

General Purposes Committee

Anderson Room, City Hall 6911 No. 3 Road Monday, October 17, 2016 4:00 p.m.

Pg. # ITEM

MINUTES

GP-5 Motion to adopt the minutes of the meeting of the Special General Purposes Committee held on October 11, 2016.

FINANCE AND CORPORATE SERVICES DIVISION

1. APPLICATION FOR A NEW LIQUOR PRIMARY LIQUOR LICENCE – TOP CUP COFFEE LTD., 6031 BLUNDELL ROAD (File Ref. No. 12-8275-30-062) (REDMS No. 5173863)

GP-8 See Page GP-8 for full report

See I age GI -0 for full report

Designated Speaker: Carli Edwards

STAFF RECOMMENDATION

- (1) That the application from Top Cup Coffee Ltd., doing business as, Top Cup, for a new Liquor Primary Licence to operate a Neighborhood Public House, be supported only for:
 - (a) A Neighborhood Public House with an indoor & patio seating and standing capacity of 70 patrons;
 - (b) Liquor service hours for Sunday to Thursday, from 9:00 a.m. to 12:00 a.m., and Friday and Saturday, From 9:00 a.m. to 1:00 a.m.; and

- (c) Family Foodservice to permit minors in all licensed areas until 10:00 p.m. when accompanied by a parent or guardian;
- (2) That a letter be sent to the Liquor Control and Licensing Branch advising that:
 - (a) Council supports the amended conditions as listed above, for a new Liquor Primary Liquor Licence as the issuance will not pose a significant impact on the community; and
 - (b) Council's comments on the prescribed criteria (set out in Section 10.3 of the Liquor Control and Licensing Regulation) are as follows:
 - (i) The potential for additional noise and traffic in the area was considered;
 - (ii) The impact on the community was assessed through a community consultation process; and
 - (iii) Given that this is a new business, there is no history of non-compliance with this operation;
 - (c) As the operation of a licenced establishment may affect nearby residents the City gathered the view of the residents as follows:
 - (i) Property owners and businesses within a 50 meter radius of the subject property were contacted by letter detailing the application, providing instructions on how community comments or concerns could be submitted; and
 - (ii) Signage was posted at the subject property and three public notices were published in a local newspaper. This signage and notice provided information on the application and instructions on how community comments or concerns could be submitted; and
 - (d) Council's comments and recommendations respecting the view of the residents are as follows:
 - (i) That based on the number of letters sent and the few responses received from all public notifications, Council considers that the approval of this application is acceptable to the majority of the residents in the area and the community.

Pg. # ITEM

ENGINEERING AND PUBLIC WORKS DIVISION

2. HARVEST POWER AIR QUALITY PERMIT REVIEW

(File Ref. No. 10-6175-02-01) (REDMS No. 5187262 v. 2)

GP-19

See Page **GP-19** for full report

Designated Speaker: Peter Russell

STAFF RECOMMENDATION

- (1) That a letter be sent to the BC Minister of Environment and Harvest Power expressing the City's expectation that measures to eliminate odours in the community be prioritized and expedited;
- (2) That a letter be sent to Metro Vancouver expressing the City's expectations that:
 - (a) Metro Vancouver appropriately resource its enforcement program to bring the facility into compliance with permit conditions;
 - (b) Metro Vancouver negotiate with Harvest Power new infrastructure and upgrades necessary to eliminate odours and present the financial implications and alternatives to the Metro Vancouver Board of Directors; and
 - (c) Metro Vancouver improve opportunities for the public to share concerns about odour and implement a transparent system that publicly reports the severity and frequency of odour complaints and the measures to be undertaken to address the public's concerns;
- (3) That a formal response from Vancouver Coastal Health be sought in response to public health concerns relative to odours.

COMMUNITY SERVICES DIVISION

3. BRITANNIA SEINE NET LOFT WASHROOM FACILITIES

(File Ref. No. 06-2050-20-BSYD-SL) (REDMS No. 5178979 v. 7)

GP-28

See Page **GP-28** for full report

Designated Speaker: Mike Redpath

Pg. # ITEM

STAFF RECOMMENDATION

- (1) That the construction of washroom facilities as detailed in Option 1 of the staff report titled, "Britannia Seine Net Loft Washroom Facilities" dated September 27, 2016, from the Senior Manager, Parks, be approved; and
- (2) That the Britannia Seine Net Loft Capital Project in the amount of \$393,014 be included in the 2017 Capital Budget, as described in the staff report titled, "Britannia Seine Net Loft Washroom Facilities" dated September 27, 2016, from the Senior Manager, Parks.

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ADJOURNMENT	





Special General Purposes Committee

Date:

Tuesday, October 11, 2016

Place:

Anderson Room

Richmond City Hall

Present:

Mayor Malcolm D. Brodie, Chair

Councillor Chak Au
Councillor Derek Dang
Councillor Carol Day
Councillor Ken Johnston
Councillor Alexa Loo
Councillor Bill McNulty
Councillor Linda McPhail
Councillor Harold Steves

Call to Order:

The Chair called the meeting to order at 6:15 p.m.

AGENDA ADDITION

It was moved and seconded

That "Richmond School Board - School Closure Process" be added to the

agenda as Item No. 2.

CARRIED

MINUTES

It was moved and seconded

That the minutes of the meeting of the General Purposes Committee held on

October 3, 2016, be adopted as circulated.

CARRIED

General Purposes Committee Tuesday, October 11, 2016

COMMUNITY SERVICES DIVISION

1. STEVESTON HERITAGE SITES: INCREASED LEVEL OF SERVICE FOR 2017

(File Ref. No. 11-7000-01) (REDMS No. 5186460)

Jane Fernyhough, Director, Arts and Heritage Services, in reply to questions from Committee, noted that, because of the nature of the project, the number of employees to be hired is still undecided.

It was moved and seconded

- (1) That \$341,000 be allocated from the Council Provision Account for increased levels of service at Steveston heritage sites for 2017 as outlined in the report titled, "Steveston Heritage Sites: Increased Level of Service for 2017" dated October 5, 2016 from the Director, Arts, Culture and Heritage; and
- (2) That the 5 Year Consolidated Financial Plan (2016-2020) Bylaw be updated to include an additional expenditure of \$341,000 funded from the Council Provision account for increased level of service at Steveston heritage sites for 2017 with spending commencing in 2016 for recruitment and training.

CARRIED

2. RICHMOND SCHOOL BOARD - SCHOOL CLOSURE PROCESS

The Committee noted that the Richmond School District would be sending information shortly regarding closures and that it would be proactive for staff to provide a report on the matter.

As a result of the discussion, the following **referral motion** was introduced:

It was moved and seconded

That the matter of the Richmond School Board – School Closures be referred to staff for comments, analysis, and report back as appropriate.

CARRIED

ADJOURNMENT

It was moved and seconded That the meeting adjourn (6:18 p.m.).

CARRIED

General Purposes Committee Tuesday, October 11, 2016

Certified a true and correct copy of the Minutes of the meeting of the General Purposes Committee of the Council of the City of Richmond held on Tuesday, October 11, 2016.

Mayor Malcolm D. Brodie Chair Shaun Divecha Legislative Services Coordinator



Report to Committee

To:

General Purposes Committee

Date: September 28, 2016

From:

Carli Edwards, P.Eng.

