



DATE OF MEETING: November 8, 2024
TO: Galiano Island Local Trust Committee
FROM: Kim Stockdill, Island Planner
Southern Team
COPY: Robert Kojima, Regional Planning Manager
SUBJECT: Rezoning Application – Preliminary Report
Applicant: George Harris
Location: 9980 Porlier Pass Rd – PID: 026-836-734

RECOMMENDATION

- 1. That the Galiano Island Local Trust Committee direct staff to proceed with application GL-RZ-2023.3 (Harris) and to prepare draft bylaws and a housing agreement.**

REPORT SUMMARY

The purpose of this preliminary report is to provide information regarding rezoning application GL-RZ-2023.3 (Harris) and to seek direction from the Galiano Island Local Trust Committee (LTC) to proceed, or not proceed, with the application, including the preparation of draft bylaws and a housing agreement.

The application as proposed would amend the Galiano Island Land Use Bylaw (LUB) No. 127, 1999 by rezoning the subject property from the following split zones: Commercial Private Film School (C7) zone and Rural Residential (RR), to a site-specific Community Housing (CH) zone. An amendment to the Galiano Island Official Community Plan (OCP) Bylaw No. 108 would also be required to re-designate the lot from the Commercial (C) and Rural Residential (RR) designations to the Community Housing (CH) designation.

BACKGROUND

The subject property is located mid-island along Porlier Pass Road. The lot slopes from the front lot line upward towards the rear of the property. The existing driveway bisects a wetland area (not mapped as a sensitive ecosystem), transverses across the western neighbouring property via easement access, and winds upwards towards the existing developed area. The buildings located on the property were originally used for forestry purposes and were converted for the use of a film school in the late 1990s.

As stated by the applicant, the buildings are now used as affordable housing for Galiano Island residents. The previously used film school student accommodation buildings are now converted into five housing units each with their own kitchen. As this use currently does not comply with existing zoning, a rezoning application is required to legalize the use.

The property owner applied to rezone the property in 1995 to amend the zoning from Rural Residential (RR) to a Commercial 7 (C7) zone that would permit a commercial film school use. In 2002, the property was successfully rezoned to the C7 use and re-designated as Commercial in the OCP. The film school business operated for approximately 20 years (as stated by the applicant).

In 2006 a lot line adjustment was registered to the Land Title Office. Prior to the lot line adjustment, the property was 1.578 hectares in area. The outcome of the lot line adjustment increased the area of the subject property to 1.98 ha and also created a split zoned parcel (C7 and RR).

Staff visited the property twice; once in June 2023 and a second time on October 29, 2024. Attachment 1 provides additional site context. Attachment 2 provides relevant maps, orthophotos, and site visit photos. A cover letter provided by the applicant is included as Attachment 3.

The applicant's proposal is to rezone the property to allow for affordable rental use with a total density for 12 housing units. Some of the housing units will be equipped with their own kitchen, and a common kitchen is proposed for communal use. The applicant would also like to legalize the following uses, buildings and/or structures: common laundry room, common lounge room, and bike repair shop.

Application Rationale

As stated by the applicant (Attachment no. 3), the rationale for the proposed rezoning is as follows:

- The goal of turning the Gulf Island Film and Television School-GIFTS into the "Gulf Island Frugal Tenancy Site"-GIFTS (as affordable housing) is an important part of ensuring Galiano can house those most in need.
- A significant water license, sewage system, integrated fire alarm and final occupancy permit existed for 30 residential [film school] students and a Manager's family under the current [C7] zoning. The sewage system was designed for 45 people which included the administration, teachers, interns and guests while the film school was in session.
- Extensive repair and upgrades to add integrity, sustainability, comfort and efficiency - including heat pumps to replace energy inefficient electric and propane heating - to the site.
- Applying for a rezoning to allow improvements to continue and, more importantly, ensure secure housing for an important part of our community.

