WILLS

PARTNERS IN ENGINEERING, PLANNING & ENVIRONMENTAL SERVICES

August 17, 2023

Damien Schaefer, MCIP, RPP - Municipal Planner
Ministry of Municipal Affairs and Housing (MMAH)
Municipal Services Office - East
8 Estate Lane, Rockwood House
Kingston, ON
K7M 9A8

Via email: Damien.Schaefer@ontario.ca

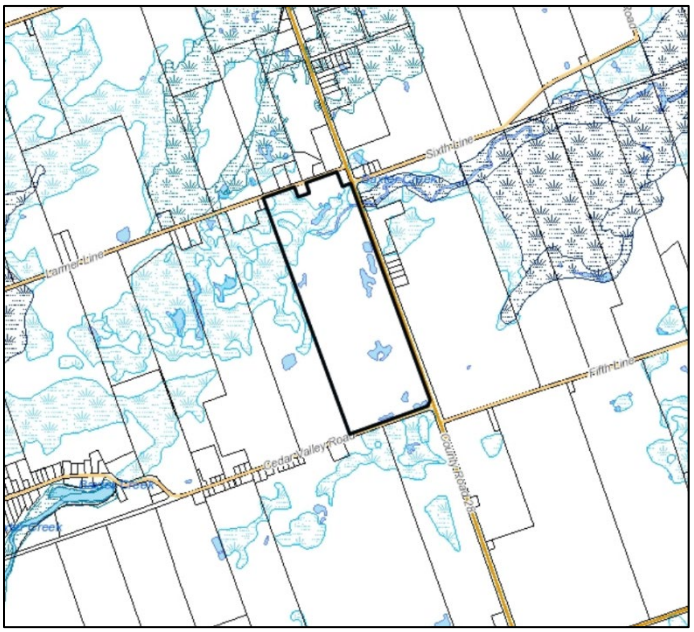
Attention: Damien Schaefer, Ministry of Municipal Affairs & Housing

Dear Mr. Schaefer

Re: Request for Modification to County of Peterborough Official Plan
Baxter Creek Golf Club - 1702 Cedar Valley Road, Cavan Monaghan
ERO number 019-5908 | Ministry reference number 15-OP-227956
D.M. Wills Associates Project No. 85002

D.M. Wills Associates Limited (Wills) is pleased to submit the following letter on behalf of our Client, Baxter Creek Golf Club care of Jerrold Paxton, providing comments on the new County of Peterborough Official Plan currently under review by the Ministry of Municipal Affairs and Housing. The comments contained within this letter pertain to the proposed residential development on lands municipally known as 1702 Cedar Valley Road (Subject Property), in the Township of Cavan Monaghan.

The Subject Property is located in Part Lot 23, Concession 6 in the Township of Cavan Monaghan (Cavan Ward), in the County of Peterborough (County). The property comprises an area of approximately 167.2 acres, with frontage of approximately 465 metres on Cedar Valley Road.



At present, the Subject Property is developed for use as an 18-hole

championship golf course, being Baxter Creek Golf Club. The facilities on premise also include a clubhouse and dedicated event space. The use of the Subject Property as a golf course was established through a Zoning Bylaw Amendment and subsequent Site Plan, approved by the Township of Cavan Monaghan (Township) in 2006. However, plans for development of the property as a golf course date back to the 1980's.

Background and History

The comments provided herein benefit from a pre-consultation meeting conducted on March 11, 2020. During this meeting, the proposed residential development was discussed with the Client, Wills, the Township of Cavan Monaghan (Township), Otonabee Region Conservation Authority (ORCA) and the County of Peterborough (County).

The following matters were identified as two key potential obstacles in pursuit of the development, which as proposed includes residential units within the existing fabric of the golf course:

1. Permanent versus seasonal occupancy, and conformity with the County of Peterborough Official Plan and A Place to Growth: Growth Plan for the Greater Golden Horseshoe (Growth Plan).
2. Municipal Responsibility Agreement (MRA), and support of such by the Township.

This letter is intended to address the two above-noted matters with respect to applicable policy from the County of Peterborough Official Plan and the proposed development.

Proposed Development

The proposed residential community is intended to operate as a right-to-occupy (i.e. life lease) agreement. The agreement would permit the residences to be occupied on a year-round basis. The community is intended to be a seniors' lifestyle community, specifically targeting the aging population and will provide for an age-friendly community design. The scale of the development and amenities are intended serve and reflect the intended seniors' lifestyle community and aging population.

During the March 11, 2020 pre-consultation meeting, to address this issue, it was suggested by County Staff that planning and legal mechanisms be considered and implemented to regulate occupancy of the site.

Planning Rationale

We are respectfully requesting that the Subject Property be removed from the Agricultural Systems mapping by the MMAH to reflect the existing use; to recognize the historical intended use of the property; and to reflect the proposed redevelopment for which consultation with staff has occurred.

A Place to Grow: Growth plan for the Greater Golden Horseshoe, Section 1.1 recognizes the aging population as a challenge for planning, stating that:

"People over the age of 60 are expected to comprise over 25% of the population by 2041, which will result in the need for more age-friendly development that can address their unique needs and circumstances. This will include a more appropriate range and mix of housing options, easier access to health care and other amenities, walkable built environments, and an age-friendly approach to community design that will meet the needs of people of all ages."

