



Corporate Report

NO: R057

COUNCIL DATE: March 27, 2006

REGULAR COUNCIL

TO: **Mayor & Council** DATE: **March 21, 2006**
FROM: **General Manager, Planning and Development** FILE: **6800-20-037**
SUBJECT: **Semiahmoo Trail – Proposed Amendments to By-laws Addressing Setbacks, Landscaping, and Designation of Additional Land**

RECOMMENDATION

It is recommended that Council:

1. Receive this report as information;
2. Approve text amendments to Surrey Zoning By-law, 1993, No. 12000, as amended (the "Zoning By-law"), as documented in Appendix I to this report, to provide for special building setbacks and landscaping on lands adjacent to the Semiahmoo Trail;
3. Approve amendments to the Surrey Semiahmoo Trail Heritage Designation By-law, 2004, No. 15280, as amended ("By-law No. 15280"), to add to the Semiahmoo Trail, the unopened 22 Avenue road allowance located east and west of Semiahmoo Trail, as documented in Appendix II to this report;
4. Resolve to add the unopened 22 Avenue road allowance located east and west of Semiahmoo Trail, as illustrated in Appendix III to this report, to the lands identified as Heritage Site No. 1 (Semiahmoo Trail) in the Surrey Community Heritage Register;
5. Amend the Semiahmoo Trail Design Guidelines by adding an additional guideline provision concerning the design of access points to the Semiahmoo Trail as documented in Appendix IV to this report; and
6. Authorize the City Clerk to bring forward the necessary amendment by-laws for the required readings and to set a date for the required Public Hearing.

INTENT

The purpose of this report is to obtain Council authorization for the following:

- To amend the Zoning By-law to establish special building setbacks and landscaping provisions to maintain and protect a suitable transition on properties abutting Semiahmoo Trail;
- To amend By-law No. 15280 and the Surrey Community Heritage Register to include the unopened 22 Avenue road allowance located east and west of the Semiahmoo Trail; and
- To amend the Design Guidelines in By-law No. 15280 to define significant "Major Access Points."

BACKGROUND

Semiahmoo Trail is one of the most significant heritage sites in the City of Surrey. It was the first designated heritage site in the City, receiving a heritage designation in 1978. In 2004, Council adopted a new designation by-law (further amended in September 2005) to extend the heritage designation of the Trail to all lands which have been acquired by the City for Semiahmoo Trail since 1978. This expanded the designed area to include all lands forming part of Semiahmoo Trail from the Nicomekl River in the north, to 20 Avenue in the south (as illustrated in Appendix I of this report). It is also listed on the Canadian Register of Historic Places.

Since the approval of a 124-unit townhouse development along Semiahmoo Trail in 1991, all developments adjacent to the Trail have been required to dedicate land to widen the Trail and to provide for a sympathetic interface with the Trail. The development approval process requires registration of a restrictive covenant stipulating that split rail fences, landscaping transitions, extra building setbacks, sensitive building massing and natural buffers be provided on developed lands along the Trail. In 2004, Council approved a consolidation of these policies and guidelines into a single document entitled "Semiahmoo Trail Design Guidelines". Council also adopted a new designation by-law, the By-law No. 15280, designating lands being protected for Semiahmoo Trail. This clearly established which lands adjacent to the Semiahmoo Trail corridor would be subject to the Guidelines upon development or redevelopment.

Semiahmoo Trail Setbacks

Recently, the Heritage Advisory Commission (the "HAC") expressed interest in having a continuity of setbacks and a consistent interface with Semiahmoo Trail as established in By-law No. 15280 to insure that the special setback is maintained on zoned properties or secured through the development process when sites adjacent to Semiahmoo Trail are developed. The HAC noted concern that construction could be approved through, for instance, the issuance of building permits without the ability to implement design guidelines such as the additional setback if no rezoning is related to a permit application. On May 25, 2005 the HAC passed a resolution recommending:

"That Council enact a zoning by-law, as a Council initiative, to protect the setback at an appropriate distance from Semiahmoo Trail".

Council considered this recommendation at its meeting of May 30, 2005 and directed staff to proceed to bring forward a Zoning By-law amendment to protect the setback at an appropriate distance from Semiahmoo Trail.

Proposed Addition to the Trail

At its November 30, 2005 meeting, the HAC received correspondence from the Friends of Semiahmoo Trail Society (Appendix V) requesting that the City designate an un-developable, city-owned 10 metre road right-of-way (i.e., 22 Avenue), located between 150A Street and the existing Trail, as shown in Appendix III, as part of By-law No. 15280. The HAC considered this request and resolved as follows:

"That the Heritage Advisory Commission recommend to Council that the unopened road allowance on 22nd Avenue, West of 150th Street be designated by By-law as part of the Semiahmoo Trail".

On December 12, 2005, Council referred this matter to staff for a report.

On February 15, 2006, the HAC passed a further resolution:

"That the Heritage Advisory Commission recommend to Council that a further report be brought forward to properly identify that the road allowance on 22nd Avenue, East of 150A and West of 152nd Street is appropriately closed off, closed to traffic, and dedicated as parkland".

On March 6, 2006, Council received the minutes of the February 15, 2006 HAC meeting and endorsed this resolution.

DISCUSSION

Special Setbacks and Landscaping

Lands that abut the Semiahmoo Trail are zoned a variety of zones, including Single Family Residential, Multiple Residential, Institutional and others. Each of these zones have setback provisions, differing from each other. To achieve a uniform setback from the Trail, as envisioned by HAC, it is necessary to override all zoning setback provisions in each of the individual zones by amending the Definitions and General Regulations in the Zoning By-law. It is proposed that Council consider amending the Zoning By-law, Part 4 General Regulations, as well as Part 1 Definitions, as follows:

- Add a definition to the Zoning By-law for "Semiahmoo Trail". The definition of Semiahmoo Trail will refer to a series of maps to be included as Schedule H to the Zoning By-law;
- Add a definition to the Zoning By-law for "Semiahmoo Trail Landscaping" which would read as follows:

"*Semiahmoo Trail Landscaping* means any combination of trees, bushes, shrubs, plants, bark mulch, split rail fence and any other similar *landscaping* as determined by the *City*, arranged and maintained in a natural and forested state so as to create a suitable transition with *Semiahmoo Trail*. As determined by the *City*, this shall not include decorative paving, planters, foundations, sculptures, decorative fences or fences other than split rail fences, non-porous or paved parking areas, uncontrolled weeds and any other similar *landscaping* as determined by the *City* that detract from a natural and forested state".

- Require the setback for new buildings and structures constructed on properties abutting Semiahmoo Trail to be not less than 10 metres (33 feet) from the edge of the property containing the Semiahmoo Trail; and
- Require that for any lot abutting Semiahmoo Trail, that the portion of the lot within 7.5 metres (25 feet) of the Trail be developed as a natural buffer.

The maps proposed as Schedule H to the Zoning By-law will include the same properties as those designated for heritage protection in the By-law No. 15280. Thus the Zoning By-law and the Semiahmoo Trail Design Guidelines will work together to achieve the objectives of: a consistent setback on lands adjacent to Semiahmoo Trail and a suitable landscaping transition consistent with the heritage character of the Trail.

