

NO: **R060**

COUNCIL DATE: **April 6, 2020**

REGULAR COUNCIL

TO: **Mayor & Council**

DATE: **April 2, 2020**

FROM: **General Manager, Planning & Development**

FILE: **6520-20 (Crescent Beach)**

SUBJECT: **Crescent Beach Neighbourhood Zoning - Response to Higher Flood Construction Levels**

RECOMMENDATIONS

The Planning & Development Department recommends that Council:

1. Receive this report for information;
2. Rescind Council Policy O-28 "Development Variance Permit – Crescent Beach" (attached as Appendix "I");
3. Instruct staff to consult with area residents on proposed new zoning provisions that take into account current and future flood construction level requirements for all new single-family dwellings constructed in the Crescent Beach Neighbourhood;
4. Direct staff to report back to Council on the outcome of the neighbourhood consultation process prior to bringing forward new Crescent Beach zoning provisions for Council's consideration; and
5. Instruct the City Clerk to forward a copy of this report and the related Council resolution to representatives of the Crescent Beach Property Owner's Association.

INTENT

The intent of this report is to provide background on the current Development Variance Permit ("DVP") process used to vary flood construction levels ("FCLs") for new house construction in Crescent Beach, and to seek endorsement for a City-led public consultation process on proposed new zoning provisions for Crescent Beach, which respond to Council's approval of the Coastal Flood Adaptation Strategy and recent amendments to the Provincial Flood Hazard Area Land Use Management Guidelines.

Repealing Council Policy No. O-28 will provide Council a more thorough opportunity to consider any proposal to vary the flood construction levels.

BACKGROUND

The Crescent Beach neighbourhood in South Surrey is adjacent to Boundary Bay and contains approximately 350 single-family lots (Appendix "II"). The Crescent Beach neighbourhood is located entirely within the 200-year floodplain. The FCL in Crescent Beach is based on the Geodetic Survey of Canada and has been set at 3.3 metres above sea level ("ASL") since the mid-1990s.

Current City Policy for Development Variance Permits to Flood Construction Levels

The floodproofing provisions of *Surrey Zoning By-law, 1993, No. 12000*, as amended, requires that all habitable space of buildings be located above the FCL of 3.3 metres ASL. In August 1992, Council passed a resolution (No. 92-3220) and adopted Policy O-28 "Development Variance Permit – Crescent Beach" ("Policy O-28"), permitting owners to apply for variances to reduce the FCL to 0.3 metres above the elevation of the road centre line fronting their property (Appendix "II"). The rationale for varying FCL elevations was to ensure that the neighbourhood's unique form and character would be maintained, without causing neighbourhood concerns about the visual impacts associated with raising the minimum floor elevation for the habitable area. This policy was reconfirmed by Council in July 2001.

Policy O-28 allows for an expedited Development Variance Permit ("DVP") process, which does not require a planning report to be presented for Council's consideration and approval. Area residents are notified of the DVP as required under the *Local Government Act*, and after the notification period is concluded, Council may issue the DVP by a Council resolution.

As part of the process, owners are required to register an indemnification Restrictive Covenant in favour of the City in order to allow the construction of habitable space below the FCL. Most Crescent Beach owners who have obtained building permits for new house construction have elected to follow the DVP process outlined in Policy O-28. Since 1992, approximately 83 DVPs have been approved in order to reduce the required FCL in the Crescent Beach community.

Rescinding Council Policy No. O-28 will ensure that any application that is proposing to develop below the FCL will be considered following the City's standard DVP process, including requiring a Planning Report to Council, prior to Public Notification. Given efforts to manage for sea level rise as identified in this report, it is considered appropriate to rescind Policy O-28 and follow the City's standard process for DVPs.

DISCUSSION

On January 1, 2018 the Ministry of Forests, Lands, Natural Resource Operations and Rural Development amended its Provincial Flood Hazard Area Land Use Management Guidelines. The amendment recommends that coastal communities allow for a 1.0 metre sea level rise to the year 2100, and a 2.0 metre sea level rise to the year 2200.

The Provincial Flood Hazard Land Use Management Guidelines indicates that for a property to be considered properly flood protected, requirements for flood construction levels need to be met. This entails ensuring that areas used for habitation, business or storage of goods damageable by floodwaters are not be constructed below the FCL. The provincial *Emergency Program Act* (Section 30) indicates that if an area is designated as a flood plain, homeowners will not qualify

for Provincial emergency assistance if they construct below the FCL. It is noted that this applies to newer construction, as historic homes may be eligible for compensation from damage caused by a flood event.

