

12950 Sharon Hollow Rd. (Parcel Number: P -16-21-300-016)(“the Shore Parcel”). A map depicting the Island and the Shore Parcel is attached as Exhibit E.

3. Upon information and belief, Ashkay Island, LLC is a Michigan limited liability company with a registered office located at 17034 Walkowe Lane, Manchester Township, MI. Upon information and belief, Ashkay Island is owned by Andrew Bobo.

4. Manchester Township has adopted various ordinances, as specifically addressed herein, and as posted on the official Manchester Township website (generally, “Ordinances”), including Ordinance No. 42 (“Zoning Ordinance”) under the authority of the Michigan Zoning Enabling Act, being Act 110 of Michigan Public Acts of 2006, as amended (“Zoning Act”).

5. Plaintiff’s Complaint against Defendant complains of violations of Ordinances with regard to structures on the Island and as to the Shore Parcel.

6. Pursuant to MCL 125.3407 of the Zoning Act, this Court has jurisdiction over claims arising from and related to the use of land, and structures, inclusive of docks and buildings, which are used, erected, altered, or converted in a manner violating a zoning ordinance, with each violation being deemed a nuisance per se.

7. Upon a finding of each violation of a zoning ordinance, this Court must abate each nuisance per se and hold the owner of the land, building, and/or structure liable for each nuisance per se.

8. Andrew and Nicole Bobo purchased the Island in 2013. Upon information and belief, in 2014 the Bobos transferred the Island to Defendant.

9. On or about July 2, 2014, Andrew Bobo submitted a Zoning Compliance Application and Certificate to Manchester Township. (Ex. A) In the application, Mr. Bobo represented that he proposed to build a “snl fam dwelling with attached garage.”

10. Manchester Township zoning official Carl Macomber granted the application on or about July 2, 2014. (Ex. A) Sections of the approval calling for for citation to ordinance sections justifying the approval were left blank.

11. Thereafter, Mr. Bobo applied for a building permit from the Western Washtenaw Construction Authority (“WWCA”) which was granted in December 2014. The WWCA is the regional body for Freedom, Bridgewater and Manchester Townships, and the Village of Manchester that acts as the permitting and enforcing agency for building activities and soil erosion/sedimentation control. It is responsible for building and trade permits, and corresponding inspections.

12. In the permit application, Mr. Bobo represented that he was constructing a “seasonal use cabin” for “residential season use.” The structure on the permit was described (as well as on the zoning application) as a structure measuring 32’ x 32’ and accounting for 1700 sq. feet.

13. Mr. Bobo then proceeded to build two structures relevant to these proceedings on the Island: a two-story home and a structure he refers to as the “treehouse” which in fact is a large structure with a deck. Pictures are attached as Ex. B.

14. Defendant received a certificate of occupancy for the house on the Island from the Township.

15. Defendant did not, before building the treehouse and deck, request or obtain a building or other necessary permits from the WWCA or submit a zoning application to Manchester Township.

16. The treehouse was equipped with beds and/or sleeping mats and intended to house people to sleep in.

17. Contrary to the representations made to the Township and the WWCA, Defendant always intended to use the Island structures for guest-rental activities. Defendant admitted this in its public ads for the Island and on Defendant's website (e.g., "From the beginning we planned on creating a vacation rental home where families of all ages could get away and relax. We adopted the slogan, 'Yes, we rented our own island.'").

18. The home on the Island constructed by the Defendant includes propane storage tanks and 24 lead-acid batteries used to store energy from a solar power array.

19. Beginning in approximately 2016, Defendant began advertising the Island for short-term rentals.

20. As part of those advertisements, Defendant represented that upwards of 12 people could stay on the Island sleeping in both the house and the treehouse. (See, e.g., <https://www.ashkayisland.com/news/article/island-luxury-without-leaving-town> ("the cottage was designed from the ground up in a master bedroom and loft design that includes three Amish-made queen beds, one full bed, two singles, and floor mats for sleeping up to twelve.") The Island was marketed towards families including small children. (See, e.g., <https://www.ashkayisland.com>). Based on the number of beds listed in the ads, upwards of 17 people could sleep in the home and treehouse.

21. In 2017, the Township and surrounding property owners asserted that Defendant's rental activities violated the Zoning Ordinance. The Court of Appeals agreed and Defendant was enjoined from renting the home by Order of the Circuit Court (on remand) entered May 12, 2021.

