MEMO

Date: January 12, 2026

To: Planner; Planning Commission / Brighton Township Trustees

From: O.W.L. (The Organization of Woodland Lake)

Subject: Proposed PUD rezoning for THE COVE AT WOODLAND LAKE (RZ #25/01)

Dear Township Planning Commission/Township Trustees:

The referenced rezoning request was presented (3rd time) Nov 10 Brighton Township Planning Commission (BTPC) meeting with the Commissioners "recommending approval" with a vote of 4 to 2. Subsequently, the Livingston County Planning Commission resoundly rejected this proposal due to its environmental implications. (5 to 1 vote).

There is substantial data supporting that the health and vitality of Woodland Lake has become <u>significantly worse</u> over the last decade or so. A few highlights:

1) Conductivity – a direct reflection of water quality – has generally doubled (to 948 microsiemens) from 2012 to 2023 with some areas measuring as high as 3000 microsiemens. The increasing levels across the lake coincide with timing of increasing contaminants coming from the drains into our lake.
2) Based on ammonia measurements, the lake reaches hypereutrophic level, meaning the lake can no longer support a healthy, balanced ecosystem and is at risk of losing its primary recreational purposes. Due to runoff and loss of vegetation from overbuilding around our lake.
3) Woodland Lake residents have spent over $350,000 in just the last 2 years attempting to reverse these trends with very marginal success to date. The Nutrient Loading of the lake exceeds the natural filtration capacity of the lake.
4) The Timber-Char bags that we've been testing the past 2 years have not created a balance of nutrients across the lake yet. If this is not successful, the next steps are in the $Millions. Many riparians have financial difficulty with the current SAD costs; the new SAD would need to be a ten-fold increase in costs. Additionally, an effective technology to resolve these nutrient issues has not been proven in discussions with many lakes. Prevention is the best proven approach, by far.
5) These new development proposals would both be significantly damaging to the nutrient loading of our lake, plus being a risk for flooding of the pond by Woodland Shore Drive. This additional loading and loss of natural filtration would be a permanent contamination to our lake, requiring additional mitigation. The Cove's drain field would be 20-25 acres, over 40% impervious with up to 80 feet elevation, yielding 1.66 to 1.76 Million gallons of runoff per day to our lake for 100 year rain.

Any development on the <u>highly sloped</u>, 43-acre parcel under consideration – whether R2 or PUD - needs to be done <u>responsibly</u> and in full recognition of the need to improve the water quality concerns stated above or at the very least not make them worse.

The current proposals **deviate from the Brighton Township Master Plan** in many ways. Bold wording is taken directly from the current master plan:

- (page 59) **Private Road standards should allow shorter streets to reduce the amount of impervious coverage**.

This **Master plan designated** this area for **750 feet** of roadway maximum. With 160 feet minimum lot width yields **9.375 lots** using both sides of the road. Adding the 30% bonus factor for public water and sewer would yield **12.1875 lots** of minimum 40,000 sq.ft., **far from the 31 or 40 lots** proposed. The **initial R2** proposal would be a **4.5x deviation** from the master plan road length, **PUD is 4x deviation**. Land division act would be 11-13 units, REU's were for 16 units. The Master plan was attempting to protect natural features/water quality, both of these proposals grossly violate this requirement.

- (page 59) **Minimize total impervious area. Conserve natural areas, provide community recreational space.**

  Neither R2 or PUD proposal is close to this standard

- (page 60) **By requiring minimum vegetated buffers, maintaining riparian corridors and limiting impervious surface coverage can all help mitigate the impacts of development.**

  Not achieved

- (page 60) **Protecting the integrity of local lakes is vital to maintaining the current quality of life in Brighton Township.**

  Let's work together for a plan to do this. These proposals do not.

- (page 60) **Studies have shown that over-development, typically defined as over 10% impervious can contribute to overall water quality degradation**.