Related to the above changes at the provincial level, the City has been working on a Coastal Flood Adaptation Strategy (“CFAS”) since 2016 in order to explore ways to reduce climate change-driven coastal flood risk now and into the future. A range of strategic actions were developed to help the City’s coastal communities become more resilient to the challenges posed. Council endorsed the Surrey Coastal Flood Adaptation Strategy – Final Report on November 4, 2019 (Corporate Report No. R212; 2019, Appendix “III”).

The CFAS identified five actions related to FCL in Crescent Beach that would aid in reducing risk related to rising sea levels:

1. Support flood resilient design (Action 11);
2. Explore Sea Level Rise Planning Areas (Action 12);
3. Design Standards Guidebook (Action 13);
4. Build Back Better Program (Action 19); and
5. Drainage Improvements (Action 43).

These actions are anticipated to commence between 2020 and 2030.

There was a high level of public participation in developing the CFAS. The online survey for Crescent Beach revealed the following:

- 55% support building new homes above expected flood levels;
- 27% support raising existing homes above expected flood levels;
- 39% support existing practice of leaving existing houses as they are and raising new homes slightly; and
- 41% support building new homes using flood tolerant materials.

Crescent Beach Pilot Projects with Increased Flood Construction Levels

In response to the CFAS and the recent amendments to the Provincial Flood Hazard Area Land Use Management Guidelines, some owners in Crescent Beach have been proactive to ensure that their new houses consider anticipated sea level rises.

Staff recently worked with the owner of 2954 O’Hara Lane as a “pilot project” to design a flood resilient, three-storey single-family dwelling on this lot. The ground level is comprised of uninhabited, flood tolerant space, while the second and third levels of the dwelling would be habitable living space that is constructed above current and future FCL requirements. To achieve this, the owner submitted a development application (Application No. 7917-0550-00) to rezone their property to a Comprehensive Development (CD) Zone, which made allowances for

calculation of density, and increased lot coverage and building height. Final adoption of the CD zone was approved by Council on December 16, 2019. The house was carefully designed to be integrated with the existing character of the neighbourhood (Appendix “IV”).

Staff are currently reviewing two new rezoning applications for properties in Crescent Beach, which also propose new houses that have all habitable space located above current and future FCL requirements, similar to the approved rezoning for the house at 2954 O’Hara Lane. These development applications are expected to be presented to Council for consideration later this spring.

Proposal

In accordance with the approved recommendations in the CFAS, as well as recent amendments to the Provincial Flood Hazard Area Land Use Management Guidelines, staff are proposing that the current DVP process to reduce FCLs be phased out, and that new zoning provisions which would be applied to all single-family lots in Crescent Beach be investigated with area residents. The new zoning provisions are intended to respond to current and future FCL requirements, while recognizing the uniqueness of the Crescent Beach community and mitigating potential visual impacts associated with raising minimum floor elevations through appropriate design guidelines.

Proposed Neighbourhood Consultation Process

Subject to Council approval, staff is proposing that a City-led public consultation process be undertaken with area residents around new zoning provisions which support new house constructions that consider anticipated sea level rise. Staff anticipate that the public consultation process could begin once the various directives put in place by the authorities to combat the spread of the COVID-19 coronavirus have been lifted. It is anticipated that the public consultation process may take approximately six to eight weeks.

The proposed neighbourhood consultation process would entail at least one Public Information Meeting (“PIM”) with area residents and working closely with the Crescent Beach Property Owner’s Association (“CBPOA”).

Upon completion of the public consultation process, staff will provide a report to Council for consideration that summarizes the input of area residents and the CBPOA, along with recommendations for proposed zoning provisions that would apply to the Crescent Beach neighbourhood.

SUSTAINABILITY CONSIDERATIONS

The work of this review supports the objectives of the City’s Sustainability Charter 2.0. In particular, this work relates to Sustainability Charter 2.0 themes of Built Environment and Neighbourhoods and Public Safety. Specifically, this project supports the following Desired Outcomes (“DO”) and Strategic Directions (“SD”):

- Built Environment and Neighbourhoods DO7: Exposure to natural hazards is minimized through appropriate location and design of development.
- Built Environment and Neighbourhoods DO9: All aspects of planning, design and construction include climate change impacts, greenhouse gas (GHG) mitigation, adaptation, and resiliency strategies.

- Public Safety SD6: Promote development types and locations that will be minimally impacted by natural disasters.

CONCLUSION

This report provides members of Council with background information on proposed steps to address recommendations in the 2019 Climate Flood Adaptation Strategy report to reduce risk associated with sea level rise in the Crescent Beach neighbourhood.

Given the discussion in this report staff recommend that Council approve the recommendations in this report directing staff to initiate a public consultation process to identify appropriate tools that may be used to accommodate anticipated sea level rise in Crescent Beach.