22. In 2017, Defendant filed a zoning application for the treehouse with Manchester Township but it was denied "because the request violates the zoning ordinance for multiple reasons including the lack of necessary access and because it is an expansion of an illegal use." (Ex. C)

23. As a result, the WWCA never issued permits for either the deck or the treehouse.

24. The Ordinances contain multiple provisions designed to ensure the safety of people visiting structures built within the Township as well as the rights of Manchester Township citizens to enjoy their land consistent with the Ordinances. To that end, the Ordinances require adequate access for fire and police and adequate fire safety measures, as detailed below.

25. The Ordinances dictate that any action by the zoning official in violation of the Ordinances is "unlawful." Zoning Ordinance article 18.03(B) provides in part:

- C. It shall be unlawful for the Zoning Administrator to approve plans or issue a permit of zoning compliance permit until he has inspected such plans and specifications in detail and found them to conform with this Ordinance.
- D. The Zoning Administrator, under no circumstances, is permitted to make changes to this Ordinance, nor to vary the terms of this Ordinance, in carrying out his duties as Zoning Administrator.

26. Similar provisions exist in Zoning Ordinance article 18.04 for the building inspector and issuance of permits.

27. The Zoning Ordinance also specifies that no structure may be constructed absent compliance with the Zoning Ordinance. Zoning Ordinance article 3.10 provides as follows in pertinent part:

SECTION 3.10 - APPLICATION OF REGULATIONS

No structure shall be constructed, erected, placed or maintained and no use shall be commended or continued within Manchester Township except as specifically, or by necessary implication, authorized by this ordinance, in the zoning district in which said structure or use is to be located.

28. As a necessary result, any structure built or used in violation of the Zoning Ordinance “shall be deemed an unlawful structure” and cannot be “used or occupied.” Zoning Ordinance article 3.13 provides as follows:

SECTION 3.13 - UNLAWFUL BUILDINGS, STRUCTURES, SITE DESIGNS, AND USES

A building, structure, or use which was not lawfully existing at the time of adoption of this ordinance shall not become or be made lawful solely by reason of the adoption of this ordinance. In case any building, or part thereof, is used, erected, occupied or altered contrary to law or the provisions of this ordinance, such building shall be deemed as unlawful structure and a nuisance and may be required to be vacated, torn down or abated by any legal means, and shall not be used or occupied until it has been made to conform to the provisions of this ordinance. Public expenditures toward abating any such nuisance shall become a lien upon the land.

29. Similarly, the Zoning Ordinance provides for voiding of the certificate of occupancy for unlawful uses. Zoning Ordinance article 18.07 provides:

SECTION 18.07 - VOIDING OF CERTIFICATE OF OCCUPANCY

Any certificate of occupancy granted under this Ordinance shall become null and void if such use(s), buildings and/or structures for which- said certificate was issued are found by the Building Inspector to be in violation of this Ordinance. The Building Inspector upon finding such violation shall immediately notify the Township Board of said violation and voiding of the certificate of occupancy.

30. The Zoning Ordinance proclaims that unlawful structures are a nuisance per se and grants standing to Plaintiff for, inter alia, mandamus and abatement. Zoning Ordinance article 18.09 provides:

SECTION 18.09 - VIOLATIONS AND PENALTIES; NUISANCE PER SE; ABATEMENT

Any building or structure including tents, travel trailers, and mobile homes, which are erected, constructed, reconstructed, altered, converted, maintained or used, or any use of land or premise which is begun, maintained, or changed in violation of any provision of this Ordinance, are hereby declared to be a nuisance per se. Any person, firm, or corporation or the agent in charge of such building or land who violates, disobeys, omits, neglects or refuses to comply with, or resists the enforcement of any provision of this Ordinance or any amendment thereof, shall be fined upon conviction not more than five hundred (500) dollars, together with the costs of prosecution, or shall be punished by imprisonment in the county jail for not more than ninety (90) days for each offense, or may be both fined and imprisoned as provided herein. Each and every day during which any illegal construction, reconstruction, alteration, maintenance or use continues shall be deemed a separate offense. The Township Board, the Township Zoning Administrator, the Township Building Inspector, the Board of Appeals, the Attorney of the Township, or any owner or owners of real estate within the district in which such building, structure or land is situated may institute injunction, mandamus, abatement or any other appropriate action or actions, proceeding or proceedings to prevent, enjoin, abate, or remove any said unlawful construction, maintenance or use. The rights and remedies provided herein are cumulative and in addition to all other remedies provided by law.