File: 12-8275-30-062/Vol 01

Manager, Customer Services and Licencing

Re:

Application For A New Liquor Primary Liquor Licence - Top Cup Coffee Ltd.,

6031 Blundell Road

Staff Recommendation

1. That the application from Top Cup Coffee Ltd., doing business as, Top Cup, for a new Liquor Primary Licence to operate a Neighborhood Public House, be supported only for:

- a) A Neighborhood Public House with an indoor & patio seating and standing capacity of 70 patrons;
- b) Liquor service hours for Sunday to Thursday, from 9:00 a.m. to 12:00 a.m., and Friday and Saturday, From 9:00 a.m. to 1:00 a.m.; and
- c) Family Foodservice to permit minors in all licensed areas until 10:00 p.m. when accompanied by a parent or guardian;
- 2. That a letter be sent to the Liquor Control and Licensing Branch advising that:
 - a) Council supports the amended conditions as listed above, for a new Liquor Primary Liquor Licence as the issuance will not pose a significant impact on the community;
 and
 - b) Council's comments on the prescribed criteria (set out in Section 10.3 of the Liquor Control and Licensing Regulation) are as follows:
 - i) The potential for additional noise and traffic in the area was considered;
 - ii) The impact on the community was assessed through a community consultation process; and
 - iii) Given that this is a new business, there is no history of non-compliance with this operation;
 - c) As the operation of a licenced establishment may affect nearby residents the City gathered the view of the residents as follows:

- i) Property owners and businesses within a 50 meter radius of the subject property were contacted by letter detailing the application, providing instructions on how community comments or concerns could be submitted; and
- ii) Signage was posted at the subject property and three public notices were published in a local newspaper. This signage and notice provided information on the application and instructions on how community comments or concerns could be submitted; and
- d) Council's comments and recommendations respecting the view of the residents are as follows:
 - i) That based on the number of letters sent and the few responses received from all public notifications, Council considers that the approval of this application is acceptable to the majority of the residents in the area and the community.

Carli Edwards, P.Eng.

Manager, Customer Services and Licencing

(604-276-4136)

Att. 4

REPORT CONCURRENCE	8
CONCURRENCE OF GENERAL MANAGER	
A	
REVIEWED BY STAFF REPORT / AGENDA REVIEW SUBCOMMITTEE	DW
APPROVED BY CAO	
Vin 1	

Staff Report

Origin

The Provincial Liquor Control and Licensing Branch (LCLB) issues licences in accordance with the *Liquor Control and Licensing Act* (the Act) and the Regulations made pursuant to the Act.

This report deals with an application to the LCLB and the City of Richmond by Top Cup Coffee Ltd., to do business as Top Cup, (hereinafter referred to as Top Cup), for a new Liquor Primary Liquor Licence to:

- operate, Monday to Sunday, 9:00 a.m. to 1:00 a.m.;
- permit an indoor occupant load of 78 persons and additional patio endorsement for 40 persons for a total of 118 persons;
- operate a café bar pub serving food, alcoholic beverages with an addition of some bakery goods and café beverages; and
- operate with a term and condition, "Family Foodservice", to permit minors in all licensed areas until 10:00 p.m. when accompanied by a parent or guardian.

The City is given the opportunity to provide written comments by way of a resolution to the LCLB with respect to the proposed Liquor Primary application. Regulatory criteria local government must consider are:

- the location of the establishment;
- the proximity of the establishment to other social or recreational facilities and public buildings;
- the person capacity and hours of liquor service of the establishment;
- the number and market focus or clientele of liquor primary licence establishments within a reasonable distance of the proposed location;
- the impact of noise on the community in the immediate vicinity of the establishment; and
- the impact on the community if the application is approved.

Analysis

Location of the Establishment

The applicant is proposing to operate a new establishment located at 6031 Blundell Road under the business trade name of Top Cup. This property is zoned under Land Use Contract (LUC) – 128, which has one permitted use, Neighborhood Public House. The primary focus of this business is to operate as a Neighborhood Public House, as previously operated for approximately 38 years by another owner. The applicant is proposing to serve food and alcoholic beverages plus additional café bakery goods and beverages.

Proximity of the Establishment to Other Social, Recreational and Public Building

The location the applicant is proposing to operate is close to the intersection of No. 2 Road and Blundell Road. There is a large commercial complex across the street, to the south, and a

commercial property adjacent to the west of this property, with residential properties situated to the east and north. The closest School & Institutional Use (SI) Zone is located approximately 261 meters from the proposed establishment and there was no noted impact from the previous establishment that operated from the same premises. There are no other social, recreational or public buildings within the proximity of this proposed location.

Person Capacity and Hours of Liquor Service of The Establishment

The applicant is proposing to operate Top Cup with an occupant load of 118 patrons. The LUC – 128 zone is specific, and only permits a neighborhood public house with a seating and standing area for a maximum of 70 occupants. The proposed 118 patrons exceeds the requirements permitted under the LUC 128 zone and can only be approved for the 70 patrons. If a patio is to be included, it must be within the 70 patron maximum occupancy and the permitted patio usage is only approved by LCLB to operate until 11:00 p.m. Further increase to occupancy as proposed, would have to be considered only after a rezoning of the property.

The applicant is requesting to operate with liquor service, Monday to Sunday, 9:00 a.m. to 1:00 a.m. These requested operating hours are contrary to newly adopted Council Policies on Provincially Regulated Liquor Establishments, Policy 9400. The permitted hours approved in the Policy are Sunday to Thursday, up to 12:00 a.m. and up to 1:00 a.m. for Friday and Saturday. Therefore, this application is recommended to be approved for operating hours of 9:00 a.m. to 12:00 a.m., Sunday to Thursday; and from 9:00 a.m. to 1:00 a.m., Friday and Saturday.

The Number and Market Focus or Clientele of Liquor Primary Licence Establishments Within a Reasonable Distance of The Proposed Location

Although this is a new liquor primary licence, it is replacing a previously issued liquor primary licence at this location. As a result of this application, there is no increase to the number of liquor primary establishments and seating capacity to the area. The applicant is looking for more of a family atmosphere operation with "Family Foodservice" as a term and condition to the liquor primary licence. Furthermore, the applicant is proposing to add café bakery goods and beverages to the menu in addition to a pub style food menu. This type of service is not currently offered by any of the other establishments in the area.

The Impact of Noise on The Community in The Immediate Vicinity of The Establishment

Staff believe that there would be no noticeable increase in noise if the liquor primary licence application is supported.

The Impact on The Community if The Application is Approved

The City's process for reviewing applications for liquor related licences is prescribed by the Development Application Fees Bylaw 8951 which under Section 1.8.1 calls for:

1.8.1 Every **applicant** seeking approval from the **City** in connection with:

(a) a licence to serve liquor under the *Liquor Control and Licensing Act* and *Regulations*;

must proceed in accordance with subsection 1.8.2.

- 1.8.2 Pursuant to an application under subsection 1.8.1, every **applicant** must:
 - (b) post and maintain on the subject property a clearly visible sign which indicates:
 - (i) type of licence or amendment application;
 - (ii) proposed person capacity;
 - (iii)type of entertainment (if application is for patron participation entertainment); and
 - (iv)proposed hours of liquor service; and
 - (c) publish a notice in at least three consecutive editions of a newspaper that is distributed at least weekly in the area affected by the application, providing the same information required in subsection 1.8.2(b) above.

The required signage was posted on August 15, 2016 and three advertisements were published in the local newspaper on August 17, August 19 and August 24, 2016.

