### Centerville Township Planning Commission Special Meeting and Public Hearing Leland Public Schools October 25, 2023 DRAFT MINUTES

Call to Order: Tim Johnson, Chair, called the meeting to order at 6:39 PM. Attendance: Present: Tim Johnson, Mary Beeker, Joe Mosher, Lindy Kellogg. Absent: None Staff Present: Township Planner Chris Grobbel, Township Attorney Lauren Teichner, Acting Recording Secretary Dana Boomer

There were approximately 21 members of the public present and another approximately 8 members of the public were viewing the meeting through the LLLA live stream video feed.

#### Public Comment: None

# Agenda: The PC reviewed the agenda. Motion to approve agenda as presented by Beeker, second by Mosher. All in favor, motion carried.

Johnson briefly summarized the recent changes to township personnel. Ron Schaub has been appointed Township Supervisor after the resignation of Jim Schwantes. Joe Mosher has been appointed to fill the Township Trustee position previously held by Schaub. Mosher is now the Board Representative to the Planning Commission, taking that spot from Dan Hubbell. Beeker has been appointed to fill an open position on the PC. There is currently one open position on the Planning Commission. The PC briefly discussed the officer positions; Mosher is currently the Secretary, but would like to relinquish that position once the PC is fully staffed.

#### Conflict of Interest: None

## Public Hearing: Leelanau Pines Campground Site Plan

Johnson opened the public hearing at 6:48 p.m.

Process Description – Johnson summarized the process for the public hearing tonight. Given the low number of public present, Johnson will allow additional time for each person to comment.

Applicant to Present the Site Plan – Jason Vander Kodde with Fishbeck summarized the revised proposal for the expansion of the Leelanau Pines Campground (see attached for full written comments). The revised proposal is the result of extensive discussion between the applicant, township, neighbors, and other involved agencies. There are three major changes – a 17-site decrease in sites from the initial request, a request for only the existing 82 permitted boat slips, and a request for a conditional approval of the plan. Vander Kodde summarized the documentation provided to the Planning Commission, including the proposed setbacks, traffic management plan, lighting plan, stormwater management plan, and project impact statement.

PC Questions/Discussions with Applicant - None

Public Comment – Johnson opened the public comment section of the meeting, reminding the audience to address their comments to the Planning Commission and that this is not a question and answer session or a back-and-forth with the applicants.

Jim Weigand – He is part of a corporation that owns a 700-site RV park in Florida, so he has experience in this area. He is concerned regarding the sewer/lagoon system. He knows not all of the approvals have been received yet, but he wonders whether the maximum discharge during their busy season has been examined. Given that the number of units is almost doubling, he is concerned if there is the capacity to treat the sewage before it ends up in Lake Leelanau.

John Popa – He is concerned regarding loud boats, and wants to make sure there is a reference, commitment, or letter stating that they will comply with the DNR laws regarding illegal loud boats. He stated that there are portions of the store and pool that are in the shoreline setback. He stated that the concrete of the store and pool are decks, which are considered structures, and are currently shown to be located in the setbacks. Boat launches are not a permitted right in the Ordinance, and the present launches are non-conforming. Since this is a new application, it has to conform to the present ordinance. He recommends removing the launches from the project altogether. They are non-conforming and expensive. If the application is approved, it must include ZBA approval for the boat launch.

Nancy Popa – She is the president of the Lake Leelanau Lake Association, representing nearly 500 households of people who live on and use the lake. They have provided numerous written comments to the PC detailing their concerns on the Leelanau Pines application. The application, with the extensive shoreline development and large amount of impervious surfaces, poses a major risk to Lake Leelanau and Rice Creek. They do not believe these risks can be mitigated by a conditional special use permit, and believe the application as presented should be denied.

Rolf Von Walthausen – He thanked the PC for considering public comment and their work reviewing the submitted documents. He and his wife live on 50 acres adjoining Victoria Creek. He has watched what happens when Victoria Creek overflows its banks and affects the surrounding land. His concern with the proposed expansion is the increase in impervious surfaces and potential runoff and the damage that it could do to the Rice Creek watershed. He suggests that the PC take a precautionary view, and uphold the Master Plan, which seeks to protect the ecological values of the land and water, especially the water of Lake Leelanau, which is already becoming impaired.

