



CITY OF NOVI CITY COUNCIL JULY 8, 2024

SUBJECT: Consideration of the request of E & M Holdings, LLC, (Society Hill) to amend the 2001 Consent Judgment relating to a previously approved multi-family development located at 12 Mile and Novi Roads.

SUBMITTING DEPARTMENT: Community Development Department - Planning

BACKGROUND INFORMATION:

The applicant is proposing changes to the Society Hill development that was originally approved in 1999. Society Hill is associated with a 2001 Consent Judgment with the City. The Consent Judgment states that the site plan approved in 1999 was to remain in effect for 5 years from the date of execution, after which time the applicant would need to seek approval annually from City Council to extend the final Site Plan approval. Each year since 2006 the applicant has requested, and City Council has granted, the site plan extension, **so the 1999 site plan remains an approved project that could be built.**

The applicant has submitted a new plan for review by City Council to consider and is asking the City to amend the Consent Judgment in order to approve it instead of the 1999 plan. Like the 1999 Plan, the new proposal is for the development of the 33.89-acre property west of Novi Road and south of 12 ½ Mile Road. It proposes to utilize the existing RM-1 Low Density Multiple Family zoning with the available Planned Development Option (PD-1) as designated on the Future Land Use Map. The proposed new plan includes 463 units in mid-rise apartment buildings and attached townhouses. The five apartment buildings would each be 5-stories tall (including ground level parking), with a total of 363 apartments ranging in size from 617 square foot studios to 1,329 square foot three-bedroom units. Sixteen townhome buildings on the north side of the site would have 100 residences with garages – 80 of those in three-story buildings and 20 in 2.5-story buildings. Sixteen of the townhome units would provide a ground floor primary bedroom suite.

Indoor and outdoor amenities are proposed for the residents of the site. The central building (E) contains 15,000 square feet of indoor space for a fitness center, spa facilities, café/bistro, community lounge, co-working space, conference rooms, community kitchen with dining area, library, and an indoor/outdoor terrace on the top

floor overlooking the outdoor space. The outdoor amenities consist of two pools, a turf soccer field, tennis courts, sports court, pickleball courts, playground areas, dog park, and over two miles of walking path through the site. The chart below compares the approved 1999 Plan to the proposed 2024 plan to be considered.

	1999 Plan (Existing Development Approval)	Current Plan (Proposed Development)
Zoning	RM-1 Low Density Multiple Family with PD-1 Option	RM-1 Low Density Multiple Family with PD-1 Option
Land Area	33.89 acres	33.89 acres
Number of Buildings	23	21
Number of Units	312	463
Room Count	1,264	1,359
Average Unit Size	1,758 square feet	1,220 square feet
Lot Coverage	Not known	14.84%
Building Height	2 and 3 story	5 stories
Number of Parking Spaces	693	942
Parking Ratio	2.22 spaces/unit	2.03 spaces/unit
Wetland Impacts	0 acres	0.847 acres
Wetland Mitigation	N/A	0.923 acres on-site Some off-site/payment (needs clarification)
Woodland Impacts	1,062 trees	1,338 trees (82 are off-site on City-owned parcel)
Stormwater Management	All on-site	On-site and Use of City-owned parcel 22-10-400-005
Usable Open Space	~ 1 acre programmed outdoor 0% of units had private outdoor space	6.64 acres programmed outdoor 98% of units have private outdoor space
Traffic Impact	1,978 trips per day (per 1996 Traffic Study)	2,162 trips per day (per 5/24/24 F&V Trip Generation Analysis)
Curb cuts	1 on Novi Road, 1 on Twelve ½ Mile Road	2 on Novi Road, 1 on Twelve ½ Mile + 2 emergency access points

The City's staff and consultants reviewed the latest proposal and provided written comments to the applicant on May 2nd. Since that time, staff has met with the applicant and discussed many of the issues raised in the review letters. As a result of that discussion, and additional information provided by the applicant, staff has taken the opportunity to revise and update the initial review letters, as follows:

- The City's wetland consultant has provided a memo updating some of the initial comments based on additional information received from the applicant confirming the character and locations of the regulated wetlands.
- The Planning Review has been revised in a few locations to address new information.
- Engineering has provided a revised letter, including discussion for the need for soil borings to verify the viability of the locations proposed for the stormwater management ponds.