31. With regard to access to the property for fire and safety purposes, the structures on the Island violate the Ordinances. Zoning Ordinance article 3.26(A) provides as follows:

SECTION 3.26 - ACCESS TO STREETS

A Streets

1. In any zoning district every use, building or structure established after February 21, 1998, shall be on a lot or parcel that adjoins a public road, private road, or multiple residence driveway that complies with Manchester Township Board standards for multiple residence driveways and residential private roads except as provided in Section 3.26 A. 8. below.
2. When a proposed building structure is not serviced by an approved driveway, multiple residence driveway, private road, or is not serviced by a dedicated public road, the Township Zoning Administrator shall not issue a Zoning Compliance Permit for the proposed structure.
3. Two (2) or more contiguous parcels of commercially zoned land that are developed as a shopping center, may share a driveway easement, said easement being a minimum of twenty-four (24) feet wide and paved with asphalt or cement concrete. When such driveway easements are shared, such easement shall be included in determining and computing lot width as such is defined herein.
4. Every building and structure constructed or relocated after the effective date of adoption of this Ordinance shall be so located on lots as to provide safe and convenient access for fire protection vehicles and required off street parking and loading zones.

32. The structures on the Island are not serviced by an approved driveway or road, in violation of subsection (2).

33. The structures on the Island do not provide safe and convenient access for fire protection vehicles, in violation of subsection (4).

34. Similarly, Article 3.26(B) provides in pertinent part as follows:

B. Driveways

1. Any building constructed or relocated more than 60 feet from a public or private street shall first provide a driveway for vehicle access. Such driveway shall be constructed or installed prior to inspection of foundation footings and shall meet the following standards:

35. There is no driveway for vehicle access on the Island, in violation of the ordinance.

36. Similarly, Ordinance No 53 was based upon the finding that “unobstructed, safe, and continuous access to lots is necessary to promote and protect the health, safety, and welfare of the public through police and fire protection, and ambulance service. Such access is necessary to insure that such services can safely and quickly enter and exit private property at all times.”

37. To that end, Ordinance No. 53 section C requires that each lot improved with a building must have access for ingress and egress for all vehicular traffic including fire police, and ambulance services and vehicles....”

38. Ordinance No. 53 section E requires an application to the zoning administrator. The zoning administrator “shall consider the application and all relevant information including Fire Marshall approval” before granting the application.

39. The Island does not comply with Ordinance No. 53 and, upon information and belief, Defendant never submitted an application nor obtained fire marshall approval before the zoning application was approved. Under section K of the Ordinance, as well as the above-cited provisions of the Zoning Ordinance, the structures on the Island are thus a nuisance per se.

40. The Island's lack of access and driveways also violates Ordinance No. 23 as amended by Ordinance No. 26.

41. Defendant has known about his violation of these various ordinances from the beginning. Indeed, in 2017, when the Township denied Defendant a permit for the treehouse, the Township advised Defendant that the permit was being denied due to "lack of necessary access." (Ex. C) That same lack of access applies to the entirety of the Island and is a clear statement by the Township that the Island structures – including the house and the treehouse – are unlawful and in violation of the Ordinances.

42. It is also obvious that the goal of these various ordinances – access for police, fire and ambulances – is frustrated by virtue of Defendant's unlawful structures. In 2017, the Manchester Township Fire Department developed a "response policy" apparently at the request of the Manchester township board. The policy (Ex. D) makes clear that there are massive challenges attempting to access the Island; that persons requiring assistance on the Island would face long delays and perhaps never receive help; and that a fire on the Island would be permitted to just burn, including the propane tanks and batteries stored on the Island, thus creating a toxic threat to the environment and the destruction of the habitat on the Island which every landowner around the lake sees and enjoys (at least before Defendant unlawfully built upon it).

43. With regard to those propane tanks and batteries, Zoning Ordinance article 16.02(A) provides:

SECTION 16.02 - PERFORMANCE STANDARDS

No parcel, lot, building or structure in any district shall be used or occupied in any manner so as to create any dangerous, injurious, noxious or otherwise objectionable element or condition so as to adversely affect the surrounding area or adjoining premises provided that any use permitted by this ordinance may be undertaken and maintained if acceptable measures and safeguards are employed to limit dangerous and objectionable elements to acceptable limits as established by the following performance requirements:

A. FIRE HAZARD

Any activity involving the use or storage of flammable or explosive materials shall be protected by adequate fire fighting and fire suppression equipment and by such safety devices as are normally used in the handling of any such material. Such hazards shall be kept removed from adjacent activities to a distance which is compatible with the potential danger involved.