In addition to the advertised public notice requirements set out in Section 1.8.1, staff sent letters to businesses, residents and property owners within a 50 metre radius of the property. There are 48 properties identified within the consultation area. On August 12, 2016, letters were sent to 60 businesses, residents and property owners within the 50 metre radius of the property. The letter provided details of the proposed liquor licence application and requests the public to communicate any concerns to the City. The period for comment for all public notifications' ended September 18, 2016.

The City relies, in part, on the response from the community to determine any negative impact of the liquor licence application. There were three responses received by the City and the responses were as follows:

- 1. Not opposed to the business but opposed to the operating hours requested (attachment 1);
- 2. Opposed to the application, especially the number of seats and operating hours proposed (attachment 2); and
- 3. In favor of a traditional pub, opposing the addition of café menu items (attachment 3).

It is staff's recommendation that these concerns are mitigated by approving the application for 70 seats (rather than the 118 requested) and amending the proposed closing hours, as supported by Council policy. Having received no further responses from businesses, residents or property owners in the surrounding area, or from the city-wide public notifications, staff feel that support of this application is warranted.

Other Agency Comments

As part of the review process, staff request comments from other agencies and departments such as Vancouver Coastal Health, Richmond R.C.M.P., Richmond Fire-Rescue, Liquor Control and Licensing Branch, Building Approvals and Business Licence Department. These agencies and departments generally provide comments on the compliance history of the applicant's operations and premises. All the agencies and departments expressed no concern on this application.

Financial Impact

None

Conclusion

Following the public consultation period, staff reviewed the Liquor Primary Liquor Licence application against the LCLB review criteria and recommends Council support the application to issue Top Cup a Liquor Primary Licence, with occupant seating/standing capacity of 70 patrons; and operating hours from, Sunday to Thursday, of 9:00 a.m. to 12:00 a.m., and Friday and Saturday, 9:00 a.m. to 1:00 a.m.

Wictor M. Duarte Licence Inspector (604-276-4389)

VMD:vmd

Att. 1: Complaint letter 1

2: Complaint letter 2

3: Complaint email

4: Ariel Map with 50 meter buffer area.

Attachment 1

Gene Boklashchuk 2-7660 No 2 Road Richmond, BC V7C3L9 e-mail: genne@shaw.ca ph:778-938-6404 August 23, 2016

Victor Duarte
Finance and Corporate Services Department Business Licenses
Richmond, BC
V6Y 2C1
Ph.604-276-4328
BusLic@richmond.ca

Dear Victor Duarte:

This letter is regarding to obtain a New Liquor License for the Pub, located at 6031 Blundell Road. My windows face to the Coast Capital Bank parking lot, a Pub's next door business. I am living here for 6 years and I have noticed so many things going around. First of all, some constant noise and barbeque smell are coming from Pub area, every day and up to 1 am. Some groups of drunken people use a bank parking lot to get together for smoking or (something else). The peak of that when a pub is closes at 1 am. Usually, it continues with yelling, screaming etc. Several years ago a stone has been thrown to my neighbor window, which was replaced by owner. The bad thing, this year the bank decided to shut down parking lot light poles and now there is dark area. I think RCMP has some info about that place, because a stand by police car has been on parking lot every week.

I agree the business should run. But some restrictions should be applied, in accordance with the noise bylaw. Closing time should 10 or 11pm and so on.

Sincerely,

Thank you for your time and attention to this matter.

Gene Boklashchuk

Attachment 2

Hello,

I live two houses east of the proposed licenced establishment.

During this location's previous incarnation as The Pumphouse, the neighborhood was plagued with noise and rowdiness. People hollering and occasionally fighting, loud cars and truck and especially motorcycles revving their engines.

The noise also came from patio speakers loudly broadcasting hockey games and outdoor live music. I could hear the music distinctly at Cheviot Place, a block away. I called the pub numerous times, but they refused to turn it down. At one point I called the police, who came and said they could do nothing.

This neighborhood has working folks, families, and retired people living in it. This type of disturbance-creating facility has no place here. A hundred and eighteen seats open till one AM? How will we get any sleep?

I do not want to see a pub open here. It would be better for the neighborhood to tear it down and build more housing for people.

Thank you for considering this.

Rae Ramsey 6091 Blundell Road

Duarte, Victor

From:

billcarter@medisafecanada.com

Sent:

September 15, 2016 15:20

To:

Duarte, Victor

Subject:

Top Cup Coffee Ltd. application for Cafe Bar

September 15, 2016

To: Richmond City Council

The City of Richmond Business Licence Division Liquor Licence Applications 6911 No.3 Rd. Richmond, BC V6Y 2C1

Re: Application of Top Cup Coffee Ltd. Doing business as Top Cup Operating from 6031 Blundell Road Richmond, BC

It has come to mine and many others attention that this company intends to replace a long serving and well established adult community gathering place with a Café Bar. As a longtime member of this community and an owner of businesses locally myself, I felt it my obligation to make my objections known.

As the proximity of the establishment previously known as the Pumphouse Pub at No. 2rd. and Blundell, it served as a local's gathering place to enjoy themselves without for many of them the need to drive to its location. It offered a unique location for this purpose. Since its closing many of the patrons have been forced to relocate to either Legends, O'Hare's, Buck and Ear, Legion or other spots that are in many cases miles away.

The idea behind neighborhood pubs has always been to serve the very local community and allow for getting to socialize with ones neighbor's .

I would like to point out here that since its closing many of the patrons have lost touch with each other as everyone has moved to different locations and thusly the feeling of community for employees, patrons and locals has diminished greatly in this area.

We knew that the current owners were intent on closing the premise and breaking a signed contract with the previous owners when in the summer of 2015 there began an intentional degradation of the environment within the Pub itself. My co-business partners and I would many times meet there in the afternoons during the week as they work at the airport and I work and live locally it was very handy.

During one of our meetings 3:30 pm with many locals there watching a sports event the new manager at the time had the bartender turn-off the sound of the sports event and turn on 1970's and 80's disco style music so loud that me and my business partners could hardly talk to one another. When I complained about it, I was blatantly told by the manager that if I did not like it then find somewhere else to go!

This as it turned out was the beginning of the end as from that point forward many many times during the Blue jays play-off run he would insist that the music stayed on. This continued for hockey and the NFL playoffs. These events were obviously intentionally done to degrade and push away customers so that when it came to council to apply for new status they could show a greatly diminished customer base and loss of business. Which was entirely caused by them (the owners) intentionally!

There are already many other spots to drink coffee nearby so the need for one more is completely not necessary nor in the best interest of the neighborhood.

In closing, I would like to say that to allow anything other than an establishment other than what the Pumphouse was is allowing for and awarding deceitful and underhanded business ethics to trump our neighborhood and city values!

To reinforce the statements I have made here, many of the past patrons are willing to sign affidavits testifying to many of the shady business practices they employed.

Please do not reward bad an unethical behavior!