All review letters, as revised, are attached to this packet item.

DEVIATIONS FROM ORDINANCE STANDARDS

In the review of the 2024 Plan provided, City's staff and consultants have identified the following items as non-compliant with our current Codes and Ordinances. Staff's position and/or justification are noted in **Bold Underline**:

1. Maximum Length of Buildings (Sec. 3.8.2.C): The ordinance states building lengths cannot exceed 180 feet. If exceeded, the ordinance allows the Planning Commission to modify the length requirement up to 360 feet if there are recreational or social common areas with a minimum capacity of 50 persons within the building and if building setbacks are increased an additional foot for each 3 foot of building length over 180. Buildings A, B, C, D, E, 3 and 4 each exceed 180 feet. No additional building setbacks are proposed to offset the building lengths. Building E, at 492 feet, also exceeds the maximum length of 360 feet. Only building E appears to have recreational or social common areas with a minimum capacity of 50 persons. All buildings in the 1999 Plan complied with maximum length. **Staff supports the deviation because there are variations in building projections that reduce the appearance of length along the Novi Road frontage.**
2. Shoreline Setbacks (Sec 3.31.6.B.iv.e): "A minimum yard setback of 100 feet shall be provided from any lake shoreline including natural or manmade water bodies. Stormwater retention facilities shall be considered as shoreline when they are designed and developed as an integral part of the site's landscaped open space." The site plan locates several buildings, drive aisles and parking areas within about 50 feet of Wetland A and the northeastern stormwater basin. **Staff supports the deviation because this setback is an atypical standard as applies to "manmade water bodies," including stormwater retention facilities, only found in the PD-1 district. In multifamily districts, the standard setback from natural shoreline is 150 feet. However, in other districts only the 25-foot wetland buffer setback is observed. Buildings in Charneth Fen and Carlton Forest are less than 100 feet from the same wetland.**

3. Building Setbacks (Sec. 3.1.7.D): Along the western property line, buildings are 50 to 60-feet from the property line rather than the required 75 feet. It appears that all buildings in the 1999 Plan complied with building setbacks. **Staff supports the deviation as the adjacent buildings are similar in size/height to the existing development to the west, and some landscape screening is present.**
4. Parking Setbacks (Sec. 3.6.2.B): A minimum parking setback of 20 feet is required from interior side and rear lot lines, and front/exterior parking setbacks are to comply with the minimum building setback. For Novi Road, that would be 75 feet. In the 1999 Plan the parking complied with setback requirements. **Staff supports the deviation to allow 14.4-foot setback along the south side of the property with the condition that landscaping and other screening be provided, and 20 feet along Novi Road.**
5. Building Orientation (Sec. 3.8.2.D): A Zoning Ordinance deviation is requested to revise the required minimum orientation for buildings along the perimeter of the property from 45 degrees for Buildings A, 12 and 15. In the 1999 Plan, it appears 4 buildings would not have met the minimum required orientation to the property line. **This deviation is supported as it allows a more efficient use of space, and therefore potentially less disturbance of natural features.**
6. Yard Setback Area (Sec. 3.8.2.D): "Within any required front, side or rear yard setback from any property line in an RM-1 or RM-2 district, not more than 30% of such yard area shall be used for off-street parking, maneuvering lanes, service drives or loading areas." The applicant has provided an overall calculation for the entire site rather than treating each yard separately. **The applicant's revised calculations to indicate a deviation is needed for the Front Yard coverage of 33.26%. Staff supports the relatively minor deviation.**
7. Distance Between Buildings (Sec. 3.8.2.H): A Zoning Ordinance deviation is requested to allow the calculated minimum distance between buildings to be less than required in seven locations. This calculation is made using a formula measuring the height and length between adjacent buildings, with a minimum distance of 30 feet required. **Based on the information provided by the applicant, the deviations for the seven locations range from 32.47 feet to 1.7 feet. Staff supports the deviation as this is a more urban-style development and will not be detrimental to the overall project or general public.**
8. Number of Parking Spaces (Sec. 5.2.12.A): Given the unit mix proposed, the number of required parking spaces is 964 according to the standards for a multifamily development (2 spaces per studio/1- and 2-bedroom unit, 2.5 per each 3+ bedroom units). The site plan proposes 942 spaces in both garage and surface lots. The applicant requests a deviation for the deficiency of 22 spaces. **Staff supports the relatively minor deviation to reduce impervious surface area on the site.**

