



The Corporation of the City of Courtenay

# Staff Report

**To:** Council

**File No.:** 2380-20

**From:** Director of Recreation, Culture, and Community Services

**Date:** May 21, 2025

**Subject:** Extreme Weather Response Shelter – End of Season Report

**PURPOSE:** To provide Council with a summary report on the provision of an Extreme Weather Response shelter (EWR) at 971 Cumberland Road for the 2024/2025 season and seek direction on the distribution of the report to local government partners and K'ómoks First Nation.

## **BACKGROUND:**

The 2023 Point-in-Time (PiT) Count in the Comox Valley unveiled a worrying escalation in homelessness, with a recorded 272 individuals experiencing homelessness—more than doubling the 132 individuals identified in 2020. This data, gathered nearly two years ago, underscores the urgent need for targeted interventions and community support, especially in times of extreme weather that poses health and safety risks to those individuals living unsheltered in the community.

In the summer of 2024, the City requested and was granted authority and funding from the Comox Valley Regional District to lead the development and implementation of a Winter Shelter Strategy on behalf of the region to address the urgent need to identify and activate locations for winter shelter services, including for the 2024/2025 winter season. Since 2023, in partnership with other local governments, K'ómoks First Nation, social service agencies, and other government entities, over 60 properties were investigated for potential activation as winter shelter locations. Despite this effort, a location had not yet been identified well into the beginning of the 2024/2025 winter shelter season.

Following the City's acquisition of 971 Cumberland Road in December 2024, the vacant, City-owned property was identified as the most promising option to deliver winter shelter services for the 2024/2025 season. Due to the need to activate winter shelter services urgently, at the December 11, 2024 Council meeting, it was resolved:

*To temporarily defer strict enforcement of the Zoning Bylaw at 971 Cumberland Road so as to facilitate the operation of the temporary winter shelter up to April 30, 2025, subject to the following:*

*a) the City of Courtenay entering into an agreement with an operator for the provision of winter shelter services;*

*b) The Fire Chief and Manager of Business Services inspecting 971 Cumberland Road and concluding that there are no immediate life safety concerns with the proposed use.*

Following the resolution to temporarily allow the property's use for sheltering purposes, Council directed staff to enter into the necessary agreement(s) with Lookout Housing and Health Society (Lookout) in order to allow Lookout to operate a winter shelter at 971 Cumberland Rd. Lookout was funded through BC Housing's Extreme Weather Response (EWR) Program.

Both the CVRD, through function 451 - Homelessness Supports Services, and the Town of Comox provided funding towards shelter activation, including the cost of capital renovations required to address building and fire code compliance, as well as additional staffing to support increased site and neighbourhood security and engagement. Renovations started in December of 2024, and the site was opened in February 2025.

With the conclusion of the EWR season as of April 15, 2025, this report provides an overview of the outcomes and impacts of the Extreme Weather Response shelter and provides considerations to inform planning for future winter shelter activations in the Comox Valley that will be included in the development of the final, regional Winter Shelter Strategy.

### **DISCUSSION:**

Lookout Housing and Health Society (Lookout) was funded through BC Housing to provide an Extreme Weather Response (EWR) shelter at 971 Cumberland. Lookout and the City entered into a License of Occupation Agreement outlining the terms and conditions under which Lookout would operate the EWR at this City-owned property. The EWR operated from February 6 to April 15, 2025 on nights when weather thresholds were met from 8:30 pm to 7:00 am.

Extreme Weather Response shelters are activated based on predetermined weather thresholds as outlined in the EWR Community Plan and approved by BC Housing. The Coordinator for the Comox Valley Coalition to End Homelessness (CVCEH) led the development of the Community Plan, as well as coordinated the activation and deactivation of EWR alerts which enabled the opening and closing of the shelter and alerted community members and partners about the shelter's activation status.

