Agenda – Executive Policy Committee – December 7, 2016

REPORTS

Item No. 10 Options to Relocate Archives and Records Control Branch Operations

WINNIPEG PUBLIC SERVICE RECOMMENDATION:

1. That the City's Records Management program be consolidated into a single facility as described in Option 2 of this report.

2. That the Archives branch of the City Clerk's Department continue to work with Municipal Accommodations to identify and develop a long term site suitable to house the City Archives and allow for proper care of the City's archival heritage.

3. That existing Capital projects 0400000113 and 0400000114 created by Council for the redevelopment of the City Archives at 380 William, with a combined value of $2 million, be consolidated into one new 2016 capital project and reallocated to enable immediate improvements to the City's Records Management program into a single facility and that any remaining funds in this project be put towards a future solution to the City Archives program.

4. That the Proper Officers of the City be authorized to do all things necessary to implement the intent of the foregoing.

ADMINISTRATIVE REPORT

Title: **Options to Relocate Archives and Records Control Branch Operations**

Critical Path: **Executive Policy Committee**

AUTHORIZATION

Author	Department Head	CFO	CAO
J. Baltessen	R. Kachur	M. Ruta	D. McNeil

RECOMMENDATIONS

1. That the City's Records Management program be consolidated into a single facility as described in Option 2 of this report.

2. That the Archives branch of the City Clerk's Department continue to work with Municipal Accommodations to identify and develop a long term site suitable to house the City Archives and allow for proper care of the City's archival heritage.

3. That existing Capital projects 0400000113 and 0400000114 created by Council for the redevelopment of the City Archives at 380 William, with a combined value of $2 million, be consolidated into one new 2016 capital project and reallocated to enable immediate improvements to the City's Records Management program into a single facility and that any remaining funds in this project be put towards a future solution to the City Archives program.

4. That the Proper Officers of the City be authorized to do all things necessary to implement the intent of the foregoing.

REASON FOR THE REPORT

Executive Policy Committee approval is required for consolidation / reallocation of a capital project related to City Clerk's Department functions.

EXECUTIVE SUMMARY

Until 2013, the Archives and Records Control Branch of the City Clerk's Department managed records stewardship (corporate records management) and archival programming out of 311 Ross and 380 William. Both facilities are owned by the City. In 2015, the Access and Privacy Office was established within the Branch.

A disaster at 380 William forced temporary relocation in 2014 of administrative offices and staff, delivery of public research services, and storage of the City's $4.1 M archival collection. The City Clerk's Department worked with Municipal Accommodations to review vacant City facilities, but none could accommodate Branch operations and leased space at 50 Myrtle was secured. As space was limited at 50 Myrtle and 311 Ross could not accommodate the balance of records removed from 380 William, additional leased space for records storage was secured with the Province in the Manitoba Government Records Centre (MGRC).

The temporary service delivery plan implemented in 2014 is quickly becoming untenable. When the plan was implemented, it was assumed that the site would only be needed for the two year anticipated construction period required to complete redevelopment of 380 William. 50 Myrtle, the only viable option found, was never intended to be a long term solution as it offers limited space for Branch administrative offices, limited public access space, no outreach programming space, is hard for the public to locate, provides sub-standard warehouse storage space for the City's archival materials, and has no space for conservation/preservation work critical to facilitate access to and long term preservation of core archival materials.

As at the date of this report, 50 Myrtle and 311 Ross are at capacity, and the agreement with the Province for storage space in the MGRC expires at the end of the year.

All Branch program responsibilities are either constrained or on hold for lack of adequate space.

The recommendation will increase records storage capacity, using existing capital projects. This will facilitate the needs of the Records Management program and provide further time to consider issues related to the Archives program and preservation of the City's heritage records.

IMPLICATIONS OF THE RECOMMENDATIONS

The recommendation reallocates existing capital projects assigned to redevelopment of 380 William Avenue towards a proper solution for records management storage in a warehouse facility. This will allow the Archives to vacate substandard storage at 311 Ross Avenue and other records storage centres currently being used. It will centralize all records in one location, and improve the efficiency of the Records Management program. It will also buy the City some time to find a proper solution to Archival storage, by easing space concerns at the leased 55 Myrtle location.