9. Wetland Impacts: Delineated wetlands are not consistently labeled and/or indicated on all sheets within the plan set, nor is the type of wetland (emergent, scrub-shrub, forested) indicated—this can and should be corrected on future submittals. On Sheet 15, total wetland impacts are calculated as 0.847 acre, with approximately 1.519 acres of mitigation required. The plan indicates 0.922 acre of mitigation is proposed to be provided on-site. The applicant's response letter states that the remaining 0.597 acres of required mitigation is "to be provided through purchase of credits from an EGLE approved wetland mitigation bank." **The applicant has also, since the last Council meeting, proposed to provide a conservation easement over existing woodland areas on the off-site parcel currently owned by the City (i.e., if it is conveyed to the applicant) and/or the peninsula within the large wetland area on-site (approximately 0.5-1.5 acre area depending on which area, or if both areas are preserved).**

This is not consistent with the City's Wetland and Watercourse Protection ordinance (Chapter 12 of the Code), which requires mitigation on-site, or off-site within the City's jurisdiction. The applicant also indicated that it does not want to provide conservation easements for preservation of the wetland mitigation areas constructed on-site. **However, if the amended Consent Judgment clearly states that wetland mitigation areas, as well as remaining wetlands, are to be preserved, Staff could support the lack of separate conservation easements. Initially City Council needs to determine whether to allow the deviation to purchase wetland bank credits in lieu of providing mitigation within the City for the full amount of mitigation required. Staff believes that the applicant should provide mitigation within the City.**

10. Traffic Study (Sec. 3.31.4.A.iii): The PD-1 Option requires a Traffic Study to be provided, regardless of site size, in accordance with the requirements set forth in the Site Plan and Development Manual. The applicant did a traffic study in connection with the 1999 plan. The applicant provided a Trip Generation Analysis to show that when compared to the 1999 proposal, the number of trips generated by the new proposal does not meet the threshold for requiring a "new" Traffic Study. The City's Traffic consultant responded by indicating that traffic conditions in the project area have changed considerably since 1999—specifically, both the number of developments and the roadway networks are significantly different than they were 25 years ago. Peak hour trips in both the AM and PM are almost 2-times the threshold for study, and daily one-directional trips are nearly 3-times the threshold for study. The most recent Traffic Study found in our files from 1996 (with an assumption of 300 units) had estimated daily trips to be approximately 1,900. The initial estimate from the applicant's consultant for the proposed plan estimated 2,900 daily trips. Hence, the initial indication by the City's Traffic Consultant that a new study would be needed.

The applicant responded to that indication by saying that a traffic study should not be required because the "new" proposed development adds very little additional traffic to what the applicant is already allowed as a result of its development (i.e., by the 1999 plan approval). That "miniscule" additional traffic, according to the applicant, should not trigger a whole new traffic study.

Following the initial review and completion of the review letter, the City's Traffic Engineering Consultant attended a meeting and conferred with the applicant's Traffic Consultant to determine if there could be a resolution to this issue. **After discussing the trip generation issue,** Staff and the City's traffic consultant can now support the waiver of the **full** Traffic Study.

However, the 2024 plan now shows 2 access drives on Novi Road where only one was shown before. Both access drives are going to require some left lane improvements—opening the median in two spots. The question becomes whether the traffic on Novi Road merits making those lane openings bigger/longer. And to know the answer to that, the City needs to know what the traffic on Novi Road is now, and how many vehicles are turning into each entrance. Hence the need for a traffic study of some kind that isn't caused by the number of new trips but by the different access plan now being proposed. In particular, the City needs an access point study that has **data** to answer questions like:

- Do they need accel/decel lanes, and if so, how long?
- Where they are proposing a median opening, what traffic control treatments are needed to control those movements—for example, how long of a turning bay length is required for stacking?
- Have they checked the warrant for a new traffic signal given that new access point?