The proposed development will provide for a seniors' lifestyle community, which will provide access to a greater range of housing options, while limiting independent maintenance responsibilities. Being located within the golf course, the proposed community will also provide access to active living / recreational opportunities.

Section 1.2.3 of the Growth Plan provides direction for reading and implementing the Growth Plan. This section directs that specific policy language is to be considered as follows:

"The choice of language in the policies is intended to distinguish between the types of policies and the nature of implementation. For example, "will" and "shall" are used interchangeably for policies that indicate positive directives in the same way that just "shall" is generally used in other provincial plans. Similarly, expressions like "is not" and "will not be" are used for policies that set out limitations and prohibitions in the same way as "shall not" is generally used in other plans."

As we understand, the Growth Plan policies in question by the County are those of *Sections 2.2.9.3* and *2.2.9.4*. These policies are as follows:

"2.2.9.3 Subject to the policies in Section 4, development outside of settlement areas may be permitted on rural lands for:

b) resource-based recreational uses;"

"2.2.9.4 Where permitted on rural lands, resource-based recreational uses should be limited to tourism-related and recreational uses that are compatible with the scale, character and capacity of the resources and the surrounding rural landscape, and may include:

b) where appropriate, resource-based recreational dwellings for seasonal accommodation."

The specific policy language in *Section 2.2.9.3* and *2.2.9.4* does not use a directive such as "shall" or "will", nor does it use prohibitive language such as "will not". Rather, these policies use supportive language of "should".

While not specifically outlined in the Growth Plan policies for specific policy language, the use of "should" in the Growth Plan is expected to be interpreted in the same manner as such use in the Provincial Policy Statement (PPS), which directs that:

"The choice of language is intended to distinguish between the types of policies and the nature of implementation. There is some discretion when applying a policy with enabling or supporting language in contrast to a policy with a directive, limitation or prohibition."

Therefore, it is our opinion that discretion may be applied in implementation of the policies of *Section 2.2.9.3* and *2.2.9.4* of Growth Plan and further that, while seasonal accommodation may be supported, permanent accommodation is not prohibited. Moreover, subject to demonstration of conformity with the policies of Section 4 of the Growth Plan, it is our opinion that the proposal would otherwise not conflict with the Growth Plan.

With respect to the Provincial Policy Statement, the lands are located in the Rural Area. Section 1.1.5 provides the following policy direction applicable to Rural Lands within Municipalities and the proposed development.

"*1.1.5.2 On rural lands located in municipalities, permitted uses are:*

a) the management or use of resources;
b) resource-based recreational uses (including recreational dwellings);
c) residential development, including lot creation, that is locally appropriate."

Residential development on the Subject Property would be locally appropriate given the surrounding land uses which consists low density residential uses and rural lands. Section 1.1.5.4 provides the following policy direction related to servicing development on Rural Lands;

"*1.1.5.4 Development that is compatible with the rural landscape and can be sustained by rural service levels should be promoted.*"

Following the pre-consultation meeting, Wills prepared a memo to the Township regarding the municipal servicing agreement, which included details on:

- Recommended form of sewage treatment;
- Operation and maintenance requirements;
- Approximate cost of unit(s) and installation, and regular maintenance;
- Typical life span of recommended system.

This memo was presented by Township Staff to Council on November 16, 2020, with a recommendation that Council support, in principle, the requirement for a municipal servicing agreement for the water and sewage systems associated with the development of an adult lifestyle community in association with the Baxter Creek Golf Course. This memo has been included as an appendix, see Appendix A.

New County of Peterborough Official Plan

The new Couty of Peterborough Official Plan was adopted by Council on June 29, 2022 and is now under review by the Ministry of Municipal Affairs and Housing for final approval. The Township of Cavan Monaghan Council made a decision following the adoption of the new Peterborough County Official Plan to maintain their own local level Official Plan document. Therefore, the schedules for Cavan Monaghan do not include land use designations. However, the County is required by the Provincial Growth Plan to identify the agricultural system for the Township and delineate the settlement area boundary for Millbrook, which has been included in a schedule in the new County of Peterborough Official Plan.

The Subject Property is included in the Agricultural Area in the Cavan Monaghan Schedule for the Agricultural System in the County of Peterborough Official Plan. As previously outlined in this letter, the lands have not been in agricultural production for several decades and do not contribute to the Agricultural System. Therefore, they are currently misrepresented by the proposed mapping for the Agricultural System. We respectfully request that the Subject Property be removed from the Agricultural System mapping as proposed by the County of Peterborough for the Township of Cavan Monaghan.

Conclusion

We trust that the information provided herein is sufficient in addressing the comments and concerns of our Client with respect to the County of Peterborough Official Plan. We look forward to the Ministry's response and are happy to discuss should there be any questions.

Respectfully submitted,

Marnie Saunders, BES., CPT.
Intermediate Land Use Planner

MS/hd

cc: Jerry Paxton, Client

WILLS

PARTNERS IN ENGINEERING

August 11, 2020

Township of Cavan Monaghan
998 County Road 10
Millbrook, ON
L0A 1G0

Attention: Ms. Karen Ellis, Director of Planning

Dear Ms. Ellis:

Re: Baxter Creek Golf Club – Municipal Servicing Agreement
D.M. Wills Project No. 85002
Our Client: Jerrold Paxton

D.M. Wills Associates Limited (Wills) is pleased to submit the following letter on behalf of our client, Jerrold Paxton (Client), regarding the proposed residential development at Baxter Creek Golf Club.