Jean Lamontagne
General Manager, Planning & Development

Appendix "I"	Policy O-28 "Development Variance Permit – Crescent Beach"
Appendix "II"	Crescent Beach Neighbourhood
Appendix "III"	Corporate Report No. R212; 2019 Surrey Coastal Flood Adaptation Strategy – Final Report (November 4, 2019)
Appendix "IV"	2954 O'Hara Lane (Development Application No. 7917-0550-00) House Plans



CITY POLICY

No. O-28

REFERENCE:	APPROVED BY:	CITY COUNCIL
REGULAR COUNCIL MINUTES 10 AUGUST 1992 PAGE 31	DATE:	10 AUG 1992
	HISTORY:	NEW

TITLE: DEVELOPMENT VARIANCE PERMIT - CRESCENT BEACH

1. All applications for a Development Variance Permit for Crescent Beach where building elevation is the only issue be processed in a more expeditious manner as follows:
 - (a) Immediately following receipt of an application, the Municipal Clerk be authorized to notify area residents as required under the Municipal Act of the proposed Development Variance Permit (before proceeding to Council);
 - (b) That such applications be forwarded to Council through the Clerk's report with staff recommendation immediately after the notification period.
2. That Council set a fee of \$400 for processing Development Variance Permits in the Crescent Beach area where the only issue to be dealt with is building elevations.
3. That the necessary by-laws and procedures be amended accordingly to effect the recommendations of this report.

This policy is subject to any specific provisions of the Local Government Act, or other relevant legislation or Union agreement.





CORPORATE REPORT

Appendix "III"

NO: R 212

COUNCIL DATE: November 4, 2019

REGULAR COUNCIL

TO: Mayor & Council DATE: October 28, 2019

FROM: Acting General Manager, Engineering FILE: 4816-706
General Manager, Planning & Development XC: 5225-23
General Manager, Parks, Recreation & Culture

SUBJECT: Surrey Coastal Flood Adaptation Strategy – Final Report

RECOMMENDATION

The Engineering Department, the Planning & Development Department, and the Parks, Recreation & Culture Department recommend that Council approve the finalized Surrey Coastal Flood Adaptation Strategy ("CFAS") final report, which is attached to this report as Appendix "I".

INTENT

The purpose of this report is to present the finalized CFAS report for Council's approval.

BACKGROUND

The Province of British Columbia has advised municipalities to plan for one metre of sea level rise over the next 80 years. With 20% of Surrey's land area in the coastal floodplain, it is important that the City continue its long-range infrastructure planning. Global sea level is rising and has impacts on Surrey's coast.

To help prepare Surrey for a changing climate and help Surrey's coastal communities become more resilient, the City initiated a comprehensive process to develop CFAS. As one of the first programs of its kind in Canada, this multi-year undertaking has identified the current and potential impacts of climate change on Surrey's large coastal floodplain area and developed a long-term strategy to reduce climate change-driven coastal flooding risks, now and into the future.

Launched in 2016, CFAS blended a value-based, participatory planning approach with deep, robust technical analysis to develop a range of strategic actions to help coastal communities in the CFAS Study Area (Mud Bay, Crescent Beach, and Semiahmoo Bay) become more resilient to the challenges. The overarching goal of CFAS has been to develop a broadly supported strategy to reduce coastal flood risks in Surrey.

CFAS followed a five-phase approach (illustrated in Figure 1) to develop the strategy.



Figure 1. Phases of CFAS

CFAS has already earned the City recognition as a leader in climate resilience. On September 25, 2019, at the Union of BC Municipalities Annual Meeting, the City received the inaugural Climate and Energy Action Award in the newly created Climate Adaptation category from Community Energy Association. The award recognizes the City for its leadership in developing CFAS with an innovative, multi-phase, and community-driven process to prepare for climate change.

The City was also able to leverage the collaborative work underway in the CFAS process to assemble a comprehensive application for early 2019, for the newly announced Disaster Mitigation and Adaptation Fund (“DMAF”) by the Government of Canada. The City was successful in its application and received a Federal funding commitment of \$76.6 million to implement large-scale infrastructure and innovative nature-based solutions to address pressing concerns, while also preparing for future impacts associated with a changing climate. DMAF advances CFAS planning to action on the ground.

At its Regular Meeting on July 17, 2019, Council received Corporate Report No. R151; 2019, a copy of which is attached to this report as Appendix “II”. The purpose of that report was to present the Draft CFAS Strategy Document for information and seek authorization to proceed with CFAS Phase 5, Reporting Back, including the final round of engagement.