Figure 1 - Location of Subject Property

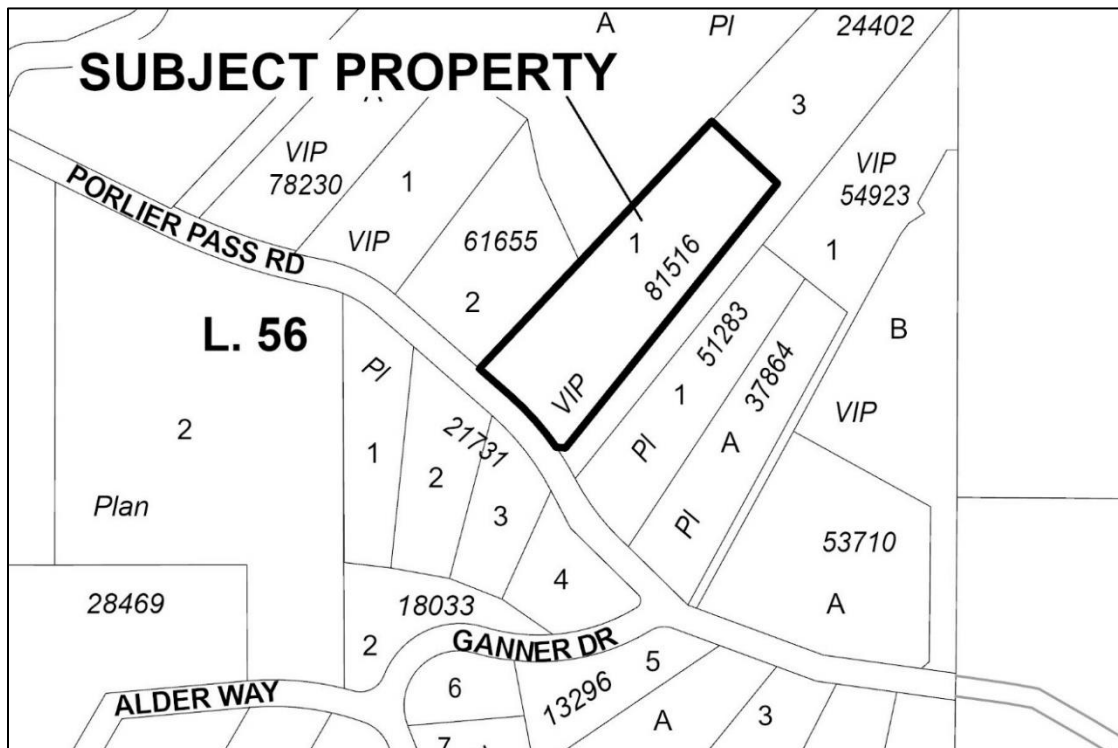


Figure 2 – Orthophoto with Zoning



ANALYSIS

Policy/Regulatory

Islands Trust Policy Statement

The most relevant policies of the Islands Trust Policy Statement (ITPS) relating to this rezoning proposal are:

5.2.3 Local Trust Committees and Island Municipalities shall, in their official community plans and regulatory bylaws, address policies related to the aesthetic, environmental and social impacts of development.

5.2.5 Local Trust Committees and Island Municipalities shall, in their official community plans and regulatory bylaws, address means for achieving efficient use of the land base without exceeding any density limits defined in their official community plans.

5.8.6 Local Trust Committees and Island Municipalities shall, in their official community plans and regulatory bylaws, address their community's current and projected housing requirements and the long-term needs for educational, institutional, community and health-related facilities and services, as well as the cultural and recreational facilities and services.

If LTC decides to proceed with drafting bylaws, the ITPS policy checklist would be presented to LTC for review and consideration in a future staff report if at such time draft bylaws are presented for first reading.

Official Community Plan

The OCP land use designations for the subject property are: Commercial (C) and Rural Residential (RR). An amendment to the Galiano Island OCP is required to change the OCP designation from a split designation to a single land use designation: Community Housing (CH).