HISTORY/DISCUSSION

HISTORY: The City of Winnipeg has a legislated and fiduciary responsibility to provide for proper stewardship of its records and archives on behalf of its citizens – present and future generations (as per Sections 109 and 100 of The City of Winnipeg Charter, the City is required to appoint a City Archivist and to establish a Records Management program).

Since its formation in 1978, the Archives and Records Control Branch of the City Clerk's Department (Branch) has been responsible for managing records in storage, developing records management policy and practice, and facilitating research access to the City's archival collection. Presently, the Branch delivers three clearly defined programs through which staff support colleagues across departments and interact with citizens interested in the history of the

City. Each of these program areas are hampered by longstanding facilities issues related to their original design/intent and delayed redevelopment for current use, which has been further exacerbated by recent construction issues which forced evacuation of the Archives from its home facility at 380 William.

Program One – Records Management: The Branch manages the Corporate Records Centre (CRC) at 311 Ross. The CRC provides departments with cost-effective records storage, retrieval and disposition services. The Branch develops and delivers records management training to departmental colleagues through Corporate Education, provides advice on recordkeeping issues through direct consultation, assists departments with by-law implementation and undertakes periodic consultation for revisions to the by-law to reflect structural and functional changes within the City as they relate to the keeping of records.

a) In 2006, Council adopted recommendations in the *Corporate Records Storage Planning Study* and an appropriation of $500,000 was used to adapt the third floor of 311 Ross for records storage. The CRC at 311 Ross began to receive records in 2007, directly supporting implementation of recordkeeping best practices as detailed in the above-referenced study. In particular, cost-effective storage and inventory management services have enabled departments to better manage records in accordance with Records Management By-law 86/2010 and Administrative Standard AS-006, resulting in an increase in routine transfers of records out of expensive operational space to the CRC. The following table compares typical annual CRC storage and service charges for one client department with those of a commercial provider.

Client Department	CRC	Commercial Provider
Storage Charges	$51,553.87	$59,631.65
Service Charges	$13,742.00	$33,307.00
Total Charges	$65,295.87	$92,938.65

For additional information, see *Appendix A: Charge Comparison of In-House (CRC) and Third Party (Commercial) Records Centre Storage and Service.* Note that a floating fuel surcharge would be applied over and above the commercial rate cited.

b) The business model for the CRC requires that the Branch plan to meet identified departmental needs for storage space – good records management practices are closely allied with the availability of adequate, secure storage space and responsive client services. Assuming routine destruction according to the records management by-law to liberate space for new transfers into the CRC, the 2006 study concluded that storage requirements for the City would stabilize at approximately 48,600 box storage spaces.

As at August 2016, the Branch had control over circa 35,000 boxes of records in 20,932 square feet in the CRC, 2,313 square feet in the MGRC, and 3,606 square feet at 50 Myrtle. Of this inventory, 8,200 boxes are designated archival and are not included in calculations for storage space for records subject to destruction (archival records will be accommodated within the proposed vault at 380 William). To accommodate current and projected inventory in storage until disposition as prescribed by the records management by-law, the Branch requires a minimum of 32,502 square feet for CRC operations.

	Box Capacity (cubic feet)	**Square Footage Current Shelf Volume**	**Square Footage 30% Increase Shelf Volume**
Current	26,800	20,932 + 2,313	NA*
Projected	48,600	38,000	32,502

For additional information, see *Appendix B: Inventory Capacity Comparison/Analysis*. Total square footage at 311 Ross is 20,932 and does not allow for shelving modifications to increase volume. Using existing equipment, projected capacity can be accommodated with a 30% increase in shelf volume in 32,502 square feet of space.

If appropriate storage space is not available, the risks are as follows:

1. departmental clients will be forced to use commercial providers to store their records and will experience higher service rates and the imposition of penalty charges on large scale withdrawals.

2. the recordkeeping framework supported by By-law 86/2010, Administrative Standard AS-006 and the availability of cost-effective storage space may be jeopardized should departmental budget constraints result in records being consigned to vacant office spaces or inadequate areas or basements rather than commercial storage facilities, thereby compromising proper capture, storage and security of information. This could place the City at risk of loss or exposure of information and contradicts the City's commitment to increased transparency and improved response times to requests through access legislation (FIPPA).