DISCUSSION

As the actions required to adapt to coastal flooding will impact a range of sectors, stakeholders and partners throughout Surrey, staff have undertaken significant engagement efforts over the past three years working through the five phases of CFAS. Thousands of residents and numerous community groups, agencies, organizations and academic institutions have contributed valuable input throughout the process that has been core to the success of the project to date.

After receiving authorization from Council on July 17, 2019 to proceed to CFAS Phase 5, Reporting Back, the CFAS Draft Strategy Document was shared with the general public and interested parties and stakeholders who had been involved in developing CFAS to date for final comments. CFAS has received letters and emails of support from outside organizations who have provided input into developing the Strategy Document. A summary of distribution of the CFAS Draft Strategy Document is listed in Table 1.

Type of Metric	Number
E-Newsletters/Emails sent by City	3,000+
CFAS webpage unique views	700+
Hard copies distributed	80

Table 1: CFAS Phase 5 Final Reporting Metrics

The information and feedback obtained from the engagement process through the five phases of CFAS have been linked and integrated into the project’s overarching, participatory decision-making process and are ultimately reflected in the final CFAS Strategy Document. The CFAS Steering Committee, consisting of senior staff for all impacted City Departments, has also provided input on the CFAS process and deliverables.

To complete CFAS Phase 5, the City will host a final CFAS wrap-up event to thank participants for their involvement and to communicate the final CFAS Strategy Document. A CFAS summary document and video will be released this Winter. The City will also complete final reporting to the Federation of Canadian Municipalities’ Municipalities for Climate Innovation Program to obtain final grant payment anticipated in the amount of \$46,600 in December 2019. As a result of the comprehensive process the City has developed, it is anticipated that the City will be well-positioned for future grant opportunities to support advancement of aspects of CFAS.

CFAS Strategic Directions

Mud Bay Strategic Direction – Coastal Works / Highway 99

The longer-term strategic direction for the Mud Bay Planning Area is to gradually develop new infrastructure and management approaches along the Highway 99 corridor to prepare for increased frequency of flooding. This agricultural area is complex, as there are numerous infrastructure corridors of regional, provincial and national significance.

Crescent Beach Strategic Direction – Expanded Edge

For the Crescent Beach Planning Area, the longer-term planning challenges are even greater. Shorter-term tactical actions include a series of smaller-scale drainage improvements and regulatory changes (e.g., higher flood construction level) until such point that sea level rise (observed increase and rate of rise) triggers an “expanded edge” approach. This approach could build up and extend the shoreline towards Boundary/Mud Bay and include additional drainage and flood management works in the Crescent Beach community.

Semiahmoo Bay Strategic Direction – Infrastructure Improvements and Land Raising

For the Semiahmoo Bay Planning Area, relatively smaller and less substantive actions are envisioned. While many of the actions will need to be achieved in conjunction with the Semiahmoo First Nation, there are long-term coordinated works required along 8 Avenue/Marine Drive.

CFAS Actions

To support the established strategic directions, the CFAS Strategy Document sets out 46 actions (“Actions”) to prepare and adapt for sea level rise, as described in Section 4 of Appendix “I”. The timing of the Actions is dependent on the rate of future sea level rise which, for the purpose of planning, the Provincial Sea Level Rise Curve noting 1.0 metre of global sea level rise by 2100 was used.

The 46 Actions have been identified and categorized for each decade between 2020 and 2100, and the timelines will be adaptable and adjusted as new information becomes available, such as observations of sea level rise and occurrence of extreme events.

The 46 CFAS Actions have been separated into two categories:

1. Area-wide Actions that benefit the entire coastal and inland floodplain areas; and
2. Planning Area-specific Actions that address area-specific issues in Mud Bay, Crescent Beach and Semiahmoo Bay.

Area-wide Actions

18 Area-wide Actions have been identified to commence between 2020 to 2030 and have been grouped into four categories listed below.

Ongoing Education, Communications, and Advocacy Initiatives

1. CFAS Steering Committee
2. Internal Updates
3. CFAS Advisory Group
4. CFAS Website
5. Advocacy Partners Workshop
6. Communications & Media

Detailed Planning, Studies, and Data Collection

7. Update hazard bibliography
8. Update coastal flood hazard assessment
9. Detailed studies – Strategic Actions

Regulatory Controls, Design, Standards, and Guidelines

10. Review Development Variance practices
11. Support flood resilient design and construction
12. Explore Sea Level Rise Planning Area
13. Design Standards Guidebook

Extreme Flood Management

14. Hazard review
15. Training and readiness
16. Improve flood warning systems and communication
17. Temporary protection measures assessment
18. Build Back Better program

Area-specific Actions

A large number of these Actions are funded in part through the Federal DMAF project.