The identification and activation of 971 Cumberland Road, including completion of necessary building renovations, was done quickly and with urgency, as outlined in the December 11, 2024 report to Council regarding Emergency Conditions. The public was notified of the activation through a letter from Lookout to residents within 100m radius of the shelter, as well as through a Notice of Assistance in the local paper. The letter provided information on the program, answers to frequently asked questions, and contact information for the City, Lookout, and CVCEH Coordinator. Lookout staff engaged directly with business owners, neighbours, and local service providers over the course of the EWR season. To ensure neighbouring residents had an opportunity to provide feedback on the EWR, residents within 150m were invited to a community conversation on May 1<sup>st</sup>, 2025 where representatives from the City, Lookout, RCMP and the Coordinator for CVCEH were present.

This report provides an overview of the outcomes and impacts of the EWR shelter operation as well as a summary of the feedback received from neighbouring businesses and residents, shelter guests, RCMP, Bylaw Services, and local service providers. This information will help inform future winter shelter activations as well as inform recommendations in the development of the regional Winter Shelter Strategy. Feedback from the operator, service agencies, and shelter guests demonstrate that the overall experience and services provided for people experiencing homelessness were effective and met critical sheltering needs despite being assembled on a short time line. Future activations of winter shelters would benefit from greater community engagement and planning to address the concerns of neighbours.

### **Overview of Operations**

Operated by Lookout, the space at 971 Cumberland Road emphasized flexibility and low-barrier access, offering overnight shelter, secure personal belonging storage, and the ability to come and go during the night. The EWR was open from 8:30 pm to 7:00 am and offered 18 beds when weather thresholds were met.

As part of the License agreement, Lookout provided the City with an End of Season Report describing the shelter operations and impacts (see Attachment 1), some of which is summarized below:

*Usage Statistics:*

- 46 (of 66 potential) nights of activation/operation from February 6<sup>th</sup> to April 13<sup>th</sup>, 2025 (69% of potential operating nights)
- 668 individual stays\*
  - 257 women
  - 404 men
  - 118 Indigenous individuals
  - 65 people with a disability
  - 18 seniors over the age of 65
- Average occupancy of 14.5 people (80% of 18 bed capacity)

\* This number represents the total number of guest stays, not individual guests.

*Additional Staffing Support*

To support the operations of the shelter, an additional support position was funded through the CVRD function 451. The EWR program as funded by BC Housing provides funding for two staff, limited to the hours and days of shelter operation. The supplemental staffing is necessary in order to provide additional security of the site, ability to work beyond shelter hours to maintain site cleanliness and ensure that guests had left the premises after closing as well as offering individual support to guests. This support position also went by the site on days that the service was not operating to maintain a presence at the location for security and inform guests if the site was open or not that day. The position was also able to be a representative in the community and connected with local businesses and neighbours. They responded to four calls for support to local businesses.

During the season, this additional staff person was also able to provide individual support to guests that is not funded through the EWR model. This support resulted in:

- 6 supportive housing applications submitted
- 30 guests completing BC Housing applications
- 1 M'akola Housing application completed
- Numerous individuals assisted with ID recovery, income assistance, and navigating complex systems

**Partner Feedback**

Partners in this section include:

- Lookout Housing
- City of Courtenay Bylaw Services
- Courtenay Fire
- Comox Valley Coalition to End Homelessness / Community Representative
- Other local service providers

Overall, partners felt the EWR shelter ran well this winter, especially considering the short timeline from approval to activation. Communication with people using the shelter went smoothly, and the shelter was full most nights it was open. Some factors contributing to the success of the shelter were that people were allowed to go in and out for smoking, there was storage for belongings (including carts in the covered area), involvement of peers in the shelter, and regular communication with other service providers. A key sentiment from community is that there is relief that a space was found and activated for this season. Having

the service available was of great benefit to the community and provided life-saving supports for people who are experiencing homelessness.

