

From: [REDACTED]
To: [REDACTED]
Subject: FORMAL PUBLIC WRITTEN COMMENT for upcoming City Council Packet Meeting 11/2/26: 6825 Wiley Road Development
Date: Monday, October 19, 2026 10:51:43 PM
Attachments: [Building Suitability Map Douglas Master Plan \(7\).pdf](#)

Dear City Clerk Kasper,

Please see the formal petition and statement of objection below regarding the proposed development at 6825 Wiley Road.

I am requesting that this complete document be officially entered into the public record and explicitly included in the physical and digital meeting packets distributed to the Mayor, City Council members, and Planning Commission officials prior to the next scheduled City Council meeting.

Please reply to confirm receipt of this email and that it will be included in the upcoming meeting packet.

RE: Formal Petition and Statement of Objection – Proposed Residential Development at the Former Miro Golf Course (6825 Wiley Road)

Dear Mayor, City Council Members, and Planning Commission Officials,

I am writing to you as an adjacent property owner to formally submit this comprehensive statement of objection regarding the proposed sale and high-density residential development of the city-owned, 16.4-acre parcel at 6825 Wiley Road by Mosaic Development. Because previous correspondence outlining these serious concerns was not addressed during the recent City Council session, I request that this complete document be entered into the official public record for the upcoming meeting.

While I recognize the need for thoughtful municipal growth, the current proposal to construct 135 units on this ecologically sensitive parcel poses severe environmental, infrastructure, and public health risks. Furthermore, recent developments regarding the city's active parkland create a massive municipal planning conflict that warrants an immediate, prudent pause on any disposition of the Wiley Road property.

I urge the City Council and Planning Commission to address the critical deficiencies and civic conflicts detailed below before proceeding with any approvals or purchase agreements.

1. The Urgent Municipal Conflict: Schultz Park & Irreplaceable Public Land It is now a matter of public discussion that the State of Michigan may reclaim significant portions of Schultz Park along the I-196 corridor to meet federal natural-buffer mandates. Surrendering that land would strip Douglas of its primary active recreational infrastructure—most notably its heavily utilized soccer fields and pickleball courts.

- **Irreplaceable Municipal Asset:** Douglas purchased the 16.4-acre Wiley Road parcel in 2013 for \$196,600 as a public acquisition, formally designating it in the 2014 Parks and Recreation Plan as a public park. If Douglas loses its recreational footprint at Schultz Park, the city will have eliminated its only viable municipal property capable of accommodating relocated athletic fields.
- **Need for Civic Transparency:** The residents of Douglas deserve the opportunity to help make decisions about our community's recreational future. I respectfully ask that the City proactively make the current situation regarding Schultz Park public.

Transparency is critical right now so the public understands that the city still possesses viable backup land at 6825 Wiley Road to relocate these facilities—provided it is not liquidated to a private developer first.

2. Historical Master Plan Inequities & Speculative Zoning The procedural history of zoning this parcel contradicts established community consensus and statutory protections.

- **Statutory Protections Against Arbitrary Upzoning:** When the City adopted its Comprehensive Zoning Ordinance in 2009 (Ordinance #02-2009), it established a strict baseline to protect the character of our neighborhoods. The highly contested decision in the summer of 2024 to preemptively push the 6825 Wiley Road parcel into an R-5 designation—passed during a vote with absent council members and well before Mosaic Development was even attached to the project—severely strained these 2009 statutory protections. Using a speculative zoning change to justify liquidating land for high-density development contradicts the intent of the 2009 ordinance.
- **Ignored Public Consensus:** When high-density zoning was considered in 2016, public input from the Friends of Wiley Road Park led the Planning Commission to formally recommend reducing density from "Compact Residential" (up to 8 units/acre) to "Suburban Residential" (no more than 4 units/acre). Moving ahead with 135 units today completely reverses years of established municipal planning compromises.
- **A Glaring Inequity:** Nearby private property owners are strictly restricted from developing their land because it is designated as wetlands with high water tables. It is hypocritical for the city to facilitate high-density housing for a developer on land where private residents face strict environmental restrictions for the exact same conditions.

3. Severe Hydrological Constraints and EGLE Wetland Restrictions Replacing this natural absorbent greenspace with 135 residential units and associated roadways will create massive impervious surfaces, fundamentally altering local surface hydrology.