Glen LaCross – He is a farmer in Centerville Township, and he thinks that agriculture is having a tough time in the county. The farmers are going to have to look for other opportunities to pay their property taxes. The lake is going to be very pressured. The hills are already seeing the fruit trees removed. The nature of Centerville Township agriculture has played a big part in the township. He thinks that projects like this are much better suited if they are spread out throughout the county, rather than being all on top of Lake Leelanau. The Sugar Loaf property has sat idle for years – he worked there as a young man, and hated to see it go away. Projects like this need to be spread out. There is a lot of National Lakeshore, and a lot of lakeshore acreage in the county. Centerville Township is jamming a lot in. He wants to have his property rights, but he also has to be responsible for the county that means a lot to us.

Rob Reimik – He is a lake biologist for Lake Leelanau. He asked what the permits are that have been applied for by Leelanau Pines. He would also like to add to Nancy Popa's concerns about the water

quality in Lake Leelanau, and the effect of the expansion of Leelanau Pines. A campground like this is better suited for the shoreline of Lake Michigan, which could absorb the impact of this many people better than a smaller lake. If this application is approved, he would like to see a condition regarding water testing in Lake Leelanau to determine whether there are additional negative impacts to the lake from the campground, and conditions regarding mitigation if negative impacts are found. He offered to help set up the water testing program.

Ray Pleva – He was born and raised in Cedar, and bought a lot to the south of Leelanau Pines in 1981. The way the Novaks ran the campground, there were no complaints. The neighbors knew the property could be enlarged. His family had a meat market in Cedar, and the business that came from the campground was a huge benefit to the community. He's never met the applicants, but if an expansion is approved by the township and done right, it could be a benefit to everyone – the community, the township, and the businesses. There are a fair amount of boats already parked in front of the campground, and the noise never bothered the neighbors. As Glen LaCross mentioned, farming is going out, and the township has to do something right to support the community and the campground.

Applicant's Response to Public Comment – Jason Vander Kodde responded to public comment. The permits that are applied for are all listed in the application package - these include applications for a new well, soil erosion permit, an application to EGLE for reconfiguring boat docks and protecting shoreline for further erosion and consolidating the two boat launches into one, and building permits for buildings and pools. They are also applying for a lagoon permit through EGLE – the current system allows for 20,000 gallons per day, and they have a permit application in to EGLE for between 20,000 and 50,000 gallons per day. In the interim, their current permit continues to be valid and they will work within those limits. They will have high efficiency filters on the pool, which will allow them to discharge the pools in low-use times, and will limit the use of washing facilities during high-use times. They do not believe that the concrete around the store and pool meets the standards for a "structure", and therefore feel they are allowed within the setbacks. The pools are more than 40' from the lake, because as commercial pools they are governed by the county building department.

Kellogg asked, regarding the gazebo structures around the pool area and near the mini golf/splash pad area, what the dimensions of the structures are and what the spacing is between the gazebos. Vander Kodde stated that this is shown on sheets 203 and 205 of the site drawings. The cabanas are 12' x 12', and the spacing is 2-4' between cabanas. They are built with 4x4 or 4x6 posts, and are engineered wood systems that are built on site, and affixed to the ground with brackets. The roofs are pitched, sloping to the back, and covered with steel. The structures around the pools and near the splash pad are built the same.

Mosher asked if Vander Kodde's opening statement could be submitted to be attached to the minutes. Vander Kodde stated he would submit the written copy of his opening statement to the recording secretary.

Close Public Hearing – The public hearing was closed at 7:32 pm.

Zoning/Planning Issues:

Leelanau Pines Campground Site Plan Review -

Staff to Present Findings of Fact Version 2:

Grobbel presented the updated Findings of Fact, which were amended based on the feedback at the October regular meeting. Additional information has been presented on multiple topics. He would like to look further into setback issues brought up tonight regarding the concrete patios.

Under Item G, lot coverage, Grobbel would like the PC to get additional information on this topic. The applicant is very close to the limit for lot coverage, and only portions of campsites are being included in lot coverage. He recommends any graded areas and impervious surfaces be included in calculations for lot coverage, which may put the applicant over 25% lot coverage. Impervious surfaces are directly linked to storm water which is directly linked to site plan review and water quality.