Program Two – Archives: The Branch manages the City's significant archival collection (appraised value of $4.1 Million for insurance purposes), facilitates public access to its holdings and promotes interest in the history of the City of Winnipeg. Records held by the Branch date from 1873, the year the City of Winnipeg was incorporated, and include records of the twelve municipalities that amalgamated in 1971 to form the present City of Winnipeg, records of the Metropolitan Corporation of Greater Winnipeg, records of the Greater Winnipeg Water District, and a number of significant private collections. Records include textual materials, digital materials, rare books and municipal publications, maps, plans, photographs, audio recordings, film, documentary art, gifts presented to the Mayor's Office, corporate memorabilia and private mixed-media collections. Through luck and the hard work of former administrative staff and City Councils, the City of Winnipeg's archival collection is considered to be one of the most complete and valuable municipal collections in Canada.

While these records are of considerable value to the City – particularly as the City moves toward its 150th anniversary in 2024 – a 2002 assessment found 380 William to be functionally sub-standard in all areas essential for the long term preservation of archival materials, and the City is at serious risk of loss of its documentary history. In 2014, during reconstruction of the roof at 380 William, massive flooding occurred twice in two separate major rainstorms. Damage to the building was severe and required the archives, the staff and its records to be vacated to leased

space at 50 Myrtle. Given the age and original purpose of 50 Myrtle, risk factors for the collection at this site are essentially the same (see *Appendix E: Myrtle Conservation Assessment, 2016*).

a) In 2009, RFP 2009-070 was awarded to Cibinel Architects Ltd. to establish the feasibility of adapting/renovating 380 William to create a functional archives. A key outcome of the Cibinel study was identification of space within the building for a vault wherein storage of archival records could be concentrated to mitigate floor load issues without loss of capacity and to meet basic preservation standards (including fire suppression). Use of a vault for conservation/preservation is consistent with practices in municipal and other government archives across the country (see *Appendix C: High Level Summary of 2016 Survey of Municipal Practice, Archives and Records Management*).

b) In 2013, RFP 2013-233 was awarded to Ager Little Architects Ltd. to prepare detailed drawings and Class B estimates, and to manage construction through to completion of an onsite vault, a shipping and receiving area, a research room and multi-purpose room on the main floor, and office/work areas on the second floor – as proposed in the Cibinel plan. As this work was getting underway, the building suffered significant water damage rendering it unfit for occupation.

   In 2014, specifications, construction drawings and a Class B estimate were delivered by Ager Little. Risk Management personnel with the City managed the claim for damage, and insurance monies for repair of water damaged ceilings, floors and systems resulting from the 2013 disaster were transferred to City Clerk's Department. These repairs were factored into the larger redevelopment project and a business case was developed and submitted for Capital Budget consideration in 2014.

   In 2015, the City was awarded $400,000 under the Canada 150 Community Infrastructure Project of Western Economic Diversification Canada for construction costs related to the multi-purpose room at 380 William – one component of the larger redevelopment project. This funding will be lost if the project is not completed by March of 2018.

c) Since 2005 when a structural audit identified critical repairs required to ensure the integrity of the building envelope, City Council has allocated $3.5 Million in capital towards the restoration of 380 William. As a result of the damage that occurred in 2013, $2 Million remains unspent. Investments include the following:

   2008, foundation waterproofing (design: $60,300/construction: $503,862)
   2008, washroom upgrades (design: in-house/construction: $50,072)
   2010, entry ramp (design: in-house/construction: $453,900.00)
   2010, accessible lift ($85,000.00)
   2010, masonry repairs (design: included in item 1 above/construction: $306,228)
   2013, roof replacement (design: $59,584/construction: $702,957)
   2013, climate-controlled vault and loading dock (design only: $388,243)

The redevelopment project for 380 William remains unfunded. If the redevelopment project is not funded, the risks are as follows:

1. Loss of federal monies and civic investment to date.

2. Loss of reputation and ongoing vacancy in a city-owned heritage facility.

3. Ongoing risk of loss of the City's valuable archival collection.

Program Three – Access and Privacy Office (FIPPA/PHIA): The Branch includes the corporate Access and Privacy Office, which coordinates requests for access to information and develops and implements process improvements to enhance openness and transparency by ensuring consistent and fair access to City records. The Access and Privacy Office plays an active role consulting and meeting with departmental colleagues. Proximity to the downtown civic campus, suitable space for confidential consultations and security for records under review are essential for operational efficiency.

