaping, street trees, lighting, and signage creates an image for residents and customers. The sporadic use or absence of these amenities can signal the lack of public sector investment in the district, business owner apathy, and lack of market.

Suggested Improvements

Recognizing that the cost for public realm improvements can be considerable, the plan suggests focusing initial attention in four areas.

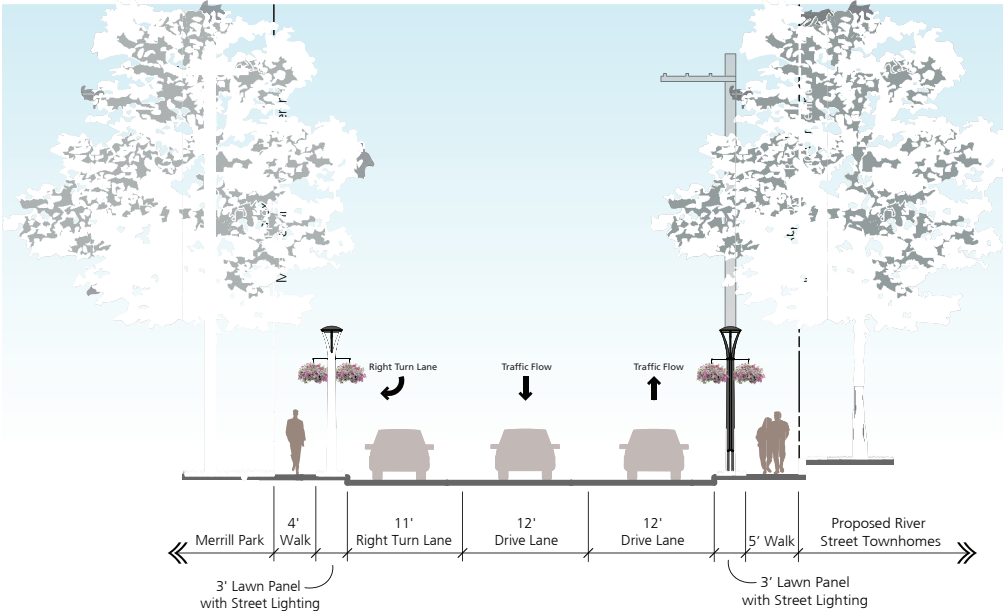
King Highway between Henning and Shirley - this portion of King Highway includes the greatest concentration of commercial properties. Proposed improvements (cross section B-B) include a more traditional streetscape with defined travel lanes, curb & gutter, pedestrian scale lighting, and sidewalks.

King Highway between Shirley and Michigan Avenue - this portion of King Highway has a combination of homes, offices and institutional uses and the character is less built-out than the west portion of the street. The suggested level of improvements is the introduction of new street lighting that complements the streetscape lighting (cross section C-C). This portion of the corridor retains that small-rural Village atmosphere.

River Street between Comstock Avenue and King Highway - this portion of River Street would be retrofitted to have the same level of streetscape amenities as the west portion of King Highway (cross section A-A). This section connects Merrill Park and the residential neighborhoods south of the Kalamazoo River with the business district.

King Highway / Michigan Avenue Intersection - this intersection would be redesigned as a "T" intersection with Michigan Avenue tying into King Highway at a 90 degree angle. The realignment of this intersection also results in the creation of an open space large enough to act as a gateway to Comstock Center. (concept)

