

**Item One- Lodi Township
Copper Leaf Crossing**

OHM Memo Information: “All notations need to be specific - not “animal-related businesses.””

Request: Update the area plan to include the specific animals that will be housed in each enclosure/building and provide specific details about the businesses on the area plan (name/type).

Attachments 1 and 20 provide details on the current businesses and enclosures within Copper Leaf Crossing. This includes a document detailing the businesses' on-site, and their corporate structure, and an animal inventory with potential species locations, including indoor and outdoor enclosures.

However, Copper Leaf Crossing would like to inquire further about the stipulations of this township request so we can better understand township expectations moving forward.

When the original area plan was submitted by Copper Leaf Crossing, information regarding potential enclosure uses and specific businesses on campus. Our understanding of the township's jurisdiction included the nature of activities allowed at Copper Leaf Crossing, not the specific business names and corporate structures that have now been requested in the current Area Plan amendment process.

While Copper Leaf Crossing acknowledges that requirements may have evolved throughout the past 20 years, we have been unable to find those changes reflected in the current application for Area Plan Amendment, or in section 42. 110 of the zoning ordinance for “Required Area Plan Information”.

Additionally, the application for Area Plan Amendment received from the township requires applicant information, which, in the case of Copper Leaf Crossing, is also property owner information. It is not clear from our interpretation of Section 42.110 labeled “Required Area Plan Information” how this request for “specific details about the businesses” align with the information required at the Area Plan Amendment stage.

If the township is requesting we provide more information than what we have provided in the attachments, we would request an explanation for what amendments or subsequent zoning ordinances have given the planning commission authority to request these details.

To help us better understand your requests, we have provided a list of follow-up questions that pertain to Item One.

1. Going forward, does the township require Copper Leaf Crossing to provide the names and corporate structure of any business that operates on campus, including those that explicitly fall within the activities that have been approved for this campus?

(a) Example: If we decide to lease out space again to a pet groomer within the approved grooming/boarding facility, would that require township notification and approval? The same question applies to other similar businesses, such as a pet store, which we have also had at Copper Leaf Crossing in past years.

2. Is the same level of scrutiny that has been applied to Copper Lead Crossing exercised among all other similar complexes in Lodi Township?

(a) Example: Travis Point Plaza, an office complex across the street from Copper Leaf Crossing, leases space to a variety of professional services and businesses. Does Lodi Township require approval of tenants and/or a list of all the tenants at the plaza and their corporate information from Travis Point Plaza?

3. If the township argues that the same level of scrutiny is applied to other similar businesses in the township, under what law does the township exercise this authority?

4. Additionally, we ask how the Planning Commission squares the level of security presented in item one with the January 10, 2007 letter (Attachment 4) sent to Copper Leaf Crossing by Supervisor Godek? This letter states-

“Final Site Plan approval determines the exterior of a proposed project, the number of buildings, where the buildings are located on the site, what the buildings look like when they are complete, landscaping, and other exterior items. There are no restrictions on what type of pet-related business you may have inside the building”.

Copper Leaf Crossing requests that the township please answer these questions and cite where these requirements are established in the Area Plan stage. Additionally, we request that the township provide evidentiary support for any ongoing requests for this granular information in the township ordinance or regulations. The primary concern of Copper Leaf Crossing regarding this process is the unequal application of rules amongst businesses within Lodi Township.

Relevant Attachments

- Attachment 1: Alphabetical list of businesses on site and their corporate structure
- Attachment 20: Spreadsheet detailing animal locations and rotations
- Attachment 4: Letter from Jan Godek dated January 10, 2007

**Item Two Lodi Township
Copper Leaf Crossing**

OHM Memo Information: “I want to know the USDA Safety Protocol.”

Request: Provide the safety protocols for each animal on-site.

Attachments 5 and 6 provide documentation of USDA-mandated safety plans, as well as internally generated Safe Operating Procedures (SOP’s) for species that require more extensive safety protocols. The Creature Conservancy’s permits and inspection reports were submitted along with OHM’s zoning compliance report to Christina Smith, Jan Godek, Hannah Firlit, and Marcus McNamara via email on March 23, 2026.

Additionally, we have again provided a previously submitted list of species The Creature Conservancy has agreed to refrain from housing (Attachment 3).

Although your request asks for a safety protocol for “each animal on site”, we are unable to completely fulfill this request due to the nature of Copper Leaf Crossing’s businesses. Because Copper Leaf Crossing contains a vet clinic, a groomer, and a boarding facility in addition to the Creature Conservancy, it is unfeasible to provide safety plans for each animal that arrives on-site during any given day. To mitigate this issue, Copper Leaf Crossing has general emergency protocols that can be applied and adapted to all animals that do not require an individual emergency plan due to their benign nature or the circumstances of their temporary presence on campus.

(a) Example: The Creature Conservancy has many ‘pet shop’ species on campus, such as chickens, box turtles, and hedgehogs that do not reasonably require individual safety plans. Instead, the Conservancy has general animal escape or injury protocols that can be applied to species that have a small capacity for harm.

(b) Example: Animals that arrive on campus temporarily for veterinary, grooming, or boarding services change daily. Therefore, to establish safety protocols for these animals as they arrive on campus and notify the township of their presence would provide an unreasonable burden on the businesses within Copper Leaf Crossing.

Given that the vast majority of the animals we have onsite can be legally owned by any township resident without providing “safety protocols” (Attachment 10), this seems excessive, particularly when the Creature Conservancy is already inspected by animal management professionals from local, state, and federal agencies.

To gain a more comprehensive understanding of the request outlined in Item Two, we have compiled a list of follow-up questions.

1. Does the spirit of this request truly intend for a safety plan for each animal on campus, or is the purpose to provide safety protocols for species that are under long-term care of The Creature Conservancy?

(a) Example: Is the township requesting a safety protocol for each individual chicken, box turtle, and fish on campus, or is Item Two intended to provide an outline of general safety protocols and specific plans for species that require more detailed oversight?

2. If the township requires Copper Leaf Crossing to provide safety plans for all animals that briefly enter the premises, how do they purpose Copper Leaf Crossing should execute this demand?

- Are other veterinary and animal care businesses within Lodi Township beholden to the same rules regarding animal safety plans?
- If not, please address the unequal application of this request.