There are 14 Area-specific Actions identified to commence between 2020 and 2030.

1. Foreshore enhancements (DMAF Project)
2. Sediment augmentation in foreshore area
3. 152 Street upgrades and raising (DMAF Project)
4. Serpentine and Nicomekl sea dams (DMAF Project)
5. Upgrade Serpentine and Nicomekl dykes (DMAF Project)
6. Coordinate with Ministry of Transportation and Infrastructure – Highway 99/Colebrook dyke upgrades
7. Upgrade Colebrook Dyke (DMAF Project) from 120 Street to King George Boulevard
8. Replace Colebrook Drainage Pump Station (DMAF Project)
9. Upgrade Nico Wynd area flood management
10. Maintenance of Crescent Beach Dyke
11. Maintenance of Crescent Beach Shoreline
12. Crescent Beach Drainage improvements (DMAF Project)
13. Little Campbell River emergency access (DMAF Project)
14. Comprehensive flood improvements

Next Steps

The focus for the foreseeable future will be on implementing the Surrey DMAF Project, which significantly advances numerous Actions developed through the CFAS process to be completed between 2020 and 2030. These works are the first Actions that will begin the implementation of CFAS. Public engagement through the Surrey DMAF Project will also be used to maintain communication and engagement with residents and stakeholders. Information on these priority coastal flood adaptation projects will be made available at www.surrey.ca/CoastalTakingAction.

The CFAS Strategy Document is a living document that will be revisited periodically and will follow an Adaptive Management Cycle. An Adaptive Management Cycle of “plan”, “do” and “learn”, as summarized in Figure 2, will be utilized throughout the implementation of Actions and updating the Strategy Document.



Figure 2: CFAS Adaptive Management Cycle

Through CFAS, the City has completed the “plan” portion of the Adaptive Management Cycle and has initiated the “implementation” and “monitoring” section of the “do” portion. As the City is completing the “do” portion, staff will “evaluate” and “adjust” the work being done, thus completing the Adaptive Management Cycle. This approach recognizes that planning in a dynamic context needs to be flexible and responsive to new drivers as they emerge. For CFAS, this includes the following considerations:

- New data or changes detected in the data - such as acceleration in sea level rise;
- New policies/directives – global, national, provincial, regional, and local;
- New partners and actions taken by stakeholders;
- New funding and the requirements/opportunities that come with them; and
- Extreme events – occurrence of an extreme coastal flood or other disaster.

FUNDING

Funding for a number of the Actions has been committed through a Federal DMAF grant to the City of Surrey in the amount of \$76.6 million. Costs for the Actions between 2020-2029 that are not covered through the Federal DMAF grant are being included in the Drainage Utility’s 10-year Servicing Plan. Future works beyond 2029 outlined in the CFAS will be included in future capital plans as funding becomes available and also through external funding opportunities.

SUSTAINABILITY CONSIDERATIONS

The process of developing CFAS supports the objectives of the City's Sustainability Charter 2.0. In particular, the CFAS relates to the Sustainability Charter 2.0 themes of Infrastructure, Built Environment and Neighbourhoods, Ecosystems, and Public Safety. Specifically, the CFAS development supports the following Desired Outcomes ("DO") and Strategic Directions ("SD"):

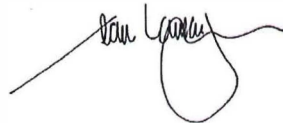
- Energy and Climate DO6: The City anticipates changing weather patterns and sea level rise as a result of climate change, and implements appropriate infrastructure, land use planning and emergency response solutions that will be resilient over the long term;
- Neighbourhoods and Urban Design SD8: Strengthen and promote community engagement and programming in public spaces;
- Green Infrastructure DO12: Surrey protects ecosystem services and manages natural assets in order to create resiliency to adapt and thrive in a changing climate; and
- Emergency Preparedness and Prevention SD6: Promote development types and locations that will be minimally impacted by natural disasters.

CONCLUSION

CFAS aligns with the community values established through the extensive stakeholder and public engagement over the past three years. The finalized CFAS report outlines how the City can adapt to the challenges faced by sea level rise and increased coastal flooding driven by a changing climate. The City's innovative response to these challenges provides important community co-benefits, while addressing current priorities.