Some challenges however included confusion amongst the community around weather activation thresholds, difficulty convening shelter staff with same-day notice, and three property breaches whereby individuals attempted to gather or sleep in the outdoor covered area on days that the shelter was not open. While some of these challenges can be addressed with stronger communication mechanisms around opening hours, activation criteria, and internal communications between the Community Representative, staff, and relevant partners, the inconsistency of EWR programs will continue to contribute to confusion and frustration among shelter users, service providers, and neighbours.

Site improvements were completed to improve site security in response to the property breaches, however EWR program locations often see gathering of individuals around the property on nights the EWR isn't open as guests look for shelter overnight. An option for addressing the issues associated with weather-based shelter activation is to consider seeking Temporary Winter Shelter (TWS) funding whereby shelter services are offered every night between October and April, regardless of weather, removing any confusion or sudden changes in when the service is open. In some locations, depending on the facility and the space available, Temporary Winter Shelters are able to offer the EWR program in the same location by adding additional staff and sleeping spaces when EWR weather thresholds are met.

Courtenay Bylaw Services observed increased pedestrian traffic and congregation in the area. Since the shelter has closed for the season, this activity has moved away from the immediate area and is now concentrated around the Connect Centre as it was prior to the site opening. Bylaw Services took a proactive approach to this expected increase in congregation by adding morning patrols in the neighbourhood which was helpful in moving people along who were sheltering in the area. The proactive approach builds relationships and prevents complaints through early intervention and interactions. Bylaw Services did not receive any negative complaints and no reports were opened in direct relation to the shelter. Staff are aware of a few incidents in the surrounding area, including one break in at the corner of Cumberland and McPhee and some incidents of difficulty moving people along from businesses.

The fire department noted that there was only one call for service related to an activated alarm but no fire.

Partners agree that more community and peer collaboration would be positive in opening a future winter shelter space. One suggestion is to have peer staff as part of operations to facilitate peer conversations with guests during the season to help guests take more initiative related to maintaining neighbourhood relationships. These meetings can build comradery and agreements to build a peer driven plan for the site, ultimately resulting in peer enforcement of guidelines in and out of the shelter site.

Partners also noted that community and neighbourhood engagement and communication was limited at times. Coupled with peer support and conversation, greater community collaboration and connection could alleviate some of the neighbour concerns raised and support shelter users to be good neighbours. More fulsome and ongoing opportunities for neighbour and community feedback were priorities identified by all the partners.

Staff want to acknowledge the significant collaboration and support provided by local partner service agencies in bringing the winter shelter to fruition this year. Many service providers, as well as partnering local governments and K'ómoks First Nation, participated in the Winter Shelter Working Group from fall 2024 through to winter 2025. This Working Group collectively identified and reviewed locations, offered resources

and funding, and supported important community conversations regarding shelter provision. In particular, staff would like to recognize Wachiay Friendship Centre and SOLID Outreach Society for their financial and peer support during the EWR season.

## **Community Feedback**

### *Feedback from Residents*

Due to the emergency activation of this space to address risks related to sheltering outside in extreme weather, engagement with neighbours surrounding 971 Cumberland Road prior to opening was limited. The EWR Community Representative is appointed as a point of contact in public communications, with social media posts and press releases related to EWR activation being released by the CVCEH and reposted by local government and service provider partners. Based on social media comments and letters/ phone calls received by the City prior to the site opening, key public sentiments about the EWR included:

- Concerns around lack of transparency / engagement / information regarding the site selection
- Concerns around City spending and tax dollars
- Confusion about whether the space was open or not, due to limited visible activity
- Lack of clarity around definitions of extreme weather, activation criteria, and opening hours
- Concern about how the site was selected and whether it was compatible with existing neighbouring land uses in the area (residential and childcare being specifically noted as concerns).