3. Again, how does Item Two comply with the explanation provided by Supervisor Godek on January 10, 2007 (Attachment 4)?

4. Is this level of detail typically required for an Area Plan Amendment?

- If so, please cite rules, regulations, or ordinances that require a complex such as Copper Leaf Crossing to provide the information requested in Item Two.

Relevant Attachments:

- Attachment 5: USDA Emergency Plan
- Attachment 6: Large Carnivore Emergency Plan
- Attachment 4: Letter from Jan Godek dated January 10, 2007
- Attachment 3: Prohibited Species List
- Attachment 10: Previous Animal Inventory

**Item Three Lodi Township
Copper Leaf Crossing**

OHM Memo Information: “How many animals in all and what kind? Complete list which should be updated or amended in writing- Complete animal information existing, plus planned future. Animals not wanting to have.”

Request: Complete the animal information document and include ALL animals that are housed on CLC property for all businesses.

The Creature Conservancy has already provided an animal inventory to the township which can be viewed in Attachment 10. The most recently updated inventory is provided in Attachment 20. If it is required moving forward, the Conservancy will consider agreeing to provide inventories at reasonable intervals; however, the Conservancy has significant reservations due to the possibility of these records inviting criminal activity into the local community. Because the majority of animals at the Conservancy have been acquired through law enforcement agencies or the illegal pet trade, to have the Conservancy's inventory on public record could threaten the security of the animals at the Conservancy due to the high market value of various regulated species.

Furthermore, Copper Leaf Crossing has additional questions regarding the scope of Item Three.

1. Item Three is clearly asking for the inventory of every animal on campus at Copper Leaf Crossing. Does this item require Creature Comforts Bed and Bath (CCBB) to provide animal information on every animal that is boarded at CCBB due to their residence on the Copper Leaf Crossing property?
2. Regarding Animal Kingdom Veterinary Hospital, is the township requesting animal information on every animal that visits the clinic, or only those temporarily housed at the facility due to temporary hospitalization?
3. If the township is requesting a continuously updated list of animals on the Copper Leaf Crossing property, how does the township suggest the businesses operating within Copper Leaf Crossing fulfill this request without creating an unreasonable logistical burden?
 - Will this standard be implemented across Lodi Township for all animal-related businesses, or only enforced at Copper Leaf Crossing?
4. Additionally, Copper Leaf Crossing requests that the township explain how Item Three fits within the requirements of an Amendment to an Area Plan and Supervisor Godak's 2007 letter (Attachment 4).

Relevant Attachments

- Attachment 4: Letter from Jan Godek dated January 10, 2007
- Attachment 20: Animal Inventory and locations

**Lodi Township - Item Four
Copper Leaf Crossing**

OHM Memo Information: “Mission statement - Including all activities going on there. i.e. breeding, boarding, research (what kind), education, buying and/or selling of animals, rescue, rehab. Provide current, accurate plans and future plans. Activities amended in writing. Monthly?
Request: Provide information on all activities that are occurring on the clc property for all businesses. Current and future plans. Examples are but not limited to.... animal exhibition, vet services, boarding, animal acquisition or selling.

We would like to bring to the attention of the township that much of this information has been formally and informally communicated several times. Not only during the original PUD process, but in the recent past. While we will summarize the information here, we will also reference previous submissions.

Below we have listed all approved businesses currently operating at Copper Leaf Crossing.

- Copper Leaf Crossing is a property management LLC that leases and/or donates space to other businesses and organizations on its 23 acres. The campus primarily provides space for businesses and nonprofits focusing on animal care and education of various types.

- Animal Kingdom Veterinary Hospital provides veterinary care to a wide variety of animals, including dogs, cats, birds, reptiles, amphibians, and sometimes fish and invertebrates. Animal Kingdom also treats a variety of nontraditional pets like hedgehogs, ferrets, skunks, rats, guinea pigs, etc. Native wildlife and small zoo animals are occasionally treated for nature centers and zoological facilities. A variety of hobby farm animals are also seen, including potbellied pigs, goats, ducks, chickens, and the like. This description is 100% consistent with what was presented during the original approval process, presented to both the Planning Commission and the Township Board more than 20 years ago. Animal Kingdom Veterinary Hospital does not have a mission statement.

- Creature Comforts Bed & Bath currently provides pet boarding services and grooming services for dogs primarily. Throughout most of its history, it has boarded a wider variety of animals, including cats, birds, reptiles, and small mammals. Current activities represent a slight contraction of services from what was presented originally, but is still within the business activities that were described to the township and approved by the township a couple of decades ago. CCBB does not have a mission statement.

- Copper Leaf Forest is a small plant nursery business that specializes in producing and selling native plants, mostly woody plants. This business is essentially dormant until township issues are resolved due to a lack of time to produce and sell stock. Selling plants and produce at Copper Leaf Crossing was also approved by the township as part of

the original concept, as evidenced by “Building D&J”, the Plant/Produce stand and greenhouse on the originally submitted and approved Site Plans. Copper Leaf Forest does not have a mission statement.

- The Creature Conservancy is a 501(c)(3) nonprofit organization with a simple, but important mission, to promote “Conservation through Education”. In support of the Conservancy’s mission, we present educational programming to area school children, university students, seniors, scouting groups, home schooling groups, and members of the general public. These educational programs include live animals, typically rescued pets or wildlife, and may occur at Copper Leaf Crossing or at area schools, libraries, nursing homes, and other venues. We also offer animal-themed kids camps and other unique events such as animal trivia nights, “Spooky Species”, our Halloween events, and “Creature Courtship,” our popular program celebrating Valentine’s Day. These educational activities and animal displays were presented to both the Planning Commission and the Board of Trustees during the original approval process. While the notes taken by the township at these meetings were minimal, the Creature Conservancy has evidence that animal exhibits and educational programs were presented and discussed from the beginning of Copper Leaf Crossing development, and were affirmed by subsequent actions and inactions of the township. The majority of this evidence has been submitted on numerous occasions, but will be summarized below.

What came to be known as The Creature Conservancy was conceived and conveyed to the township from the very beginning. However, this particular development did not receive significant attention during the approval process due to a focus on septic systems and concerns about Corn Crib aviaries being used as cell phone towers. While we did not predict that the non-profit organization would become such a prominent aspect of Copper Leaf Crossing, it was always a planned element of this development from the very beginning.