Scott Neuman, P.Eng.
Acting General Manager,
Engineering



Jean Lamontagne
General Manager,
Planning & Development



Laurie Cavan
General Manager,
Parks, Recreation & Culture

YY/MO/cc

***Appendices available upon request.**

Appendix "I" –CFAS Strategy Document
Appendix "II" – Corporate Report No. R151; 2019
Appendix "III" – DMAF Projects

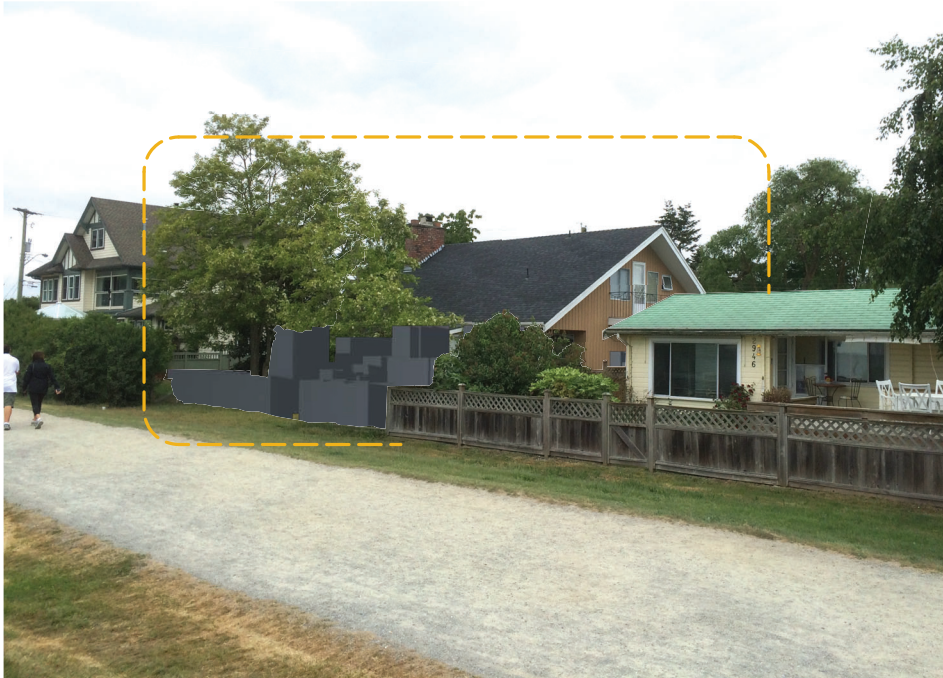
2954 O'Hara Lane, Surrey

Rezoning for Flood Protection

Elizabeth MacKenzie Architect
June, 2018

Appendix "IV"





VIEW FROM BEACH WALK
VIEW FROM BEACH WALK



VIEW FROM LANE
VIEW FROM BEACH WALK



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A	REVISED REZONING	18-6-26
No.	Revision	Date
1	FOR REZONING	17-11-27
No.	Issue/ Printing	Date