It is noteworthy that despite several individuals raising concerns through email and phone calls to the City prior to opening, the site did not receive any direct phone calls or emails from individuals in the neighbourhood after opening nor did City staff. Like the challenges identified by partners, these sentiments highlight a need for strengthened communications that support education around the definition of an EWR, how it is activated, and what community members can expect when a site like this opens in their neighbourhood.

### Petition

There was a petition circulated online in late 2024 / early 2025 through change.org that opposed the selection of 971 Cumberland as a site for shelter services. The concerns raised included: community impacts, the interim measure of this service rather than long-term planning to address homelessness, the zoning not being compatible, and concerns regarding extension of the shelter without due process. The request of this petition was that the City limit use of 971 Cumberland to its temporary EWR designation, develop and invest in long-term, well planned and properly zoned solutions for addressing homelessness, to consult with the community, and to uphold transparency and community engagement in future planning processes related to shelter and supportive services. The final request of this petition was that the site not be continued for shelter use past April 15, 2025, and that the service remain EWR only between January and April 2025.

### Neighbourhood Open House

In order to hear from neighbours of 971 Cumberland regarding any impacts they experienced, an open house was hosted at 971 Cumberland on May 1<sup>st</sup>, 2025. Notification of the event was provided via letter to all addresses within a 150m radius of the site. Approximately twelve residents and or business owners in the area attended the event and one person provided feedback via email as they were unable to attend. Some of the attendees represented the strata or other housing in the area.

The most often repeated concerns were regarding the location's proximity to schools and a daycare, that the service was unpredictable, and a sense that there is a lack of transparency about the City's plans for the site. Attendees noted that Cumberland Road is a main walking route for families and children going to

nearby schools, in addition to the site being very close to daycare services. Open substance use was also raised as a nuisance and concern, especially when done in areas where it could be witnessed by children. Unpredictability of services created uncertainty and neighbours observed an increase in people sheltering in the area, especially on nights that the service was closed.

Attendees also noted other general concerns regarding the impact of substance use and homelessness on both their neighbourhood and the community at large. Examples of residences thought to be involved in potential criminal activities were noted as places that raised safety concerns in the neighbourhood and contributed to higher levels of congregation and negative behaviour. Other impacts in the neighbourhood over the winter season noted by attendees were finding drug paraphernalia, vehicles being tampered with, people sleeping in nearby areas, shouting at night, people sheltering at Woodcote Park, and aggressive behaviour near children. It was suggested that increased visible patrols of peers, RCMP, and Bylaw Services could help in resolving some of these concerns.

One often repeated concern was the belief that the Connect Centre was being relocated to 971 Cumberland Rd. It is unclear where this misinformation came from, but it was mentioned by 10 of the 11 people who attended. One person also raised a concern that the Braidwood BC Housing project had been cancelled and no permanent shelter or supportive housing was being developed. City staff clarified and confirmed with attendees that there has been no discussion of the Connect Centre relocating to 971 Cumberland Rd and that the Braidwood shelter and supportive housing project was proceeding.

Beyond the concerns, attendees also stated repeatedly that the shelter service is needed and that people generally support shelters being in the City. While this location was not preferred by many attendees, many people shared that they feel there is a need for services and that they would like to see “something nice” built. The Campbell River tiny home community was provided as an example.

Some concerns about the site were specifically related to the fact that the EWR program leads to uncertainty and unpredictability for both service users and neighbours. Many people expressed support for a Temporary Winter Shelter rather than an EWR as this program has more opportunity to build relationships and it reduces the impacts of people seeking refuge nearby the site when not in operation. Some other suggestions for improving the services and possibly minimizing impact on the neighbourhood were increasing the visibility of staff, clear communication (preferably directly with neighbours) about the program, and operating the program consistently rather than on a night-to-night basis.

### **Feedback from Service Users**

Guests of the shelter shared that they benefited from the sense of community, purpose and belonging at the shelter. One guest took care to clean the shelter daily and stated, “when I have something to do I stay out of trouble”, showing the benefit of peer roles in shelter services. Outreach staff support was able to connect guests with housing providers through applications, and support with tasks such as getting identification.