Other animal-related activities that the township has approved, but are not currently active on the Copper Leaf Crossing site, include both indoor and outdoor dog parks, a veterinary neurological referral practice, a horse boarding/riding facility, a feed store, and a pet store.

We hope that the township appreciates that a business complex is significantly more dynamic than the majority of other zoning types. Using the developments across from Copper Leaf Crossing, as an example, the building that is currently Tippen’s Market was originally a furniture store, and then a series of different party stores before its current iteration. Similarly, the real estate office next to Tippen’s Market was originally a bank, then an audio-visual sales and service store, before its current tenants. While we regret that we can not provide a substantial prediction for the future, we can not know what events will change the operations of Copper Leaf Crossing. For example, the ‘Great Recession’ of 2008 was the primary catalyst for the

termination of the horse boarding business. Likewise, the pandemic almost closed the pet boarding facility and greatly impacted the veterinary practice. The Creature Conservancy was only able to survive this time due to government grants. With these events in mind, we stress that it is not possible to predict how Copper Leaf Crossing may need to respond to changing dynamics. Despite these points, we do not anticipate any significant changes in current activity, especially in relation to the Area Plan. Copper Leaf Crossing will seek township advice and approval through the major or minor site plan approval process in the future if needed.

Additionally, we would like to specifically address the “animal acquisition” and “selling of animals” referenced in Item Four. We are aware that there have been concerns expressed to the Planning Committee regarding the breeding and selling of Creature Conservancy animals. We would like to take this opportunity to clear up any confusion or misinformation that has been conveyed about our practices.

First, we have attached our population management plan for large mammalian carnivores (Attachment 14). This internal policy is in accordance with both the [Big Cat Public Safety Act 2022](#) (Attachment 13), and the [Michigan Large Carnivore Act 2000](#) (Attachment 16).

Additionally, this internal policy has been approved by the Michigan Department of Agriculture and Rural Development (MDARD), the regulatory body of large carnivore breeding permits. Any concerns regarding the acquisition or dispersal of all large mammalian carnivores owned by The Creature Conservancy can be addressed by reviewing the guidelines we operate under. In regards to breeding, The Creature Conservancy is aware of concerns about the breeding of big cats at our facility. The only animals determined to be big cats by law in the state of Michigan owned by The Creature Conservancy include Danny and Kya, the breeding pair of clouded leopards, and Harper, a senior, spayed mountain lion. The Creature Conservancy does intend to ethically breed our clouded leopards to contribute to their conservation, is a member of the clouded leopard Animal Management Plan¹ (AMP) under the Zoological Association of America (ZAA).

The other species that The Creature Conservancy actively breeds are sloths, chickens, and dingos.

The vast majority of animal acquisitions at the Creature Conservancy have no monetary exchange.

(a) Example: The Columbus Zoo has donated a Whitenecked Raven, a surplus Warthog, and a Burmese python, among other animals.

(b) Example: The Toledo Zoo has donated a couple of kinkajous.

(c) Example: The Creature Conservancy has donated sloth babies bred at the facility to the Binder Park Zoo, the Buffalo Zoo, the San Diego Zoo, and other USDA-inspected, Association of Zoos and Aquariums (AZA) or ZAA-approved facilities.

¹ AMPs are oversight programs designed to ensure all member facilities intending to breed clouded leopards are qualified and participate in ethical practices.

The Creature Conservancy has, and will continue to purchase animals in support of our educational work. All purchases are made legally and ethically through licensed and inspected facilities, when required.

(a) Example: Recent purchases include crayfish and giant millipedes to support a new camp session called "Boneless Beasts" that focuses on invertebrates. We have also recently purchased chickens, which will be included in our new featured programming for the month of September, which is designed to celebrate the agricultural heritage of the area called "Barnyard Buddies".

The last year that The Creature Conservancy recorded any "animal sales" revenue was 10 years ago. The total animal sales revenue accounted for a fraction of 1% of our total revenue in 2016. This claim can be verified by reviewing the Conservancy's tax records if requested by the township.

We would also like to take this opportunity to address previous concerns expressed by the township regarding The Creature Conservancy's Educational offerings. We argue that Copper Leaf Crossing's current iteration is highly consistent with original concepts. To further establish this claim, we have pulled notes dated 2005 with the former Copper Leaf Crossing Lawyer, Fred Schmerberg (Attachment 24) that were used to present to the planning commission during the initial PUD approval process, detailing:

- (a) A vet clinic labeled "Daldin Veterinary Services."
- (b) A Boarding and Grooming Business
- (c) Copper Leaf Farm, which had multiple subsections including horse boarding, a plant nursery, and other various potential activities.
- (d) Most importantly, "Steve's Educational Programs," which outlined professional development programs for teachers, lecture programs for specific groups, 501(c)(3) nonprofit status, and sloth babies.

While it is evident that "Steve's Educational Programs" has expanded far beyond its original scope and into The Creature Conservancy, almost all initial goals detailed in this document have been completed. Although Copper Leaf Crossing no longer offers boarding for horses, the property does contain a vet clinic, a boarding and grooming business, and a plant nursery. Furthermore, The Creature Conservancy does offer professional development programs for teachers, lecture programs for specific groups, maintains 501(c)(3) nonprofit status, and has successfully constructed a nationally known sloth breeding program.

Relevant Attachments:

- Attachment 24: Presentation notes, Fred Schmerberg
- Attachment 14: Population Management Plan for Large Mammalian Carnivores
- Attachment 13: Big Cat Public Safety Act

- Attachment 16: Large Carnivore Act
- Attachment 15: Confirmation of AMP membership

**Lodi Township- Item Seven
Copper Leaf Crossing**

OHM Memo Information: “Plans for animal waste nuisance for neighbors.”

Request: “Provide Animal Waste protocols and plans so that waste does not become a nuisance for the surrounding properties”.

The vast majority of the animal waste is collected daily and bagged. The bags are placed into a dumpster and removed from campus weekly.

Animal bedding, which may contain small amounts of urine and feces, is managed in two different ways.

- In some cases, the animal bedding is bagged and placed into a dumpster to be removed weekly. This is true, for instance, in the case of bedding from our opossum enclosures. Their feces can carry a disease called equine infectious anemia (EIA), so opossum bedding is always bagged and removed from campus weekly.
- Bulk bedding, like pine shavings from horse, reindeer, and cow stalls, is held onsite and composted, along with produce scraps. Once sufficiently composted, the resulting material may be used to grow our large collection of indoor plants or used to enhance the soil in outdoor planting beds. The majority of the resulting compost is used to grow the potted native plants produced and sold by Copper Leaf Forest, therefore leaving the campus.