11. Major Drives (Sec. 5.10.1.B): Based on the ordinance definition nearly all private drives through the site would be classified as Major Drives if they exceed 600 feet (currently shown as Reserve Blvd, Society Hill Drive, Society Hill Blvd). "Angled and perpendicular parking spaces may be accessed directly from a minor drive or parking lot aisle, but not from a major drive." Perpendicular parking is shown throughout the site on major drives. The 1999 Plan had some areas of visitor parking that were perpendicular to the major drives. Major drives are also required to be a minimum of 28-feet wide; however the plan proposes a 24-foot width in several locations where adjacent to parking spots. **Staff supports the deviations as the narrower streets and presence of parking can serve to calm traffic, causing slower speeds.**
12. Building Setbacks from Parking (Sec. 3.8.2.F & Sec. 5.10.1.B.vi): Both ordinance sections prohibit parking spaces to be within 25 feet of any wall of a dwelling structure. In several locations parking is closer than 25 feet from the building, and in some cases as close as 12 or 14 feet. It is unclear if the 1999 Plan had parking within 25 feet of the buildings as dimensions were not indicated clearly, and the scale is not accurate. **Staff supports the deviation requests, as the first floor of the larger buildings are generally parking areas, not living areas.**
13. Driveway Spacing Waiver (Code of Ordinances, Ch. 11.216.d.1.e): Deviation to allow a 41-foot driveway spacing from the opposite-side driveway on 12 ½ Mile Road. **This may be supported by staff if the projected traffic on 12 ½ Mile Road is projected to be low. A traffic study has not been provided to confirm the current conditions.**

14. Landscape Berm (Sec. 5.5.3.B.ii and iii): Deviation to allow a lack of screening berm along south property line. **This is not supported by staff unless the applicant agrees to provide an opaque screening fence or wall acceptable to the City's Landscape Architect at the next submittal, in addition to the landscaping that is proposed.**
15. Adjacent to Public ROW (Sec. 5.5.3.B.ii and iii): Deviation to allow a lack of greenbelt berms and street trees for sections of both roads that are being preserved, as well as areas that are developed. **This is supported by staff because it avoids disturbance of areas to be preserved. In the areas to be developed, significant screening landscaping has been proposed which fulfills the intent of the ordinance.**
16. Adjacent to Public ROW (Sec. 5.5.3.B.ii and iii): A deviation is required for the shortage in greenbelt landscaping for 12. 5 Mile Road and Novi Road (1 canopy tree along 12.5 Mile Road, 3 canopy trees and 3 subcanopy trees along Novi Road). **This is supported by staff due to the required emergency access points on 12 1/2 Mile and topography on Novi Road makes providing more trees difficult.**
17. Greenbelt Canopy Trees (Sec 5.5.3.B.ii.f): A deviation is required for a shortage in greenbelt subcanopy trees on the City Parcel. **This is supported by staff because the topography on Novi Road makes providing more trees difficult.**
18. Street Trees (Sec 5.5.3.B.ii.f): A deviation is required for a shortage in street trees on the City Parcel where the stormwater basin is proposed. **This is supported by staff since there will be no buildings here, and trees are provided to the extent practicable.**
19. Foundation Landscaping (Sec. 5.5.3.F.iii): Deviation for a shortage of foundation landscaping for Buildings A-D, 8, 9, 10, 11, and 12. **The applicant has stated they will reduce the need for the deviation by correcting recommended items, so staff supports any remaining deviations needed.**

POSSIBLE CONDITIONS IF CITY COUNCIL DETERMINES TO APPROVE THE UPDATED PLAN

1. The development shall be as shown in the site plan exhibit, with a maximum of 1,359 rooms as defined in the ordinance, or approximately 463 multiple-family units.
2. Soil borings shall be provided at the time of Final Site Plan submittal for both the off-site and on-site detention basins to show the current groundwater elevations. The stormwater detention system shall be designed to meet current City standards. Additional soil borings shall be provided as necessary at other locations to meet road and building requirements.