William Carter President Medisafe Distribution Inc. 7-11771 Horseshoe Way Richmond, BC. V7A 4V4

Ph: 604-232-2442 Fx: 604-232-2445 Cl: 604-360-8443

City of Richmond Interactive Map



GP - 18

THIS MAP IS NOT TO BE USED FOR NAVIGATION

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Report to Committee

To:

General Purposes Committee

Date:

October 4, 2016

From:

John Irving, P.Eng. MPA Director, Engineering

File:

10-6175-02-01/2016-

Vol 01

Re:

Harvest Power Air Quality Permit Review

Staff Recommendation

 That a letter be sent to the BC Minister of Environment and Harvest Power expressing the City's expectation that measures to eliminate odours in the community be prioritized and expedited;

- 2. That a letter be sent to Metro Vancouver expressing the City's expectations that:
 - a. Metro Vancouver appropriately resource its enforcement program to bring the facility into compliance with permit conditions;
 - b. Metro Vancouver negotiate with Harvest Power new infrastructure and upgrades necessary to eliminate odours and present the financial implications and alternatives to the Metro Vancouver Board of Directors; and
 - c. Metro Vancouver improve opportunities for the public to share concerns about odour and implement a transparent system that publicly reports the severity and frequency of odour complaints and the measures to be undertaken to address the public's concerns;

3. That a formal response from Vancouver Coastal Health be sought in response to public health concerns relative to odours.

John Irving, P.Eng. MPA Director, Engineering (604-276-4140)

Att. 1

REPORT CONCURRENCE				
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER		
Business Licences Environmental Programs Law		CC -		
REVIEWED BY STAFF REPORT / AGENDA REVIEW SUBCOMMITTEE	INITIALS:	APPROVED BY CAO		

Staff Report

Origin

The purpose of this report is to provide a summary of Harvest Fraser Richmond Organics' (Harvest Power) recently issued air quality permit. Additional information regarding Harvest Power's business license; the permit appeal process; alternative organic waste management facilities; enforcement from Metro Vancouver; public health; mechanisms to receive public concerns; and, the City's annual volume sent to the facility and associated fees are also summarized.

This report supports Council's 2014-2018 Term Goal #6 Quality Infrastructure Networks:

Continue diligence towards the development of infrastructure networks that are safe, sustainable, and address the challenges associated with aging systems, population growth, and environmental impact.

6.1. Safe and sustainable infrastructure.

Background

The ultimate authority regulating air quality in British Columbia resides with the Province's Ministry of Environment through the *Environmental Management Act*. The Province has delegated this authority regionally to Metro Vancouver. Through utility rates, member municipalities pay Metro Vancouver for this level of service. It is important to bear this responsibility in mind given the matter at hand.

Harvest Power began an air permit renewal process with Metro Vancouver and the Province in the fall of 2015. Since this time, there have been sustained periods of odour nuisance complaints due to Harvest Power's operation in Richmond. Council have reviewed several reports regarding this issue and have sent one letter to the Province and four letters to the Metro Vancouver Board of Directors to date sharing its expectations that there be zero tolerance for odour nuissances from the Harvest Power facility. At the September 19, 2016 General Purposes Committee and Special Council meetings, Council received information regarding conditions under consideration in the draft Harvest Power air quality permit. At the time, staff noted that the City did not have access to the draft permit. Staff nonetheless shared information as it was communicated by Harvest Power and Metro Vancouver as there is a 30-day appeal period. On September 30, 2016, the City received notification that Harvest Power was issued a new air quality permit. Approximately 200 parties who participated in the consultation process were also notified.

Analysis

Permit Summary

The permit defines maximum emissions and source-specific works and procedures for ten emissions sources on the site (e.g. receiving areas, the Energy Garden, compost and storage piles, biofilters). Specific dates in which new procedures, reporting, maximum emissions and/or material handling requirements are identified; most new requirements to address odours take effect in 2017 and 2018 and new maximum emissions for known odorous compounds take effect in 2020. To meet these new requirements, Harvest Power will need to invest in infrastructure and procedural changes

immediately. In a public statement following the issuance of the permit, Harvest Power made this commitment (Attachment 1).

The following points provide an overview of key aspects of the permit:

- **Permit Duration:** The permit expires on April 30, 2020; as such, interested parties will have an opportunity to be consulted within 3 years when a permit renewal will be due.
- Key Aspects of the Permit Intended to Reduce Odour:
 - Covered Aerated Static Piles: The permit will require that all covered aerated static piles ("covered piles") are rebuilt to significantly increase aeration; Metro Vancouver accepted that this was a costly undertaking and it will take time to complete. Harvest Power has indicated publicly that they intend to invest immediately in rebuilding the covered piles through a recent press release (Attachment 1). The permit also limits the height of covered piles to 6m through to May 2017 after which a 3m maximum height will be in effect. Metro Vancouver has advised that covered piles have reached heights of 15m at times.
 - Pre-treatment of Digestate: Odourous digestate, the material remaining after the anaerobic digestion of a biodegradable feedstock from the Energy Garden, must be treated before being processed on the covered piles instead of being placed directly on the covered piles.
 - Seasonal Food Waste Restrictions: While covered piles are being rebuilt (2016-2018), interim summer time monthly restrictions for receiving commingled waste for placement on either covered pile equal to 70% of the average monthly rate will be in place.
 - Facility Wide Emissions Requirements: Starting in 2017, the Director will have the
 authority to force the facility to immediately cease receiving any food waste for placement
 on any covered pile if any Metro Vancouver Officer observes malodours for 10 minutes in
 any hour at prescribed distances from the plant.
 - o **More Frequent Biofilter Media Replacement:** New requirements will see media changed more frequently compared to past practices.
 - o **New Doors:** Rapid opening and closing doors need to be installed at the Energy Garden. Metro Vancouver advises they ticketed Harvest Power for having doors open recently.

Other key points and comments related to conditions in the permit include:

- Performance Requirements (Maximum Emissions Quality): New requirements are in place for some emissions (e.g. sulphur oxides and particulate matter). Increases in permitted total volatile organic compounds are identified for some sources; on average, permitted maximum volatile organic compounds have increased by 90%. Metro Vancouver advises that this increase is approximately 50% of what Harvest Power requested and that volatile organic compounds are not good indicators of odour; many volatile organic compounds have no odours at all. For this reason and in the context of a phased implementation, new maximum emissions from known odourous compounds (e.g. aldehydes, ammonia, sulphur compounds, fatty acids) take effect in 2020.
- Prescribed Material Handling Requirements: By spring 2017, the facility must install new
 automatic doors and indoor material handling procedures for receiving materials at the Energy
 Garden. A covered receiving facility will be required if highly putrescible materials are stored
 for placement on the covered piles; this excludes commingled food and green waste.
- **Increased Monitoring and Reporting:** As a general note, the permit includes increased requirements for reporting, record keeping and monitoring.
- Overall Site Odours: No odours past the plant boundary such that the District Director
 determines that pollution occurs is now a general clause in the permit, as opposed to specific to
 the source. In addition, new 'Facility Wide Emissions' thresholds for odour detection identifies

that based on written reports of 'observations' by an Officer of malodours from the facility for 10 minutes in any hour at prescribed distances (5km in 2017 for 4 days; 4 km in 2018 for 3 days; 3 km in 2018 for 2 days) that the facility must immediately stop receiving any food waste (including co-mingled food and yard waste) for placement on piles until the Director determines that the issue has been addressed. This implies that the permit accepts that odours will continue to occur; the City previously requested that no odours from the site be deemed acceptable and that a more appropriate method of site wide odour detection be applied to the permit. What is favourable about this requirement however is that the facility will need to cease receiving materials for placement on piles immediately upon notification.

As reported previously, immediate results were not expected. The permit is based on the premise that Harvest Power will make improvements to covered piles and enhance material handling procedures as a key improvement to address odours, all of which takes time to implement. Piloting of new procedures and the introduction of new technologies are likely to result from the phased requirements as well. At the same time, new emission requirements will be phased to ensure progress is being made. If the above measures are implemented, it is expected that odour issues from the facility will significantly decrease. The City should expect to see the results of Harvest Power's improvements starting in the spring of 2017 or sooner when the covered piles are updated.