Section - River Street from Comstock Avenue north to bridge four lane section

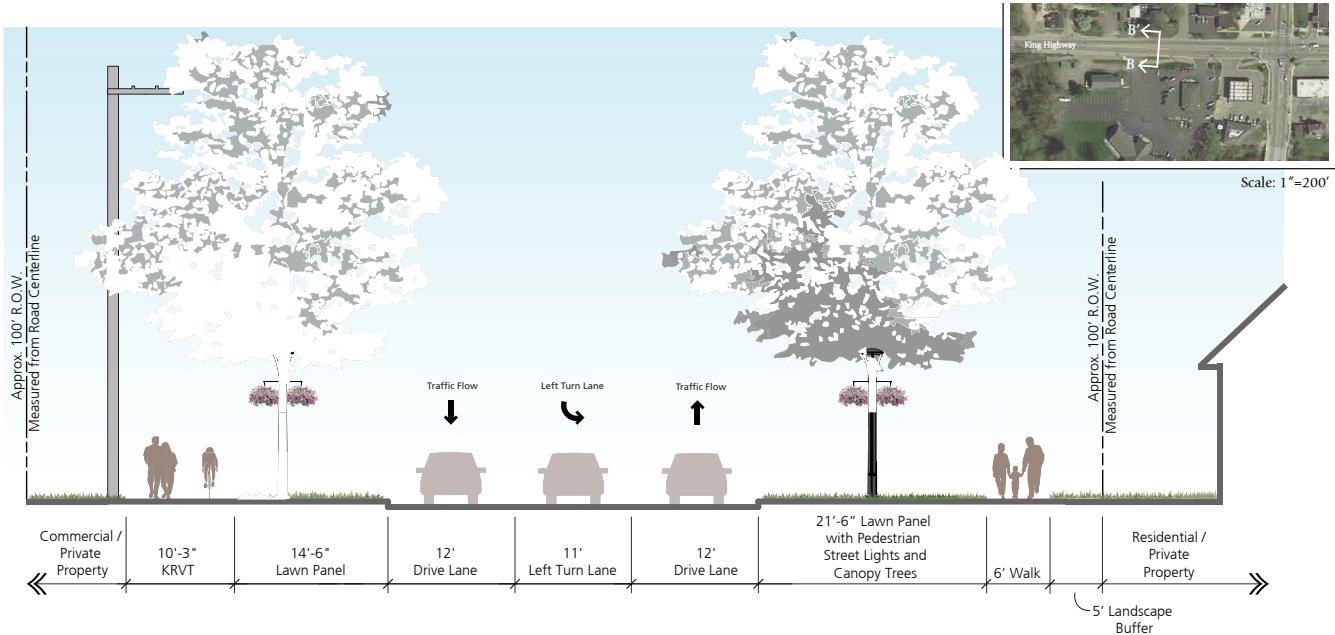


River Street South - Proposed Section A - A'

Scale: 1/8" = 1'-0"



Section - King Highway West of River Street



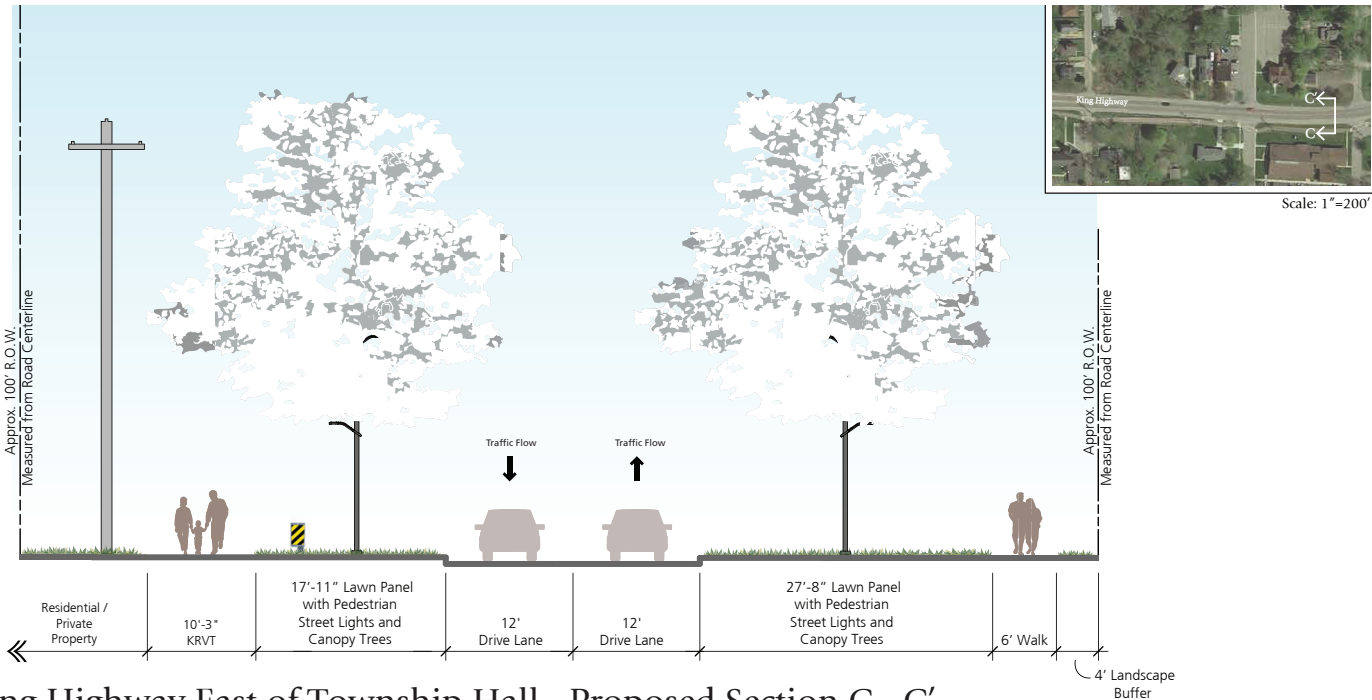
King Highway West of River Street - Proposed Section B - B'