44. Upon information and belief, there is no fire fighting and fire suppression equipment on the Island nor any other safety devices normally used in the handling of such materials, especially in connection with structures designed to house 12-17 people.

45. Moreover, the totality of factors stated herein mean that the Island creates a dangerous condition that adversely affects the surrounding area. The Island is only apx. 200 feet from shore and in a pristine, natural area prized by its other landowners. A fire on the Island, or a toxic spill of Defendant's materials in to the waterways or on the soil, would dramatically and detrimentally affect the Plaintiff's other landowner's property values and rights to quiet enjoyment of their property, and any such event on the Island, given the proximity to shore, could easily spread to other parcels directly.

46. Ordinance No. 88 defines a "dangerous building" and provides for abatement and destruction of same. The structures on the Island constitute a "dangerous building."

47. Upon information and belief, the generator used on the Island also violates the Ordinances and was installed without a permit.

48. The treehouse is additionally in violation of the Ordinances, aside from the fact that it was built without any of the necessary permits.

49. The treehouse was built in violation of the Zoning Ordinance article 5.04 as violating certain required setbacks. This violation has never been corrected.

50. The treehouse was built in violation of the Zoning Ordinance section 2.03 which prohibits the use of an accessory structure for “residential or lodging purposes or sleeping quarters for human beings.”

51. Additionally, the Treehouse constitutes a “Guest House,” as defined by Section 2.03 as “[a]n accessory building intended for temporary or periodic use as an auxiliary sleeping facility, but which does not have kitchen facilities, and is not intended to be used as a permanent residence.”

52. The Township has confirmed that the treehouse and deck remain in violation of the Zoning Ordinance and that there were no permits issued for the generator and treehouse. The Township has demanded that these issues be corrected prior to any occupancy. (See Email from Township Supervisor Ron Milkey to Mr. Bobo, May 17, 2021.) Yet, those issues have not been corrected and Mr. Bobo, his family and (upon information and belief) others continue to periodically reside on the Island.

53. Defendant is also in violation of the Ordinances with regard to the Shore Parcel.

54. When Defendant bought the Island, it also obtained an easement from a landowner, Mr. Whiteman, on the shore which would permit the parking of vehicles and would include a boat dock. The Whiteman property was marked with a sign reflecting the Whiteman street address obtained, upon information and belief, from the Manchester Township fire department. It was that property which was evaluated in 2017 by the Manchester Fire Department as a launch point for any emergency personnel needed for the Island.

55. Sometime thereafter, Defendant purchased the Shore Parcel. This Parcel is much smaller than the Whiteman parcel. Defendant moved the sign from the Whiteman parcel to the Shore Parcel without Township authorization or review.

56. Parking vehicles at the Shore Parcel violates Zoning Ordinance Article 13.01. Upon information and belief, no application was filed with the Zoning Administrator as required by subsection (A), and the parking could not be approved because the spots are more than 150 feet from the principal building (i.e., the Island). Parking on the Shore Parcel also violates subsections (D) and/or (F)(2) and (5). Based upon mandatory setbacks in the Zoning Ordinance there is, based upon information and belief, no room for cars to park on the Shore Parcel.

57. Plaintiff has suffered, and continues to suffer damages, in excess of \$25,000.00.

COUNT I

NUISANCE PER SE

58. Plaintiff incorporates the above paragraphs as though more fully set forth herein.

59. Defendant's use of the subject properties, as more specifically set forth in this Complaint, violate the Zoning Ordinance and constitutes a nuisance per se, in violation of MCL 125.3407.

60. Pursuant to MCL 125.3407, Defendant, as owner of the subject properties, is liable to Plaintiff for the damages and injuries suffered by Plaintiff.

61. The fact that Defendant constructed the house on the Island in reliance on an issued building permit does not deprive Plaintiff of his right to equitable relief where the issuance of the permit was in violation of the Zoning Ordinance.

62. Plaintiff is not required to show the existence of a nuisance in fact or irreparable harm resulting from the maintenance of the nuisance.

63. Pursuant to MCL 125.3407, this Court must order that Defendant's violations of the Zoning Ordinance be abated and enjoined.