  Both current proposals, R2 and PUD, are designed as if there are no inland lake nearby. The baseline R2 has 41% impervious surface over 20 acres and the PUD has 46% impervious surface over 20 acres (**1.76M** and **1.66M gallons** of runoff per day, 100 year rain), both would have hugely negative, permanent impact to our lake. Numerous studies indicate that there is potential of net zero nutrient loading if the impervious surfaces for a development are <25%, with the right mitigation plans (Including Flooding).

O.W.L board and those we represent, view these approvals as permanently damaging to the lake and the surrounding natural features and therefore, are negligent to the Master plan and certainly not in the best interest of the residents and users of this lake.

It is not too late to refocus on a <u>more responsible</u> development proposal. Whether R2 or PUD, we encourage the Planning Commission and the Trustees to advocate for a more environmentally responsible and conscientious development proposal. Elements of such a proposal would include fewer and larger parcels (suggesting 12-16 units, <0.25 impervious total surface), re-establishment of a vegetative buffer area with building envelopes no lower than 960 ft elevation, maintaining a minimum of 100 feet to existing wetlands, and other provisions as necessary to achieve minimal damages to our lake and its' citizens. The Organization of Woodland Lake is willing to take part in working with the developer and an environmental engineering firm to come up with an environmentally acceptable plan for this critical location.

Thank you for your consideration of these comments as you evaluate this rezoning proposal.

Recommendations

Storm Water Management

Increased development activity places additional burden on existing natural drainage systems. The overtaxing of drainage systems leads to localized flooding, environmental damage and costly storm drainage improvements to be borne by taxpayers. Storm water drainage can be managed by installation and improvements to storm water drainage systems and by requiring on-site detention of storm water, which Brighton Township currently does. Another way to manage storm water is through preservation of natural drainage ways and providing onsite storm water detention with controlled discharge. Through these approaches, the impact of development on drainage systems can be minimized.

Acknowledging that some impacts must be anticipated, a comprehensive approach to storm water management using Low Impact Design recommendations is encouraged. These types of measures will be much more effective in pre-treatment of storm water before it enters the ground or surface waters. Storm water protection can be achieved through many of the other recommendations in this chapter. Some additional policies not discussed include:

- Private road standards should allow shorter streets to reduce the amount of pervious coverage. Narrower roads may be considered if allowed by the Brighton Area Fire Authority.
- Minimize use of long cul-de-sacs in favor of connected street patterns.
- Encourage clustering of homes to minimize total impervious area, reduce total construction costs, conserve natural areas, provide community recreational space, and promote watershed protection.
- Promote more flexible design standards for residential subdivision sidewalks. Where practical, consider locating sidewalks on one side of the street and providing common walkways linking pedestrian areas.
- Minimize clearing and grading of forests and native vegetation, except where necessary to accommodate development.
- Conserve vegetation by clustering tree areas, promoting the use of native plants, and planting additional vegetation.

Watershed Planning

A more regional approach to conservation includes watershed planning. Watersheds and the sub-basins within them can be identified using GIS mapping technology that considers topography to locate changes in drainage direction and establish the watershed boundary. Studies have shown that over-development, typically defined as over 10% impervious coverage, within a given sub-basin or watershed can contribute to overall water quality degradation. By requiring minimum vegetated buffers, maintaining riparian corridors, and limiting impervious surface coverage can all help mitigate the impacts of development. Often implemented in a coordinated approach with neighboring communities, protection of watersheds must include all municipalities that regulate any portion of a given watershed and, therefore, requires the Township to pursue local relationships with their municipal neighbors. Additional research to establish watershed and sub-watershed boundaries and existing natural vegetation along surface water resources is needed to accomplish this objective.

Protection of Lakes

Protecting the integrity of the local lakes is vital to maintaining the current quality of life in Brighton Township. Most lakes are surrounded by residential development, which means that impacts to those lakes will also affect the residents that live there. These impacts can be both ecological and recreational, as overpopulation of the lakes can contribute to water quality degradation. Various lake associations are active in preservation efforts, including participation in an on-going water quality monitoring program. The testing program involves volunteers from various homeowner associations to collect water samples and submit them to a biologist who prepares detailed analysis and reports.