Scale: 1/8" = 1'-0"

*KRVT - Kalamazoo River Valley Trail



Section - King Highway East of the Township Hall



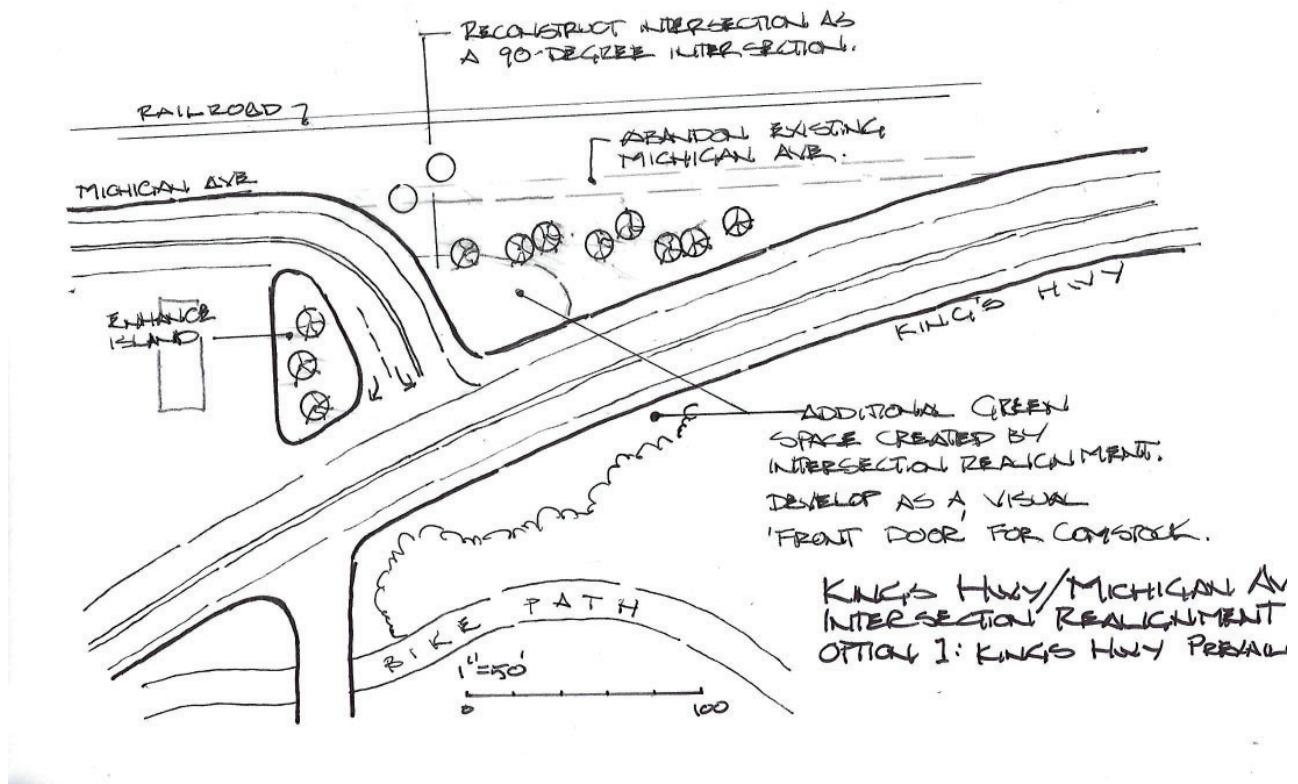
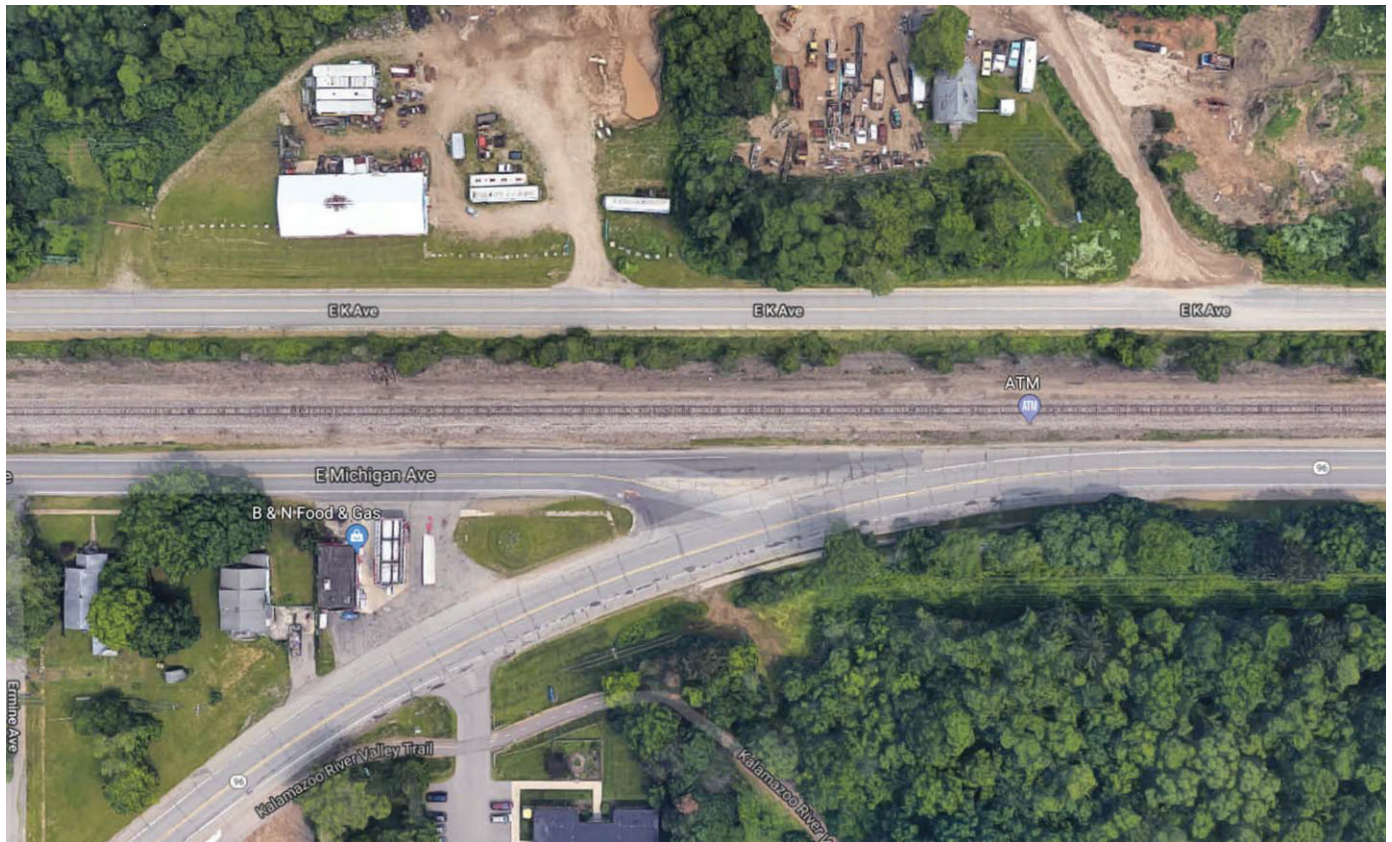
King Highway East of Township Hall - Proposed Section C - C'