DISCUSSION: Recognizing that a mixed paper and electronic recordkeeping environment is inevitable for the foreseeable future and that the City continues to experience growth in the volume of paper records created or received, the City's need to manage paper records remains a critical component of its information management and recordkeeping strategy.

The City is equally responsible for the long term care of its valuable archival holdings and for providing access to this important civic resource.
The Branch continues to undertake projects and programming to improve records management and to preserve and share the City's archival collection. Initiatives include:

a) Effective management of CRC inventory through the use of O'Neil Records and Information Management and Tracking software.

b) Charging back to departments costs for records storage and services and working with departments to ensure efficient and timely destruction of records reaching disposition.

c) Updating and refining the records management by-law to reduce retention periods where appropriate, identify new and evolving records creating systems, and ensure that legal, personal, administrative and archival considerations are met.

d) Working with Corporate IT, Legal Services and Audit through the Records Committee to ensure that records management processes are effective.

e) Improving online access to archival holdings through implementation of archival information management and digital preservation software. Innovation Fund Project.

f) Featuring the rich content in the City's archival collection in physical exhibits and online in *Pathways to Winnipeg History* – http://winnipeg.ca/pathways and *Winnipeg in Focus* – http://winnipeg.ca/focus.

g) Preparing new content for access through internships and grant-funded projects.

Despite these efforts, Branch program responsibilities are either constrained or on hold for lack of adequate space. This is a direct result of expectations that 380 William would become operational two years following implementation of the temporary service delivery plan. Such delay has resulted from (1) unavoidable construction interruption due to rain damage/flooding, and (2) unapproved budget funding requirements.

The Branch has worked closely with Municipal Accommodations to develop optional approaches for program delivery and engaged a consultant to scan the commercial market to identify sites other than 380 William and 311 Ross that might meet Branch program requirements (see *Appendix D: Optional Approaches for Delivery of Archives and Records Control Branch Programs*). Based on an analysis of program requirements and results of the consultant's study, the following Options are available:

Option 1: Preferred Option. Redevelopment of 380 William to deliver Archives and Access and Privacy Office programs and relocation of the CRC at 311 Ross to a suitable site.

The City Clerk's Department submitted a capital project Business Case for redevelopment of 380 William as part of its 2015, 2016 and 2017 capital budget submissions, but none of these projects have moved forward due to unapproved funding. The Business Case developed in 2014 and submitted along with these capital projects, forecasts redevelopment of 380 William to cost approximately $9.2 Million in total with $2 Million in existing capital presently available. Were this project to go ahead as part of the 2017 capital budget, $4,688,000 would be required in 2017 and $2,344,000 in 2018. In 2015, the City's application for funding under the Canada 150 Community Infrastructure Program was approved and the City will receive $400,000 in approved federal monies from Western Economic Diversification Canada for specific improvements within 380 William under the terms of a grant agreement.

In conjunction with redevelopment of 380 William, the Corporate Records Centre would be relocated to a suitable site. A study was undertaken in late summer / early fall 2016 and one site identified by a consultant of sufficient size to address immediate and longer term storage and service delivery requirements for the Records Management program. Annual lease costs for this site are $306,117.75. This compares to current accommodation costs of approximately $240,000 annual for space in the City-owned facility at 311 Ross ($204,000 annually) and space with the Province in the MGRC ($37,200 annual). The consultant has estimated $125,000 for renovations required to meet Branch and City requirements. Additional costs to be determined include design of administrative space, IT installations, shelving layout, move and installation of existing shelving, inventory move, costs related to operational changes such as equipment, warehouse staffing and a fleet vehicle. As such, there may be some additional annual operating costs associated with this option. A business plan would follow this report to fully identify all accommodation and program costs, but costs will be well within the $2 million in capital currently allocated for 380 William.

This option results in the release of space on the second and third floors of 311 Ross, which would be returned to Municipal Accommodations for repurposing. This would also allow consolidation of records at the Provincial Manitoba Government Records Centre (MGRC).

Note that the Branch has identified another temporary solution for overflow records presently in storage at the MGRC. Under a Memorandum of Understanding, Library and Archives Canada will allocate storage space in the federal records centre at 1700 Inkster for use by the Branch. The Branch can also use this site to receive transfers from civic departments that cannot be accommodated in the CRC until the business plan for relocation is implemented.