Johnson stated that the calculations for lot coverage caught his interest because of how much larger the area covered by the proposed campsites is than what is calculated for the existing campsites. Johnson distributed a screenshot of the property, which he had outlined, and then outlined the campground area, and it appears to be much more than 25%. By his calculations, the applicant is only considering less than 60% of each new site in their lot coverage calculations, and only about 20% of each of the existing sites. The calculation for the existing sites only appears to calculate the area where the camper is parked. He would like to see the entire camp site considered as part of the lot coverage calculations. However, this would move the lot coverage to approximately 35%, which is a big difference from the allowed 25%. This not only comes back to runoff, it comes back to the rural community feel that needs to be maintained. The lagoon will also likely need to be bigger with the new EGLE application, and the calculations only consider the existing lagoon, not an expanded lagoon. Johnson reminded the PC that they discussed this at the last meeting, and he still feels that all of the areas used for the campground should be considered as part of the lot coverage.

Grobbel stated that there is also a discrepancy in the lot size, with the county and applicant giving different lot sizes. The official county records state 72.74 acres, but the developer states 80.08 acres. The discrepancy appears to be in the lakeshore mapping and there has not been a shoreline delineator described in this application.

Kellogg stated that she also had questions regarding lot calculations, specifically site plan sheet 205. For the pools, she asked where the pool decking areas are included in the calculations, as their color on the site plan does not match the key given.

Brion Doyle, attorney for the applicant, stated that he disagrees with Johnson's interpretation of lot coverage, as that is not how lot coverage is defined in any ordinance in the State of Michigan. Because it is undefined in the ordinance, Leelanau Pines takes the position that lot coverage only included buildings. They have only counted portions of the campsites because the uncounted portions are covered in grass or trees, and are not impervious surfaces. The shaded areas on the plan are the impervious surfaces, the unshaded areas are surfaces that will absorb water, and there are properly not included in the lot coverage calculations. Vander Kodde stated that their survey matches the county website for acreage, but states "more or less". On sheet 6 of the survey plan, the asterisk indicates the larger number (80.08 acres to the waters edge), given the vagaries of the shoreline and the methods used for surveying.

Vander Kodde stated the existing sites are mostly grass. Their calculations for those sites include the size of the largest camper that can fit on the site – the majority of the campers parked on those sites will not be that large. On the proposed sites, those will be gravel pads. While they are considering those

impervious surfaces, in reality those are semi-permeable. They are included in the calculations to be conservative. Much of the campground area will be covered in trees, which is not considered in lot coverage. They have included every impervious area and every developed area of the site that is not grass or trees in the calculations, and are still below 25%.

The lagoon is not planned to be expanded. Once the effluent is cleaned, it will be disposed of through underground trenching. The area of the lagoon will not be enlarged, however. Vander Kodde will look into Kellogg's question regarding the sidewalk area around the pools, and have an answer by the next meeting.

Mosher asked for clarification on the table on sheet 205 – there is no pavement calculation within the existing improvements, only in the proposed. He wants to make sure that all of the existing roads, sidewalks, launches, etc. were calculated on the sheet in some fashion. Vander Kodde will look into this and provide an answer by the next meeting.

Grobbel asked for a copy of the permit application for the lagoon through EGLE, as he was not aware of the plan for an underground trench infiltration system. This should include the engineering plans and be shown on the site plan, as they will need to be included in the lot coverage calculations.

Grobbel returned to his summarization of the Findings of Fact. On page 4, Signs needs to be addressed as the proposed signage is still larger than what is allowed by the ordinance. Security lighting, item 4 on page 5, has been addressed since the last meeting. On page 6, parking lot lighting has been addressed since the last meeting. On page 7, a detailed Project Impact Statement has been provided, and Grobbel asked the PC to address this statement this evening.

On page 10, the perimeter buffer, the applicant has voluntarily proposed (as it is not included in the Zoning Ordinance) a perimeter buffer of 40'. Grobbel has proposed a perimeter buffer of 100', which is frequently used elsewhere. Vegetation does not buffer noise very well, and so 100' is better than 40'. He asked the PC to consider what is appropriate here. On page 11, number 12, Grobbel asks the PC to consider a requirement for an expansion for a deceleration lane and passing lane on Lakeshore Drive, as he believes this was shown to be necessary by the traffic study.

Beeker stated, regarding the lagoon and treatment system, they have been told the applicant has started the permitting process with EGLE. She is wondering where the applicant is in submitting the basis of design requested by EGLE. Given that the township has no information, either from the applicant or through EGLE, on this matter, how can the applicant assure the township that the sewage will be properly treated.