The 10 metre (33 foot) setback has already been achieved in new developments along the Trail. However, an analysis completed by staff identified a number of lots having buildings or structures lawfully constructed at a setback of less than the 10 metres being proposed. Most of these are lots in existing single-family subdivision abutting Semiahmoo Trail. The intent is not to render existing lawfully constructed buildings non-conforming. Therefore, the proposed setback is intended to apply to new construction only to ensure structures are not constructed in the 10 metre setback area.

The proposed setback provision for the Zoning By-law has been drafted to apply to new construction only, and allows for damaged or destroyed buildings to be rebuilt as originally sited at the adoption date of the by-law, as amended, or to be extended so long as extension/addition is not built closer than 10 metres to the Trail.

Public Information Meeting For Special Setbacks

A Public Open House was held on February 15, 2005 at the Star of the Sea School at 15024 - 24 Avenue to present the proposed amendments related to the Semiahmoo Trail and to seek feedback from the public on these amendments. Notice of the Open House was sent to all owners of properties located within 100 metres of the Semiahmoo Trail, and an advertisement regarding the Open House was also placed in the local newspaper. Approximately 67 people attended the Open House to view a display and ask questions concerning the Semiahmoo Trail setback and landscaping changes being proposed. There was overwhelming support for the proposals, with 44 questionnaires being returned

supporting the change. Three people did not support the changes and two questionnaires were returned with no response.

The most frequently cited concern was about landscaping in the back yards of single family lots along Semiahmoo Trail. Residents were concerned whether they would need to comply with the requirements to have a natural transition in the rear yard of existing lots on which homes were already constructed. It was explained that the intent of the amendments to ensure that natural transition along the Trail on development sites was protected and that any new development sites along Semiahmoo Trail design into the development the full requirement for the natural transition area along the Trail. Therefore, to remedy this concern, the proposed new definition has been changed by adding the wording "as determined by the City" before the list of prohibited uses. Therefore, property owners could retain elements such as solid fences, hard landscaping, decorative pavers or parking within the 7.5 metre buffer area where there is an existing developed site with such features already in place and where the site is not subject to development or redevelopment.

One property owner raised the concern that he has purchased a lot backing on Semiahmoo Trail that was recently created through subdivision. Through the approval process, the City acquired land for park purposes to create a buffer between Semiahmoo Trail and the lots backing on to it. The property owner was concerned that the siting of the new house may encroach slightly within the 10 metre (33 foot) setback. Legal Services has advised that, as the intent to provide for separation and buffering is achieved by the parkland dedication, Council could consider issuance of a development variance permit at the time of the application.

Unconstructed 22 Avenue Road Allowance East and West of the Trail

The undeveloped 22 Avenue road allowance, located east and west of Semiahmoo Trail that is the subject of this section of the report, is illustrated in Appendix III.

Presently, the road allowance is being used as an informal access point to the Semiahmoo Trail. It is maintained by the Parks, Recreation and Culture Department to typical trail standards.

In 1995, the City received an application to develop land directly south of the 22 Avenue road right-of-way, west of Semiahmoo Trail. Council agreed to close and release the southerly 10 metres of the 22 Avenue road right-of-way. At the time of this development approval, it was noted that 22 Avenue would not become a through street, as a Significant Tree was located in the northern half of the road allowance. It was determined by the Engineering Department that the physical continuation of a paved street in this section of 22 Avenue was not required.

The HAC has recommended the 22 Avenue road allowance be subject to the following:

1. **Designating these lands in the Surrey Semiahmoo Trail Heritage Designation By-law.**

The HAC has recommended that, given the proximity of this unopened road allowance to the Semiahmoo Trail and the fact that it is already used as a pedestrian access point to the Trail for residents in the "Meridian-by-the-Sea" subdivision, there is justification to include this unopened road allowance as part of the Semiahmoo Trail. The HAC notes that the unopened road allowance possesses similar heritage character and value and similar design features as those associated with the Semiahmoo Trail.

Trail users frequently uses this trail entrance, and the addition of this unopened road allowance would formalize an already existing mid-block connection and access point. This would contribute to the larger pedestrian and trail system in South Surrey.

The designation of this road allowance would also recognize Significant Tree No. 103. This Douglas Fir tree is listed as a heritage feature in the Tree Preservation By-law No. 12880, and is further identified by a heritage plaque. The location of the Heritage Tree is illustrated on Appendix VI.

2. **Dedicate 22 Avenue as a Park**

The 22 Avenue road allowance is presently dedicated as road allowance. To designate the land as park, it would be necessary for Council to proceed with a formal road closure by-law and then proceed with a by-law to dedicate the same land as parkland. The parkland dedication process would include a Public Hearing and title in the resultant parkland would be vested with the Provincial Crown and not in the name of the City. While this would have the advantage of making it more difficult to ever re-convert the land back from parkland, it is noted that many City-owned properties not dedicated as parkland are currently used and maintained as parkland.

The proposed Heritage Designation By-law, ownership by the City and maintenance of the site to City park standards by the City is considered to be sufficient to ensure the protection of this land in a condition acceptable to the City, as part of the City's trail system, without the need for the cost and process associated with converting the road allowance to park.

If Council approves the addition of the unopened 22 Avenue road allowance to By-law No. 15280, these lands will be included in Schedule H of the proposed amendment to the Zoning By-law, as shown in Appendix I.

Semiahmoo Trail Design Guideline Changes

With the addition of a major access point (i.e., 22 Avenue road allowance) as part of Semiahmoo Trail, it is recommended that the Design Guidelines be amended to make provision for such entrance points. It is recommended that the Guidelines define "major access points" as lands at least 10 metres (33 feet) in width that provide access to the Semiahmoo Trail. Narrow walkways and entrances through switchbacks in the split rail fence along the Semiahmoo Trail Corridor would not be covered by this definition.

To maintain a similar natural and heritage character along these major access points as the main trail corridor, it is proposed that the main design principles of the existing Guidelines be applied to these access points. This would mean that a setback of 10 metres for new buildings and structures, the application of restrictive covenants on new development, the definition of the trail edge by a split rail fence and the guidelines for the trail surface characteristics would be the same on the major access points as for the main Trail.

Appendix IV documents the recommended changes to the Semiahmoo Trail Design Guidelines, including an illustration concerning the siting of buildings in relation to "major access points".

Legal Review

The proposed amendments to establish special setbacks and landscaping regulations respecting lots along Semiahmoo Trail and the Heritage Designation *By-law* have been reviewed and found acceptable as to form and content by Legal Services.