3. The applicant shall provide the traffic data and analysis necessary to verify the proposed access management treatments are appropriate as designed at the time of Final Site Plan submittal. The analysis shall answer the following questions:
 - a. Are acceleration/deceleration lanes necessary for each of the proposed site driveways? If needed, how long?
 - b. Where openings in the medians are proposed, what traffic control treatments are needed to control those movements? How long of a turning bay length is required? Is there a warrant for a new traffic signal?
4. Preservation of remaining wetland and woodland areas outside the limits of disturbance, as well as the preservation of planted woodland tree credits, shall be as shown in the amended Consent Judgment exhibits.
5. Dedication of master-planned right of way along 12 ½ Mile Road.
6. Phasing of development: Phasing plans shall be reviewed and approved by the City prior to execution of the amendment to the Consent Judgment.
7. At the time of Final Site Plan submittal, the applicant shall provide a current tree survey for the new areas of disturbance of the subject property (relative to the 1999 Plan). All new woodland tree impacts shall comply with the requirements of the current Woodland Ordinance.
8. The City has been working to verify the applicant's records of woodland replacement trees planted at off-site locations as was permitted by the Consent Judgment. This will be completed, and the number of replacements credited will be determined by the City prior to final amendment of the Consent Judgment.
9. There are recent changes to the proposal by the applicant that should be formally reviewed before this project receives final approval by virtue of the amendment to the Consent Judgment. The applicant should submit revised plans and the list of conditions requested as a revised Preliminary Site Plan submittal. At this time, we are aware of the following items that should be addressed in the revised submittal:
 - a. Phasing plans along with a narrative to ensure compliance with City standards, or identify any deviations required
 - b. The proposed addition of carports, including locations and a carport design detail
 - c. Changes to the facades of buildings—the applicant would like to be able to have some flexibility in the type of materials permitted that may deviate from Ordinance standards
 - d. Landscape changes they have stated they will make to achieve greater compliance with standards
 - e. Changes to the off-site boardwalk to the south
 - f. Preservation of additional woodland areas

CITY COUNCIL ACTION

If the City Council is inclined to approve the request for amendment, the City Council's motion would be to authorize the City Attorney to work with the applicant's team to develop the terms of an amendment to the Consent Judgment to be brought back before the City Council for approval with specified conditions.

RECOMMENDED ACTION (THREE PART MOTION PROPOSED BELOW INCLUDING A-C):

Authorize to the City Attorney to prepare the Consent Judgment amendment for City Council review including:

A. All deviations from the ordinance requirements shall be identified and stated in the amended agreement, including:

1. Maximum Length of Buildings (Sec. 3.8.2.C): Deviations to permit the lengths of Buildings A, B, C, D, E, 3 and 4 each exceed 180 feet, as shown in the attached Site Plan.
2. Shoreline Setbacks (Sec 3.31.6.B.iv.e): Deviation to permit reduced shoreline setbacks, as shown on the attached Site Plan. The site plan locates several buildings, drive aisles and parking areas within about 50 feet of Wetland A and the northeastern stormwater basin.
3. Building Setbacks (Sec. 3.1.7.D): Along the western property line, deviation to allow buildings to be a minimum of 50-feet from the property line rather than the required 75 feet.
4. Parking Setbacks (Sec. 3.6.2.B): Deviation to allow a parking setback of 14.4 feet along the south property line with the condition that landscaping and other screening be provided, and 20 feet along Novi Road with the condition that landscape hedge screening is provided.
5. Building Orientation (Sec. 3.8.2.D): A deviation to allow Buildings A, E, 12 and 15 to not comply with the required minimum orientation for buildings along the perimeter of the property from 45 degrees.
6. Yard Setback Area (Sec. 3.8.2.D): A deviation to permit the Front Yard area to exceed 30% used for off-street parking, maneuvering lanes, service drives or loading areas (33.26% proposed).
7. Distance Between Buildings (Sec. 3.8.2.H): A deviation to allow the calculated minimum distance between buildings to be less than required in seven locations. The deviations for the seven locations range from 32.47 feet to 1.7 feet, and shall be as shown in the site plan.