**Lodi Township- Item Ten
Copper Leaf Crossing**

OHM Memo Information: “Wolf-dogs and loud animals need to be moved to the opposite corner away from neighbors’ backyard. If it is too wet, bring in fill. Plan to reduce noise and objectionable sounds to neighbors.”

Request: “Provide a plan that will reduce noise and objection(able) sounds to neighbors during the township designated quite (quiet) hours.”

These complaints have been primarily in relation to The Creature Conservancy and the canines housed on campus. Additionally, the majority of these complaints have been issued by neighbors Carly Rose and her husband Steve Rose.

The Creature Conservancy has taken measures to rectify these disputes, which are detailed below.

- The Conservancy planted over 100 native trees in the canine enclosure, both deciduous and evergreen. The effect of this project is two-fold. First, the trees will provide a natural sound-dampening barrier. Second, the trees can help provide a wind barrier, therefore decreasing wind speed and wind-carried noises.
 - (a) The Conservancy has an ongoing project to plant another 50 trees in the enclosure and surrounding area.
- The Conservancy has installed 8-foot-tall privacy slats, which provide 90% screening along a 950ft fence. This project cost over \$16,000 dollars in materials alone. The Conservancy then added a second layer of privacy fencing along a 300ft stretch closest to the Roses’ property to provide a secondary sound barrier. The materials used in the project cost an additional \$5,000 dollars. These materials dampen sound and wind speed.
- Additionally, the Conservancy has established a commercial-grade sound monitoring system that tracks decibel readings near the canine enclosure 24/7 and records sounds that exceed specific decibel parameters. This monitoring system has been effective since July of 2025, and to date, has not recorded noise above 65dB(A), the legal limit in Lodi Township between the hours of 10:00 pm and 7:00 am. While we acknowledge that the 65dB(A) decibel parameter is not specifically established for animal noises, we use it as a guideline to monitor noises that exceed a reasonable volume. Additionally, when our canines do howl, they typically only howl for brief periods, lasting no longer than 3 minutes. These occurrences of howling are usually provoked by a specific incident, such as emergency vehicle sirens or wild packs of coyotes in the surrounding area. This monitoring system was \$13,795, and a considerable financial burden on the Conservancy.

Additionally, an attorney working for the township, Victor Lillach, communicated with Supervisor Godek via email on June 24, 2025, with guidance regarding what information the Roses would need to provide in order to make actionable claims. These requirements were also

conveyed to the Rose's. Since this communication, the Roses have not provided this actionable evidence that Copper Leaf Crossing, more specifically, The Creature Conservancy, has violated any township noise ordinances.

Lillich stated: "If they are no(t) willing to isolate and provide more discreet recordings to demonstrate the objectionable noise, then I would like(ly) deny the issuance of citations with requests for further information to support the claim." (Attachment 18)

The neighbors continue their harassment by calling the sheriff out, but are unwilling, or, more likely, unable, to provide the substantiation the township lawyer requires.

Supervisor Godek made considerable efforts to resolve issues with the neighbors last year. These attempts were fully endorsed by The Creature Conservancy. Ultimately, neighbors have declined to meet with associates of The Creature Conservancy to discuss their true concerns. (Attachment 19)

Additionally, there have been statements made by neighbors claiming that the sound is not the source of any grievances. For example, WXYZ produced this anonymous quote from a neighboring property owner.

'These neighbors also say they have no issue with the Conservancy itself, and like living next to it. They also said their concerns aren't with Harry being dangerous or loud, it's just the fence's proximity to their property.' (WXYZ Article)

The Conservancy would like to further acknowledge that, after years of harassment and a formally issued letter of demand from the Roses on May 3, 2024 (Attachment 23), we issued a *Cease and Desist and Demand for Retraction of Defamatory Statements* via the Conservancy's legal counsel, Samuel L. Estenson August 13, 2024 (Attachment 22). As outlined in the Cease and Desist, the Roses have made numerous false reports to various local agencies claiming The Creature Conservancy and subsequent businesses on Copper Leaf Crossing property do not have proper licences to operate, or own the animals, such as the clouded leopards. If the Roses are willing to have a meeting mediated by legal counsel, The Creature Conservancy would consider rescinding the cease and desist for the purpose of facilitating such a meeting.

Currently, the Conservancy is attempting to quell tensions with neighboring homeowners by only housing the Conservancy's quietest Canines, the dingos, overnight in the corner enclosure. The Conservancy will consider taking additional action going forward, such as refraining from housing any Cainines in the corner enclosure during nighttime hours once enclosure #46 is completed, with the exception of emergency circumstances.

The Conservancy requests that the Township consider the validity of noise complaints that have not resulted in actionable evidence, as outlined by the Township Attorney.

Relevant Attachments

- Attachment 23: Letter of Demand- Feiger Law- Steve and Carly Rose
- Attachment 22: Cease and Desist, Demand for Retraction of Defamatory Statements
- Attachment 12: MC Site Visit
- Attachment 19: Communications regarding possible mediation

**Lodi Township- Item Twelve
Copper Leaf Crossing**

OHM Memo Information: “Person or persons responsible for questions.”

Request: “Provide the name of the person responsible for answering questions/providing information”.

Copper Leaf Crossing and subsequent businesses are providing this information as a cooperative courtesy. The Area Plan Amendment requires this information from the land owner(s) only. Tenant information is not a part of the original Area Plan, nor is it required in the current Area Plan Amendment application.

Can the township provide evidence that this information is required as a part of the Area Plan Amendment process?

Copper Leaf Crossing- Steve Marsh and Claire Baker
Animal Kingdom Veterinary Hospital- Vicki or Steve Marsh
Creature Comforts Bed & Bath- Steve Marsh
The Creature Conservancy- Xavier Edwards and Claire Baker
Copper Leaf Forest- Steve Marsh

**Lodi Township- Item Fifteen
Copper Leaf Crossing**

OHM Memo Information- Where each kind of animal is housed. If there is a rotation, it should be noted on the plan. What type of animal is in each enclosure?