Applicable OCP Policies or Development Permit Areas (DPAs):

OCP Policy/DPA	Application to Comply	Staff Comments
<p>1.6 Community Housing – Policy ‘b’:</p> <p>Applications for rezoning to a higher density than permitted by current zoning shall be considered where the application would result in the provision of seniors, affordable or special needs housing, subject to the following:</p>		
<p>i) All additional density greater than that permitted by current zoning shall be in the form of units reserved primarily for occupancy as affordable, seniors or special needs housing as operated on a not for profit basis.</p>	✓	Property will be rezoned to allow affordable housing only (market housing not intended)
<p>ii) Applications shall include provision of a housing agreement ensuring that for affordable housing the rental, lease, sale or share prices are fixed below average rates within the region, and the agreement may limit occupancy of the dwellings to rental, lease, co-housing or cooperative tenure, and may limit occupancy.</p>	✓	Housing agreement will be a condition of rezoning
<p>iii) Applications may be for units in the form of clustered detached dwellings, duplexes or attached ground-oriented housing, and are encouraged to incorporate water conservation and energy efficient building design elements, including rainwater catchment.</p>	✓	Units will be primarily clustered and/or attached.
<p>iv) All applications shall site development on land with modified ecosystems, avoid potentially hazardous lands, demonstrate an adequate supply of potable water, and be in proximity and accessible to existing roads, services and other amenities.</p>	✓	Location of future buildings will be located outside of the slope hazard area. As a condition of rezoning, applicant must provide a groundwater assessment to ensure adequate supply of potable water. Property is located on main arterial road.
<p>v) Consideration of applications for affordable or seniors or other special needs housing shall include the following where appropriate: amendment of the OCP to designate the land as Community Housing, designation as a development permit area, amendment of the zoning to designate the area for affordable or special needs housing, site-specific zoning regulation of density, siting and size, and registration of a housing agreement and a section 219 covenant.</p>	✓	Property to be re-designated to Community Housing. A housing agreement and a Section 219 covenant (if required) will be a condition of rezoning.
<p>2. Water Supply – Policy ‘e’:</p> <p>Any rezoning application involving an increase in density or intensity of use should be required to provide an assessment of the availability of sustainable, long-term groundwater. Any additional density or intensity of use that would negatively affect</p>	✓	A groundwater assessment will be required.

the quality or quantity of groundwater should not be permitted in critical groundwater areas.		
3. Heritage Conservation – Policy ‘c’: All development applications shall be reviewed for the presence of known and recorded archaeological sites. Applicants should modify or revise proposed development plans to avoid archaeological site impacts as the best means of preserving archaeological resources. Alteration of a protected archaeological site requires a Provincial Heritage Alteration Permit prior to land altering activities.	✓	Application reviewed – see Attachment No. 1
6. Climate Change Mitigation & Adaption – Policy ‘b’ In considering applications for new development, the LTC should ensure that additional density is located in areas accessible to existing transportation and services.	✓	Additional density is located on existing main road.
Development Permit Area 7 – Steep Slope Moderate Hazard	N/A	If development is proposed within the Steep Slope Moderate Hazard DPA, a development permit may be required.

Land Use Bylaw

The subject property is split zoned Commercial 7 (C7) and Rural Residential (RR) in the Galiano Island Land Use Bylaw No. 103. The intent is to rezone the entirety of the subject property to a site-specific Community Housing (CH) zone to legalize the affordable rental housing use. The site-specific CH zone will also regulate:

- Permitted uses (affordable rental housing and accessory uses)
- Density – maximum number of dwelling or multi-dwelling units
- Maximum floor area of buildings and structures

Residential Rental Tenure

In May 2018, the Province amended the *Local Government Act* to provide local governments with the authority to zone land for residential rental tenure. The intent is to give local governments greater ability to preserve existing rental housing and/or increase the supply of new rental housing in their communities.

In accordance with this, staff recommend including a zone-specific regulation in the amending bylaw that regulates tenure to “residential rental tenure”, along with an associated definition, as suggested below:

Definition of residential rental tenure: *means the granting of a right to occupy a dwelling unit as living accommodation where the minimum occupancy period is thirty consecutive days, and where the dwelling unit is not owned by a dwelling unit occupant, but where regular payments are made to the owner for the use of the dwelling unit.*

Housing Agreement

Section 483 of the *Local Government Act* authorizes LTC to enter into a housing agreement, which defines terms and conditions agreed to by the LTC and the property-owner/operator regarding the occupancy, rents and tenure of the housing units identified in the agreement. The primary purpose of a housing agreement is to ensure that a development provides affordable rentals in the long term, as intended.