The below is intended to provide a background on the history of the property and proposed development, as well a preliminary analysis of servicing options in the context of an anticipated Municipal Servicing Agreement (MSA). This letter specifically provides an overview of sewage disposal options, including details on the following:

- Recommended form of sewage treatment;
- Operation and maintenance requirements;
- Approximate cost of unit(s) and installation, and regular maintenance; and
- Typical life span of recommended system.

Background and History

The Subject Property is located in Part Lot 23, Concession 6 in the Township of Cavan Monaghan (Cavan Ward), municipally known as 1702 Cedar Valley Road. The property comprises an area of approximately 167.2 acres, with frontage of approximately 465 metres on Cedar Valley Road.

At present, the property is developed for use as an 18-hole championship golf course, being Baxter Creek Golf Club. The facilities on premise also include a clubhouse and dedicated event space.

The use of the property as a golf course was established through a Zoning By-law Amendment and subsequent Site Plan, approved by the Township of Cavan Monaghan (Township) in 2006. However, plans for development of the property as a golf course date back to the 1980's.

At the time that development plans for the property were originally conceived, it was the intent of the property owners that the property would be developed in the form of a resort residential community, together with the championship golf course. However, in consultation with the Township at such time, the proponents were advised that the approvals for the residential component should proceed separate to those for the golf course.

Such being the case, the proponents acted on the advice of the Township, and prepared and submitted first the required plans, reports and applications required to obtain approval for the golf course. Various studies and reports were prepared throughout the late 1990's and early 2000's, with approvals for the golf course being provided in 2006. In 2007, the 18-hole championship golf course was completed and began operation.

Since opening in 2007, Baxter Creek Golf Club has experienced incredible success, not only as a golf course, but also as a location for community gatherings and events. However, during the course of obtaining approvals for the golf course, the planning landscape evolved significantly, hindering and delaying the process to obtain subsequent approvals for the proposed resort residential community.

Notwithstanding, a pre-consultation meeting was held with the Township, County of Peterborough (County), and Otonabee Region Conservation Authority (ORCA) on March 11, 2020. Inferred support of the residential development was provided during the pre-consultation meeting, subject to conditions, certain of which included the acceptance by Council of a Municipal Servicing Agreement.

As a fundamental initial step, and in order to facilitate the proposed residential development, the proponents are now seeking confirmation from the Township that a Municipal Servicing Agreement for the proposed residential development would be supported by Council. Details on the proposed resort residential development, municipal servicing agreements and possible servicing arrangements are provided below.

Resort Residential Development

The residential community would include approximately 49 residential units within the existing fabric of the golf course, providing accommodation for and serving the prominent "snow-bird" population. As proposed, the community would comprise a mix of both single and semi-detached units. Please refer to the enclosed concept plan.

The resort residential community would be owned and operated under a right-to-occupy (life lease) agreement. The right-to-occupy agreement would permit the residences to be occupied throughout the year however, it

is anticipated that the proposed residences would largely be habituated on a seasonal basis (i.e. May – October).

Policy Framework

With respect to servicing of the proposed development, the hierarchy of preferred servicing systems is driven by the policies of Provincial Policy Statement (PPS), 2020 and further directed by the policies of the Township's Official Plan.

The PPS provides policy direction on matters of provincial interest related to land use planning and development, including direction on preferred sewage and water services. Section 3 of the *Planning Act* requires that decisions affecting planning matters "shall be consistent with" policy statements issued under the Act.

As outlined in Section 1.6.6.2 of the PPS, outside of settlement areas where municipal sewage and water services are not available, private communal sewage services and private communal water services are the preferred form of servicing for multi-unit development. Such service provision supports protection of the environment while minimizing risks to human health and safety. This direction is also reflected in the Official Plan for the Township, which states that new recreation uses will be encouraged to development on private services.

As proposed, the MSA will support the development of resort residential community on private services on the subject property, consistent with the direction of the PPS and Official Plan.

Municipal Servicing Agreement

An MSA is the typical mechanism by which the Ministry of Environment, Conservation and Parks (formerly Ministry of Environment and Energy) ensures responsible management of communal services for residential development. The agreement stipulates the conditions for construction, operation and maintenance, together with actions in the event of default, in order to establish responsibility and ensure protection of the environment and public health.

In most instances, an MSA is executed for residential development of permanent homes or primary residences. In this instance, the MSA would be provided for the proposed resort residential community, but would otherwise be consistent with a typical agreement for permanent residential development.

Sewage Disposal System Overview

Sewage Disposal System

For a residential development of this size, it is recommended that the units are serviced by a single communal septic system. The system would likely be an area bed that receives effluent from a pump tank and series of treatment units. The processes involved in the system and required materials and equipment are described in **Table 1** below.

Table 1 – Septic system summary

Process	Material/Equipment
Raw sewage is conveyed from each residential unit to the first septic tank in the communal treatment area by use of gravity sewers or pumping through forcemains.	Sanitary sewer Pump station (depending on site topography)
The raw sewage is partially treated through a series of septic and treatment tanks.	Septic tank Treatment unit PVC pipe
The remaining effluent is pumped to the leaching bed for final treatment and disposal.	Pumping tank with pumps, floats, and control panel PVC pipe Distribution boxes Perforated PVC distribution pipe Stone layer Sand Layer

Examples of advanced treatment systems suitable for this type of development are enclosed with this report. These systems are highly popular given their longevity and low maintenance requirements.