Appeal Process

The BC Environmental Management Act (the "Act") includes provisions for a "person aggrieved" by a decision of the District Director, including a permit or any specific requirement in a permit, to appeal that decision to the Environmental Appeal Board (the "Board"). Written notices of appeal must be received by the Board within 30 days of notification of the decision. Therefore, if the City wishes to appeal the permit it must submit a notice of appeal on or before October 31, 2016.

The test for "person aggrieved" is whether such person presents sufficient information 'to allow the Board to reasonably conclude that the decision has or has potential to prejudicially affect that person.' It is the obligation of the appellant to identify how it has been aggrieved. If the City is able to establish that it is an aggrieved person, it would still have the burden of convincing the Board that the permit should be overturned.

When a notice of appeal is received by the Board, the time to complete a hearing varies and depends on the format of the hearing (i.e. hearings may be in writing or oral, which may range from 1 to 6 days). At the low end, hearings will generally be completed within 5 months upon notice of appeal, but could go as long as 9 months. Release of final written decisions or written responses varies from 3 to 9 months after the closing of the hearing and receipt of all closing submissions. Therefore, if an appeal is filed by the end of October (e.g. within 30 days of the notification of the permit issuance), a final decision can be expected to be received within 8 to 18 months (May 2017 to April 2018).

Negotiate More Stringent Requirements

An appeal has the potential to be expensive and does not provide any assurance in regards to outcome of the procedure. As an alternative to an appeal, Metro Vancouver could review the terms of their contract directly with Harvest Power. For this reason, a recommendation is

included in the report to send a letter to Metro Vancouver's Board of Directors requesting a review of the contract and report back to members regarding financial implications.

Contract with Harvest Power

In 2015, the City sent approximately 18,500 metric tonnes of organic waste to Harvest Power. The projected amount of waste for 2016 is 21,500 tonnes. Harvest Power reports that it processes 240,000 tonnes of yard trimmings and food waste annually. In this context, the City's contribution is approximately 8% of the total amount.

The City's agreement with Harvest Power is valid through to June 30, 2019; the agreement identifies options for two additional terms of 60 months each. The agreement covers for green waste from single-family and duplex homes in Richmond. The City may choose to haul multifamily organics elsewhere at any time.

Business Licence

Harvest Power was last issued a City business license on January 2015 which has subsequently renewed. Business licenses are renewed annually. The holder of a business license must comply with the terms and conditions, if any, of the business license and all applicable bylaws which include City bylaws and may include Metro Vancouver bylaws. If the Chief License Inspector finds that a business license holder is in breach of a term or condition of a business license or any applicable bylaw, she can recommend to Council that the business license be suspended or canceled. Council then conducts a business license hearing. Before Council decides on the suspension or termination, submissions are made by the Chief License Inspector and the business license holder.

While she continues to investigate, the Chief License Inspector has not found Harvest Power to currently be in breach of any term of condition of its business license or any City bylaw. A business license suspension or cancellation may be complicated by the fact that Harvest Power is located on federal lands.

Alternative Organics Management Facilities

There is currently only one other financially viable option available to the City for processing organic waste. Enviro-Smart Organics Ltd, located in Delta, processes organics waste using a covered, aerated static pile method of composting. Currently, the cities of Burnaby, Delta and a portion of Vancouver's green waste is hauled to this facility. Staff will be considering hauling green waste from multi-family buildings to Enviro-Smart since waste from this source is not in the current contract scope with Harvest Power. Staff will bring forward a report with options to Council in this regard.

The City of Surrey has partnered with OrgaWorld to develop a facility similar to Harvest Power's Energy Garden. This facility will not have open air composting as seen at Harvest Power. The facility operators have indicated they expect to be completed in early 2017, although based on current status, are not expected to be able to receive material until late 2017 or even early 2018. Other facilities are operating in Langley and Abbotsford. All of these facilities could be considered for receiving waste from Richmond but it would be expected to significantly increase costs.

Health Impacts

Members of Council and the public have raised questions regarding health impacts related to emissions from Harvest Power. Vancouver Coastal Health was active in Metro Vancouver's consultation program related to Harvest Powers Permit Renewal Application. In their response Vancouver Coastal Health advised Metro Vancouver that they have been the direct recipient of public complaints regarding objectionable odor emissions attributed to Harvest Power and stated that the odors can be cause for discomfort and are cause for public concern

In their feedback, Vancouver Coastal Health recommended that parties consider a structured mechanism which would seek to engage the community in an ongoing capacity such as an odor management committee where community, industry and regulatory stakeholders could convene and work towards positive outcomes on odour issues. Furthermore, it was recommended that Metro Vancouver work with the Ministry of Environment to create a regulatory framework for odor mitigation and management.

Vancouver Coastal Health recently acknowledged that they wish to remain an active participant in ongoing discussions and activities with all stakeholders in assessing and addressing the ongoing issues related to Harvest Powers operations.

Mechanisms to Receive and Respond to Public Concerns

Currently, Metro Vancouver operates a complaint hotline and input form on their website. With respect to sharing information about complaints, Metro Vancouver will share the anonymous complaints with the facility generating the odour and after receiving more than 10 in one day, Vancouver Coastal Health will also receive a notification. On request, Metro Vancouver has shared the total number of complaints with the City but otherwise does not currently post this information publicly.

Many Richmond residents have expressed frustration with the above approaches to addressing their concerns. Residents have reported that they do not receive feedback regarding how or if their complaint has been addressed nor have a chance to see if others are complaining. Many residents have communicated that they have given up sharing their concerns with Metro Vancouver because of these frustrations. For these reasons, a recommendation is included in this report requesting that Metro Vancouver improve public input opportunities for sharing odour concerns and implementing a more transparent system that regularly reports to the public information regarding the severity and frequency of odour complaints and, most importantly, the measures undertaken to address the public's concerns.

Enforcement

Staff previously highlighted Metro Vancouver's role and approach in enforcing its bylaws and permits. In summary, Metro Vancouver's regulatory program includes both administrative (e.g. permits) and compliance promotion and enforcement tools (e.g. notices, tickets). Metro Vancouver's actions are predicated on the principle that bringing offenders into compliance, voluntarily if possible, is the goal, and that non-punitive actions should be taken in efforts to bring the permit holder into compliance without the need for enforcement.

Metro Vancouver advised that it recently created a team of three officers available to respond to Harvest Power complaints. Metro Vancouver also recently issued Harvest Power a ticket for leaving the doors to the Energy Garden open allowing odourous air to leave the facility. New conditions in the recently issued permit that would be subject to enforcement take effect in 2017. Again, Harvest Power will need to invest immediately to be compliant with these requirements when they take effect.

Financial Impact

None.

Conclusion

Harvest Power is providing a critical regional service related to waste management and reduction of greenhouse gas emissions. In order to meet the City's environmental goals, it is in the City's interest to ensure Harvest Power comes into compliance with its permit. The City also recognizes minimising or eliminating odour impacts to communities is just as critical. This report highlighted a range of options and considerations available to the City related to this issue. The recommendations focuses on sending letters to the Province, Harvest Power and Metro Vancouver to share the City's expectations that appropriate measures be taken immediately to eliminate odour issues from Harvest Power's operations in Richmond.

Peter Russell, MCIP RPP Senior Manager, Sustainability and District Energy (604-276-4130)

PR:pr

Att. 1: Harvest Power Media release regarding the New Air Emissions Permit (Oct. 3, 2016).