Pros & Cons, Option 1:

a) The redevelopment of 380 William incorporates program-specific improvements, health/life safety improvements, and repair of water damage incurred during 2013. Given that 380 William is over 111 years old, health/life safety upgrades are required before the building can be occupied (*City of Winnipeg Archives Building, Condition of Systems and Expected Lifespan, Epp Siepman Engineering Inc., 2014*).

b) Redevelopment would result in creative re-use of the City's first public library, a historically significant and heritage designated building constructed between 1903 and 1905 with a grant of $75,000 from American philanthropist Andrew Carnegie. This historically designated building will require a large investment regardless of whether it is used as the City Archives or other. It may be a difficult building to repurpose in the private sector due to very high main floor ceilings and other factors.

c) Construction of an archival vault at 380 William to preserve the City's valuable archival collection for future generations is consistent with practices in municipal and other government archives across the country (see *Appendix C: High Level Summary of 2016 Survey of Municipal Practice, Archives and Records Management*). The vault would allow the City to re-assess risk factors and self-insure the archival collection without concern for sustaining a major financial loss in the event of fire, flood or theft.

d) Redevelopment of 380 William would provide citizens with a centrally-located, accessible location to engage with archival materials specific to the City.

e) Redevelopment of 380 William would provide the Access and Privacy Office with a convenient central site from which to maximize program potential.

f) The Class B estimate prepared in 2014 projected redevelopment of 380 William to cost $9.2 Million. There is currently $2 Million in approved capital and the potential to receive $400,000 in federal funding through the Canada 150 Community Infrastructure Program. The facility is presently vacant and there are no additional costs to decant the site. However, 380 William has been sitting empty for some time now and this may result in additional costs related to code compliance. While the Department believes this to be the best option to meet the needs of the City's Archives program and the CRC, we recognize the high cost as the reason that the project has not gone forward to date.

g) Plan for the relocation of the CRC into suitable space as per Option 2 below. Relocation of the CRC enables the City to meet its records management responsibilities.

Option 2: Viable and recommended. Relocation of the Records Management program to a suitable warehouse location and provide for service delivery of Archives and Access and Privacy Office programming from a second central location.

As noted in Option 1 above, one site identified by the consultant is of sufficient size to address immediate and longer term storage and service delivery requirements for the Records Management program. Annual lease costs for this site are $306,117.75. This compares to current accommodation costs of approximately $240,000 annual for space in the City-owned facility at 311 Ross ($204,000 annually) and leased space with the Province in the MGRC ($37,200 annually). The consultant has estimated $125,000 for renovations required to meet

Branch and City requirements. Additional costs to be determined include design of administrative space, IT installations, shelving layout, move and installation of existing shelving, inventory move, costs related to operational changes such as equipment, warehouse staffing and a fleet vehicle. As such, there may be some modest additional annual operating costs associated with this option.

A business plan would be created to fully identify all accommodation and program costs. It is recommended that City Council reallocate to this option the $2 Million in previous year's capital designated for redevelopment of 380 William. Funds required will be well under the $2 Million. It is recommended that funds not required for the CRC develop the future Archives program.

Option 2 results in the release of space on the second and third floors of 311 Ross, which would be returned to Municipal Accommodations for repurposing as well as vacating other outside space currently used for record storage.

While redevelopment of 380 William is the preferred option for delivery of Archives and Access and Privacy Office programs, the Branch acknowledges the high cost associated with this proposal. As the consultant was not able to identify a suitable alternative to 380 William during their initial search, Option 2 proposes that the search continue and that Archives and Access and Privacy Office programs remain at 50 Myrtle until a site is identified for development. Annual lease costs for 50 Myrtle are $185,829.

This option results in the return of 380 William to Municipal Accommodations for repurposing and to continue a search for another alternative for the City Archives.

Pros & Cons, Options 2:

a) Records storage in the CRC at 311 Ross is on multiple floors and requires access by a single shared freight elevator, thus hampering efficiency in the management of inventory. Capacity within this site is limited for a variety of reasons: the building is old and there are floor load issues that prevent the installation of additional shelving to accommodate growth; low ceilings limit shelving height and capacity; beams and other obstacles limit runs of shelving. Option 2 would enable the Records Management program to re-establish the CRC in a single newer building purpose-built for warehousing operations. Ceiling height within the proposed site is sufficient to allow for future vertical growth of shelving/storage to meet demand.

b) Costs for this option can be covered using existing capital presently designated for redevelopment of 380 William.

c) Continue to plan for relocation of the Archives and Access and Privacy Office into suitable space, at a later date.

d) By releasing 380 William and deferring the relocation of the Archives and Access and Privacy Office to a future date, the City fails to address ongoing limitations and risks to both programs that result from sub-standard space.