Operation and Maintenance

To keep the system functional and operating in its intended manner, regular maintenance is required for septic tanks and treatment units. The septic tank will require regular pumping and inspection, depending on use, size and condition of the septic tank. Treatment systems that use advanced

technologies typically require annual maintenance of the units by a manufacturer-authorized service provider to ensure proper performance of the system.

For operating the system, the pumps are controlled by automated control panels and level sensors. A qualified person should be readily available to respond in the event of any sewage back-ups, high level alarms, or pump failures.

Costs

The design for a sewage disposal system requires a subsurface investigation, detailed design drawings, and a final report. Total design costs can range from $10,000 to $50,000 for large septic systems plus the associated costs for hydrogeological assessments.

The construction and installation of the septic system typically involves the following activities:

1. Site development – topsoil stripping, grading, excavating
2. Installing septic, treatment, and pump tanks
3. Placing leaching bed fill
4. Installing distribution piping in stone layer and distribution boxes
5. Backfilling and final grading over leaching bed
6. Installing pumping system in required tanks
7. Installing piping between tanks and leaching bed
8. Final backfill and grading over tanks and pipes

The total costs associated with constructing and installing a large communal septic system can range from $300,000 to $600,000.

The total costs associated with operating and maintaining a large communal septic system can range from $5,000 to $60,000 per year.

System Lifespan

For most septic systems, the lifespan is approximately 20 to 30 years depending on if the system was properly designed and built, maintained, and not overloaded. Systems that use treatment units result in longer system lifespans due to the septic bed receiving higher quality effluent.

Conclusion

The proposed development for Baxter Creek Golf Club would include the construction of approximately 49 single- and semi-detached dwellings; which

would serve to fill a market demanded by the snowbird population. It is anticipated that the proposed development would be serviced by a large, on-site private communal septic system, which is identified as a preferred form of servicing under provincial policy.

The recommend system to service the development is an area bed with advanced treatment. Operation and maintenance would include regular pump-outs and inspections of the septic tank and treatment units, pump replacements, and responses to back-ups or pump failures.

The septic system would be designed to MECP design guidelines and Ontario Building Code standards, similar to the existing communal sewage treatment systems in the Township. These include the Millbrook Wastewater Treatment Plant (WWTP) owned by the Township and the Ambria Otonabee Development in South Monaghan that were approved by the MECP and Township.

We trust that the information provided herein is sufficient to identify the potential servicing options for the development, and further inform Council as a Municipal Servicing Agreement is contemplated. As the Township's acceptance of the concept of a Municipal Servicing Agreement is crucial to the proposed development, we would be grateful if this information could be brought forward for Council's consideration.

Please do not hesitate to contact our office if there is further information required. We look forward to the opportunity to discuss this proposal further.

