

Bloom Sluggett, PC
Counselors & Attorneys

Patrick Sweeney
Direct Dial: 616-591-1878
patrick@bloomsluggett.com

March 27, 2026

Planning Commission
Golden Township
P.O. Box 26
Mears, MI 49436
zoning@goldentownship.gov

*Sent via email and
Federal Express*

Re: Objection to Application for Amendment to PUD 12.25 Breakaway Bay

To the Golden Township Planning Commission:

Bloom Sluggett PC represents Dr. David Roseman, 4629 N. Ridge Drive. Mr. Roseman owns a lakeshore residence directly across Ridge Drive from the Woodland Shores RV Resort (“Woodland Shores”).

The land upon which Woodland Shores sits is subject to PUD zoning ordinance 12.25 “Breakaway Bay,” which was adopted in 2003. The PUD initially permitted up to 180 camp sites. The PUD was later amended to permit up to 237 sites. The owner of Woodland Shores has now requested a major modification of the PUD to permit 300 sites (including 3 additional cabins) at Woodland Shores.

Dr. Roseman opposes the application because it is inconsistent with underlying zoning and the township’s master plan, because it would expand a nonconforming use in violation of the township zoning ordinance, and because Woodland Shores is already being operated in violation of the existing PUD restrictions and requirements.

1. Expansion of Woodland Shores would be inconsistent with the Township’s PUD requirements and with its Master Plan.

The Breakaway Bay PUD is surrounded by the Resort Residential (“RR”) zoning district. Prior to the adoption of the Breakaway Bay PUD in 2003, the Woodland Shores parcels were zoned RR. See **Attachment 1**, Golden Township Zoning Map (1997).

Pursuant to the Golden Township Zoning Ordinance, this district permits single family dwellings, residential accessory buildings and structures, day care homes, recreational vehicles (subject to Section 4.33), churches, licensed residential facilities, and solar energy systems. The district also permits for residential site condos and subdivisions, multi-family dwellings, and resorts¹ as PUD

¹ Woodland Shores calls itself a “resort,” but it is a campground under the Township’s Zoning Ordinance. The Zoning Ordinance defines “campground” as: “A business or parcel that offers sites for Recreational Vehicle units or tents on a daily, weekly, monthly, or annual basis.

developments, and it permits two family dwellings, public buildings, community clubs, parks, home occupations, and adult foster care as special land uses. This district does **not** permit campgrounds, either as of right, as a special land use, or under a PUD. See Zoning Ordinance, §§7.1-7.3.

The sections of the Zoning Ordinance describing the requirements for PUD districts states: "The establishment of incompatible business or industrial uses in zoning districts in which such uses are not permitted shall not be permitted under any circumstances." Zoning Ordinance, §12.5. The underlying zoning for the PUD therefore does not permit campgrounds under any circumstances.

Furthermore, the Township's Master Plan describes the township's goals for the RR zoning district, including:

1. Year-round and seasonal home neighborhoods are free from encroachment by non-residential uses.

4. Surface water and groundwater quality is protected and improved.

The Master Plan seeks to implement its goals by:

3. Enforc[ing] keyhole regulations to prevent overcrowding of remaining undeveloped shoreline ...

5. Strictly enforce[ing] lakefront zoning. [Golden Township Master Plan, p.18.]

The Master Plan states regarding PUDs that they "must be consistent with the intent and purpose of this Master Plan and the Township Zoning Ordinance, and be in accordance with permitted and special uses allowed in the zoning district in which the PUD is proposed to be located." Additionally, the Master Plan explains that: "The Golden Township Planning Commission has expressed a preference not to plan for future areas of PUD." Golden Township Master Plan, p. 23.

When reviewing a PUD ordinance request, the Planning Commission may approve it only when the Planning Commission finds that the proposed use "shall be consistent with the township's Master Plan & its Zoning Ordinance" and that it "will not materially impact use & development of surrounding property." Zoning Ordinance §12.11.

Both the Zoning Ordinance and the Master Plan prohibit campgrounds on this property. The addition of at least 50 new sites will only increase the burden of this nonconformity upon the surrounding property owners, including Dr. Roseman. Because the Planning Commission is prohibited from approving a PUD that is not consistent with the underlying zoning or the Master Plan, the Planning Commission cannot approve this modification request.

2. Expansion of Woodland Shores would expand a nonconforming use in violation of the Township's Zoning Ordinance.

Accommodations may include, but are not limited to camp store, swimming pool, and recreational facilities." That definition is a near perfect fit for Woodland Shores. The existence of a handful of cabins among nearly 300 campsites does not alter that conclusion.

As discussed above, because the underlying RR zoning district does not permit campgrounds under any circumstance, the existing Breakaway Bay PUD is a nonconforming use. The Zoning Ordinance strictly prohibits the expansion of nonconforming uses. “A nonconforming use of open land may not be extended to cover more land than was occupied by that use before the effective date of this ordinance.” Zoning Ordinance, §17.2(4). The applicant is requesting permission to convert previously vacant land into additional campsites. The Zoning Ordinance expressly forbids this. The application cannot be granted.

3. Woodland Shores is already operating in violation of the existing Breakaway Bay PUD and the Township’s keyholing regulations, and the Applicant should not be rewarded for flouting the Township’s zoning requirements.

A landowner should not be granted relief from zoning requirements when the need for that relief is self-created. *Johnson v Robinson Twp*, 420 Mich 115, 126 (1984). Several provisions of the current Breakaway Bay PUD are relevant here:

- The number of campsites/cabins is limited to 237 (originally 180).
- “The resort shall be limited, in its operational and physical entirety, to the east side of Ridge Road.
- “Keyhole to Lake Michigan, omitted.”