An issue identified by service users was that the closing hours of the shelter did not align with opening hours of other services or places to be, such as the library. The shelter closed at 7:00 am and Connect day services do not open until 8:00 am. This left an hour where there was nowhere to go. When the weather was particularly cold and wet, this led to people seeking a place to hunker down and may have contributed to loitering in the area around the shelter. The closing hours of the EWR however were structured to ensure the shelter was closed prior to the opening of nearby daycare centre (opening hours of 7:30 am).

### **EWR Program Challenges**

The nature of the EWR program being based on weather condition criteria means there is inconsistency in when the services are open. Activation must be determined based on weather predictions, and what is

predicted and the actual weather may be different. The instances of persons breaching the fence and settling into the covered area all occurred when the shelter could have been activated based on actual weather but wasn't because weather predictions did not meet criteria. Some instances of fires or camping nearby may be related to this situation as well. Despite significant communication efforts, guests would sometimes travel to the shelter site only to find the services closed. Finding the service closed, people were likely to stay in the neighbourhood and find a place to shelter from the weather. This likely resulted in increased sheltering in the immediate area of the shelter on nights that it was closed. Neighbours reiterated this concern, noting that there was increased sheltering in the area when the EWR was not open. A Temporary Winter Shelter program rather than an EWR program may address these concerns by providing more consistent and dependable services, thereby reducing confusion, increasing stability for guests, and decreasing sheltering in the associated neighbourhood.

The EWR model is designed for emergency relief and does not provide the level of services or supports required in the community to effectively respond to winter sheltering needs, especially when provided as the only winter shelter service in the community. Additionally, the limited budget provided by BC Housing for EWR programs inhibits the ability of the operator to dedicate resources to building relationships and collaborative solutions with the neighbourhood and partners.

### **Winter Shelter Future Considerations**

Outcomes from the 2024/2025 season provide several lessons for future planning of winter shelter supports in the Comox Valley. Key insights that will be included in the development of the Winter Shelter Strategy are listed below:

- Feedback from all parties indicate opportunities to strengthen the Extreme Weather Response (EWR) program through enhanced planning, coordination, and communication.
- Challenges with the program were largely related to the emergency and weather-based activation of the site, which could be remedied by offering a different service type (Temporary Winter Shelter) that is open for the whole winter season.
- A major consideration for the future is how to prepare for and communicate about any winter shelter services (especially EWR) so as to maintain clarity regarding operations and responsibility.
- Selecting a site and creating a site plan which includes partners, neighbours, and strategies to minimize impact, should be done early in the year.
- Involvement of peers in program planning, preparing site usage guidelines, and supporting with monitoring guests is beneficial to overall operations of the site, including facilitating good neighbour agreements and commitments. Peers should be involved early and in an ongoing manner for any shelter services.

Actions to respond to key insights could include:

- Identifying potential winter shelter locations early in the year to allow time for greater public engagement .
- Review radius of notification requirements for winter shelters with local government development services departments, including the possibility of expanding notification requirements to within 150m where appropriate.
- Develop the EWR plan earlier with broader input from more partners. Collaboratively determining activation criteria and processes should include RCMP, Bylaw, service providers, and people with lived and living experience so that roles and responsibilities during activation and criteria are clearly understood.

- Creation and distribution of communication materials for the program in addition to the standard activation notification template to provide plain language explanations of the program, what to expect, and when to expect it to be open.
- Align service hours with other services in the community or work with services providers to see how hours of operation among services may be coordinated to reduce gaps.
- Increase involvement of people with lived/living experience in planning and operation of shelter.
- Offer outreach to nearby residents and businesses ahead of the next season and engage early and often.
- Work with BC Housing to secure funding for a Temporary Winter Shelter service to address guest, neighbour and service provider concerns and challenges associated with the EWR program.
- Work with key partners to establish a community safety plan in advance of any shelter opening, identifying strategies to use throughout the season including meeting regularly and convening at the end of the season to review how it went.
- Ensure that adequate staffing levels are funded (either by BC Housing or other partners) to make sure outreach and site security support is available daily and in hours outside of the shelter operations to support guests with referrals, address neighbour concerns, meet with partners, and ensure daytime needs.