Vander Kodde responded that the first (Part 301 and 303 – inland lakes, wetlands and streams) permit was applied for earlier this summer, and the public hearing and public comment period took place earlier this year. He has now received the public comments and will be addressing those with EGLE. The second (Part 41 - wastewater) permit was applied for in 2022, and is still in process. The individual that they were working with left the department while the permit was in process; it has now been assigned to a new representative. The new representative asked for a basis for design, which had not been previously asked for, and is now being completed. That is expected to be submitted to EGLE by the end of the week. The basis for design is for the increase to the 20,000-50,000 gallons per day category of discharge. Grobbel asked if, at the 50,000 gallon per day category, the township is required to take over the system if the business fails? Vander Kodde stated that while that was historical practice, current case

law states that the township can submit a letter abdicating responsibility. Grobbel asked whether this was true up to the 50,000 gallon limit, or only up to 40,000 gallons? This will need to be checked.

Kellogg asked, if the new permit is granted, will the existing lagoon be used or will the entire system transition to a new model? Vander Kodde stated that he is not sure of this yet, it depends on the approval from EGLE and their requirements for a system design. They expect to still be able to use the space, but the actual method of use may change. They are asking for conditional approval from the township, because they know they are not able to operate at full capacity until the EGLE approval is received. He disagrees that the underground trenches be considered in lot coverage, as a septic area on a residential property would not be considered as part of their lot coverage.

Grobbel asked of the depth of the water table is in that area of the site? Vander Kodde stated that he cannot state that now, as the designs and mapping are not fully finalized. Grobbel asked if the state is going to require monitoring wells for the system? Vander Kodde stated there are existing monitoring wells, and he would assume the new system would have similar requirements.

Beeker clarified that EGLE is looking to the developer for their methods for processing sewage. There have been a number of public comments regarding the fragility of the watershed. She is looking for more assurances that the applicant will respect the watershed. Vander Kodde replied that EGLE gives the applicant effluent limits for the chemicals within the effluent – residential septic systems don't have these limits. With a commercial application, the system has much stricter requirements, and the effluent will be much cleaner than that coming out of residential systems. While the state does set limits, it is a conversation between EGLE and the applicant as to what the final system will look like, and that is still under discussion. Doyle stated that the applicant will work to get additional information to the township on the proposed systems. Beeker specifically stated that she is requesting information on monitoring. Vander Kodde stated that the final system is going to be fully engineered and monitored annually by EGLE, just like other systems at campgrounds around the state.

Kellogg requested that the applicant forward notifications from EGLE on movement on EGLE applications to the township, as that would be helpful to the PC members. Mosher asked to spend some time on the revised Project Impact Statement for the balance of the meeting.

Johnson's biggest concern is that the applicant is saying that the only thing that counts in lot coverage is impermeable surfaces. When he looks at the site plan, he isn't asking what are impervious surfaces, he is asking what ground is covered in areas that are used as part of the camp sites, and are part of the use of the camp ground. This is something the PC needs to define. Mosher believes that the PC and applicant are not very far apart on lot coverage. The applicant is counting all of the gravel pads for new sites, and he is comfortable with that. He would like to see a more detailed accounting of the impervious surfaces, including the existing and proposed buildings, roads, lagoon, sidewalks, paths, etc., than is currently given. If all of that is included, and that is sub-25%, he would be comfortable with it. There is an open issue of future development, and if the PC determines that the site is currently at less than but close to 25%, it would put a hard cap on future development on the site.

Kellogg stated that, regarding lot coverage, the size of the lot needs to have a finalized number that is agreed upon by both parties. She agrees with Mosher that a more detailed accounting of lot coverage is needed. The structures (cabins and glamping pods) that are currently in the campground are not noted on the drawings, and the square footage of those should be noted on the site plans. Vander Kodde noted that the cabins and glamping pods are on wheels and can be moved – he is happy to show them on the

lots, but they fit within the lot calculations given for site coverage. Kellogg stated that all temporary and permanent structures should be shown on the plans. Grobbel read the definition of "structure" from the Zoning Ordinance .

Beeker stated that she drives through some RV sites, and sees some with added structures, like decks. She asked if this would be allowable on the Leelanau Pines sites? Vander Kodde stated that they are not allowing additional seasonal structures, such as decks, to be built on sites where they are not already existing.