WHEREFORE, Plaintiff prays that this Honorable Court grant the following relief:

- A. Declare and adjudge Defendant's violations of the Zoning Ordinance and thereupon issue such preliminary and permanent orders and judgments abating and enjoining Defendant's violations of the Zoning Ordinance, as set forth in this Complaint, including without limitation an order requiring a tear down of the structures on the Island and an injunction against future use or habitation of the structures on the Island or use of the Shore Parcel for parking.
- B. Grant and award Plaintiff damages so wrongfully incurred caused by Defendant's violations of the Zoning Ordinance, as set forth in the Complaint.
- C. Grant Plaintiff such further and other relief as may be equitable and just.
- D. Grant Plaintiff attorney fees and cost so wrongfully incurred.

COUNT II

PRIVATE NUISANCE

64. Plaintiff incorporates the above paragraphs of this Complaint as though more fully set forth herein.

65. That Defendant's use and development of the subject properties constitutes a private nuisance and have, and will, continue to cause injury and damage to Plaintiff and his property.

WHEREFORE, Plaintiff prays that this Honorable Court grant the following relief:

EXHIBIT A

MANCHESTER TOWNSHIP

Major Issues To Be Dealt With In The Growth Management Plan Update

PERMIT NO. 16

ZONING COMPLIANCE APPLICATION AND CERTIFICATE

I. APPLICANT/OWNER/CONTRACTOR INFORMATION		Applicant is: <input type="checkbox"/> OWNER <input type="checkbox"/> CONTRACTOR	
APPLICANT NAME <i>Andrew Bobo</i>	OWNER NAME (if NOT applicant) Building permit data. Building permit data collected by:		
COMPANY	COMPANY		
ADDRESS <i>17034 Walker Ln</i>	ADDRESS		
CITY/ZIP <i>Manchester, VT 05201</i>	PHONE <i>732-2138</i>	CITY/ZIP	PHONE

II. SITE INFORMATION				
ADDRESS <i>15050 Sherway Hollow</i>	CITY/ZIP <i>Manchester</i>	NEAREST INTERSECTING ROADS	LOTSIZE/ACREAGE	ZONED
PROPERTY TAX ID # <i>16-29-100-033</i>	OTHER EXISTING BUILDINGS	DISTANCES TO OTHER BUILDINGS:		
DRIVEWAY PERMIT #	SEWAGE PERMIT #	WELL PERMIT #	SOIL EROSION PERMIT #	
SETBACKS:				

III. STRUCTURE/USE INFORMATION <input type="checkbox"/> NEW STRUCTURE FOOTPRINT <input type="checkbox"/> NO FOOTPRINT CHANGE			
<input checked="" type="checkbox"/> NEW <input type="checkbox"/> ADDITION	<input checked="" type="checkbox"/> PRINCIPAL <input type="checkbox"/> ACCESSORY	BEDROOMS-	BATHS-
<input type="checkbox"/> SNGL FAM DWELLING with attached garage		DIMENSIONS: <i>32x32'</i>	
<input type="checkbox"/> OTHER (describe)			

- IV. REQUIRED ATTACHMENTS FOR NEW FOOTPRINT Initial & date all attachments, north arrow & scale on drawings
- SITE PLAN (show property dimensions, all buildings, distances to property lines from all sides of new structure)
 - PROOF OF OWNERSHIP (mortgage, deed, land contract, abstract NOTE: Tax bill is NOT proof of ownership)
Liber & Page of Register of Deeds registration if copy not attached
 - LEGAL DESCRIPTION (copy of tax bill if copy of Proof of Ownership not attached NOTE: tax bill NOT proof of ownership)

V. APPLICANT SIGNATURES - Signing this application affirms the accuracy of its contents & attachments.
Signature grants property access permission to Township for required inspections.

Applicant	owner (if NOT applicant--letter of consent may be substituted)

ZONING OFFICE USE ONLY:	ZONING FEE PAID AMOUNT: \$ <i>100.00</i>	RECEIPT # <i>1004</i>
<input checked="" type="checkbox"/> PERMIT GRANTED	AUTHORITY, ORDINANCE SECTION #(s)	
<input type="checkbox"/> PERMIT DENIED	REASON, ORDINANCE SECTION #(s)	
REFERRED TO: <i>WVCA</i>	FOR: <i>Building permit</i>	
ZONING ADMINISTRATOR SIGNATURE: <i>Carl Macomber</i>	DATE: <i>7-2-14</i>	