Date: October 3rd, 2016

Media Contact: Stephen Bruyneel, 604 842 1971, bruyneel@telus.net



HARVEST RECEIVES NEW AIR EMISSIONS PERMIT FROM METRO VANCOUVER

Company to initiate first phase of multi-million dollar infrastructure upgrade at Richmond organics recycling facility

RICHMOND, BC. (October 3rd, 2016) – Metro Vancouver has issued a new air emissions permit to Harvest Fraser Richmond Organics, Ltd. (Harvest), which operates one of the region's largest recycling facilities for food scraps and yard trimmings. The permit will require the company to invest in significant upgrades at the facility, improve its air emissions controls and submit to stringent monitoring.

"This is a very strict permit, but one that we are pleased to finally have in hand, "said Chris Kasper, CEO of Harvest Power. "We can now proceed with infrastructure investments at the facility and expect to spend several millions of dollars – beginning now and over the next few years – to improve our operations."

Metro Vancouver issued the permit nearly eleven months after Harvest's initial application and following the agency's extensive consideration of public comments.

"We heard loud and clear that the public expects us to do better," added Kasper, "and we're committed to address their concerns. Now that we have the permit, we can focus our efforts and investments to deal with the issues that have been raised."

Harvest will begin work immediately to meet the terms of the new permit with a focus on actions that can address odour issues as soon as possible.

"We will be replacing our composting infrastructure in a phased approach so that we can continue to serve the local communities and not disrupt their organic recycling programs," Kasper explained. "However, we know the public wants to see results right away to address odour concerns. That's why we are implementing measures such as volume limits on our inbound material and reductions in the height of our compost piles. We will take these and additional steps to improve the performance of our operations even before the new infrastructure is in place."

He concluded by emphasizing that Harvest wants to be in Richmond – and the surrounding region – for the long term.

"Managing organic waste is an evolving societal challenge," said Kasper. "We are proud to help the Metro Vancouver region be a leader in North America of diverting organic materials from landfills and turning it into clean renewable energy and compost: key components of thriving communities. At the same time, first and foremost, we need to do that in partnership with those who live and work around us. Harvest looks forward to working with our local Community Liaison Committee, the City of Richmond and the residents of the Metro Vancouver region to achieve these important goals."

About Harvest Power

<u>Harvest Power</u> is creating a more sustainable future by turning organic materials into locally consumed products that are good for the environment. Harvest has grown rapidly since its founding in 2008, garnering awards for its business of organic recycling, energy generation and soil revitalization. The company has been named to the Global Cleantech 100 six years running, received Bloomberg's 2013 New Energy Pioneer Award and was named one of Fast Company's 50 Most Innovative Companies in the World.

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Report to Committee

To:

General Purposes Committee

Senior Manager, Parks

Date:

September 27, 2016

From:

Mike Redpath

File:

06-2050-20-BSYD-

SL/Vol 01

Re:

Britannia Seine Net Loft Washroom Facilities

Staff Recommendation

- 1. That the construction of washroom facilities as detailed in Option 1 of the staff report titled, "Britannia Seine Net Loft Washroom Facilities" dated September 27, 2016, from the Senior Manager, Parks, be approved; and
- 2. That the Britannia Seine Net Loft Capital Project in the amount of \$393,014 be included in the 2017 Capital Budget, as described in the staff report titled, "Britannia Seine Net Loft Washroom Facilities" dated September 27, 2016, from the Senior Manager, Parks.

Mike Redpath Senior Manager, Parks (604-247-4942)

Att. 4

REPORT CONCURRENCE				
ROUTED TO:	CONCURRENCE	CONCURRENCE OF GENERAL MANAGER		
Finance Department Project Development	<u> </u>	for C.V. Carlile		
REVIEWED BY STAFF REPORT / AGENDA REVIEW SUBCOMMITTEE	MITIALS:	APPROVED BY CAO		

Staff Report

Origin

At the June 4, 2014, General Purposes Committee meeting, staff received the following referral:

That the provision of washroom facilities in the Seine Net Loft and Phoenix Net Loft be referred to staff to explore options.

The purpose of this report is in response to the above referral.

This report supports Council's 2014-2018 Term Goal #2 A Vibrant, Active and Connected City:

Continue the development and implementation of an excellent and accessible system of programs, services, and public spaces that reflect Richmond's demographics, rich heritage, diverse needs, and unique opportunities, and that facilitate active, caring, and connected communities.

- 2.3. Outstanding places, programs and services that support active living, wellness and a sense of belonging.
- 2.4. Vibrant arts, culture and heritage opportunities.

This report supports Council's 2014-2018 Term Goal #6 Quality Infrastructure Networks:

Continue diligence towards the development of infrastructure networks that are safe, sustainable, and address the challenges associated with aging systems, population growth, and environmental impact.

6.2. *Infrastructure is reflective of and keeping pace with community need.*

This report also supports the Council endorsed Britannia Shipyards National Historic Site Strategic Plan 2014-2018 Outcome #1 Unique Spaces:

Historic structures are preserved and developed to celebrate the site's history and embrace future opportunities.

1.1 Update capital development plan for Britannia Shipyards to identify priorities and future opportunities and prioritize within the five year plan.

Analysis

Background

The Seine Net Loft building at Britannia Shipyards National Historic Site was restored in 2013. The restoration project included the rehabilitation of the superstructure, which included seismic and electrical upgrades, a fire protection system as well as life and safety improvements so that the building could be used for public assembly, exhibit space and storage. Programming, exhibits and rentals of the Seine Net Loft have been successful and popular since the opening of the

restored building. Uses range from weddings, special events, celebrations of life, Seniors Week opening, Culture Days opening, private/corporate rentals, school programming and more. Attendance to the events range from 50 to 300 people per event. Major events on site attract 20,000 to 40,000 visitors depending on the event.

The Phoenix Net Loft (Attachment 1) is a twin building to the Seine Net Loft. The Phoenix Net Loft is currently in a critical state of disrepair and is not safe for public access. Major restoration options for the Phoenix Net Loft are currently being explored and are the subject of an existing Council referral. Options for the restoration of the Phoenix Net Loft will be presented in a separate report to Council in 2016 and considered as part of the next phase of the City's Major Facilities Development Program.

Existing Washrooms at Britannia

Washrooms are currently available on site during events and from dawn to dusk. Public washrooms are located in the Murakami building, adjacent to the Seine Net Loft, and on the east side of the Britannia Shipyards National Historic Site, 70 meters away from the Seine Net Loft, and 140 meters from the Phoenix Net Loft (Attachment 2). During events, demand for washrooms at the site is high. Staff have also received complaints from visitors to the site with respect to the walking distance from the Seine Net Loft to the washrooms.

Current washroom facilities in the Murakami building at Britannia Shipyards National Historic Site are not adequate and were not designed to support the increased programming demands at the site, which include rentals of the Seine Net Loft.

As a temporary solution, staff have brought in portable washrooms to temporarily meet the need. When required, the cost to bring a portable washroom trailer for a week with servicing is approximately \$1,500. Port-a-potties have also been used to fill the need at a cost of approximately \$300 for a weekend. These port-a-potties are filling the temporary need, however, they detract from the overall historic nature of the site, lack privacy, are not lit at night when events typically occur and have foul odours. Examples of events at Britannia Shipyards National Historic Site include large annual events/festivals (Ships to Shore, Maritime Festival, Doors Open, Culture Days, Gran Prix of Art and Dragon Boat Festival) which have placed further strain on the current washroom facilities.