CONCLUSION

Based on the above discussion, it is recommended that Council:

- Approve text amendments to the Zoning By-law, as documented in Appendix I to this report, to provide for special building setbacks and landscaping on lands adjacent to the Semiahmoo Trail;
- Approve amendments to By-law No. 15280 to add to the Semiahmoo Trail the unopened 22 Avenue road allowance located east and west of Semiahmoo Trail, as documented in Appendix II to this report;
- Resolve to add the unopened 22 Avenue road allowance located east and west of Semiahmoo Trail, as illustrated in Appendix III to this report, to the lands identified as Heritage Site No. 1 (Semiahmoo Trail) in the Surrey Community Heritage Register;
- Amend the Semiahmoo Trail Design Guidelines by adding an additional guideline provision concerning the design of access points to the Semiahmoo Trail as documented in Appendix IV to this report; and

- Authorize the City Clerk to bring forward the necessary amendment by-laws for required readings and to set a date for the required Public Hearing.

Murray Dinwoodie
General Manager
Planning and Development

AK/GDM/kms/saw

Attachments:

- Appendix I - Proposed Amendments to the Surrey Zoning By-law for Building Setbacks and Landscaping on Lots Abutting Semiahmoo Trail
- Appendix II - Proposed Amendments to Surrey Semiahmoo Trail Heritage Designation By-law, 2004, No. 15280 Amendment to Schedule A;
- Appendix III - Proposed Amendments to Surrey Semiahmoo Trail Heritage Designation By-law, 2004, No. 15280 Amendment to Schedule "B" section 6 map;
- Appendix IV - Revisions to the Semiahmoo Trail Design Standards
- Appendix V - Letter from the Friends of Semiahmoo Trail Society
- Appendix VI - Contextual Map and Aerial Photographs of the Land Subject to this Report

**Proposed Amendments to the Surrey Zoning By-law, 1993, No. 12000
for Special Building Setbacks and Landscaping on Lots Abutting Semiahmoo Trail**

The following amendments are proposed to Surrey Zoning By-law, 1993, No. 12000:

1. The Index is amended by inserting a new line immediately following "Schedule G" as follows:

"Schedule H Semiahmoo Trail H.1"

2. The following new definition is inserted between "Secondhand Store" and "Semi-detached Residential Building" in Part 1 Definitions:

"Semiahmoo Trail
means the area shown in Schedule H."

3. The following new definition is inserted between "Landscaping" and "Light Impact Industrial" in Part 1 Definitions:

"Semiahmoo Trail Landscaping

means any combination of trees, bushes, shrubs, plants, bark mulch, split rail fence and any other similar *landscaping* as determined by the *City*, arranged and maintained in a natural and forested state so as to create a suitable transition with *Semiahmoo Trail*. As determined by the *City*, this shall not include decorative paving, planters, foundations, sculptures, decorative fences or fences other than split rail fences, non-porous or paved parking areas, uncontrolled weeds and any other similar *landscaping* as determined by the *City* that detract from a natural and forested state."

4. The following new Sub-sections are inserted after Sub-section 25, in Section E. Regulations Applicable to All Zones, of Part 4 General Regulations:

"26. *Setback Requirement from Semiahmoo Trail*

Notwithstanding the *setback* requirements for *buildings* or *structures* on a *lot* in Surrey Zoning By-law, 1993, No. 12000, as amended, the *setback* for *buildings* and *structures* constructed after the effective date of this by-law amendment from the edge of a *lot* abutting *Semiahmoo Trail* shall be not less than 10 metres [33 ft.] from the *lot* line of *Semiahmoo Trail*. Where existing *buildings* and *structures* are located within the 10 metres [33 ft.] setback on the date of this by-law amendment, such *buildings* and *structures* may be:

- (a) rebuilt in the event they are damaged or destroyed only to the extent that the *buildings* and *structures* encroached into the *setback* requirement from *Semiahmoo Trail* as of the date of this by-law amendment; and

- (b) expanded, provided any *building* expansion complies with *setback* requirement from *Semiahmoo Trail*, excluding sub-section 269(a);

and provided *buildings* and *structures* being rebuilt or expanded, shall comply in every other respect to the Surrey Zoning By-law, 1993, No. 12000, as amended, and other applicable by-laws of the City."

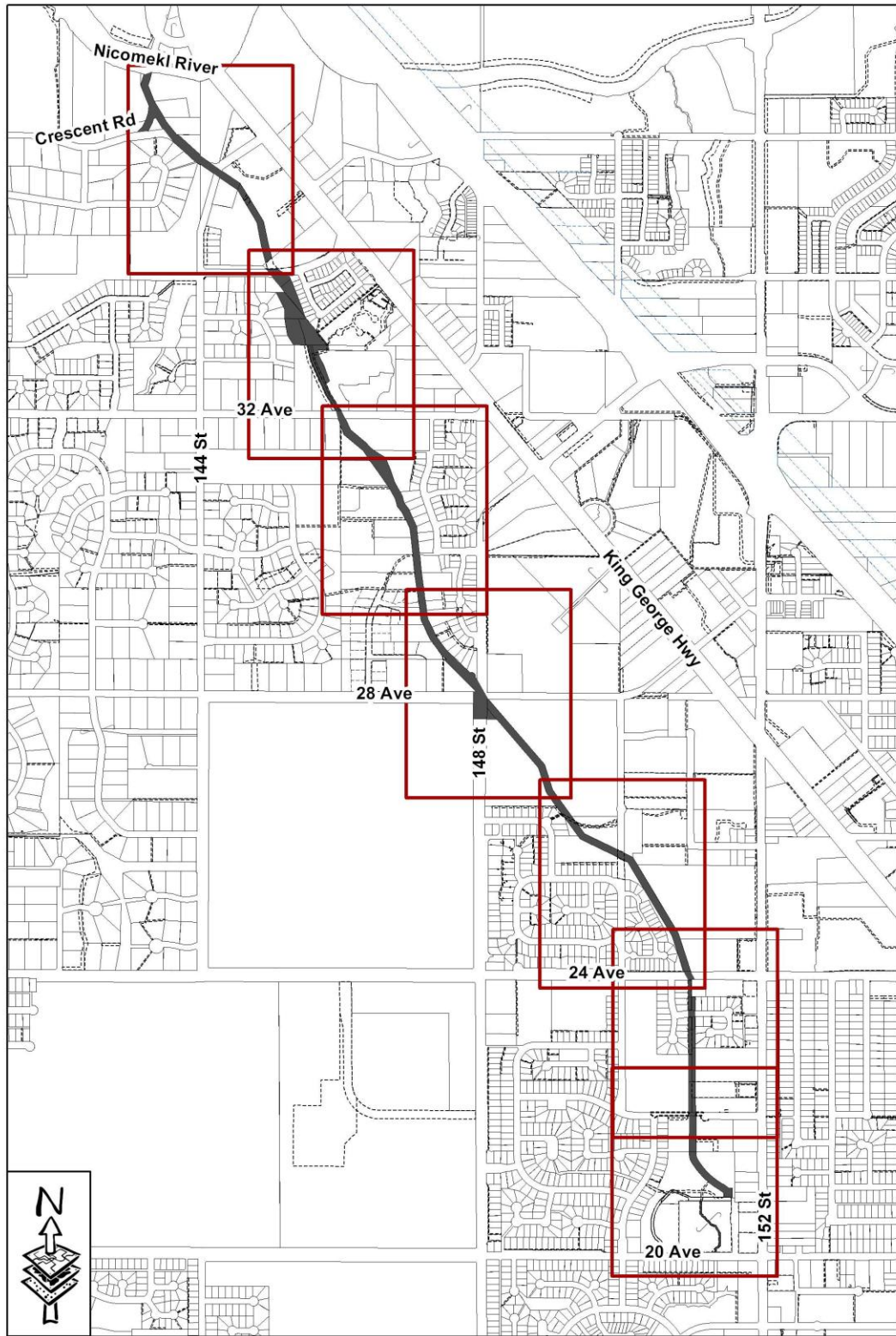
27. *Landscaping Along Semiahmoo Trail*

Notwithstanding the definition of *landscaping* and any *landscaping* requirements in Surrey Zoning By-law, 1993, No. 12000, as amended, the *Semiahmoo Trail Landscaping* shall be provided and maintained, including the retention of mature trees, on all portions of a *lot* 7.5 metres [25 ft.] or less from *Semiahmoo Trail*, to protect the heritage character of *Semiahmoo Trail*."