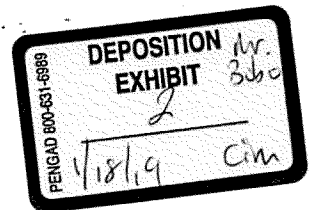


EXHIBIT B



HOUSE



“TREEHOUSE”

EXHIBIT C

TOWNSHIP OF MANCHESTER

Post Office Box 668
275 South Macomb St.
Manchester, Michigan 48158
(734) 428-7090

November 15, 2017

Andy Bobo
13150 Sharon Hollow Rd.
Manchester, MI 48158

Re: AshKay Island – treehouse and deck zoning denial

To Whom It May Concern,

This letter is to inform you that the Zoning Compliance for the treehouse and deck on AshKay Island has been denied. The zoning request was denied because the request violates the zoning ordinance for multiple reasons including the lack of necessary access and because it is an expansion of an illegal use.

Sincerely,

Carl Macomber
Manchester Township
Zoning Administrator

EXHIBIT D

MANCHESTER TOWNSHIP FIRE DEPARTMENT



10/04/17

Manchester Township Board

Dear Board Members,

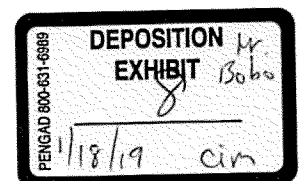
The Manchester Township Fire Department has developed a response policy for Ashkay Island. Due to the property location on an island, and our only access is by a civilian owned boat, this will affect the safety of the firefighters and a patient of an emergency on the island. Additional response time will be required as personnel and needed equipment will have to be loaded onto a boat and transported to the island location. The fire department does not have a boat in our fleet, so we will need to use the property owner's boat if available. A non-department boat will not receive the same monthly inspections that our apparatus receives, so we will not know the condition of the boat prior to arrival. A training took place to associate the membership with operation of the boat, but trained members may not be available for the call, so this will add to delays in service, and to the safety of the responders.

During a recent visit, cell phone signals were weak during a clear day. Weather conditions may change this causing communication difficulties from the island. Cell phones are the only means of communication from the island, and a poor signal will delay starting the emergency response system.

When dispatched to a medical emergency we will refer to policy #232 – attached. Additional hazards encountered, due to the location, may potentially delay needed vital patient care. Traveling across the lake, weather conditions, and time of day will add additional, firefighter and patient, life safety issues. The noted obstacles will add to the response time to the patient, but we will still be able to deliver the same emergency care that we provided to all other patients once we arrive at the patient.

Due to the lack of fire suppression in the home, and on the island, the Manchester Township Fire Department, or any responding mutual aid companies will not initiate any type of fire suppression on the structure. We will attempt to access the island to check for occupants that are out of the structures, but we cannot risk the life of a firefighter by sending them into a burning building to search for victims without the protection of hose lines. The incident commander will determine our actions after conducting a size up of the building. A wildland fire on the island will receive the same size up by the incident commander to determine suppression actions. Fire suppression actions are also part of policy #232.

William J. Scully, Fire Chief
Manchester Township Fire Department



Manchester Township Fire Department

Policy: Response to Ashkay Island

Policy#232

I. Purpose:

- a. Direct a safe response to the Island resort.

II. Procedure:

- a. The island resort is only accessible by a civilian boat. Responses to the island resort creates unique firefighter safety issues that will require a Safety Officer for each incident.

III. Medical Emergencies:

- a. The Pt may be located at the parking area on Sharon Hollow Rd prior to our arrival.
- b. If the Pt is still located at the resort the following will strictly be followed for firefighter safety
 - i. The Incident Commander and Safety Officer positions will be filled immediately
 - ii. The Safety Officer will conduct a pre-trip inspection of the boat prior to boarding.
 - iii. The IC will assign an operator to pilot the boat to and from the island.
 - iv. The IC will contact Dispatch to obtain the ETA of the ALS crew, and determine if we will wait for the ALS crew, or travel to the island and send the boat back for the ALS crew.
 - v. All personnel will wear approved PFD's when not on land – including the Pt.
 - vi. A stokes basket will be needed for Pt transport in addition to the normal EMS equipment.
 - vii. Personnel will remain seated while the boat is in motion, unless Pt care requires movement for supplies.
 - viii. The boat operator will maintain a safe speed on the water, weather, fog and darkness will require reduced speeds, and may require an indirect route to the island dock
 - ix. The island dock is located on the northeast side of the island; the boat may also be grounded onto shore in another location as required.
 - x. If the Pt requires transport and they cannot walk to the boat, they will be transported in the stokes basket to and from the boat. The stokes basket cannot be secured in the boat, so it will be laid between the forward bench seats.