The Notice issued to Dr. Roseman states that the applicant is seeking “to add 47 campsites to the existing 250 campsites along with 3 cabins.” If accurate, then the applicant is already in violation of the existing PUD by constructing and maintaining 13 more sites than are currently allowed.

It is also unclear to Dr. Roseman how many sites truly exist at Woodland Shores. The current site map available on Woodland Shores’ website, thewoodlandshores.com, depicts 289 camp sites and cabins—greater than the 250 stated on the notice, but less than the requested 300. See **Attachment 2** (Site Map from Woodland Shores website). The applicant’s site plan submitted with its application appears to also depict approximately 280-290 camp sites and cabins, but in a different configuration than is shown on the website’s site map. See **Attachment 3** (Applicant’s Site Plan).

At this point, it is clear that there are more sites at Woodland Shores than the PUD permits. But it is unclear how many sites actually exist, and how many sites would exist if this PUD expansion were to be granted.

The applicant’s site map (**Attachment 2**) also depicts a parking area, maintenance building, restrooms, and a “Woodland Shores Private Beach” west of Ridge Drive and along the Lake Michigan shoreline. This is a clear violation of the PUD’s condition that Woodland Shores’ operations be limited to the east side of Ridge Drive. The land connecting the Woodland Shores campground to the Lake Michigan shoreline consists of three parcels to the west of Ridge Drive which are not covered by the PUD, but rather are within the RR zoning district. These three parcels—IDs 006-005-200-03, 006-005-200-02, and 006-005-200-0—are being utilized by Woodland Shores to violate the prohibition on operations to west of Ridge Drive. A printout from the Oceana County GIS depicting the parcels owned or controlled by Woodland Shores is included as **Attachment 4**.

Woodland Shores' practice of granting access to Lake Michigan for its residents and campers is also a violation of the Township's keyholing regulations, which apply "to all lots having frontage on or access to any lake or stream regardless of whether access to a lake or stream is by way of an easement, park, common-fee ownership, single-fee ownership, condominium arrangement, license, or lease." Zoning Ordinance §4.31. This section applies to Parcel 006-005-200-04, which Woodland Shores is using as its "keyhole" to Lake Michigan.

Any residential development ... that shares a common lake [] frontage is permitted to provide lake [] access to one dwelling, cottage, condominium unit, or site condominium unit for each segment of lake [] frontage that is equal to the minimum lot width requirement of the zoning district in which such development is located."
[Zoning Ordinance §4.31(2).]


Here, a lot with approximately 200 feet of Lake Michigan frontage is being used to provide access to between 250 and 289 campsites and cabins. Woodland Shores is already in violation of the Township's keyhole regulations, and it cannot be permitted to expand that violation.²

The Township's keyholing regulations exist to protect the township's natural resources—including Lake Michigan and its beaches—as well as to protect the rights of neighboring property owners. Although Woodland Shores owns only about 200 feet of lake frontage, it is advertising to its customers that the entire beachfront to the west of the campground is "Woodland Shores Private Beach." See **Attachment 2**. That is untrue. Woodland Shores' site map (**Attachment 2**), while clearly depicting its beachside facilities, omits all of the private residences to the north of its lake front lot (including Dr. Roseman's residence).

4. Conclusion

The application to expand the number of permitted camp sites and cabins at Woodland Shores must be denied because granting the application would 1.) violate the zoning requirements for the PUD district and the underlying RR district, as well as the township Master Plan; 2.) expand a nonconforming use in violation of the Zoning Ordinance; and 3.) would reward the applicant for its violations of the existing PUD and of the Township's keyholing regulations. Dr. Roseman also requests that the Township's zoning administrator perform an inspection of Woodland Shores to assess its compliance with current zoning.

Sincerely,


Patrick Sweeney
Bloom Sluggett, PC

Enclosures
cc. Dr. David Roseman

² The PUD Ordinance states: "Keyhole to Lake Michigan, omitted." Dr. Roseman understands this provision to mean that there is no keyholing to Lake Michigan; the only "keyholing" pursuant to the PUD relates to Cranberry Lake within the campground. Because the PUD does not encompass land along the Lake Michigan shoreline, it would not make sense for the PUD to permit keyholing on Lake Michigan.

Attachment 1

Golden Township Zoning Map (1997)

Attachment 2

Woodland Shores Site Map



MAP KEY

	RV SITE		LAKE SITE RV SITE
	KEY DROP BOX		RESTROOM
	HOT TUB		DUMP STATION
	POOL		DUMPSTERS
	SHOWERS		DOG PARK
	LAUNDRY		BIKE RACK
	BIKE RACK		PARKING

Attachment 3

Site Plan from Application

THE WOODLAND SUBDIVISION & CANNERY ROAD

PART OF SECTION 17, T19N, R18W,
SARDEN TOWNSHIP, CO. OF CLATSOP, OR.



NOTE: EXISTING WATER LINE
LOCATION HAS DETERMINED FROM
INFORMATION PROVIDED BY
PLANS BY WOODLAND & ASSOC.
DATED SEP. 1998 WHICH WERE
APPROVED BY MICRO UNIT 247 1998

EXISTING WATER LINE (TYPICAL)
PROVIDED BY WOODLAND

EXISTING SITES

1 EXISTING SITES

THE WOODLAND SUBDIVISION AND CANNERY ROAD

PREPARED BY: [Name]
DATE: [Date]



TYPICAL SITE WATER
CONNECTION
NO SCALE

DATE: [Date]

Attachment 4

Oceana County GIS Printout



006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-422-001-00

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-004-100-04

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-034-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-280-001-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-370-005-00

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-200-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-01

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-02

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-03

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-04

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-05

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-06

006-005-400-07

006-005-400-07</