8. Number of Parking Spaces (Sec. 5.2.12.A): A deviation for the deficiency of 22 spaces from the minimum required calculation for the unit types proposed.
9. Wetland Mitigation (Code of Ordinances, Chapter 12): Deviation to permit up to 0.6 acres of required mitigation to be provided through purchase of credits from an EGLE approved wetland mitigation bank. The amended Consent Judgment shall state that wetland mitigation areas, as well as remaining wetlands, are to be preserved. The applicant shall also preserve the indicated woodland areas as offered on the off-site or on-site locations offered.
10. Traffic Study (Sec. 3.31.4.A.iii): The City agrees to waive the requirement of a Traffic Impact Study given that relative to the approved 1999 Plan, the proposed Plan does not generate significantly more trips to warrant a new study. This shall not preclude the City from requiring the traffic analysis necessary to verify the design and safety of proposed access points.
11. Major Drive (Sec. 5.10.1.B): Based on the ordinance definition nearly all private drives through the site would be classified as Major Drives if they exceed 600 feet, deviations to permit perpendicular parking and a 24-foot minimum width.
12. Building Setbacks from Parking (Sec. 3.8.2.F & Sec. 5.10.1.B.vi): Deviation to allow parking spaces to be within 12 feet of the residential buildings where the first floor of the buildings are generally parking areas, not living areas.
13. Driveway Spacing Waiver (Code of Ordinances, Ch. 11.216.d.1.e): Deviation to allow a 41-foot driveway spacing from the opposite-side driveway on 12 ½ Mile Road.
14. Landscape Berm (Sec. 5.5.3.B.ii and iii): Deviation to allow a lack of screening berm along south property line.
15. Adjacent to Public ROW (Sec. 5.5.3.B.ii and iii): Deviation to allow a lack of greenbelt berms and street trees for sections of both roads that are being preserved, as well as areas that are developed.
16. Adjacent to Public ROW (Sec. 5.5.3.B.ii and iii): A deviation is required for the shortage in greenbelt landscaping for 12.5 Mile Road and Novi Road (1 canopy tree along 12.5 Mile Road, 3 canopy trees and 3 subcanopy trees along Novi Road).
17. Greenbelt Canopy Trees (Sec 5.5.3.B.ii.f): A deviation is required for a shortage in greenbelt subcanopy trees on the City Parcel.
18. Street Trees (Sec 5.5.3.B.ii.f): A deviation is required for a shortage in street trees on the City Parcel where the stormwater basin is proposed.

19. Foundation Landscaping (Sec. 5.5.3.F.iii): Deviation for a shortage of foundation landscaping for Buildings A-D, 8, 9, 10, 11, and 12.
20. Any additional deviations identified during Site Plan Review (after the Concept Plan and Amendment of the Consent Judgment is approved), will require amendment of the Consent Judgment, unless otherwise stated in the judgment.

B. The following conditions are recommended for inclusion:

1. The development shall be as shown in the site plan exhibit, with a maximum of 1,359 rooms as defined in the ordinance, or approximately 463 multiple-family units.
2. Soil borings shall be provided at the time of Final Site Plan submittal for both the off-site and on-site detention basins to show the current groundwater elevations. The stormwater detention system shall be designed to current City standards. Additional soil borings shall be provided as necessary at other locations to meet road and building requirements.
3. The applicant shall provide the traffic data and analysis necessary to verify the proposed access management treatments are appropriate as designed at the time of Final Site Plan submittal. The analysis shall answer the following questions:
 - a. Are acceleration/deceleration lanes necessary for each of the proposed site driveways? If needed, how long?
 - b. Where openings in the medians are proposed, what traffic control treatments are needed to control those movements? How long of a turning bay length is required? Is there a warrant for a new traffic signal?
4. Preservation of remaining wetland and woodland areas outside the limits of disturbance, as well as the preservation of planted woodland tree credits, shall be as shown in the amended Consent Judgment exhibits.
5. Dedication of master-planned right of way along 12 ½ Mile Road.
6. Phasing of development: Phasing plans shall be reviewed and approved by the City prior to execution of the amendment to the Consent Judgment.
7. At the time of Final Site Plan submittal, the applicant shall provide a current tree survey for the new areas of disturbance of the subject property (relative to the 1999 Plan). All new woodland tree impacts shall comply with the requirements of the current Woodland Ordinance.

8. Appropriate terms for conveyance (or encumbrance) of the off-site parcel to the applicant.

C. This motion is made because the proposed revised plan utilizing the PD-1 Option is a reasonable alternative and fulfills the intent of the Master Plan for Land Use, because it meets the requirements of the Zoning Ordinance except as noted in the deviations listed, and the improvements to the project relative to the previously approved plan outweigh the detrimental impacts of the project:

1. The proposed residential neighborhood would support healthy lifestyles through the provision of walking trails, sidewalk connections, and open space amenities within the development.
2. The unit sizes and types help the City's goal of providing a wide range of housing options and could appeal to a variety of buyers who prioritize minimal maintenance, smaller unit sizes, and natural surroundings.
3. The proposed project will protect and maintain some of the City's woodlands, wetlands, and natural features.