Mosher stated that he feels that the taxable size of the lot is what should be used for calculations, which is the 72.74 acres. The additional acreage is likely not able to be built on anyways. He asked if there was any sort of precedent on this topic. Grobbel stated that in his experience the warranty deed is the definitive document, and that states 72.74 acres. Kellogg would agree using the 72.74 acres. Johnson stated that the 80.08 acres should be used for lot calculations because that is what the survey shows. Mosher asked for the applicant's thoughts. Doyle stated that this should be discussed with the township's counsel before coming to a final decision on this matter. He believes that the 80.08 acre number is the correct number for calculating lot coverage. He will be discussing this with the township's legal counsel. Vander Kodde stated that the application materials submitted in September 2023 show the 80.08 acre amount. The 40' setback puts several structures within the extra 8 acres, and so he is unsure how this area can be used for building but not included for lot calculations.

Mosher feels that a finalization of the lot size and a more detailed accounting of the lot coverage will make this an easier decision.

Kellogg requests, again, that the applicant provide elevation drawings of the structures, especially those along the lakeshore, indicating from Rice Creek to the area to the north of the boat launch, from approximately 100' off shore. She would also like elevation landscape drawings of all the buildings.

Johnson directed the PC to the discussion on the Project Impact Statement. This statement was substantially expanded in the most recent memo from Fishbeck. Johnson stated that this project has been approved by the Road Commission. A new road study would be completely useless this time of year. He suggests that perhaps another traffic study be conducted next year during the summer as part of the phased build-out. He is most concerned about impacts on the environment and adjoining lands. The LLLA has several pages of thoughts on conditions that could be placed on any approval. Johnson suggested the PC read these potential conditions. He feels that the requirement for the submission of a Project Impact Statement has been met.

Beeker asked for project impacts regarding 25 year rain events, and she believes that the PC asked for impacts regarding a 100 year rain event. Grobbel stated that this can be made a condition. Mosher stated that he found the expanded Project Impact Statement very helpful, and seconded Johnson's request for the PC to read the LLLA's proposed conditions.

Grobbel stated that, regarding the new Project Impact Statement, it speaks to the number of boat sips. He keeps hearing that boat slips are limited to 82. The settlement agreement clearly speaks to 82 boats, not boat slips. However, the new Project Impact Statement specifies "boat slips", not "boats", as being limited. Doyle understands the concern, and they intend to honor that hard cap on boats. This can be made a condition, and the verbiage can be firmed up. Grobbel said the applicant stated they would consider a conservation easement – has this been discussed further. Doyle stated there is no intention of developing the wetland, and the project team has responded favorably to a discussion of a conservation easement. He will continue this discussion with the project team.

Beeker asked, regarding a statement that the campground would be considered family friendly, whether they would be similar to the park in Virginia. Doyle stated there would be quiet hours at the park that would need to be followed by campers and events. Beeker stated that as a lake resident, they can hear concerts on the lake from a mile away. This is an important issue. Doyle stated that campground needs to be quiet at night, because that is part of the campers' experience, and that quiet hours are strictly enforced. They are very in tune with the fact that their guests want quiet nights.

Kellogg asked for a draft events and activities schedule for the campground and what it might look like, to better weigh the potential impacts of that on the surrounding neighbors.

The PC then determined that they were at a stopping point for the evening and would continue the discussion at the next regular meeting.

#### Public Comment -

Jim Weigand – He would like to depend on a current technology survey, rather than a decades old deed, to determine the actual size of the lot. He is glad to hear that the PC is concerned about the sewage treatment, and he is glad that the applicant is working on an expansion. He would like to hear them respond to his question regarding what their maximum output per day is. He also stated that if a business sells itself on certain amenities, but they will not be able to shut down those amenities without harming their business, even if this affects their output.

John Popa – Regarding campsite coverage, he thinks the entire campsite needs to be included, not just the camper area or gravel area. These areas are rented out as entire campsites, not just the spot where the RV or tent is placed. He again covered the definition of setbacks and the inability to have decks within the setbacks. The building department looks at the buildings, but much of this stuff goes through the township zoning staff. He has a big issue regarding the boat launches. EGLE may approve these launches, but they are nonconforming at this time. The PC has been discussing the boat slips, and the launch contributes to the difficulty in keeping track of boats. Any launch needs to be approved by the ZBA as a nonconforming use.

Linus Laskey – His property is immediately north of the campground. The PC asked what the level of the water table was. He has tried to get a septic field on his property and was denied by the health department, and the campground does not have a lower water table than his property. That is a big concern of his. He said the applicant referred to a buffer between properties, and he is happy about this. Laskey asked whether Centerville still had right to farm laws – he was told that that is a state law. Regarding the 8 acre discrepancy, this has the potential to be under water. Mr. Pleva stated he was a neighbor to the south with no complaints. He doesn't spend any time at that property, he rents it out, so he obviously wouldn't have any experience.