Scale: 1/8" = 1'-0"

*KRVT - Kalamazoo River Valley Trail



Concept Design - King Highway / Michigan Avenue Intersection



Strategies; Organizational and Regulatory

The redevelopment of Comstock Village will require an approach that focuses on the revitalization of residential properties, redevelopment of underutilized commercial properties, and improvement to public spaces. The attributes of the organizational structure need to include a board that determines priorities, eliminates blight, marshals funding and oversees implementation. Three state statutes address these attributes, and they include the Downtown Development Authority, Neighborhood Area Improvements Act, and the Blighted Area Rehabilitation Act.

Each of the state statutes was reviewed to address the attributes outlined above, and from this assessment, two statutes were selected: the Downtown Development Authority and the Neighborhood Area Improvements Act.

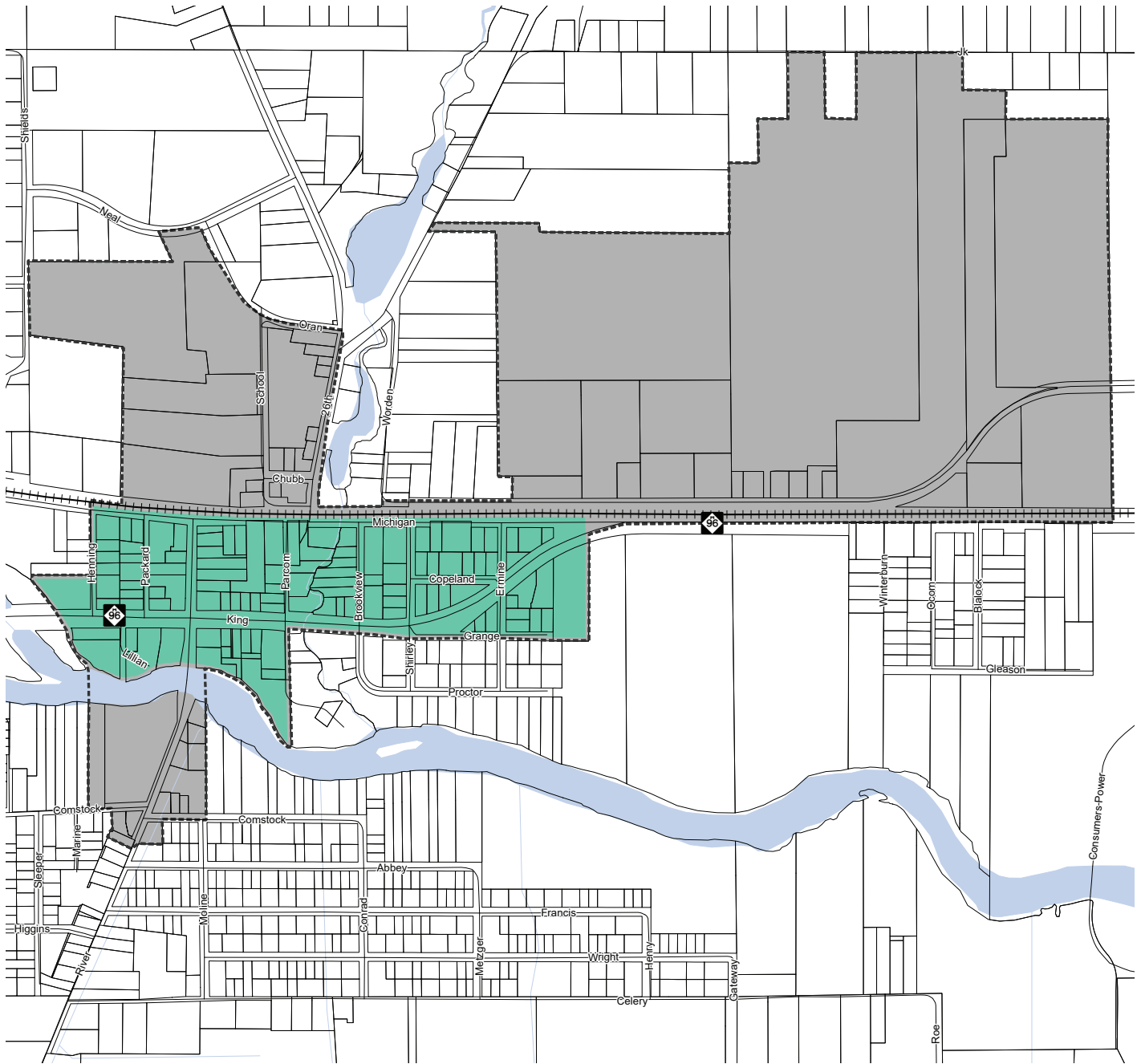
Organizational Evaluation

	Downtown Development Authority PA 57 of 2018 (Section 217)	Blighted Area Rehabilitation PA 344 of 1945 (Section 4)	Neighborhood Area Improvements PA 208 of 1949 (Section 3)
Location	X	X	X
Extent	171 Parcels	111 Parcels	111 Parcels
Character	X	X	X
Probable Costs	X	X	X
Time of Completion	X		
Development Plan	X	X	X
General Obligation Bond	X	X	X
Special Assessment District			X

The Downtown Development Authority was selected because the geographic extent of the district covers more than residential land uses in the study area and the administrative structure inherent through the appointed board of directors provides an institutional oversight with a defined mission, revitalization of the business district. The Neighborhood Area Improvements act was selected because it focuses on rehabilitation of residential properties within the study area and offers the Township with the ability to special assess benefiting properties for improvements; an option not included under the Blighted Area Rehabilitation Act. The Neighborhood Improvement Area district would overlay the Downtown Development Authority District and co-exist together.

Downtown Development Authority; PA 57 of 2018 (former PA 197 of 1975)







The Comstock Center area includes a combination of commerce, institutional, and residential properties. Comstock Center, although an unincorporated area within the Township, has all the attributes of a typical Village with a definable downtown area. The commercial areas primarily exist along King Highway from Henning Street to the intersection of King Highway and Michigan Avenue. There are several commercial establishments along Michigan Avenue between Packard and Parcom Streets. The map entitled, "Proposed DDA & Improvement Districts" illustrates