

To: Brighton Township Trustees

From: John Boland, OWL

Subject: Coves of Woodland Lake

Good evening.

I want to thank the Township Planning committee and the Township trustees for allowing me the time to present how endangered Woodland Lake is from nutrient loading due to overbuilding around our lake.

From our discussions, a number of opportunities have come to light that would improve the planning process used around lakes and waterways in our township.

The Brighton Township Master Plan was developed, in part, to protect lakes from excessive runoff and nutrient contamination. It defined several Best Management Practices to reach that goal. These include: defining maximum 750 foot Roadway lengths, 40,000 Square Foot minimum lot size, 160 foot minimum lot width, appropriate setbacks, 15% maximum build density and the use of vegetative buffers to absorb nutrients from runoff in developments. Pages 59 and 60 of the Master Plan state that “Studies have shown that over-development, typically defined as over 10% impervious can contribute to overall water quality degradation” and that we “minimize clearing and grading of forests and native vegetation”. Additionally, it states “Private Road standards should allow shorter streets to reduce the amount of impervious coverage”. The plan goes on to state, “Protecting the integrity of local lakes is vital to maintaining the current quality of life in Brighton Township”.

These words are good guidance for developments around inland lakes. There are over 200 studies around the country that conclude overbuilding is the number one contributor to the degradation of water quality in inland lakes being seen around the country. At an average depth of 7.5 feet, our lake is very shallow. This means it is significantly affected by the nutrient runoff from the drains that feed into the lake. We have seen the correlation of the drain contamination levels increase and how they have driven our lakes’ contamination levels to double the levels they were in 2007.

The Master Plan guidance is appropriate for all near-water developments, including the Coves of Woodland Lake. The 750 feet of roadway would allow over 9 lots at 160 feet width, or with the 30% bonus for public water and sewer, would allow over 12 PUD units. This is all well-planned protection for our lake. The problem arises when we deviate from those guidelines. The Coves proposals go well beyond the guidelines and will adversely affect the health of the lake and its’ wildlife. The Coves plans reflect two approaches. The Baseline plan shows 31 R2 homes, using 3,400 feet of roadway, **4.5 times Master Plan guidance**. The PUD proposal shows 40 residences, uses 2,888 feet of roadway, or **4 times the Master Plan guidance**. These proposals drive 41% to 46% total impervious surfaces across 20 to

25 acres, yielding about 1.7 million gallons of nutrient laden stormwater into our lake for a 100 year rain event. The master plan states that over 10% impervious surface will impact water quality. Any plan over that guidance should have significant environmental buffering and protection to mitigate stormwater runoff impacts. Neither of these proposals enable these protections. Both of these plans will flood the 2.1 acre pond and the homes between the pond and the lake, per Fleis and Vandenbrink's engineering assessment. The Coves proposals go far beyond the Master Plan guidelines and will adversely affect the health of the lake and the wildlife.

The Master Plan is intended for a developer to use, as it would protect the citizen riparians of our lakes more effectively. Studies indicate that the highest level of impervious surfaces that can be mitigated for a development such as the Coves is 25% impervious. We are almost double that level with either proposal. We are concerned that, per statements by the Township, the Master Plan is only guidance and can't be enforced by Brighton Township to protect our citizens and the environment.

We would hope that any developer would respect the Township's master plan and, at a minimum, make modifications that would allow a profitable development, while not damaging the health of the lake nearby. The OWL organization proposed an example proposal for the Coves development that makes an attempt at this approach.

Woodland Lake has significantly more nutrients coming into it than it has vegetation to absorb them, due significantly to the incoming drains. The land where the Coves are intended is the last undeveloped forestation and wetlands remaining around the lake to absorb nutrients in significant amounts. If the Cove development proceeds with either of the current proposals, the Woodland Lake residents will incur substantially more expenses to maintain the lake. From discussions with many other lakes, these will be expensive and with marginal effectiveness. The best protection is prevention. Livingston County Planning overwhelmingly denied the PUD request and recognized, as does the Township, that either of these Cove proposals will have significantly negative repercussions to the lake.

It is clear that the planning system is inadequate. If the goal is to protect the integrity of the lakes, processes must change. Either keep these critical areas protected from development (zone them as undeveloped) or put some legal repercussions to the intent of the Master Plan so the Township has authority to protect the environment, your constituents and the integrity of our natural resources.

Thank you for your consideration

John Boland