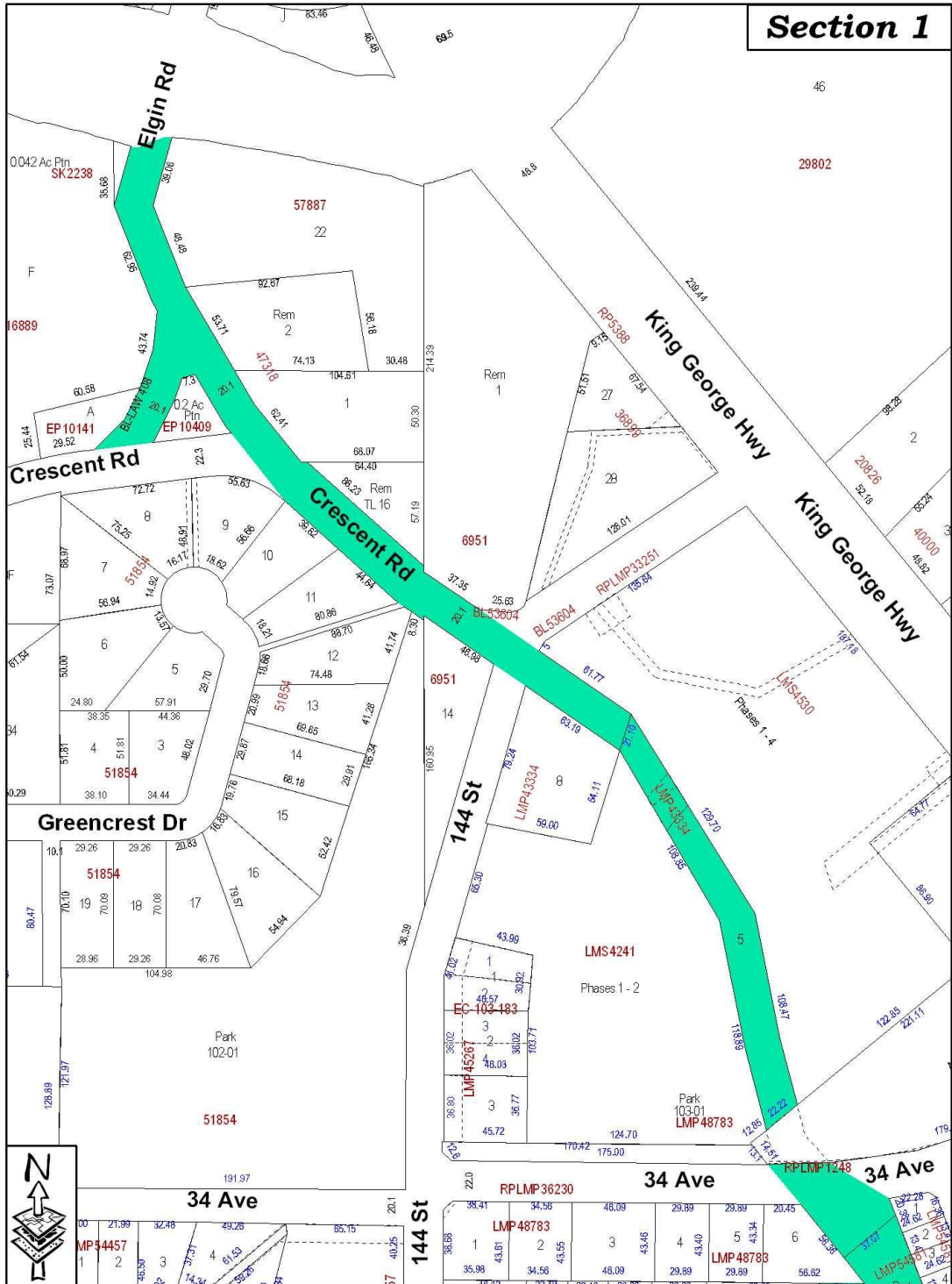
- 5. To insert the following new "Schedule H: Location of Semiahmoo Trail" after Schedule G.

(Please refer to the maps attached on the following pages)