#### **POLICY ANALYSIS:**

*OCP, 2022*

##### *Affordable Housing*

- AH 13: Identify undeveloped and underdeveloped municipal sites for future affordable housing projects with emphasis on providing a mix of tenures including supportive housing.
- AH 18: Advocate for senior government funding for affordable housing projects and initiatives. Social Infrastructure

##### *Social Infrastructure*

- SI 6: Identify an appropriate role for the City in the delivery of social infrastructure in relation to other organizations, agencies, and jurisdictions that provide services for equity-priority groups.
- SI 8: Continue to support regional partners on program administration and delivery for homelessness, poverty prevention, mental health, addiction, and overdose prevention programs.
- SI 16: Provide sufficient, high-quality public spaces that promote social connectedness. Include amenities to support all ages and abilities such as public washrooms, seating areas, and drinking fountains.
- SI 17: Develop a strategy to address community need for public washrooms, including hand washing stations and access to secure potable water.
- SI 21: Support volunteers, organizations, and other social assets to continue undertaking their work within the community

##### *Zoning*

Zoning for 971 Cumberland Road site is Industrial 2. This site was permitted to operate temporarily without strict enforcement of the Zoning Bylaw in accordance with Section 20(2) of the Community Charter, Emergency Powers, via Council resolution until April 15<sup>th</sup>, 2025.



### FINANCIAL IMPLICATIONS:

In summer 2024, the CVRD authorized the City to lead the development and implementation of a Winter Shelter Strategy on behalf of the region. The CVRD provided \$91,000 from function 451 to initiate this work with \$50,000 earmarked for development and implementation of the Winter Shelter Strategy and \$41,000 to be used to support site activation and operation.

The City requested funding from the CVRD towards renovation costs associated with the necessary building and fire code improvements required to activate 971 Cumberland Rd for shelter purposes, as well as foregone lease revenue. The CVRD approved \$200,000 in funding in December 2024.

In winter 2025, the Town of Comox provided an additional \$80,000 to the City of Courtenay to support the site activation at 971 Cumberland Rd.

The total funding provided to the City to enable the activation of 971 Cumberland Rd and support the development of a regional Winter Shelter Strategy is \$371,000. The original estimated budgets with amounts spent to date and estimated totals are provided in Table 1.

*Table 1: Winter Shelter Strategy and EWR Activation Budget and Estimated Totals*

| Description   | Budget           | Estimated Total  |
|---|------------------|------------------|
| Shelter Operations (site security and neighbourhood support)        | \$50,000         | \$39,300         |
| Building Improvements   | \$150,000        | \$178,728        |
| Other services rendered (architect fees, hazardous materials, etc.) | \$30,000         | \$16,735         |
| Foregone Lease Revenue  | \$35,100         | \$18,661         |
| Winter Shelter Strategy & Implementation                            | \$91,000         | \$55,000         |
| Staff Time Contribution (est. 560 hours)                            | -                | \$53,175         |
| <b>Total</b>  | <b>\$356,100</b> | <b>\$378,333</b> |
| <b>Funding Received (CVRD, Town of Comox)</b>                       |                  | <b>\$371,000</b> |
| <b>Estimated Net Surplus (Deficit)</b>                              |                  | <b>\$(7,333)</b> |

The total estimated direct costs specifically related to the activation of 971 Cumberland Road as an Extreme Weather Response shelter is \$283,424 including construction costs for building improvements, shelter operation support, other services rendered, foregone lease revenue, and project management.