There are three parts to a housing agreement:

1. **A bylaw.** Adopted by the LTC and authorizes LTC to enter into a housing agreement with another party.

2. **The housing agreement.** The housing agreement is attached to the bylaw, and is a contract between the parties to provide affordable housing.
3. **Registration on title.** Once the bylaw is approved, notice of the housing agreement is registered on title.

Contents of a housing agreement generally include:

- Definitions and Interpretation
- Agreement over the lands on use and development, including property maintenance;
- Affordable rental housing eligibility;
- Rental rates;
- Rules governing the establishment of rental policies by owners to ensure alignment with policy goals of the housing agreement and the *Residential Tenancy Act*;
- Restrictions on subletting or assignment;
- Monitoring and reporting requirements to the LTC; and,
- General terms related to various legal matters such as order to comply if in default, site inspections, indemnity, covenant runs with the land, amendment and termination etc.

Terms of Reference

Should the LTC decide to proceed with the application, a terms of reference will be issued to the applicant from staff that provides specific guidance on application requirements that is consistent with the Galiano Island Development Approval Information Bylaw No. 148 (DAI Bylaw).

A Groundwater Assessment prepared by a professional Engineer or Hydrogeologist with experience in groundwater hydrogeology and water resources management will be a requirement of the rezoning application. The Groundwater Assessment should ensure the existing well has sufficient quality and quantity for the proposed use, and that the extraction of groundwater water in respect of each permitted building, structure or use will not adversely affect the quantity or quality of any existing groundwater well or surface water used as a source of potable water.

A Waste Water Assessment prepared by a professional will be a requirement of the rezoning application to ensure the existing waste water treatment systems are sufficient for the proposed use and densities.

A housing agreement will be required to ensure the land in perpetuity is used for affordable housing as stated above. A section 219 covenant may also be required to restrict uses, or prescribe development layout or restrictions.

Confirmation from the Capital Regional District (CRD) Building Department to ensure the existing buildings meet the BC Building Code for the proposed affordable housing use or brought up to code (owner will obtain occupancy permit for use).

Consultation

Statutory Requirements

In accordance with regular statutory requirements a public hearing is required. It is common practice to hold a Community Information Meeting (CIM) prior to that. With direction from LTC these would be scheduled either separately or concurrently after draft bylaws are complete, reviewed and have received at least First Reading should the application proceed to that stage.

Public hearing notice would be posted as per statutory and bylaw requirements in advance of a public hearing.

First Nations

Staff have identified the following First Nations for bylaw referral based on the Province's database:

- Stz'uminus First Nation
- Lake Cowichan First Nation
- Halalt First Nation
- Lyackson First Nation
- Penelakut Tribe
- Semiahmoo First Nation
- Pauquachin First Nation
- Tsartlip First Nation
- Tseycum First Nation
- Cowichan Tribes
- Tsawwassen First Nation
- Tsawout First Nation
- WSANEC Leadership Council

Agencies

Staff have identified the following agencies for bylaw referral; the LTC may direct staff to include other agencies not listed. The LTC may also choose to refer the rezoning proposal to the Galiano Island Advisory Planning Commission by resolution.

Provincial Agencies

- Ministry of Forests, Lands & Natural Resource Operations – Water Licensing Branch
- Ministry of Attorney General and Minister responsible for Housing
- Ministry of Transportation and Infrastructure

Adjacent Local Trust Committees

- Mayne Island Local Trust Committee
- Salt Spring Island Local Trust Committee
- Thetis Island Local Trust Committee
- Gambier Island Local Trust Committee

Regional Agencies

- CRD, Planning and Protective Services, Building Inspection
- CRD, Planning and Protective Services, Regional Housing
- Island Health
- Galiano Island Fire Rescue – North & South Departments
- Islands Trust Conservancy