Glen LaCross – Regarding noise pollution, that has been a problem in the township, with wedding venues, and there have been concerns regarding those. The PC is going to need to make sure the

residents are assured of no noise. Agriculture sprays their crops, and those sprayers are very loud, but the public has to co-exist with that noise.

Next Meeting Date: The next regular meeting is scheduled for November 6, 2023, at the Leland Public School.

Adjournment: Johnson moved to adjourn the meeting at 9:09 PM; Kellogg seconded. All in favor, motion carried.

Respectfully Submitted, Dana Boomer Acting Recording Secretary



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## Leelanau Pines Campground Fishbeck Project 211505 10/25/23 Centerville Planning Commission Meeting Site Plan Presentation

• Good evening, I'm Jason Vander Kodde with Fishbeck, the Civil Engineering Firm for the Proposed Leelanau Pines Campground Improvements.

• Tonight, we are presenting a reimagined campground proposal for the Planning Commission's consideration and approval.

• The plan we're presenting tonight is the result of a lot of hard work and coordination by the applicant with the township staff, the neighbors, the fire chief, the drain commission, and the road commission.

• The campground design changes are both substantive and meaningful and will provide the best plan possible for the community in full compliance with the zoning ordinance.

• I'd like to highlight three major changes provided in the 29 page site plan drawing set:

o Proposing a total of 320 campsites (removal of 17 sites from 2022)

o Proposing a total of 82 boat slips (matches current operations and 1999 permit)

o Proposing a conditional approval of the site plan for the other outside agency permitting processes such as the Benzie-Leelanau Health Dept and EGLE

• We've also provided numerous additional design details as requested by the planning commission, township staff and the other agencies.

• I'd like to highlight six of the additional details and information provided showing compliance with the Centerville zoning Ordinance.

o First, The Zoning ordinance requires a minimum of 10' side yard setback in the CR zone and we are proposing a minimum of 40' of buffering – a 400% increase in the requirement.

• In most places the 40' minimum buffer is significantly exceeded by the actual placement of improvements.

• The proposed campsites are a minimum of 740 feet from the northwest property line along South Lake Shore Drive, a minimum of 193 feet from the northern property line, a minimum of 462 feet from the shoreline, and a minimum of 49 feet from the west property line.

• The proposed check-in building is 162 feet from the northwest property line along South Lake Shore Drive.

• The proposed maintenance building is 150 feet from the northwest property line along South Lake Shore Drive.

o Second, The Zoning ordinance requires a safe and effective traffic management plan and we have a provided a traffic impact assessment supporting our proposed drive entrance improvements. The LCRC has reviewed the study, findings, recommendations, and improvement design. They have found it to meet or exceed ITE standards, LCRC standards, and have issued a construction permit for the drive entrance and acceleration/deceleration lanes. o Third, The Zoning Ordinance governs lighting heights and hours of lighting except for security lighting. We have proposed a lighting plan in compliance with the standards.

• Our security lights are within the campground along the main road and allow the fire department to easily find the entrance and the dry hydrant in the case of an emergency.

o Fourth, The Zoning ordinance requires a comprehensive stormwater management plan and we have provided a design compliant with the Leelanau County Drain Commission standards. They have provided an email acknowledging review and approving the design.

• The design uses best management practices including gravel campsites, three different infiltration basins, infiltration trenches, vegetated swales, and similar low-impact design features.

o Fifth, The Zoning ordinance requires a maximum lot coverage of 25%. And although there is some ambiguity in the ordinance on what constitutes lot coverage, we have shown that in the most conservative interpretation (with any surface improvement counting towards coverage) we are fully compliant at 21.58% o Sixth, The Zoning ordinance requires a project impact statement be provided. We have submitted an 18 point project statement for review showing that:

- The existing infrastructure has capacity for the proposed expansion
- The natural environment will be protected by the site design
- The adjoining lands will be protected by the site design

• In addition to the ordinance requirements, the planning commission has asked for details on other items internal to the campground.

o To that end, we've provided additional detail regarding:

- The proposed pools and splash pad,
- The proposed boat wash
- And the proposed shoreline views from Lake Leelanau

• Based on our reimagined proposed campground improvements, we are asking the Planning Commission for a Conditional Approval of the Leelanau Pines Site Plan and Special Land Use.