Respectfully submitted,

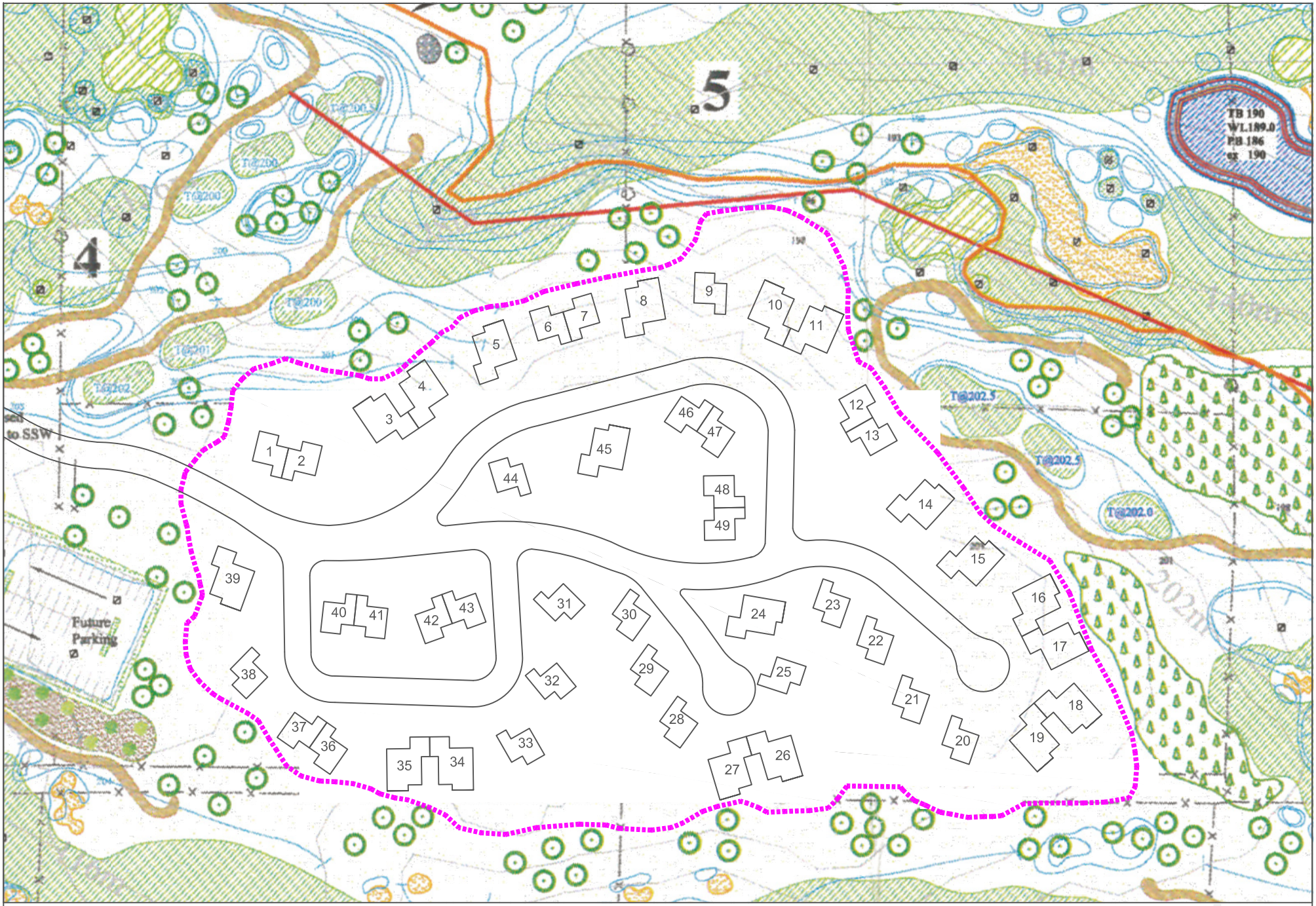
Emma Drake, M.Sc.
Land Use Planner

Darryl Tighe, M.Sc., RPP
Senior Land Use Planner

ED/

cc: Jerrold Paxton, Client

Enclosures: Concept Plan
Sewage System Options



LARWOOD ESTATES

by Baxter Creek

Preliminary Concept

LANDMARK ASSOCIATES LIMITED
PLANNERS AND ENGINEERS

0 10 20 50m

Scale 1: 1500

SepticSmart!

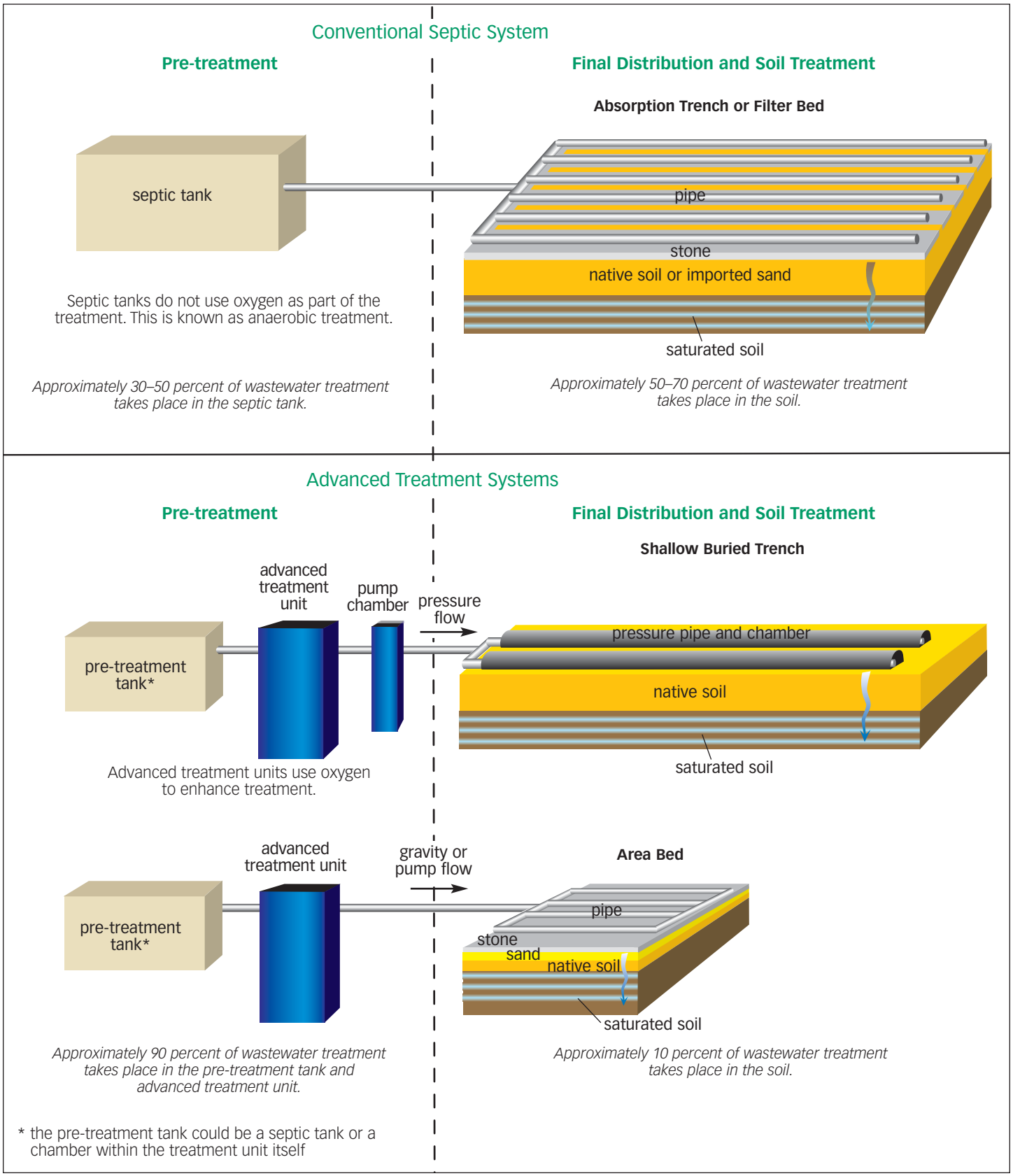
Advanced Treatment Systems — Alternatives to Conventional Septic Systems