Non-Agency Referrals

- BC Hydro and Power Authority
- BC Housing
- Coast Salish Peoples of Galiano Society
- Georgeson Family

RECOMMENDATION

Based on the foregoing, the recommendations on page 1 are supported as:

- Affordable housing has been identified in numerous studies as a longstanding community need;

- The proposed land use is consistent with housing-related policies of the Islands Trust Policy Statement (ITPS);
- Proceeding with the preparation of draft bylaws would allow for next steps in the process to proceed including the initiation of First Nations engagement, referrals to potentially affected agencies, and the consideration of further input from the public including adjacent property owners.

ALTERNATIVES

The LTC may consider the following alternatives to the staff recommendation:

1. Request further information

The LTC may request further information prior to making a decision. If selecting this alternative, the LTC should describe the specific information needed and the rationale for this request.

Resolution:

That the Galiano Island Local Trust Committee request that the applicant for GL-RZ-2023.3 submit to the Islands Trust _____.

2. Send Rezoning Application to the Galiano Advisory Planning Commission

Resolution:

That the Galiano Island Local Trust Committee refer rezoning application GL-RZ-2023.3 (Harris) to the Galiano Advisory Planning Commission for the following purpose _____.

3. Deny the application

The LTC may deny the application.

Resolution:

That the Galiano Island Local Trust Committee proceed no further with application GL-RZ-2023.3(Harris).

NEXT STEPS

With direction from LTC, Staff will:

- Develop a draft amending bylaw and a draft housing agreement
- Prepare a cost recovery agreement for legal review of a housing agreement
- Refer the application to the CRD Building Department
- Conduct agency and First Nation referrals

Submitted By:	Kim Stockdill, Island Planner	October 31, 2024
Concurrence:	Robert Kojima, Regional Planning Manager	October 31, 2024

ATTACHMENTS

1. Site Context
2. Maps, Plans, Ortho-photos
3. Terms of Reference
4. Cover Letter from applicant

ATTACHMENT 1 – SITE CONTEXT

LOCATION

Legal Description	Lot 1, District Lot 56, Galiano Island, Cowichan District, Plan VIP81516
PID	026-836-734
Civic Address	9980 Porlier Pass Rd
Lot Size	1.98 hectares (4.88 acres)

LAND USE

Current Land Use	Forest and Residential
Surrounding Land Use	Forest, Residential, Utility, and Nature Protection

HISTORICAL ACTIVITY

File No.	Purpose
GL-SUB-1990.30	N/A
UN-SUB-1991.82	
GL-SUB-1999.2	
GL-RZ-1995.4	To rezone a portion of the subject property to a permit a film school

POLICY/REGULATORY

Official Community Plan Designations	Galiano Island OCP No. 108, 1995 Designations: Commercial (C) and Rural Residential (RR)
Land Use Bylaw	Galiano Island LUB No. 127, 1999: Commercial Private Film School (C7) and Rural Residential (RR)
Other Regulations	N/A
Covenants	None
Bylaw Enforcement	GL-BE-2019.17 – Closed GL-BE-2021.10 – Closed