the proposed boundaries for a downtown development authority district. Included on the map are several large parcels north of K Ave E (Worden) that are currently being mined for sand and gravel. Once these resources are mined these tracts are well positioned for residential and limited commercial development. As a result, it would be advantageous to have these parcels within the boundaries of the downtown development authority district.



COMSTOCK TOWNSHIP

Proposed DDA & Improvement Districts

Data Sources: State of Michigan Geographic Data Library, Comstock Township, National Wetland Inventory

-  Parcels
-  State Roads
-  All Roads
-  Railroads
-  Proposed Downtown Development Authority District
-  Proposed Neighborhood Area Improvement District

According to MEDC, the Downtown Development Authority (DDA), Public Act 57 of 2018, is designed to be a catalyst in the development of a community's downtown district. The DDA provides for a variety of funding options including a tax increment financing mechanism, which can be used to fund public improvements in the downtown district and the ability to levy a limited millage to address administrative expenses. Once established, the DDA is required to prepare a development plan and may create a tax increment financing plan to submit for approval to the local municipality. A development plan describes the costs, location, and resources for the implementation of the public improvements that are projected to take place in the DDA district. A tax increment financing plan includes the development plan and details the tax increment procedure, the amount of bonded indebtedness to be incurred, and the duration of the program.

The proposed DDA district boundary includes 171 parcels with a taxable valuation of \$4,938,000.

Neighborhood Area Improvements Act 208 of 1949

The Neighborhood Area Improvements Act requires the preparation of a neighborhood betterment plan. The neighborhood betterment plan is approved by the planning commission and adopted by the legislative body after a public hearing. The plan designates the location, extent, character and estimated cost of the improvements contemplated for the area; and may include any or all of the following improvements:

- Partial or total vacation of plats, or replatting;
- Opening, widening, straightening, extending, vacating or closing streets, alleys or walkways;
- Locating or relocating water mains, sewers, or other public utilities; paving of streets, alleys or sidewalks in special situations;
- Acquiring parks, playgrounds, or other recreational areas or facilities;
- Elimination of nonconforming uses;
- Rehabilitation of blighted areas; and
- Street tree planting; green belts, or buffer strips and other appropriate public improvements.