Site Selection

As Britannia Shipyards is a National Historic Site, attention to detail to maintain the existing form and character while ensuring respect for the heritage integrity of the site is essential. Several options for additional washrooms have been developed for consideration. Staff have presented these options to the Steveston Historic Sites Building Committee and they have received these options for information. Feedback from the Steveston Historic Sites Building Committee has ranged from support for the inclusion of washrooms within the Seine Net Loft, to support for washrooms outside the Seine Net Loft, including a suggestion to defer washrooms until restoration of the Phoenix Net Loft is completed.

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Staff have considered the feedback from the Steveston Historic Sites Building Committee and are recommending the implementation of washrooms facilities within the existing Seine Net Loft. Deferring a decision to include washrooms in the Seine Net Loft, pending the restoration of the Phoenix Net Loft which has not commenced, as suggested by the Steveston Historic Sites Building Committee, will not address the current need for washrooms within the Seine Net Loft.

Options for Washroom Facilities at Britannia Shipyards National Historic Site

Option 1 — Construct Accessible Washrooms within the Seine Net Loft Building (Attachment 3) — Recommended

This option would involve the construction of two new accessible washroom stalls within the Seine Net Loft building. The recommended option (Attachment 3) preserves the heritage integrity of the existing building and locates washrooms close to where they were originally situated in the historic building. Locating washrooms within the Seine Net Loft will provide the greatest level of convenience to visitors to the Seine Net Loft and will complement existing washroom facilities on the site outside of the building.

Buildings of this type generally had plumbing open to the river below and no connections to sanitary services. Staff are recommending full sanitary connections as required by today's building standards. The concept detailed in Attachment 3 takes advantage of a currently vacant area under a stairwell, and would also create needed secure storage for tables and chairs and other equipment in the facility.

The total cost estimate for construction of two accessible washrooms within the Seine Net Loft, as illustrated in Attachment 3, is \$393,014 which includes a 30 per cent project contingency.

Option 2 – Build a New Washroom Building on the West Side of the Britannia Shipyards National Historic Site, North of the Boardwalk (Attachment 4) – Not Recommended

This option involves the construction of a new washroom with shower facilities parallel to the boardwalk on the west side of the site (Attachment 4). It would be accessible from both the Seine Net Loft and Phoenix Net Loft buildings to support public events, exhibits, rentals and school programs that generate revenue to support the operations on site. It would also provide washrooms and shower services for the City's waterside/maritime programs, events and visiting vessels at both Britannia Shipyards National Historic Site and Imperial Landing. This structure would be constructed with an exterior cladding consistent with the heritage character of other buildings at the site. The cost estimate for construction of the stand-alone washroom concept with shower facilities is \$1,173,300 and would have an ongoing operating budget impact of \$17,000. While this option would provide new washrooms for the site, it is not recommended given the high cost, impact to the park/programmable area and it is removed from the Seine Net Loft.

Option 3 – Locate Temporary Washrooms on Site – Not Recommended

This option would include the installation of a temporary washroom trailer to be located between the Seine Net Loft and Phoenix Net Loft buildings parallel to the boardwalk. Given the high

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rental cost and visual impact of the portable washrooms, this option is not recommended. Annual temporary site servicing and washroom rental costs are estimated to be \$93,000.

Option 4 – Status Quo – No Additional Washroom and Shower Facilities – Not Recommended

As the programming and ongoing restoration of buildings at the Britannia Shipyards National Historic Site grows, the popularity and number of visits to the site also increases. Existing demand for washrooms exceeds present service levels.

Financial Considerations

In order to ensure that construction is commenced as soon as possible and the expenditure is within the City's 5 Year Financial Plan (2016-2020), staff recommend that an existing Council approved capital project be utilized as a temporary funding source until the 2017 Capital Budget and 5 Year Financial Plan (2017-2021) is approved.

In June 2013, Council established an Arts, Culture and Heritage Capital Reserve Fund with a contribution of \$4,340,112 realized from the land transactions in conjunction with the Oris Development (Kawaki). Based on interest accumulated and previously approved capital expenditures by Council, the fund balance is currently \$4,448,995. It is proposed that this fund be utilized for the washroom installation at the Britannia Seine Net Loft.

The eligible purposes under this fund are:

- Capital costs associated with the development of arts, culture or heritage facilities;
- Capital costs associated with the restoration of heritage properties; and
- Capital costs associated with the renovation or restoration of facilities or properties that are or will be used for arts, culture and heritage activities.

Financial Impact

Funding is available in the Arts, Culture and Heritage Reserve and will be included in the 2017 Budget and 5 Year Financial Plan (2017-2021). In order to commence construction in 2016, funding will be temporarily borrowed from an existing Council approved project. The estimate to complete the washroom installation is \$393,014. Operating budget impact costs for janitorial labour and supplies will be offset through rental fees to the Seine Net Loft.

Conclusion

Since the restoration of the Seine Net Loft building in 2013, the Britannia Shipyards National Historic Site has seen an increase in school education programs, visitors, rentals, visiting vessels and events/festivals. Programing is expected to increase and the continued provision of accessible washroom facilities fulfills a basic facility and community need. Approval of this report will allow for tendering for detailed design and construction management to commence in 2016.

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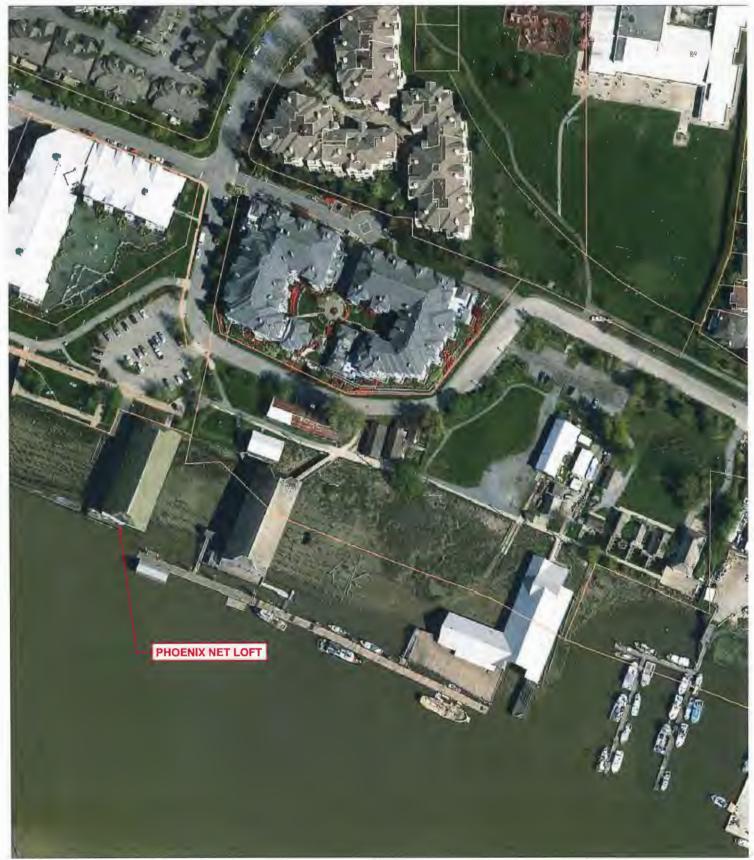
Mike Redpath