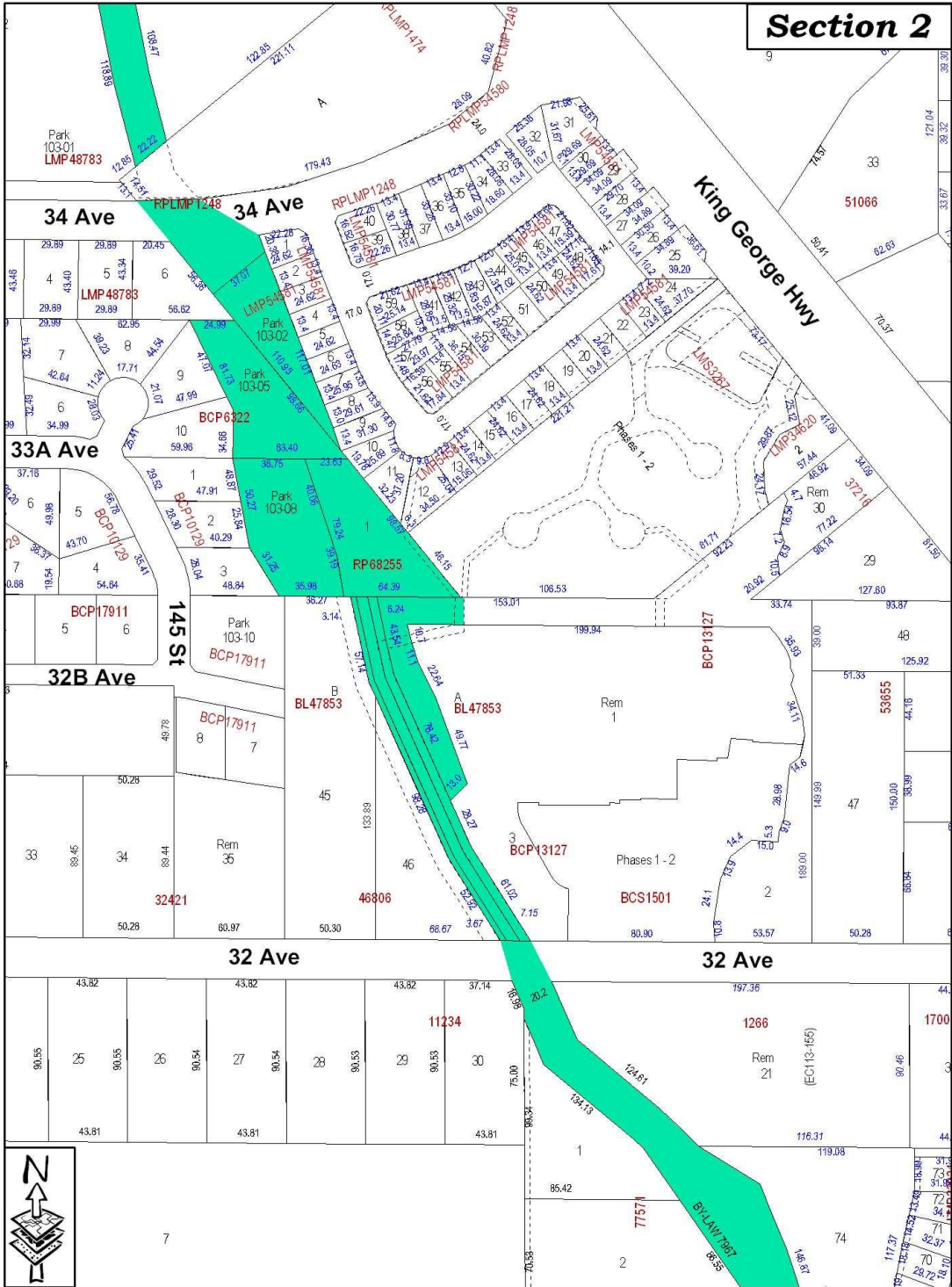
Schedule H
Location of Semiahmoo Trail



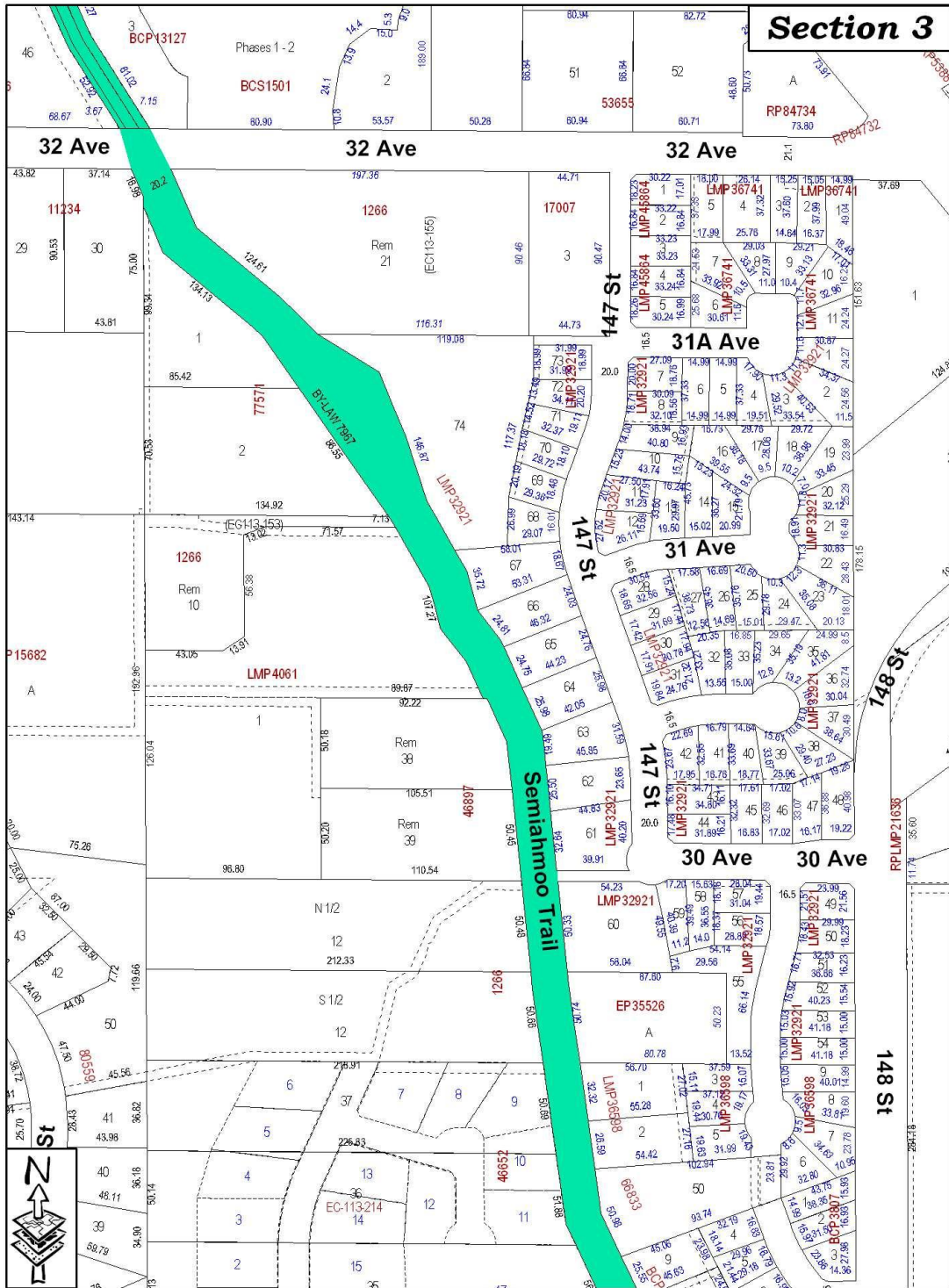
Schedule H Location of Semiahmoo Trail



Schedule H Location of Semiahmoo Trail



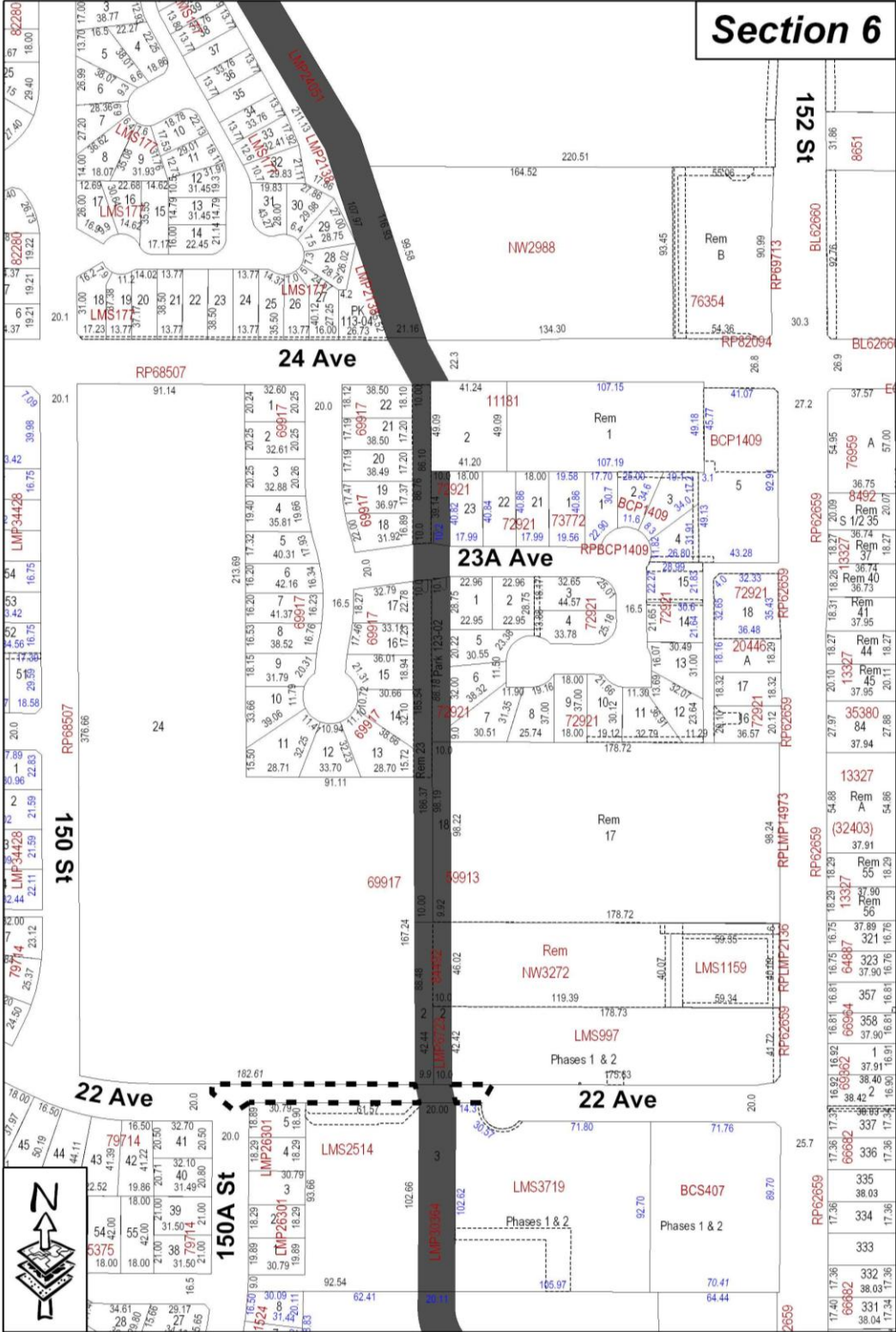
Schedule H
Location of Semiahmoo Trail



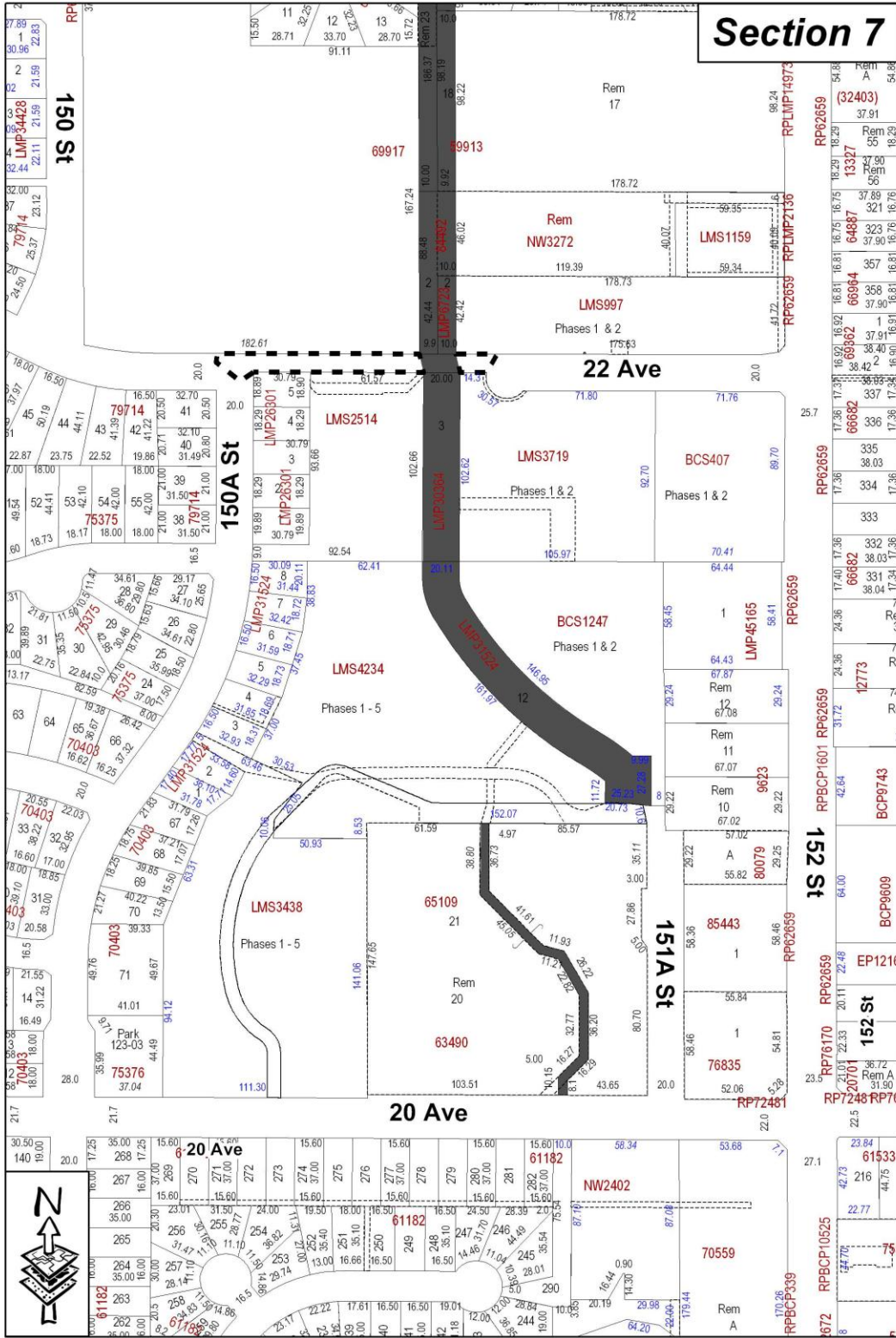
Schedule H
Location of Semiahmoo Trail



Schedule H
Location of Semiahmoo Trail



Schedule H
Location of Semiahmoo Trail



**Proposed Amendments to
Surrey Semiahmoo Trail Heritage Designation By-law, 2004, No. 15280
Amendment to Schedule "A"**

The following amendments are proposed to Surrey Semiahmoo Trail Heritage Designation By-law, 2004, No. 15280, as amended:

1. In Schedule "A" – "Part One: Real Property with Heritage Value or Heritage Character", add the following additional real property:

LEGAL DESCRIPTION	DESIGNATED FEATURES
<p><u>31</u></p> <p>All that portion of 22 Avenue lying in Section (Sec.) 15 Township (Tp.) 1 New Westminster District (NWD) described as follows:</p> <p>Commencing at the southeast corner of Lot 2 Sec. 15 Tp. 1 NWD Plan LMP6723.</p> <p>Thence easterly and following along the southerly boundary of Strata Plan LMS997 Sec.15 Tp. 1 NWD for a distance of 22.2 metres.</p> <p>Thence southwesterly for a distance of 12.3 metres more or less, to a point on the northerly boundary of Strata Plan LMS3719 Sec.15 Tp. 1 NWD said point being 12.643 metres easterly from the northwesterly corner of said Strata Plan LMS3719.</p> <p>Thence westerly and following along the said northerly boundary of Strata Plan LMS3719 a distance of 12.643 metres to the said northwesterly corner of Strata Plan LMS3719.</p> <p>Thence northwesterly to the point of commencement.</p>	<ul style="list-style-type: none"> • The land and the features associated with the Semiahmoo Trail, including the pedestrian trail, whether paved or naturally surfaced, and the landscaping, trees, trail signage, pedestrian amenities, pedestrian bridges and fences.

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All that portion of 22 Avenue lying in Section (Sec.) 15 Township (Tp.) 1 New Westminster District (NWD) described as follows:

Commencing at the southwest corner of Lot 2 Sec.15 Tp. 1 NWD Plan 84492.

Thence southeasterly to the northwesterly corner of Lot 3 Sec.15 Tp. 1 NWD Plan LMP30364.

Thence westerly and following along the northerly boundary of Strata Plan LMS2514 Sec.15 Tp. 1 NWD to the northwesterly corner of said Strata Plan LMS2514.

Thence westerly and following along the northerly boundary of Lot 5 Sec.15 Tp. 1 NWD Plan LMP26301 to the northwesterly corner of said Lot 5.

Thence southwesterly on a line between the said northwesterly corner of Lot 5 Plan LMP26301 and the northeasterly corner of Lot 41 Sec.15 Tp. 1 NWD Plan 79714 for a distance of 8.8 metres.

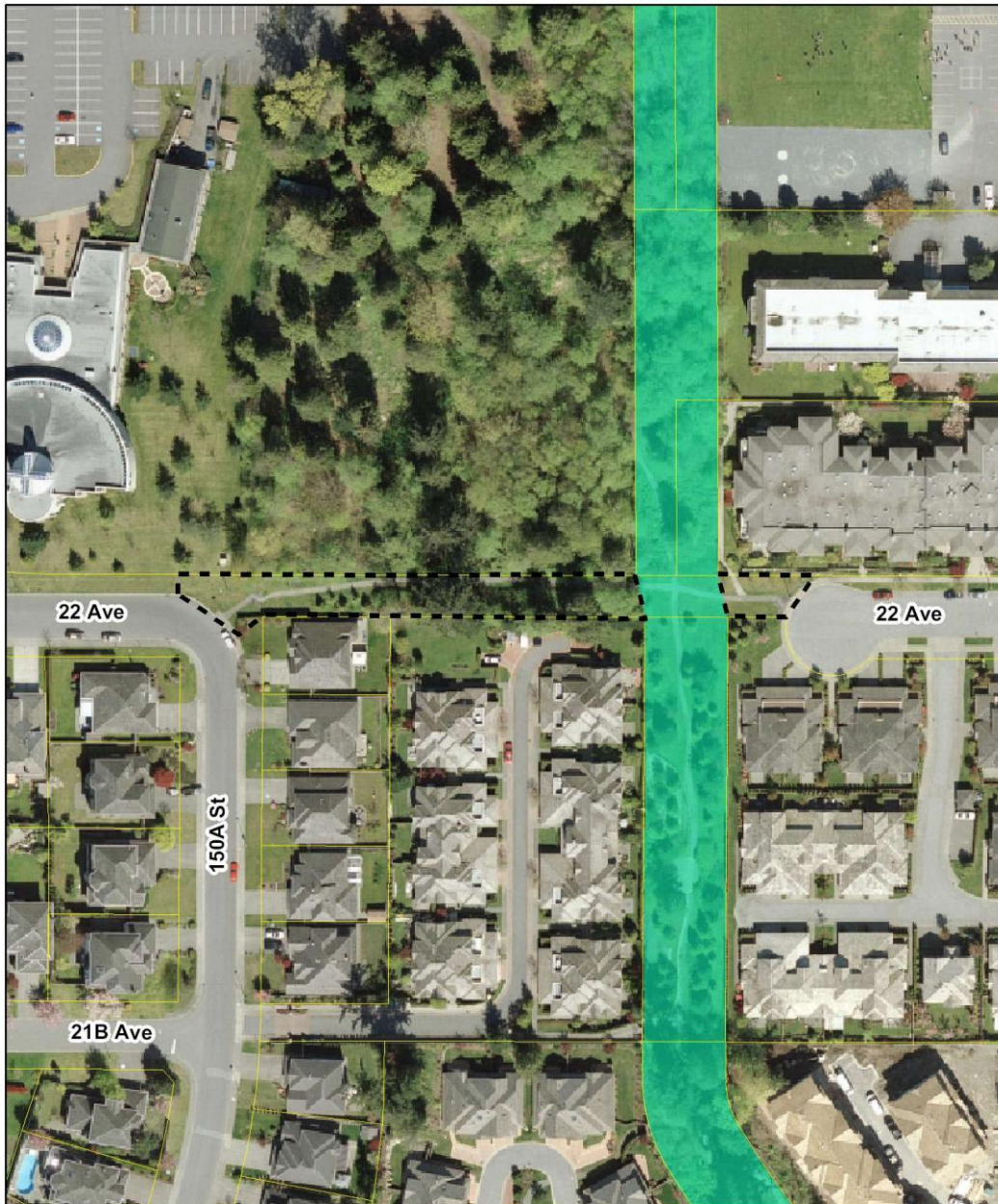
Thence northwesterly to intersection with the northerly production of the easterly boundary of said Lot 41 Plan 79714.

Thence northerly and following along the said northerly production of the easterly boundary of Lot 41 Plan 79714 for a distance of 4.7 metres more or less to intersection with the southerly boundary of Lot 24 Sec.15 Tp. 1 NWD Plan 69917.

Thence easterly and following along the said southerly boundary of Lot 24 Plan 69917 for a distance of 110 metres more or less to the point of commencement.

- The land and the features associated with the Semiahmoo Trail, including the pedestrian trail, whether paved or naturally surfaced, and the landscaping, trees, including the Significant Tree identified in Schedule 'B' of the Tree Preservation By-law, 1996, No. 12880 identified as tree #103, trail signage, pedestrian amenities, pedestrian bridges and fences.