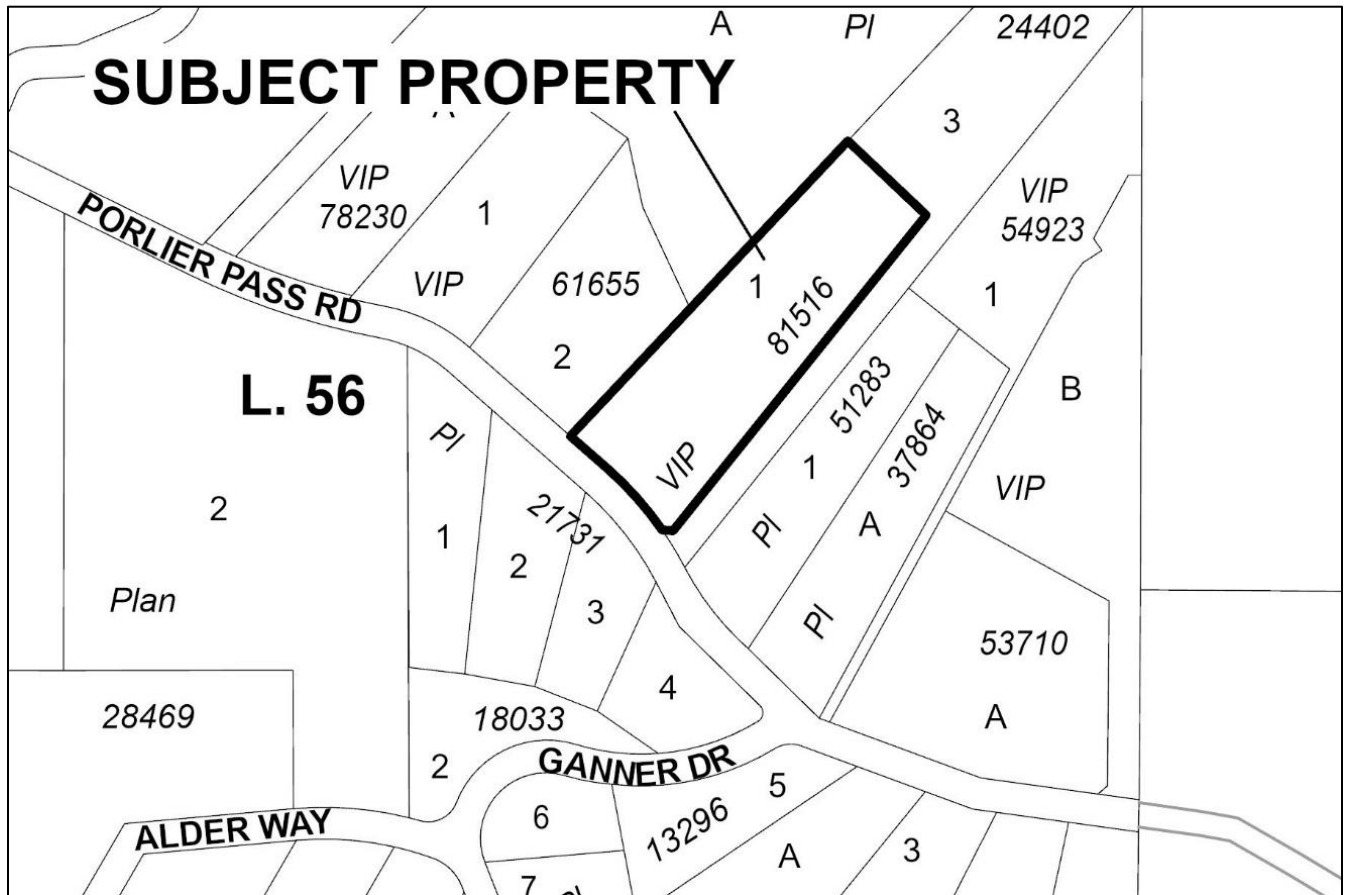
SITE INFLUENCES

Islands Trust Conservancy	The Islands Trust Conservancy covenant is directly northwest of the subject property; therefore a referral will be made to the ITC.
Regional Conservation Strategy	The proposal does not impact the objectives and priorities of the Islands Trust Conservancy regional conservation plan.
Species at Risk	N/A
Sensitive Ecosystems	N/A
Hazard Areas	Low and medium risk steep slope on property
Archaeological Sites	There is potential for the presence of archaeological material. Staff have directed the applicant to the following guidelines:

	<ul style="list-style-type: none"> • All archaeological and cultural heritage is protected under the <i>Heritage Conservation Act</i> and areas of archaeological potential may contain undocumented archaeological sites which would be automatically protected under the <i>Heritage Conservation Act</i> (including all intact or disturbed sites) and require a permit from the BC Archaeology Branch. Further information regarding permits: https://www2.gov.bc.ca/gov/content/industry/natural-resource-use/archaeology/permits. • In the event that archaeological features or materials are found, either intact or disturbed on the subject property, stop work immediately and contact the BC Archaeology Branch at 250-953-3334 or archaeology@gov.bc.ca. • Any impacts, would include the following: landscaping, tree removal, digging, using heavy equipment, development, fencing, footings, or any form of groundwork. For more information regarding registered archaeological sites and archaeological potential on the subject property, submit an Archaeological Information Request Form: www.archdatarequest.nrs.gov.bc.ca, or contact Islands Trust to access mapping of the subject property.
Climate Change Adaptation and Mitigation	Increased density and clustered design support climate change strategies
Shoreline Classification	N/A
Shoreline Data in TAPIS	N/A

ATTACHMENT 2 – MAPS, PLANS, ORTHO-PHOTOS

2.1 SUBJECT PROPERTY MAP



2.3 ZONING AND ORTHO



2.4 DEVELOPMENT PERMIT AREAS



2.5 10 METRE CONTOURS



2.6 SITE VISIT PHOTOS



LOOKING NORTH TOWARDS EXISTING BUILDING CURRENTLY USED FOR COMMUNITY HOUSING



LOOKING WEST TOWARDS EXISTING BUILDING



LOOKING NORTH TOWARDS REAR OF PROPERTY (MODERATE STEEP SLOPE)



LOOKING SOUTH TOWARDS WINDING DRIVEWAY



LOOKING SOUTH TOWARDS PORLIER PASS RD AND WETLAND AREAS BORDERING DRIVEWAY



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November 8, 2024

File Number: GL-RZ-2023.3 (Harris)

Dear George Harris
Via email: XX

Re: Rezoning Application GL-RZ-2023.3 (Harris) - Terms of Reference – Lot 1, District Lot 56, Galiano Island, Cowichan District, Plan VIP81516

The Islands Trust has completed a preliminary review of your rezoning application for 9980 Porlier Pass Road on Galiano Island.

The purpose of this letter is to identify information that is required from the applicant pursuant to the [Galiano Island Development Approval Information Bylaw No. 148](#) (DAI Bylaw). Under the DAI bylaw, a zoning amendment application uses a 'terms of reference' (TOR) approach to information collection. The objective of this TOR is to identify and request any anticipated information from the applicant in a timely manner, and as early as possible in the process.

The information received by Islands Trust to date pertaining to your application includes:

- Signed and dated land use application seeking rezoning of the subject parcel from Commercial 7 (C7) and Rural Residential (RR) to site-specific Community Housing zone
- A brief summary of property background and proposed uses
- Site plan showing existing driveways, buildings and structures
- A current land title search for the subject property

As per this TOR, additional information that is required to proceed with your application for consideration by the Galiano Island Local Trust Committee (LTC) includes:

- 1) A site plan professionally prepared at an appropriate scale, based on a legal survey, delineating the proposed areas for future development (where future community housing units may be located) and associated features - existing buildings and structures, roads and driveways, existing septic field and tanks, existing well, topographic features, and any significant sensitive environmental or habitat features.
- 2) Hydrogeologist's* Report
 - a. Confirmation that the existing well has sufficient available groundwater to provide the daily required volume of potable water for each existing and proposed community housing unit.
 - b. Confirmation that the quality of groundwater from the well meets or exceeds the Guidelines for Canadian Drinking Water Quality.
 - c. Inclusion of recommendations for mitigation measures, if applicable, to ensure long-term sustainable yield of the drilled wells and to lower the risk of saltwater intrusion.

Prior to initiating the assessment, staff recommend the Hydrogeologist contact the Islands Trust Senior Freshwater Specialist (wshulba@islandstrust.bc.ca) regarding the requirements and contents of the assessment report.

*Hydrogeologist means an engineer or geoscientist with competency in the field of hydrogeology, regulated under the *Professional Governance Act, Engineers and Geoscientists Regulation*.

Note: It is the applicant's responsibility to ensure the existing and proposed uses meet the Water Sustainability Act. It is also the applicant's responsibility to ensure well registration for the existing and proposed uses and density.