Request- “Update area plan to indicate where each animal is housed either permanently or in a rotation. Be specific on the type and if the animal is housed there on a rotation or permanently.”

Due to the dynamic nature of animal care, this question prompts too much information to be applied directly to the Area Plan. Instead, we have attached a spreadsheet that lists each species and the place (or places) they may be housed. If only one location is noted for a given species, then the township can consider that the individual's permanent location. If multiple locations are listed, then those locations are the areas where a given species may be located at different times of the year, day, or week, depending on weather, enrichment, training, and numerous other factors. Additionally, it is important to note that animals could be in the vet clinic temporarily for care, or at an off-site educational program.

Relevant Attachments:

- Attachment 20: Spreadsheet detailing animal location and rotations

**Lodi Township- Item Sixteen
Copper Lead Crossing**

OHM Memo Information- “The items marked in orange indicating they have not been completed. What is the timeframe for completion of each? If these are built, what is the expected increase in cars? Where on the property will house the overflow parking if this current parking area is taken away? This situation could result in a change to the area plan in the future. It is helpful to understand CLC timeframe for these decisions. Keep the builds and”

Request- “Provide one of the following: 1. Update the area plan to exclude the buildings located in the temporary parking location, or 2. Update the area plan to include the buildings plus an area to replace the temporary parking.”

The area plan has been updated to reflect current and future conditions. Buildings E, F, and G have been removed to create space for additional parking spaces. The Creature Conservancy has decided to leave Building H on the area plan because it does not conflict with the additional parking spaces, and because we are likely to build this building in the next few years to address storage needs.

The Creature Conservancy is not currently prepared to make a commitment as to when we may construct Building H. The township process has been long and complicated, and we have a backlog of deferred maintenance and projects that require priority attention once normal operations can be resumed. The township will be made aware of our plans for building H when we request a zoning compliance permit needed before we can apply for a building permit.

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Eighteen
Copper Leaf Crossing**

OHM Memo Information- “What is the plan if the cargo containers are not approved? Does this change the area plan by using planned existing buildings for storage, or change the future planned use of an area to build a storage building? Plan for the removal of the cargo containers, and if anything will go in its place.”

Request- “Remove the cargo containers on the area plan and update if anything will go in its place.”

The cargo units remaining on the Copper Leaf Crossing property were originally purchased and placed on the property in 2018. It is our understanding that cargo units were not banned in the township until 2019. Therefore, we are requesting a nonconforming use for the three cargo units owned by The Creature Conservancy.

→ Under section 55.17 Accessory Structures: “Semi-trailers, shipping or cargo containers, transparent soft sided structures shall be prohibited to be used as accessory structures”. This, however, was not in effect until June 20, 2019.

https://loditownshipmi.org/wp-content/uploads/2019/07/2019_lodi_twp_zoning_ordinance_rev.pdf

These cargo units are crucial to the operation of The Creature Conservancy because Cargo units are the most cost-efficient way to ensure animal feed and hay are secure from other mammals, birds, and insects, as required by USDA guidelines.

Considering The Creature Conservancy is a 501(c)(3) nonprofit organization, we must find creative and economical ways to maintain the high standard of husbandry we offer all animals in our care.

**Lodi Township- Item Nineteen
Copper Leaf Crossing**

OHM Memo Information- “Item M- Existing House - well - septic - residential or part of the business Use/Future/Well Septic.”

Request- Update the area plan to include the well/septic location for the item (M). Confirm if this residential structure has its own well/septic or is tied into the over property well/septic.

Building M has its own well and septic. It is no longer being used as a residence, and its future uses are under consideration. It will mostly be used for storage in the near term. It may be nearing its useful lifespan, and at some point, it may be razed and replaced.

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Twenty
Copper Leaf Crossing**

OHM Memo Information- "Item C- Grooming/Boarding"

Request- Item C on area Plan- Grooming/Boarding. Update the area plan to specify where boarded animals are housed indoors, the outdoor area dedicated for these animals, including bathroom and exercise.

Once again, Copper Leaf Crossing would like to reference Supervisor Godek's letter, January 10th, 2007 (Attachment 4), which clearly states the internal operations of our buildings are not within the zoning authority of the township.

For boarding services offered by Creature Comforts Bed and Bath, animals are not housed externally for more than a few minutes at a time. During these periods, the animals have the opportunity to urinate and defecate in the outdoor portion of the kennel. During this outside time the indoor kennel run is cleaned. This typically occurs three times a day, morning, midday, and evening. The dogs are moved outside in blocks of up to eight individuals at a time so that the overall period that dogs may be outside is limited to less than one hour periods.

If customers of the boarding facility request exercise periods for their dogs, they are typically walked on a perimeter trail around the northwest end of the Copper Leaf Crossing campus. During extreme inclement weather events, exercise periods are typically done inside the kennel building.

Relevant Attachments

- Attachment 4: Letter from Jan Godek dated January 10, 2007

**Lodi Township- Item Twenty Five
Copper Leaf Crossing**

OHM Memo Information- “Uses: Please list how each existing and proposed use aligns with current use listed in the Township’s table of uses”.

Request- “Provide list of proposed uses and correlate a use from the use table for each”.

Because Copper Leaf Crossing is a planned unit development, it is a mixed-use area. Since this property was originally split into commercial, residential, and agricultural uses, it does not fit neatly into the township's table of uses.

Copper Leaf Crossing has received approval for a veterinary hospital, pet store, dog park, kennel, and horse stable. While there is limited documentation from the early 2000s from the Township regarding Copper Leaf Crossing, we assert that education has been an aspect of this development from the beginning.

- Once again, we have the presentation notes for township meetings archived by Fred Shmerberg (Attachment 24) highlighting “Steve’s Educational Programs”, which have evolved into The Creature Conservancy in the many years since Copper Leaf Crossing’s inception.
- Bill Lindemann, as a Township Trustee who heard our presentations during the approval process about the educational aspects of Copper Leaf Crossing, signed off on our classroom building as the Zoning Compliance Officer of the day. This further indicates that the Township was aware of the educational programs occurring on-site.
- Additionally, in 2007, the township approved a minor site plan change, including, among other things, a fox hut.
- Another minor site change was approved for a wolf enclosure in 2025.
- A letter from Supervisor Godek that clearly acknowledges the ongoing existence of the educational nonprofit and the rescue and display of wildlife.