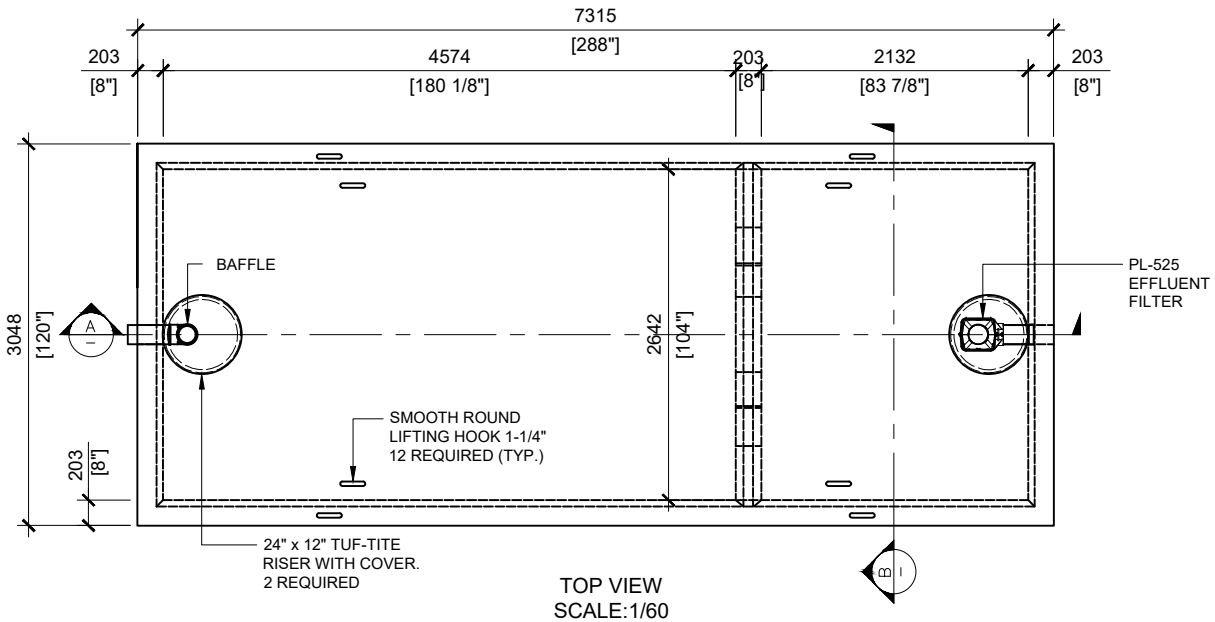
Booklet Number 2

Canada

Ontario

Comparing Conventional Septic System and Advanced Treatment Systems





TOP VIEW
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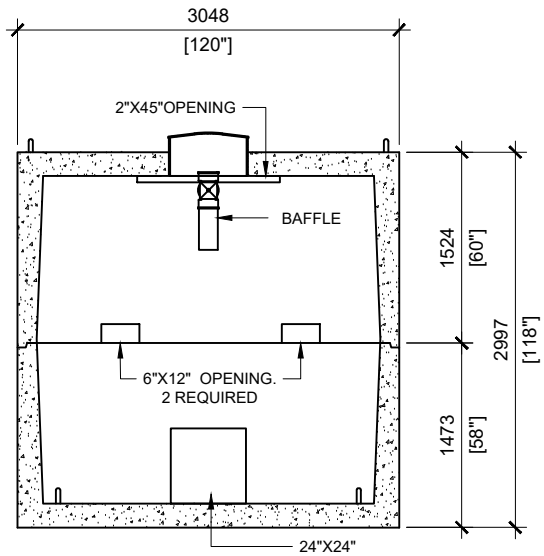