IV. Fire Emergencies

- a. Structure Fire
 - i. Firefighter and civilian safety are the top priorities
 - ii. No structural fire suppression activities will be attempted by the Manchester Township Fire Department, or any additional responding fire companies
 - iii. The IC can order a fire crew to the island for further investigation of conditions
 - iv. The Safety Officer will conduct a pre-trip inspection of the boat prior to boarding.

Manchester Township Fire Department

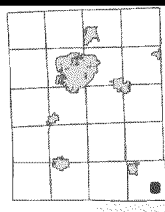
- v. The IC will assign an operator to pilot the boat to and from the island
 - vi. All personnel will wear approved PFD's when not on land
 - vii. Equipment and tools will need to be transported to the island on the boat
 - viii. If a report of a civilian trapped in the structure, the IC will determine if a safe rescue can be attempted
- b. Wild Land Fire
- i. Firefighter and civilian safety are the top priorities
 - ii. The Safety Officer will conduct a pre-trip inspection of the boat prior to boarding.
 - iii. The IC will assign an operator to pilot the boat to and from the island
 - iv. All personnel will wear approved PFD's when not on land
 - v. Equipment and tools will need to be transported to the island on the boat
 - vi. The IC will direct fire suppression activities based on available equipment and personnel and fire conditions
 - vii. Refer to Policy 221
- c. Vehicle or Boat Fire
- i. A vehicle or boat located at the Sharon Hollow Rd location – refer to policy 218
 - ii. A vehicle or boat located on the island
 - 1. Firefighter and civilian safety are the top priorities
 - 2. The Safety Officer will conduct a pre-trip inspection of the boat prior to boarding.
 - 3. The IC will assign an operator to pilot the boat to and from the island
 - 4. All personnel will wear approved PFD's when not on land
 - 5. Equipment and tools will need to be transported to the island on the boat
 - 6. The IC will direct fire suppression activities based on available equipment and personnel and fire conditions

V. Additional Hazards

- a. Storage batteries
 - i. The shed next to the main home structure contains the electrical panel for the home and 24 lead acid storage batteries
- b. Solar Panels
 - i. Solar panels will continue to produce electricity at any given time. Shut off boxes are located on the west side of the home, north of the main entrance. The boxes need to be shut off if possible during a fire emergency
- c. Gas storage
 - i. LPG storage tanks are located on the east side of the home. The tanks need to be shut off if possible during a fire emergency

AUTHORIZED BY: William J. Scully
TITLE: Fire Chief DATE:

EXHIBIT E



Legend

- Simultaneous Conveyance
- Lot and Units
- Quarter Sections
- Sections
- University and College
- K12 Schools
- Police Stations
- Fire Stations
- County Buildings
- Local Unit Offices
- Lakes
- Streams
- Railroad
- Close Roads OneWay
- To-From
- From-To
- Road Centerlines_4K
- <all other values>
- Collector
- Freeway
- Highway
- Local
- Major Arterial
- Minor Arterial
- Ramp

THIS MAP REPRESENTS PARCELS AT THE TIME OF PRINTING. THE INFORMATION SHOWN HERE IS MAINTAINED SOLELY BY THE WASHINGTON COUNTY EQUALIZATION DEPARTMENT AND THE WASHINGTON COUNTY TAX COLLECTOR. THE INFORMATION CONTAINED IN THIS CADASTRAL MAP IS USED TO LOCATE, IDENTIFY AND INVENTORY PARCELS OF LAND IN WASHINGTON COUNTY FOR APPRAISAL AND TAXATION PURPOSES AND IS NOT TO BE CONSIDERED AS A "SURVEY DESCRIPTION". THE INFORMATION IS PROVIDED WITH THE UNDERSTANDING THAT THE CONCLUSIONS AND OPINIONS OF THE EQUALIZATION DEPARTMENT AND THE TAX COLLECTOR ARE SOLELY THE RESPONSIBILITY OF THE USER. ANY ASSUMPTION OF LEGAL STATUS OF THIS DATA IS HEREBY DISCLAIMED.

NOTE: Parcels may not be to scale.

Notes

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