It is our contention that every activity, past and present, has been acknowledged and approved by the township during the original PUD process and reaffirmed in subsequent Site Plan Changes.

Relevant Attachments:

- Attachment 2: Approval of Fox Hut
- Attachment 28: Letter to Supervisor Godek
- Attachment 29: Bob LaVassuer Letter

Lodi Township- Item Twenty Nine
Copper Leaf Crossing

OHM Memo Information- "Site Elements ... Shows existing shelters with enclosure. Does not appear to provide 30-foot transition buffer. It should be noted a minor site plan approval for canine fencing area was previously granted. Provide measurement on the Area Plan from the transition buffer to the canine shelters."

Request- "Provide evidence that current well and septic supports the activities."

Copper Leaf Crossing was designed to support multiple animal care businesses and horticultural production. The well specifications were designed in conjunction with the county based on the anticipated robust use of water for activities such as:

- Frequent surgical scrubbing and heavy laundry use at the veterinary hospital.
- Bathing multiple dogs each day, washing large amounts of bedding in an industrial-sized washing machine, and hosing down dozens of kennel runs daily in the boarding and grooming facility.
- Two Bathrooms, a kitchenette, a drinking fountain, and utility sinks were designed into the classroom building, which was designed with a capacity of 75 people.
- The horse stable was designed with a kitchenette, a horse wash stall, multiple water hydrants along the horse stalls to fill multiple troughs daily, and spigots for spraying down the indoor riding arena to reduce dust.
- Each building also has multiple outdoor hydrants.

The main campus has two 6" wells supplying water to the campus in addition to a separate well that supplies water to a former residence. The well sizes were designed to support robust usage, greater than current uses, because a number of buildings included in water use calculations for the original site plan were never built. Copper Leaf Crossing's current water usage is far less than the capacity to which Copper Leaf Crossing's system was designed to support.

Concerning septic field capacity, Copper Leaf Crossing has two different drain fields. One for Agricultural Waste and one for Domestic Waste. Both drain fields were recently improved per county health department recommendations that would allow Copper Leaf Crossing to accommodate a third concurrent summer class session should we choose to do so (up to 90 children onsite, as opposed to the current 60 children maximum). The drain fields effluences are monitored by the county as part of their Operations and Maintenance Program, and we are functioning well under the capacity for which the county designed our system to accommodate.

**Lodi Township- Item Thirty Two
Copper Leaf Crossing**

OHM Memo Information- "Site Elements....It is not clear if enclosures and fencing meet 30-foot transition buffer. The supplemental information provided indicates these areas have not yet been constructed. Are you moving forward with these enclosures. If Yes, provide information."

Request- "Update the area plan to show all abut(ti)ng properties parcel numbers, house locations, setback boundries (boundaries) and transition buffers".

This has been completed, and can be viewed in the attached area plan (Attachment 21).

Required Attachments

- Attachment 21- Area Plan

**Lodi Township- Item Thirty Three
Copper Leaf Crossing**

OHM Memo Information- "Site Elements.... It should also be noted that a large part of the rear of the site (adjacent to items 29, 45, and 46) appears to be enclosed, presumably with fencing (thick black line, outlining the area)."

Request- "Provide information (information) on which buildings visitors can occupy".

Supervised Public Access Locations

Visitors are not permitted to be inside Copper Leaf Crossing facilities without staff or volunteer supervision

Building A Primary Classroom	Visitors can occupy most of the main floor of this building.
Building B Veterinary Hospital	Visitors can occupy the lobby located in the front third of this building.
Building C Boarding and Grooming	Visitors can only occupy the small entry lobby of this building.
Building K Mixed use, storage, animal housing, summer classroom.	Visitors can occupy a third of the main floor of this building. The southwest end of the building has picnic tables for visiting school groups to eat at if the weather outside is not accommodating. During weekend open hours, the general public can also use this area in the same way.
Building L Main Conservancy Building	Visitors can occupy approximately half of this building from the southwest end to view animals and attend educational programs.

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Thirty Six
Copper Leaf Crossing**

OHM Memo Information- "PUD Eligibility... The applicant should provide information demonstrating that the land area is sufficient to support animal care."

Request- "Provide information the land area i(s) sufficient to support animal care".

Copper Leaf Crossing has both scheduled and surprise inspections of our animal care facilities by local, state, and federal agencies that are experts in animal management. At the state and federal levels, most of the inspectors are veterinarians. These inspectors analyze all aspects of animal husbandry, including evaluation of enclosure dimensions, ventilation, shelter opportunities, temperature regulation, and secure infrastructure that meet agency standards. These agencies also review our animal diets, programs of veterinary care, veterinary care records, acquisition and disposition records, etc. Some species require additional oversight through emergency plans, safety protocols, and even established standards for animal enrichment.

We feel that holding permits and licences through the US Department of Agriculture, US Fish & Wildlife, the Department of the Interior, the Michigan Department of Agriculture, the Michigan Department of Natural Resources, and Washtenaw County Animal Control sufficiently demonstrates that The Creature Conservancy has the skills and space to manage the animals in our care. Furthermore, as a facility open to the public, we receive constant oversight and feedback from the local community regarding our daily operations.

A comprehensive list of The Creature Conservancy's permits was submitted to Cindy Strader and Hannah Smith by Ella Marsh

Relevant Attachments:

- Attachment 11: MDNR Scientific Collector's Permit
- Attachment 26: Class C License
- Attachment 31: Threatened and Endangered Species Permit
- Attachment 32: Live Eagle Exhibition Permit
- Attachment 33: Special Purpose Possession - Live and Dead Migratory Birds Permit
- Attachment 35: Cervidae Registration
- Attachment 36: Permit to possess a deer or bear carcass MDNR

**Lodi Township- Item Forty Four
Copper Leaf Crossing**

OHM Memo Information- "Site Elements.. Produce Stand-Labeled as Never completed".

Request- " Remove the produce stand from the area plan if there is no intent to move forward with having"

We have removed some buildings and features that we were unlikely to build (G,F,E,I). We are leaving some features we still intend to build, including the produce stand (D), the pallet building (H), and the greenhouse (J). We are not prepared to provide a timeline for the completion of those structures at this time.

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Forty-Five
Copper Leaf Crossing**

OHM Memo Information- "Applicant should clarify if it is still planned to be completed."