Consultant / Consultant Seal



4659 Dorsland Drive, Vancouver, B.C.
 V6R 1E8
 Phone: 604.731.9157 Email: emack@ghae.ca

SINGLE FAMILY HOME

Langton/Presson Residence

AT
 2954 O'Hara Lane,
 Surrey BC

Project

3D VIEWS

Sheet Title

Checked By EM

Drawn By JS

Scale Next To Scale

Date SEPT 2017

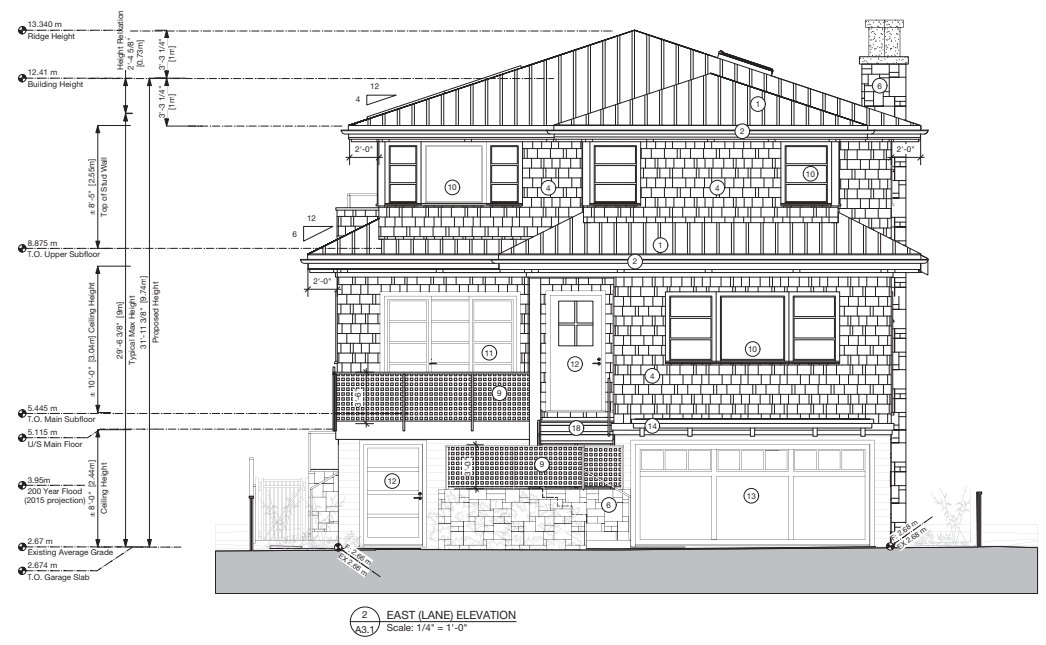
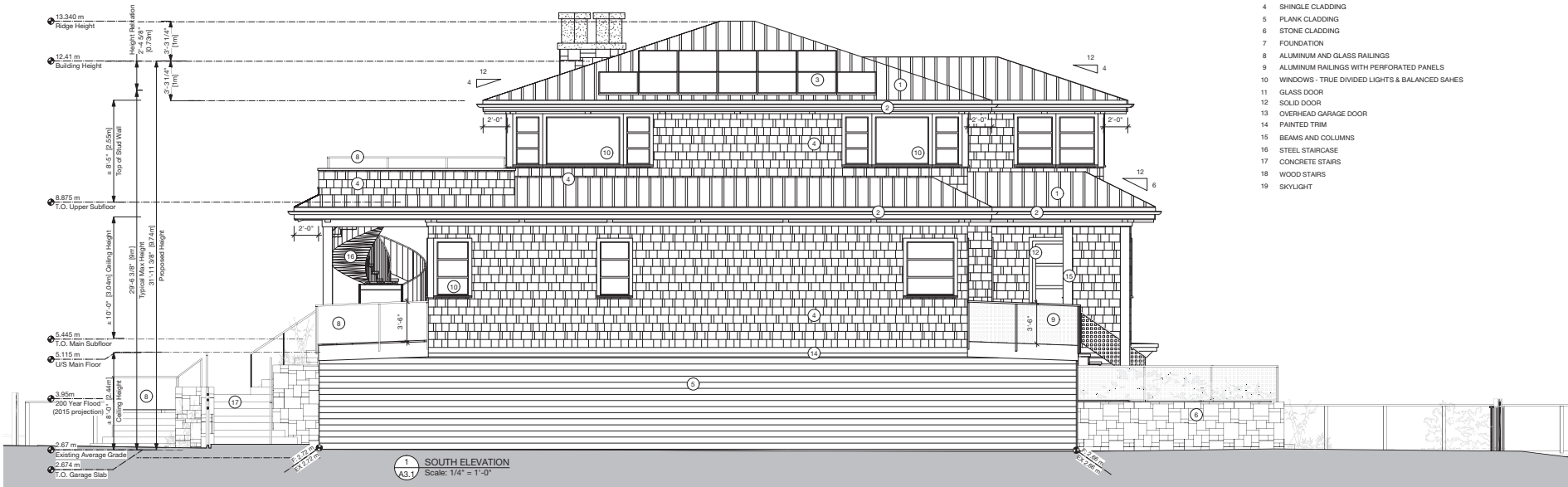


EXTERIOR FINISHING SCHEDULE

- 1 METAL ROOFING
- 2 ALUMINUM GUTTERS AND RAIN WATER LEADERS
- 3 PHOTOVOLTAIC PANELS
- 4 SHINGLE CLADDING
- 5 PLANK CLADDING
- 6 STONE CLADDING
- 7 FOUNDATION
- 8 ALUMINUM AND GLASS RAILINGS
- 9 ALUMINUM RAILINGS WITH PERFORATED PANELS
- 10 WINDOWS - TRUE DIVIDED LIGHTS & BALANCED SASHES
- 11 GLASS DOOR
- 12 SOLID DOOR
- 13 OVERHEAD GARAGE DOOR
- 14 PAINTED TRIM
- 15 BEAMS AND COLUMNS
- 16 STEEL STAIRCASE
- 17 CONCRETE STAIRS
- 18 WOOD STAIRS
- 19 SKYLIGHT