Information prepared for this analysis would provide the foundation for the neighborhood betterment plan. The location and extent of the neighborhood area improvement plan would be smaller than the DDA district boundary and include properties south of Michigan Avenue and north of the Kalamazoo River between Henning and the Michigan Avenue / King Highway intersection. The location of both the DDA district and neighborhood improvement district are illustrated on the map entitled, "Proposed DDA & Improvement Districts." The key advantage of utilizing the Neighborhood Area Improvement Act is the ability to levy a special assessment within the neighborhood to pay for blight removal, elimination of nonconforming uses, and infrastructure improvements.

Unlimited Tax General Obligation (UTGO) Bonds

Comstock Center is the historic core of Comstock Township and as the Township grew it radiated from the unincorporated Village to what it is today. Although a more aggressive strategy, the issuance of a General Obligation Bonds to finance public improvements such as streetscape, sidewalk installation, street resurfacing and lighting, should be considered. General Obligation Bonds are bonded for which the electorate has pledged to tax themselves an amount which is sufficient to retire the bonds and pay interest on all that is outstanding. That is, the local taxing authority is not limited in the amount of taxes that can be levied to retire the bonds and pay interest in any year. The electorate must vote to approve the issue prior to the issuance of the debt. The total taxable valuation of the Township is \$476,200,000, and residential property comprises 68% of this valuation. A \$5,000,000 UTGO financed over 20 years would require a local millage of approximately 0.62 mils. Based on the taxable valuation for the Township the average taxable valuation for a residence is \$56,000, resulting in an additional annual tax of \$34.75.

Zoning Ordinance Revisions

Currently, 31 residential parcels north of King Highway between Henning and Parcom are zoned B-2; Community Business. As a result, these parcels are nonconforming which impairs their use and potential mortgage financing. Further, 55 residential parcels in the proposed Neighborhood Area Improvement district are less than 9,000 square feet in land area which makes them nonconforming, as well. It is recommended that a new zoning ordinance district is established which recognizes the development pattern of the neighborhood. In addition, this district should include commercial property and focus on allowing by right pedestrian-oriented businesses and requiring special use approval for auto-dependent businesses. This district could also include design standards that reinforce the redevelopment vision for the district.

Sequence of Actions

The revitalization of Comstock Center requires three strategic initiatives that are linked together. First, there is an identifiable retail and residential market available that makes a compelling case to redevelop several underutilized properties. Second, the neighborhood needs code and blight enforcement and regulatory changes focused on zoning revisions. And, third, there is a need for public investment in the neighborhood infrastructure and the overall district. These three initiatives working in concert will revitalize Comstock Center.

Effective community and economic development strategies include both a process and outcome. The process includes developing and strengthening the ability to work and act collectively. For example, the Planning Commission determines that establishing a new zoning district would alleviate nonconforming uses and strengthen opportunities for pedestrian-oriented businesses. However, the enactment of this zoning amendment requires the Board of Trustee to legislate the zoning amendment. The outcome is taking actions that are intended to make the community a better place to live and work.

The table below outlines a suggested sequence of actions in order to undertake the three strategic initiatives in relation to the process and outcome.

Strategy 1 Market / Redevelopment



Strategy 2 Code Enforcement / Regulatory










Strategy 3 Investment



Sequence of Actions - Process and Outcome

Initiative	Process	Outcome	Timeframe
Blight Enforcement 	Township Board has already adopted provisions to enforce blight elimination in the Township.	Blight removal. Enhanced property values. Neighborhood appearance improved.	2018 - Provide curbside pick-up in the Fall and Spring of each year.
Rental Inspection Program 	Planning Commission can perform research and recommend ordinance. Township Board needs to approve ordinance and designate the compliance officer.	Inspection of rental properties within the study area and based on certification process fixing code deficiencies. Improvement to housing stock and neighborhood property values.	2019 - Research and preparation of a police power ordinance. 2019 - Implementation
Redevelopment Out Reach Opportunity 	Planning Commission approves the market brochure. Township Administration contacts regional developers and other entities to review redevelopment potentials in Comstock Center.	Focus on redevelopment of SITE E which is currently available on the market and positioned for residential development.	2018 - Brochure 2018-2019 Out reach activities