SECTION B
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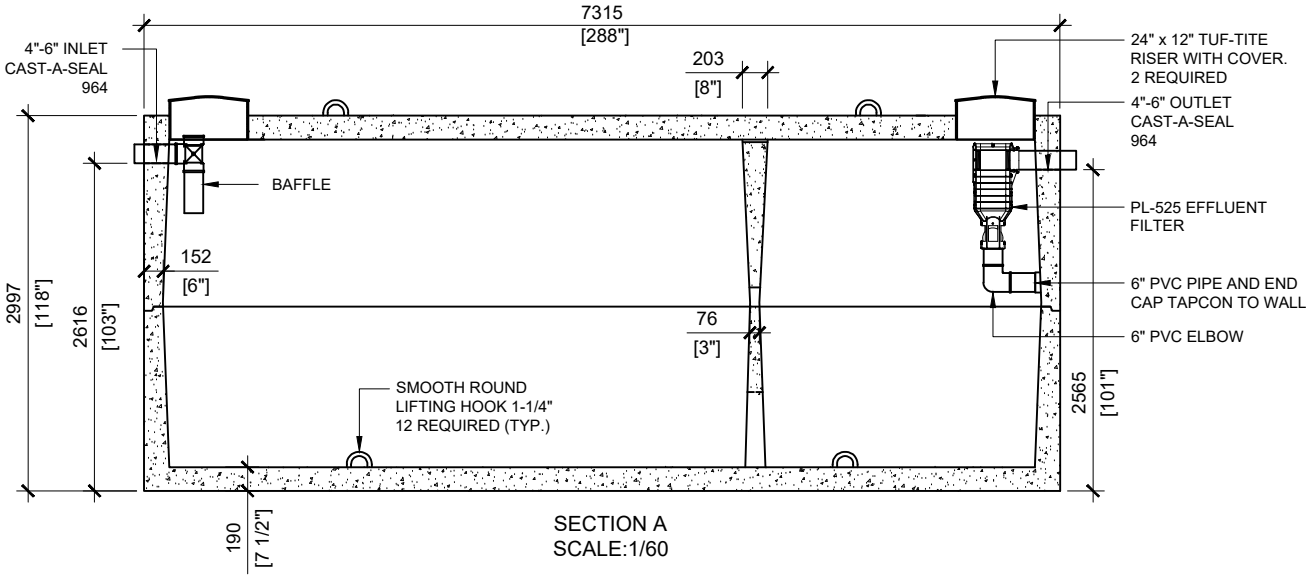


SECTION A
SCALE:1/60

1. UNITS ARE SEALED WITH BUTYL TAPE AT THE JOINTS
2. CONTRACTOR TO ENSURE CRANE IS ON-SITE TO OFFLOAD AND SET TANK
3. EXCAVATION MUST BE READY FOR INSTALL
4. MIN OVERHEAD CLEARANCE OF 18FT (5.5 METRES) IS REQUIRED
5. ALL UNITS MUST BE HANDLED WITH PROPER LIFTING EQUIPMENT
6. TANK DESIGNED FOR A MAXIMUM FILL COVER DEPTH OF 1000mm, WITH 4.8 kPa LIVE LOAD, AND NO VEHICLE LOADING

* AVAILABLE FOR TRAFFIC LOADING

POWER PRECAST SOLUTIONS

MANUFACTURED:
OTTAWA, ON
1-800-655-3430

CONCRETE TYPE: SCC
CONCRETE: 45MPa at 28 days / 6,500PSI
AIR ENTRAINMENT: 5-8%
REINFORCEMENT: STEEL TO CSA CAN A23.1 /A23.3 G30.18 Fy=400MPa

WEIGHT:
BOTTOM - 49,416lbs / 22,462kg
TOP - 50,845lbs / 23,111kg
CSA APPROVED
MEETS CAN/CSA-B66
"AGINP"

DRAWN BY: N.CHAN
DATE: FEB/2020

45500 LITRES
10,000 IMPERIAL GALLON

SEPTIC TANK

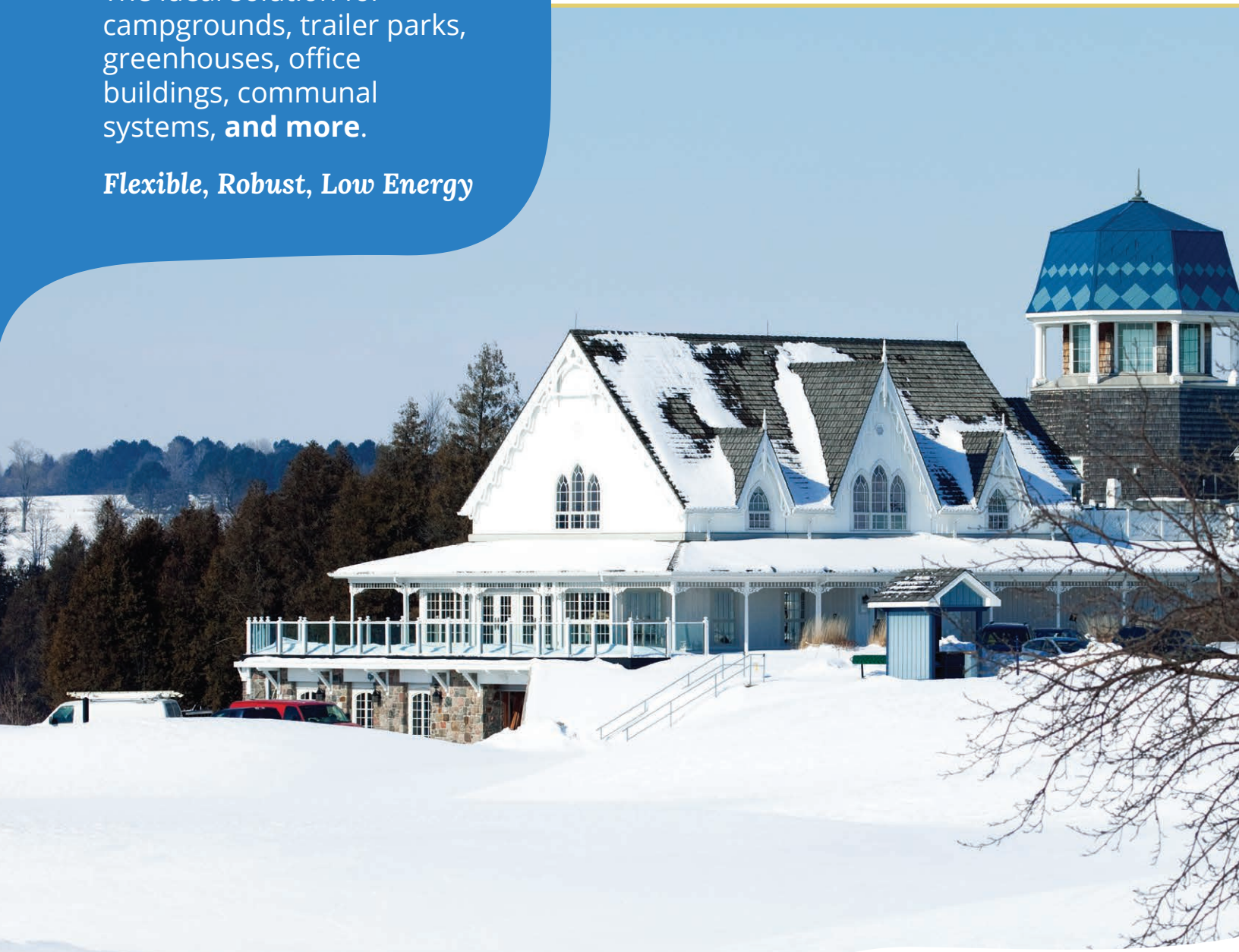
WORKING CAPACITY: 43741L TO INVERT OF OUTLET
TOTAL CAPACITY: 48067L TO UNDERSIDE OF CHAMBER LID