**Proposed Amendments to
Surrey Semiahmoo Trail Heritage Designation By-law, 2004, No. 15280
Amendment to Schedule "B"**



**Adding lands to those designated in
Surrey Semiahmoo Trail
Heritage Designation BYLAW
2004, No. 15280**



Revisions to the Semiahmoo Trail Design Standards

The policy be amended as follows:

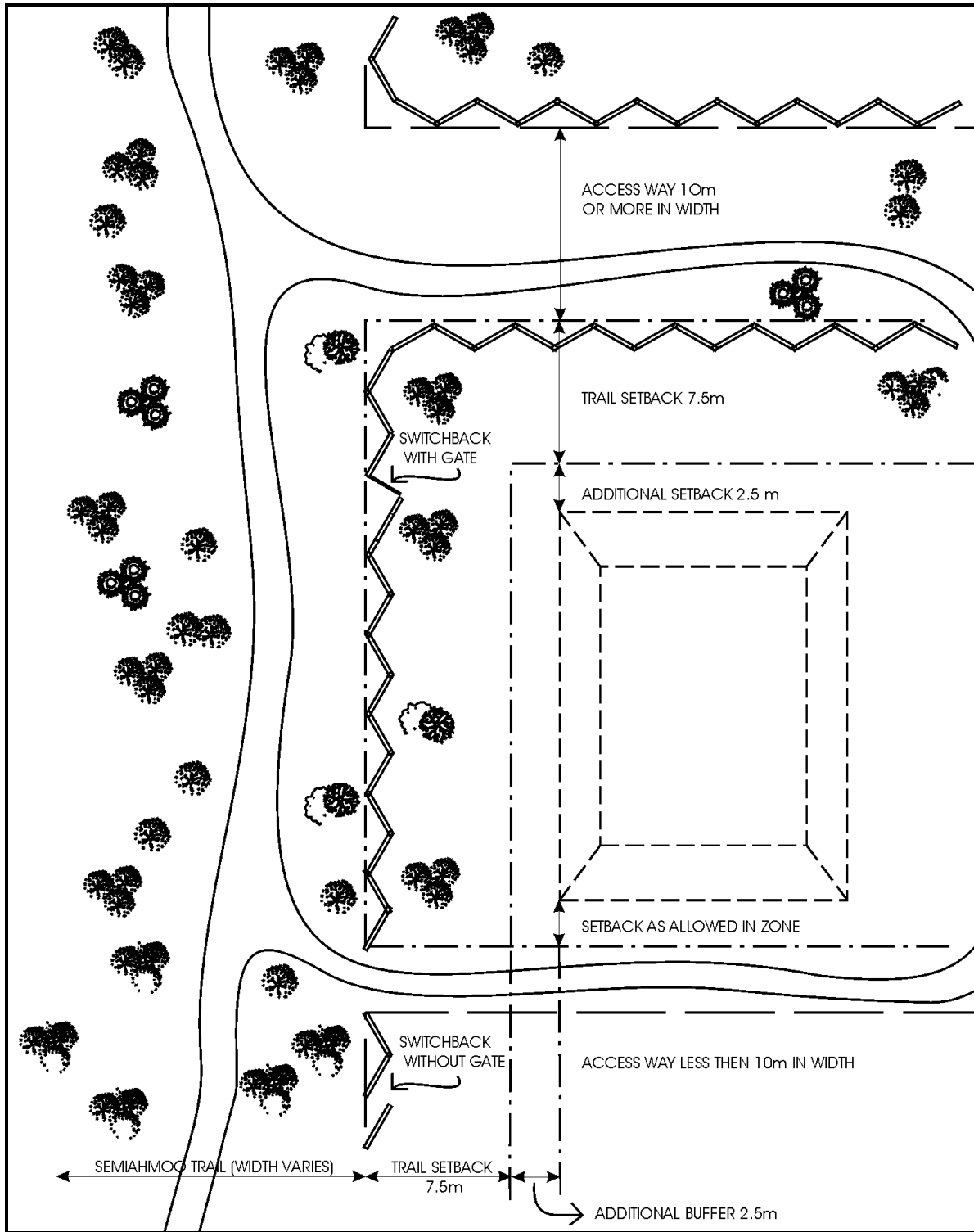
- (a) The following section is to be added to the Guidelines, immediately following "Fencing along the Trail":

Integration of Major Access Points Along the Trail

- Buildings and structures should be sited no closer than 10 metres (33 feet) from the property boundaries of major access points (e.g. public lands 10 metres (33 feet) or more in width that provide for pedestrian access to the Semiahmoo Trail Right-of-way);
 - The requirements shown in Schedule 1 (Figures 1, 2 & 3), including the requirement for a restrictive covenant, the 7.5 metre Trail setback, the 2.5 metre additional setback and the split-rail fence, apply to lands abutting major access points;
 - The split rail fence may be interrupted where major access points provide access to Semiahmoo Trail, as shown in Schedule 1 (Figure 3); and
 - The physical trails in any major access point leading to Semiahmoo Trail will consist of natural materials rather than concrete or similar hard surfacing. It is recommended that such natural materials be extend away from the Trail for a distance of at least 30 metres where possible.
- (b) Figure 3 illustrates a major pedestrian access point entering Semiahmoo Trail and the design requirements for building setbacks and installing the required split rail fence.

Schedule 1 (Figure 3)

Example Design Requirements Major Public Access Ways Entering Semiahmoo Trail



Letter from the Friends of Semiahmoo Trail Society

Friends of the Semiahmoo Heritage Trail

c/o #7, 2168 150A Street,
Surrey, B.C. V4A 9W4
604-538-5124

Surrey Heritage Advisory Commission,
14245 56th Avenue,
Surrey, B.C. V3X 3A2

November 21, 2005

Dear Commissioners:

Recently several pieces of land have been made part of the Semiahmoo Heritage Trail in order to assure the integrity of the Semiahmoo Trail. Members of the Friends of the Semiahmoo Heritage Trail applaud this action by city staff and council.

That approach may serve the city well in another area adjacent to the Semiahmoo Heritage Trail. I refer to a portion of land that was originally designated as "undevelopable" roadway.* This piece of land is the site of a walking path between 150A Street and the Semiahmoo Heritage Trail and is the pathway to the giant heritage tree, plaqued # 002, and to a cul de sac at the end of 22nd Avenue. Parks staff is maintaining it to Parks standards.

Designation as Semiahmoo Trail would assure its long-term retention and will augment the 'Trail' by recognizing the proximity of the heritage tree, which is listed in addendum A of the Tree Protection Bylaw #12880, and will assure access to the Trail pathway from both west and east directions.

We ask that the Heritage Advisory Commission recommend to Surrey City Council that this city land be incorporated into the Semiahmoo Heritage Trail by designation under the Semiahmoo Heritage Trail Designation Bylaw.

Yours truly,



Edna L. Shaw,
Member, Friends of the Semiahmoo Heritage Trail

Attachment A diagram of location
Attachment B aerial view of location

* undevelopable due to its width of only 10 meters, as opposed to the required 20 m width for roadways

Contextual Map and Aerial Photographs of the Section of 22 Avenue that is the Subject in this Report

22 Avenue as a Major Access Point to Semiahmoo Trail