### ADMINISTRATIVE IMPLICATIONS:

Securing a site and doing the work required to activate it for this EWR season was a significant undertaking. The work was led by Recreation, Culture, and Community Services with support from several other departments including Planning, Building, Civic Facilities, Communications, and Corporate Services. While the City secured the services of Urban Matters CCC to support this work, the leadership and activation of winter shelter services on behalf of the region has required significant City of Courtenay staff time. It is important to note that this is City staff time above and beyond what would typically be provided by a municipality to support the activation of shelter services (i.e. review of building permits, temporary use approvals, etc) and is resulting in delays to other City strategic priorities.

The City's in-kind contribution of staff time is estimated at a total of \$53,175 as follows:

- August to November 2024 estimated at 250 hours for total of \$23,750

- December 2024 and January 2025 estimated at 150 hours for total of \$14,250
- February to April 2025 estimated at 95 hours for total of \$9,000
- May to July 2025 estimated at 65 hours for a total of \$6,175

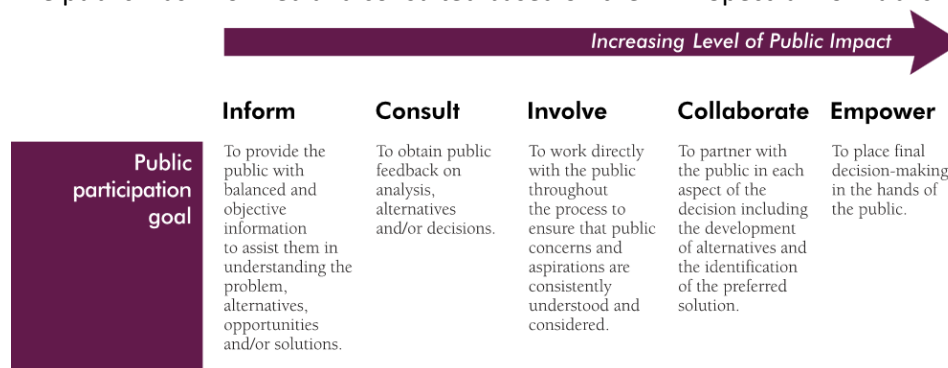
### STRATEGIC PRIORITIES REFERENCE:

This initiative addresses the following strategic priorities:

- Social Infrastructure - Continue working with community agencies to deliver day services. Explore role in the provision of social support services, including future of Connect Centre.
- Social Infrastructure - Identify roles for the City in the delivery of social infrastructure outlined in the OCP; Implementation plan for delivery of social infrastructure
- Public Safety - Build capacity for emergency planning and local response
- Affordable Housing - Explore approaches to develop affordable housing: Review potential of city property for housing partnerships with BC Housing

### PUBLIC ENGAGEMENT:

The public was informed and consulted based on the IAP2 Spectrum of Public Participation:



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### RECOMMENDATION:

1. THAT Council receive the “Extreme Weather Response Shelter – End of Season Report”; and

THAT Council direct staff to send the “Extreme Weather Response Shelter – End of Season Report” to the Town of Comox, Village of Cumberland, Comox Valley Regional District, and K’ómoks First Nation; and

THAT Council direct staff to make a delegation request to the Comox Valley Regional District to make a presentation of the “Extreme Weather Response Shelter – End of Season Report”.

2. THAT Council provide alternative direction to staff.

### ATTACHMENTS:

1. Lookout Housing & Health Society: EWR 971 Cumberland Rd Shelter Report

Prepared by: Susie Saunders, Director of Recreation, Culture, and Community Services  
Reviewed by: Marianne Wade, Director of Development Services  
Adam Langenmaier, Director of Financial Services  
Kate O'Connell, Director of Corporate Services  
Concurrence: Geoff Garbutt, M.Pl., MCIP, RPP, City Manager (CAO)