- 3) Verify, in writing, the existing septic field and tanks are compliant and sufficient for the existing and proposed densities.
- 4) Regarding the potential for archaeological material to be found on the property, Islands Trust reviews all applications/permits using Remote Access to Archaeological Data (RAAD) mapping to ensure the preservation and protection of cultural heritage, archaeological sites, and ancestral places. Further to that review, staff direct the applicant to contact the BC Archaeology Branch to determine if an archaeological permit would be required prior to commencing development.

With respect to any reporting requirements listed above, the applicant and/or professional must, in accordance with generally accepted impact assessment methodology, ensure the reports:

- (a) identify relevant baseline information and document the nature of the resource or other matter on which the proposed activity or development may have an impact;
- (b) identify and describe the potential and likely impacts of the activity or development including any cumulative effects when combined with other projects proposed or under development;
- (c) evaluate the impacts in terms of their significance and the extent to which and how they might be mitigated; and
- (d) make recommendations as to conditions of approval that may be appropriate to ensure that undesirable impacts are minimized or avoided, and
- (e) make recommendations as to measures that may restore or enhance natural functions or features that have been damaged or degraded prior to development or that would be impacted by the proposed development.

This information must be prepared by a professional or professionals in good standing with his/her professional organization within British Columbia, acting within his/her area of expertise, and with demonstrated and pertinent experience and/or training.

Please also note that the Islands Trust reserves the right to require additional information or clarification in response to the project reports. As a condition of rezoning, the Local Trust Committee will require a registration of a housing agreement and associated Section 219 covenants. Any additional requirements will be provided in writing and will identify the additional information required in as clear and specific manner as possible.

If you have any questions concerning the application or TOR requirements stated above, please do not hesitate to contact me.

Sincerely,

Kim Stockdill
Island Planner, Galiano Island Local Trust Area

cc: *Robert Kojima, Regional Planning Manager*
William Shulba, Senior Freshwater Specialist
Galiano Island Local Trust Committee

The goal of turning the Gulf Island Film and Television School-GIFTS into the "Gulf Island Frugal Tenancy Site"-GIFTS (as affordable housing) is an important part of ensuring Galiano can house those most in need.

I have been a board member of 3 different housing societies over the past 15 years and am presently on the board of GALI and GIGARHS. Although we have now spent over a million dollars on soft costs, we are likely to be many, many years from success. Our building costs have doubled since applying for rezoning and financing has tripled. The budget of GALI has gone from 7 million dollars to 14 million dollars and is expected to continue to inflate.

After running GIFTS as a film school for 20 years, I sold it to new owners who unfortunately failed, blaming COVID, and returned the facility to me. A local First Nations mother from an old Galiano family and her children approached me, after they had been evicted and were sleeping in their car, to ask if she could stay at the facility while it was sitting empty. I was extremely reluctant, but agreed to a very temporary situation while I decided what to do with the newly returned property. This quickly led to a further 4 single moms with kids, and a couple of single men moving in. About half the residents are Indigenous, and none of the residents have any other option for housing on Galiano Island. These people are the volunteer firefighters, first responders, recycle center volunteers, dish washers, house cleaners, childcare providers, bicycle mechanics, etc.

A significant water license, sewage system, integrated fire alarm and final occupancy permit existed for 30 residential students and a Manager's family under the current zoning. The sewage system was designed for 45 people which included the administration, teachers, interns and guests while the film school was in session. After extensive repair and upgrades to add integrity, sustainability, comfort and efficiency - including heat pumps to replace energy inefficient electric and propane heating - to the site, our new residents have come together to support each other in a community that I could never have envisioned when I agreed to their requests for emergency housing on the old film school site.

I am now applying for a rezoning to allow improvements to continue and, more importantly, ensure secure housing for an important part of our community. While I am able to pay the fees for rezoning, the funds for doing so are diverted from those available to improve the living situation of those on-site now. Please consider waving the fees to rezone my property to Community Housing for the ongoing benefit of those who reside there and other members of the Galiano community who may find themselves in need while we all wait for the "official" affordable housing projects to navigate the continued bureaucracy to their completion.

Thank you for your consideration,

George Harris