Request- "Update area plan to include all fence locations and fence heights."

This has been completed, and can be viewed in the attached area plan (Attachment 21).

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Forty-Six and Item Fifty-Two
Copper Leaf Crossing**

OHM Memo Information- “Site Elements... The applicant should clarify if all lines in the area indicate fencing. The applicant should indicate need for increased height. The supplemental information clarifies that the 8-foot fence is required by the USDA for cougar fencing.”

Request-“For the 8ft fence for the cougar... provide documentation the township approved/signed off, along with all permits obtained for construction, including approve(d) inspections and final approval.”

OMH Memo Information- "Site Elements..8-ft fence indicated, applicant should provide information on need for an 8ft fence."

Request- “ Provide documentation on the requirements to have an 8ft fence and also info the township approved/signed off along with all permits obtained for construction, including approve(d) inspections and final approval.”

These sections refer to Site Elements 7 and 27, which are a connected, 8ft high fence that creates a larger paddock. This paddock has two primary uses. First, the fences can be opened to give the reindeer extra space for enrichment activities or to section off his enclosure to allow for mowing. Additionally, these paddocks are used to provide the dingos with supervised enrichment space when vacant.

Because Dingos were reclassified as wild dogs by the USDA in 2016, they now require the same 8ft fencing regulations as our wolves. Because the dingos share the enclosure created by Site Elements 7 and 27, we adapted the fence height to reflect the USDA requirements.

→ <https://content.govdelivery.com/accounts/USDAAPHIS/bulletins/143f1a8>

We are in active conversations with the county building department to bring the fence into compliance.

**Lodi Township- Item Forty-Eight
Copper Leaf Crossing**

OHM Memo Information- “Site Elements.... Labeled as converted to a livestock enclosure. Supplemental materials provided this is mainly intended to be an aviary enclosure. What is in site element S.”

Request- “Update area plan to reflect current use”.

Site Element S is currently used as a brooding space for young chicks, but may be used as an enclosure for other animals throughout the year (Attachment 20).

Relevant Attachments

- Attachment 20: Animal Inventory and Locations
- Attachment 21: Area Plan

**Lodi Township- Item Forty-Nine
Copper Leaf Crossing**

OHM Memo Information- “Site- elements. ... Supplemental materials indicate this area is used for rescued mini horses and donkeys. Appears to extend into required landscape strip along Ann Arbor Saline Road. Provide info of when the fence along AA Saline Rd was approved and installed.”

Request- “Update area plan to include a landscape strip.”

The fence that runs along Ann Arbor Saline Road has been present at that location for at least 30 years and is a remnant of the original farmstead. The fencing originally extended almost all the way to the corner of Ann Arbor Saline Rd and Pleasant Lake Rd before construction. Throughout the years, this paddock has housed many species such as draft horses, goats, and mini donkeys. The rest of this fence was removed during the process of building Copper Leaf Crossing into its current iteration. The part remaining is shown in our approved Washtenaw County Rd Commission plans in 2004.

Lodi Township has been aware of the fencing since the approval of the original PUD, and has never instructed Copper Leaf Crossing to remove it.

Relevant Attachments

- Attachment 34: Previous Area Plan

**Lodi Township- Item Fifty
Copper Leaf Crossing**

OHM Memo Information- "Site Element...Item 2 is labeled in the key, but does not appear to be shown on the area plan. The supplemental materials indicate this is a separate section of the donkey enclosure, and ideal space for the emu."

Request- "Update area plan to reflect current use and current animals that inhabit this enclosure on rotation or permanently."

This change has been made and is reflected in the Area Plan (Attachment 21) and the Animal Inventory (Attachment 20).

Relevant Attachments

- Attachment 20: Animal Inventory and Locations
- Attachment 21: Area Plan

**Lodi Township- Item Fifty-One
Copper Leaf Crossing**

OHM Memo Information- "Site Elements.. Not clear if extends into required 30-foot transition buffer. Confirm location on the area."

Request- "Update area plan to include transition buffer. Include measurements from transition buffer to enclosures."

The Creature Conservancy would like to seek a variance to allow these structures to remain in their current location. The reasoning behind the positioning of these enclosures is to utilize the shade provided by the trees that straddle the property line.

We have communicated with both neighbors sharing the adjoining property, and they are in support of the variance. If required by the township, they would be happy to provide letters of support for a variance.

**Lodi Township- Item Fifty-Three
Copper Leaf Crossing**

OHM Memo Information- "Site Elements...9&10 appear to be area where well was previously labeled. Show all well and septic".

Request- "Update the area plan to include all well/septic"

The location of the septic field is noted for building M. The complex agricultural and domestic waste field locations have not changed from the original site plans the township has on file.

The smaller agricultural waste field is in the same location, and size as on the original site plan. The domestic waste field has increased in size by one third, and remains essentially in the same location. The slight changes to the fields will be updated on the next set of plans.

Relevant Attachments

- Attachment 21: Area Plan
- Attachment 30: Wastewater Systems Letter

**Lodi Township- Item Fifty-Four
Copper Leaf Crossing**

OHM Memo Information- "Site Elements...The supplemental materials indicate this is an enclosure with temporary fencing and is not intended for animals to live in, but serves as an enrichment area. What type of fence and animals use this area."

Request- " Provide information on what types of animals inhabit this enclosure and what type of fence is surrounding it".

Site Element 11 is a temporary animal enclosure constructed with 6ft portable fencing panels. This is primarily used as a holding station for animals while their enclosures are being deep-cleaned. Please reference the animal inventory (Attachment 20) for documentation regarding what animals utilize this enclosure.

Relevant Attachments

- Attachment 20: Animal Inventory and Locations
- Attachment 21: Area Plan

**Lodi Township- Item Fifty-Six
Copper Leaf Crossing**

OHM Memo Information- "Site Elements... Does not appear to provide 30-foot transition buffer; detention pond in the middle of animal enclosure. The applicant should provide more detail. The supplemental information states this area is for emus and black swans."

Request- Update the area plan to include transition buffers. Include all animals that inhabit this area on a rotation or permanently.

The animals that inhabit this enclosure are detailed in the animal inventory (Attachment 20).

The Conservancy recognizes that Site Element 24, the emu hut, is currently within the 30-foot transition buffer. This structure is semi-mobile, and we can move it outside of the transition buffer.