Option 3: Not viable. Status Quo. The temporary service delivery plan implemented in 2014 is untenable for a longer term than had been planned and all Branch program responsibilities are either constrained or on hold for lack of adequate space. The site at 50 Myrtle was never

intended to be a long term solution as it offers limited space for Branch administrative offices, limited public access space, no outreach programming space, is hard for the public to locate, provides sub-standard warehouse storage space for the City's archival materials, and has no space for conservation/preservation work critical to facilitate access to and long term preservation of core archival materials. An assessment of 50 Myrtle conducted in 2016 found the site unsuitable for the long term preservation of the City's valuable archival collection (see *Appendix E: Myrtle Conservation Assessment, 2016* for a discussion of site suitability).

The Branch has identified another temporary solution for overflow records presently in storage in the MGRC. Under a time-limited annually-negotiated Memorandum of Understanding, Library and Archives Canada will allocate storage space in the federal records centre at 1700 Inkster for use by the Branch to relocate materials presently in storage at the MGRC. Optionally, the Branch could use additional space in this site to receive transfers from civic departments that cannot be accommodated in the CRC. The associated risk is that the federal records centre is to be decommissioned and any inventory stored in this facility will again need to be moved. Costs to move and shelve inventory in the MGRC to be determined. Storage space will be made available at no cost to the City.

Option 4: Not viable. Relocation to a single facility that meets Records Management, Archives and Access and Privacy Office program requirements. No suitable sites were identified (see *Appendix D: Optional Approaches for Delivery of Archives and Records Control Branch Programs*).

FINANCIAL IMPACT

Financial Impact Statement

Date: November 18, 2016

Project Name:

Options to Relocate Archives and Records Control Branch Operations

First Year of Program 2016

	2016	2017	2018	2019	2020
Capital					
Capital Expenditures Required	$ 2,000,000				
Less: Existing Budgeted Costs	2,000,000				
Additional Capital Budget Required	$ -	$ -	$ -	$ -	$ -
Funding Sources:					
Debt - Internal					
Debt - External					
Grants					
Reserves, Equity, Surplus					
Other					
Total Funding	$ -	$ -	$ -	$ -	$ -
Total Additional Capital Budget Required	$ -				
Total Additional Debt Required	$ -				
Current Expenditures/Revenues					
Direct Costs					
Less: Incremental Revenue/Recovery					
Net Cost/(Benefit)	$ -	$ -	$ -	$ -	$ -
Less: Existing Budget Amounts					
Net Budget Adjustment Required	$ -	$ -	$ -	$ -	$ -

Additional Comments: The recommendation is that two Council-approved capital projects for the City Archives be consolidated into one distinct capital project, to faciliate a new corporate records centre project. The total capital funding involved is $2,000,000 as follows:

City Archives Project 0400000114 - $1,500,000
City Archives Project 0400000113 - $500,000

The funds will be used for immediate improvements to the City's Records Management program as described in Option 2 of this report and that any remaining funds be allocated towards a future solution for the City Archives.

City Clerks advises that there will likely be an operating budget impact starting in 2018 related to lease costs. The exact amount has yet to be determined.

(Original Signed By: Ramona Hodges)
Ramona Hodges
Manager of Finance (Campus)
Corporate Finance Department

CONSULTATION

In preparing this report there was consultation with:

Planning, Property and Development
Corporate Finance

OURWINNIPEG POLICY ALIGNMENT

The recommendations in this report support *Our Winnipeg* objectives outlined in *Complete Communities*. In particular:

01-1c – City Building, Key Directions, Specific Areas, Downtown; 02-3 – Heritage – Directions 2, 3 and 6; 03-3 – Creativity – Directions 2, 3 and 4.

SUBMITTED BY

City Clerk's Department
Archives and Records Control Branch
Prepared by: J. Baltessen
Date: September 12, 2016
File No.



Appendix A - Cost Comparisons.pdf



Appendix B - Inventory Capacity C



Appendix C - Summary of Survey F



Appendix D - 2016 Report Site Options.p



Appendix E - 50 Myrtle Conservation A