Senior Manager, Parks

604-247-4942

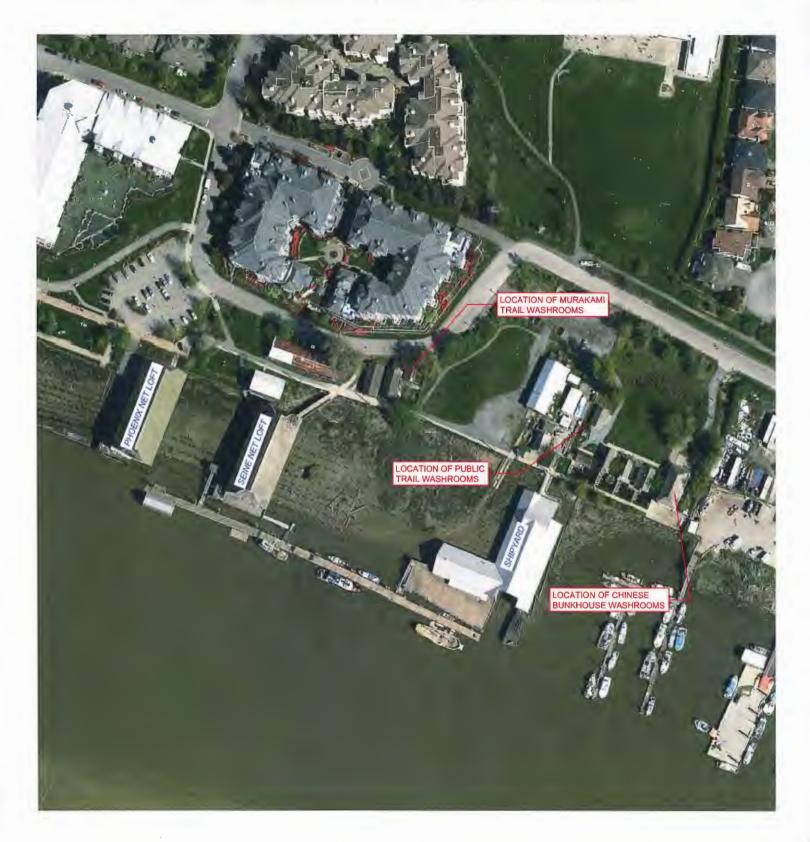
- Att. 1: Map of Phoenix Net Loft
 - 2: Map of Current Public Washrooms at Britannia Shipyards National Historic Site
 - 3: Option 1 Accessible Washrooms within the Seine Net Loft Building Recommended
 - 4: Option 2 Proposed Public Washroom Building Diagrams Not Recommended

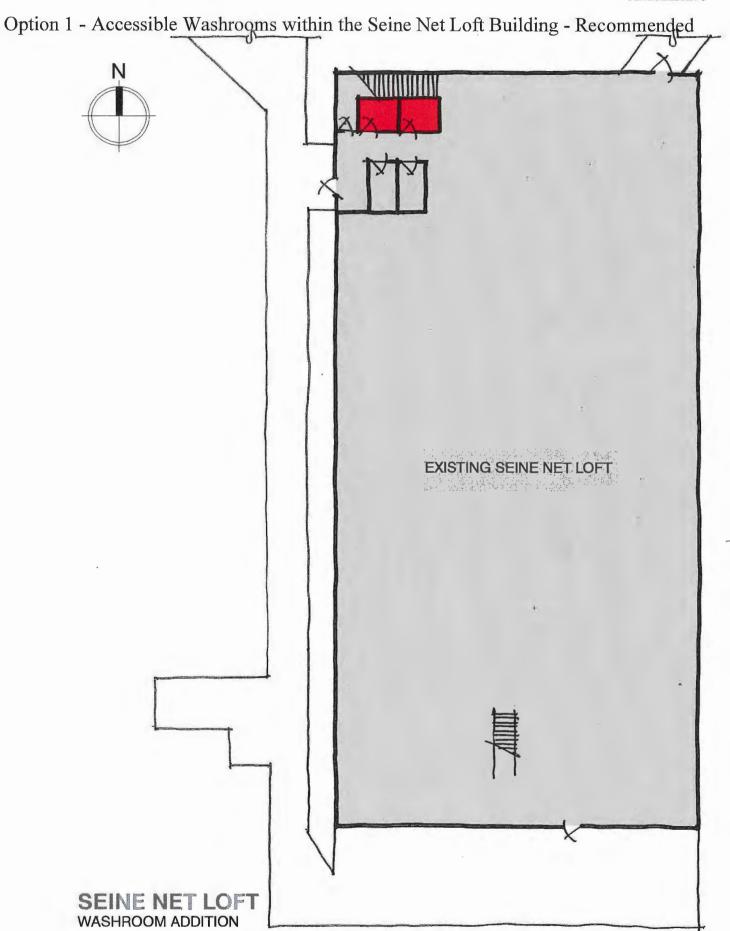
MAP OF PHOENIX NET LOFT



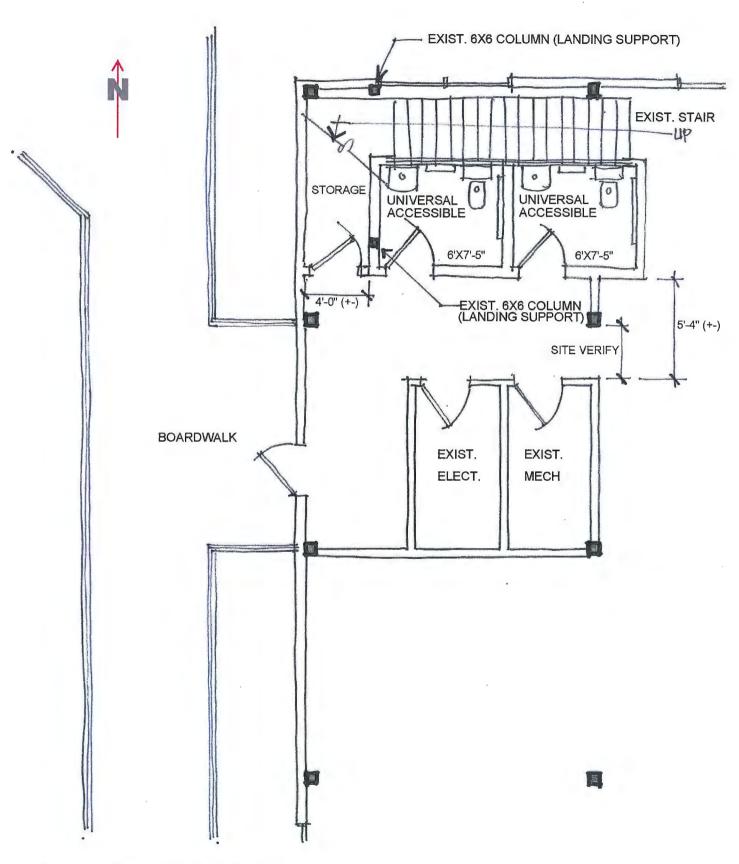
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MAP OF CURRENT PUBLIC WASHROOMS AT BRITANNIA SHIPYARDS NATIONAL HISTORIC SITE





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SEINE NET LOFT WASHROOM ADDITION 2016.07.14 - RATIO

Option 2 - Proposed Public Washroom Building Diagrams - Not Recommended

BSNHS - Public Washroom Buildings - South East Perspective

BSNHS - Public Washroom Buildings - South West Perspective





BSNHS - Public Washroom Buildings - Entering from Westwater Drive, Traveling South

BSNHS - Public Washroom Buildings - South East Aerial Perspective