Relevant Attachment

- Attachment 20: Animal Inventory and Locations
- Attachment 21: Area Plan

**Lodi Township- Item Fifty-Seven
Copper Leaf Crossing**

OHM Memo Information- "Site Elements ... Shows existing shelters with enclosure. Does not appear to provide 30-foot transition buffer. It should be noted a minor site plan approval for canine fencing area was previously granted. Provide measurement on the Area Plan from the transition buffer to the canine shelters."

Request- Update area plan to include transition buffers and measurements from transition buffers to canine shelters.

The distances between these structures and the adjoining property line have been measured by Conservancy staff to confirm they do not impede the transition buffer. These measurements can be viewed in Attachment 25.

Relevant Attachments

- Attachment 25: Canine Shelter Measurements

**Lodi Township- Item Fifty-Eight
Copper Leaf Crossing**

OHM Memo Information- "Site Elements... 8-foot fence indicated. Applicant should clarify need for increased height. The supplemental information indicates this area houses the cougar currently, which requires 8-foot fencing per USDA. Please provide the evidence the township approved this 8ft plus all permit up to completion."

Request- For the 8ft fence for the cougar..provide documentation the township approved/signed off along with all permits obtained for construction including approve inspections and final approval.

The cougar fence consists of 7ft modular horse stall panels with top fencing approved and inspected annually by the USDA.

<https://www.behlencountry.com/products/modular-horse-stalls>

**Lodi Township- Item Fifty-Nine
Copper Leaf Crossing**

OHM Memo Information- "Site Elements... Item 36 is listed in the key, but does not appear to be shown or labeled on the plans. The supplemental information indicates this was originally a horse stable but is now an area for other animals and is currently porcupines. Please show on area plan."

Request- Please update area plan to reflect animals that inhabit this area on a rotation or permanently.

This has been updated and can be viewed in the most recent area plan (Attachment 21).

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Sixty
Copper Leaf Crossing**

OHM Memo Information- "Site Elements....It is not clear if enclosures and fencing meet 30-foot transition buffer. The supplemental information provided indicates these areas have not yet been constructed. Are you moving forward with these enclosures? If Yes, provide information."

Request- Provide information if these are plans to move forward with these animal enclosures. Type of animals targeted to rotationally or permanently inhabit these enclosures. Details to related to construction of the enclosures.

Site Element 47 will be a fully enclosed raptor enclosure designed to house our pair of rescued Bald Eagles, Quinn and Zuni. We still fully intend to build this enclosure, but are currently unable to provide a specific timeline for this project.

Additionally, The Creature Conservancy still intends to build proposed Site Elements 45 and 46. Site Element 46, as referenced in item ten, will be a canine enclosure, similar to Site Element 29. This enclosure will be added to the canine rotation and used to house Harry, our wolf-dog hybrid, at night. This enclosure will be constructed with 8ft fencing, identical to the materials used in Site Element 29.

The Creature Conservancy does not currently have a plan for the development of Site Element 45, but wishes to keep this element in our area plan, as we still intend to build this enclosure.

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Sixty-One
Copper Leaf Crossing**

OHM Memo Information- "Site Elements.... It should also be noted that a large part of the rear of the site (adjacent to items 29, 45, and 46) appears to be enclosed, presumably with fencing (thick black line, outlining the area)."

Request- Update area plan to clearly show all fencing and fence height for each.

This has been updated and can be viewed in the most recent area plan (Attachment 21).

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Sixty-Two
Copper Leaf Crossing**

OHM Memo Information- "Section 42.110 Required Area Plan information outlines the information this is required to be included in an area plan, as applicable and as determined by the Planning Commission. It should be noted the following required information is not provided within the area plans. The Planning Commission should review and determine if the item of information is not applicable or necessary for review."

Request- Update area plan to include all required elements as listed in section 6 a-i.

Copper Leaf Crossing requests that this question be reworded and clarified by the Planning Commission before we attempt to answer this question. What is "section 6 a-i" in reference to?

**Lodi Township- Item Sixty-Three
Copper Leaf Crossing**

OHM Memo Information- "Parking.... Parking calculations are not included within the plans... The applicant should provide additional information for Planning Commission and Township Board review showing that parking is sufficient for the operation. Please provide the parking calculation."

Request- Provide parking calculations.

Parking calculations have been added to the updated area plan (Attachment 21).

Relevant Attachments

- Attachment 21: Area Plan

**Lodi Township- Item Sixty-Four
Copper Leaf Crossing**

OHM Memo Information- "Parking... overflow parking: The applicant has since provided supplemental information stating that these buildings are not intended to be constructed, and the overflow parking is permanent. However, is also states that they were left on the plans in case future needs change. The applicant should provide clear direction on if the parking is permanent or not."

Request- Provide clear information if this overflow parking is permanent.

We have labeled this parking as temporary, but intend to convert it to a permanent lot in the future. We started the process to make it permanent in 2017, but that process was never completed because the township's previous engineer, Donald Pennington, retired, the pandemic began, and the ball was dropped.

**Lodi Township- Item Sixty-Five
Copper Leaf Crossing**

OHM Memo Information- "Parking Surface Materials. The overflow parking appears to be gravel surface and does not appear to have been approved as such. The supplemental materials provided by the applicant indicate this parking area are required to be paved. The Township may consider approval of the alternative surface of the parking if it is intended to be temporary, however, the information provided indicates it is likely intended to be permanent parking."

Request- Provide clear information if this overflow parking is permanent.

We have labeled this parking as temporary, but intend to convert it to a permanent lot in the future. We started the process to make it permanent in 2017, but that process was never completed because the township's previous engineer, Donald Pennington, retired, the pandemic began, and the ball was dropped.

**Lodi Township- Item Sixty-Six
Copper Leaf Crossing**

OHM Memo Information- "Parking... Barrier-Free Parking. The area plan shows a total of 77 parking spaces include all parking areas. The main parking lot (W) shows 47 parking spaces which includes 2 barrier-free parking spaces; this meets the requirement for the individual lot. It should be noted that the employee parking (X) and the overflow lot do not provide any barrier-free parking."

Request- Provide parking calculations and if overflow parking is permanent.

Parking calculations have been added to the updated area plan, and proposed barrier free parking is now shown in parking lot X (Attachment 21).

Relevant Attachments

- Attachment 21: Area Plan