

STIPHANY SOWELL ARCHITECTS

April 26, 2026

Golden Township Planning Commission and Township Board

Re: PUD Request – Woodland Shore RV Expansion and Related Development

Dear Members of the Golden Township Planning Commission and Township Board,

I am writing as a property owner on W Harrison Road, as someone who grew up in Pentwater, and as a licensed architect and urban planner whose work focuses on housing, infrastructure, and environmental risk in contexts where regulatory systems have struggled to keep pace with development. My research and practice—across Latin America and the U.S.–Mexico border—have focused specifically on the long-term consequences of infrastructure–light development on groundwater systems, sanitation, and community health.

It is from this perspective that I urge you to carefully reconsider this PUD request.

Golden Township’s 2019 Master Plan is unusually clear in its recognition of environmental limits. It identifies the Township’s sandy soils and total reliance on groundwater as conditions of high vulnerability and acknowledges that once contamination occurs, remediation may be infeasible. It further establishes that development must remain low-impact, coordinated, and aligned with the carrying capacity of the land in the absence of municipal sewer infrastructure.

The current proposal raises several concerns:

1. Expansion Beyond the Approved PUD Framework

The original Breakaway Bay PUD established a maximum of 237 sites. The current application references approximately 250 existing campsites and proposes the addition of approximately 47 more, resulting in a total site count approaching 300. This represents a substantial increase in development intensity beyond the originally approved limit. It also appears to retroactively redefine the existing baseline, which, if accepted without verification, would undermine the enforceability of the PUD itself.

2. Cumulative Groundwater Risk

The proposed increase in campsites and associated plumbing fixtures introduces a significant increase in wastewater generation within a system dependent on on-site septic. In comparable contexts, this level of intensification—particularly in highly permeable soils—has resulted in measurable groundwater degradation over time. These impacts are typically difficult and costly to remediate once they occur.

3. Public Health and Sanitation Risk

The proposed increase in campsite density and associated wastewater generation is also a public health, safety, and welfare concern. In areas reliant on on-site septic systems and groundwater for drinking water, the relationship between wastewater disposal and potable water quality is direct. When system capacity is exceeded or cumulative loading increases beyond what soils can safely absorb, contaminants—including nitrates and pathogens—can migrate into groundwater supplies.

In comparable contexts, these conditions have been associated with increased risk of well contamination, particularly for nearby properties that rely on private wells. These risks emerge incrementally and are often not detected until impacts are widespread.

For this reason, public health best practices require that increases in wastewater-generating land uses be evaluated not only at the parcel level, but in terms of cumulative impact on shared groundwater systems. No such analysis has been provided as part of this application.

4. Inconsistency with PUD Intent and Master Plan Guidance

The scale and intensity of the proposed expansion appear inconsistent with both the original PUD framework—which emphasized limitation, buffering, and containment—and the Master Plan's intent to protect residential areas from higher-intensity, tourism-oriented uses. As proposed, this project represents a shift in development model rather than a continuation of the approved use.

5. Absence of Required Environmental Due Diligence

No documentation has been provided demonstrating that a comprehensive hydrogeological assessment, groundwater vulnerability study, or cumulative septic capacity analysis has been conducted. Given the scale of the proposed increase and the known sensitivity of the site, the absence of this analysis represents a significant gap in the record. Without it, the Township lacks the technical basis necessary to determine whether the proposal is consistent with its own planning framework.

6. Precedent and Regulatory Integrity

Approval of this proposal would establish a precedent for increasing development intensity without corresponding infrastructure or environmental verification. More critically, it risks setting a precedent in which established PUD limits can be incrementally redefined over time.

In other regions, this is precisely how otherwise stable environmental systems become gradually overburdened, often without a single point of failure but with clear long-term consequences for public health, safety, and welfare.

Taken together, these issues indicate that the proposal, as currently presented, is not consistent with the intent, scale, or environmental assumptions of the original PUD approval or the Township's Master Plan.

For these reasons, the Planning Commission and Township Board should:

- (1) **Pause the current proposal** as inconsistent with the PUD framework and Master Plan; and, at minimum,
- (2) **Require a comprehensive environmental and infrastructure impact assessment**—including groundwater and cumulative septic capacity analysis—prior to further consideration.

Golden Township has already articulated a clear and disciplined framework for managing growth in environmentally sensitive conditions. Upholding that framework in this case is essential to maintaining both environmental integrity and public confidence in the Township's planning process.

Thank you for your time and consideration.

Sincerely,



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