- **EGLE Restrictions & Delineated Wetlands:** Adjacent parcels along the Wiley Road corridor (such as 6806 Wiley Road) have undergone formal 2024 Wetland Delineations, classifying them as wetland habitats subject to strict EGLE regulation.
- **Acknowledged Building Limitations:** I direct the Council's attention to Map 5 ("Building Suitability") within the City's own 2024 Master Plan. Relying on federal USDA soil data, it explicitly classifies significant portions of the Wiley Road corridor as "Very limited" and "Somewhat limited" for building suitability due to severe "Depth to Water Table" limitations.
- **Impact on Septic Systems:** During the heavy rain events of April 2026, numerous neighboring properties experienced severe water saturation and surface runoff overflow. Unmanaged stormwater displacement from 16.4 acres of converted impervious ground will elevate the localized water table further, threatening structural damage to adjacent homes and the total failure of surrounding private mounded septic fields.

4. Potential Arsenic and Heavy Metal Contamination Given the site's multi-decade

history as an actively managed golf course, the land has been subjected to prolonged historical applications of lead-arsenate pesticides, herbicides, and synthetic fertilizers.

- **ATSDR Guidelines:** The Agency for Toxic Substances and Disease Registry (ATSDR) Health Consultations frequently identify legacy golf courses as high-risk sites for persistent soil arsenic contamination, posing grave risks during large-scale earthmoving activities.

5. Sanitary Sewer Infrastructure & Lift Station Vulnerability The proposed utility layout presents critical engineering and financial liabilities. The existing municipal sewer main along Wiley Road sits at a significantly higher elevation than the interior low points of the proposed development site.

- **Lift Station Dependency:** High-density flow (135 units) will rely entirely on continuous mechanical pumping to transport raw sewage uphill into the municipal system.
- **Environmental Exposure:** Power outages during severe storms coincide with peak surface water absorption, rapidly raising the localized water table. What fail-safes prevent raw sewage overflow directly into the high water table and adjacent private properties during a catastrophic pump failure?

6. Infrastructure, Traffic, and Safety Deficiencies Adding 135 homes will dramatically alter the quiet dynamic of our community.

- **Traffic & Pedestrian Safety:** The development could introduce 300 additional cars daily onto a narrow roadway that lacks sidewalks, walking lanes, or bike lanes. This poses severe safety risks to residents and children while diminishing the quality of life with increased noise and headlights.
- **Water Infrastructure Capacity:** There are a limited number of water stubs available in the area, raising doubts about the site's ability to safely support such high-density residential utility demands without impacting existing municipal water pressure and service.

7. Procedural Flaws and Lack of Transparency

- **Inaccurate Claims & Acreage:** Community members were repeatedly assured that "nothing new has happened" regarding this site, yet the project advanced steadily behind closed doors. Furthermore, official notices reference a 17-acre parcel, while public records indicate it is 16.4 acres. A discrepancy of over half an acre substantially alters maximum impervious surface allowances and setback evaluations under local zoning codes.

Summary of Requested Actions To safeguard the public health, safety, and economic well-being of existing Douglas taxpayers, I respectfully urge the City Council to place a temporary hold on finalizing any purchase agreement with Mosaic Development. Furthermore, I request a pause on all site plan or preliminary approvals for 6825 Wiley Road until the following steps are taken:

1. **Public disclosure of the Schultz Park state lease situation** so the community can

determine the best civic use for 6825 Wiley Road.

2. **Commissioning of an independent hydrological impact study**, funded by the applicant but directed by an unbiased third-party engineering firm selected by the city.
3. **Production of a comprehensive stormwater management plan** demonstrating zero net increase in off-site runoff and zero elevation of the local water table.
4. **Public disclosure of a state-reviewed EGLE Part 201 Environmental Assessment** addressing soil arsenic contamination and dust suppression protocols prior to any earth disturbance.
5. **A public engineering hearing** addressing the long-term utility liability, maintenance agreements, and disaster recovery plans for the proposed sanitary sewer lift station.

Thank you for your attention to these crucial matters. We look forward to your formal written response and to seeing these items placed on the record for the next scheduled public hearing.

Respectfully submitted,
John Rau

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MAP 5: BUILDING SUITABILITY