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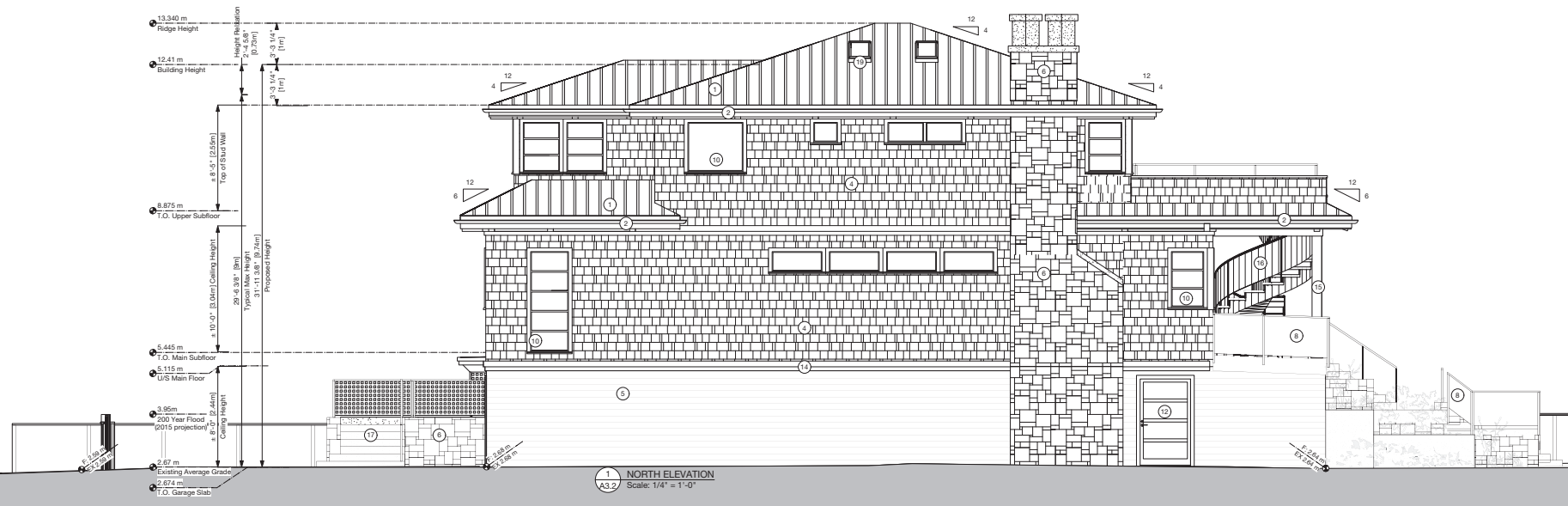
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 Phone: 604.731.9157 | email: emack@shaw.ca

SINGLE FAMILY HOME
 Langton/Presson Residence
 AT
 2954 O'Hara Lane,
 Surrey BC

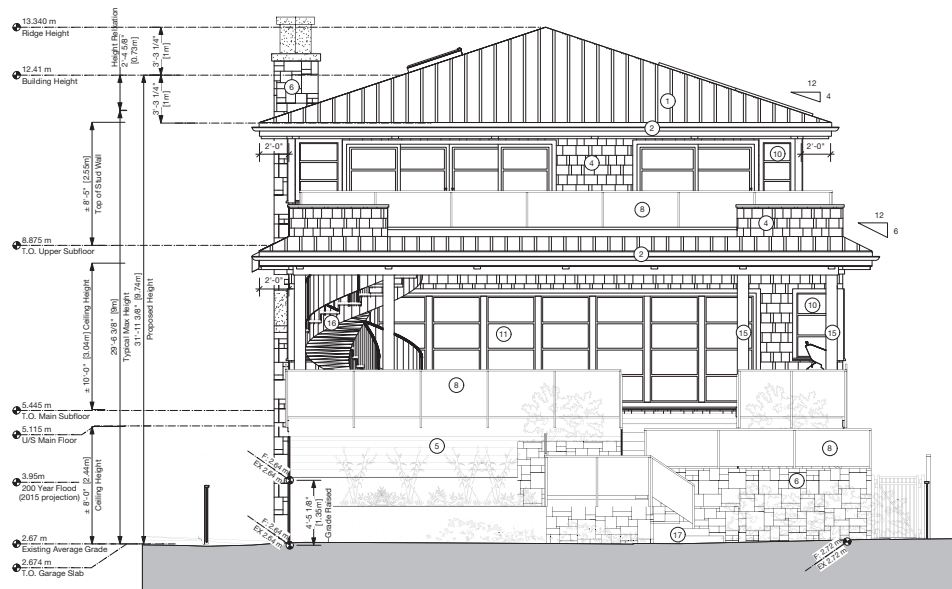
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ELEVATIONS

Sheet Title
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 Date SEPT 2017

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1 NORTH ELEVATION
Scale: 1/4" = 1'-0"



2 WEST (OCEAN) ELEVATION
Scale: 1/4" = 1'-0"

EXTERIOR FINISHING SCHEDULE

- 1 METAL ROOFING
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18	REVISED REZONING	18-6-26
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1	FOR REZONING	17-11-27
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Project
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A3.2