Initiative	Process	Outcome	Timeframe
Establish a Downtown Development Authority  	<p>Planning Commission recommends DDA District to Board of Trustees. Board of Trustees adopts ordinance establishing the District and appoints a DDA Board.</p> <p>The process to establish a DDA is outlined in PA 57 of 2018, Section 203 and includes notification to affected property owners, publication of the public hearing in the local newspaper, and postings within the proposed district.</p>	<p>Establishment of a DDA Board. Board mission and focus is redevelopment and revitalization of Comstock Center. The DDA becomes the “Champion” for the districts’ revitalization.</p> <p>Option: The Board of Trustees can loan the DDA start-up funds to begin the redevelopment process with repayment coming from TIF revenue capture at a later time.</p>	<p>2018 - Determination of need and recommendation of District boundaries.</p> <p>2019 - Enactment and creation of DDA Board</p>
DDA Development Plan and Tax Increment Financing Plan 	<p>DDA Board prepares and recommends adoption of Development Plan and Tax Increment Financing Plan to Board of Trustees. Board of Trustees adopts.</p>	<p>Provides the basis and funding for redevelopment of Comstock Center.</p>	
Neighborhood Area Improvement (NIA) District  	<p>Planning Commission seeks approval from Board of Trustees to enact a NIA program.</p> <p>If the Board of Trustees approves moving forward the Planning Commission prepares a Neighborhood Betterment Plan (MCL 125.943) and transmits that to the Board of Trustees.</p> <p>The Board of Trustees holds the required public hearing and adopts ordinance establishing the NIA.</p>	<p>If enacted the NIA provides the foundation for blight elimination and removal and offers the Township the ability to special assess for public improvements within the NIA that will enhance the quality of life for the neighborhood and improve property values.</p> <p>The DDA Board provides oversight of the NIA activities to ensure alignment with the DDA Development Plan.</p>	<p>2019 - Planning Commission research and preparation of a Neighborhood Betterment Plan.</p> <p>2019 - Enacted.</p>
Zoning Ordinance Revisions 	<p>Planning Commission prepares revisions to the Zoning Ordinance for a new Form Based Code district called the Comstock Center FBC.</p> <p>The Board of Trustees enacts the revisions.</p>	<p>The ordinance rectifies current nonconforming issues and bases property dimensions on historic development patterns and includes a differentiation between pedestrian-oriented and auto-dependent land uses.</p>	<p>2019 - Preparation of FBC</p> <p>2019 - Enactment</p>

Initiative	Process	Outcome	Timeframe
Streetscape Improvements 	<p>DDA would identify funding in conjunction with the Board of Trustees. KEY component.</p> <p>DDA would determine the scope of the project and commission the design development drawings.</p> <p>DDA and Board of Trustees would let project and contract for construction.</p>	<p>Enhancement to streetscape zone along King Highway between Henning and Parcom.</p> <p>Improved pedestrian access and appearance to the corridor.</p>	<p>Dependent on project financing. Options include Special Assessment District or general Obligation Bond.</p> <p>Federal and State grants may be limited.</p>

The sequence of activities is predicated on the assumption that the neighborhood, businesses, Planning Commission and Board of Trustees want to effectuate change. To accomplish the sequence of actions either the steps can be elongated to match the internal capacity of the Township Administration obligations or technical assistance can be commissioned to accelerate the process. Either way, the sequence has a degree of elasticity.

Redevelopment outcomes are dependent on finding an interested party to perform the redevelopment and the willingness of current property owners to sell their property. Since a DDA nor NIA exist, there is no source of funding for property acquisition, which is an impediment to the redevelopment process. Once an entity is established and property can be acquired and controlled the redevelopment process becomes less cumbersome.

Project funding outcomes are dependent on the utilization of available public finance tools, such as tax increment financing through a DDA, special assessment district through the NIA, and general obligation bonds through the electorate. Each requires buy-in from the property owners and the community-at-large and firm public policy by the Board of Trustees.

Public development is achievable but takes a willingness to effectuate change and close collaboration between commissions, authorities, and the Board of Trustees.