Advanced Wastewater Treatment

The ideal solution for campgrounds, trailer parks, greenhouses, office buildings, communal systems, **and more**.

Flexible, Robust, Low Energy

Waterloo BIOFILTER



BNQ
CAN/BNQ 3680-600
Certificate No. 2312

ETV

For more information:

www.waterloo-biofilter.com
1-866-366-4329
info@waterloo-biofilter.com

The Waterloo Advantage

Waterloo Biofilter Systems Inc. is a Canadian-owned and operated company that has for over 20 years developed, designed, manufactured, and maintained advanced onsite wastewater treatment systems.

We are committed to helping protect the environment with technology focused on high quality treatment, low energy usage, and system robustness.

UNIVERSITY OF WATERLOO

The patented Waterloo Biofilter system was developed at the University of Waterloo's Centre for Groundwater Research.

Permanent Filter Medium

The key to the Waterloo Biofilter system is the absorbent foam filter medium that has been optimized to physically filter and biologically treat sewage. This filter medium is warrantied for up to 20 years and will likely last generations.

Our range of treatment units and add-ons give us the flexibility to design a system suited to your unique needs.

- Nutrient Removal
- Wastewater Reuse Option
- Passive System with Low Energy Use
- Low Operating Cost and Maintenance

The environmentally friendly choice

Step 1

Wastewater is collected and distributed over the Waterloo foam filter medium.

Step 2

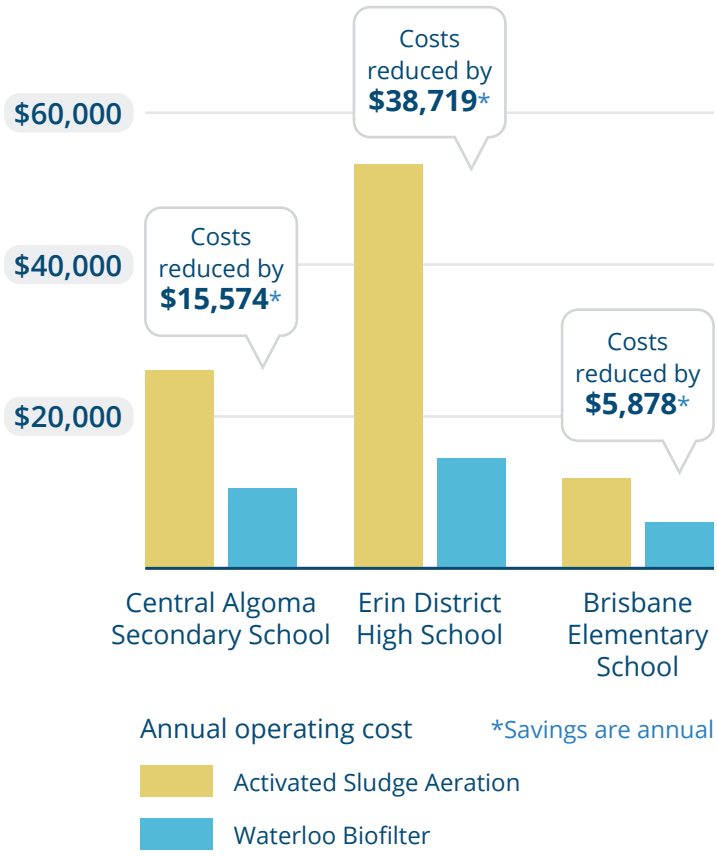
Wastewater slowly trickles down through the foam pieces where natural occurring bacteria remove contaminants.

Step 3

After passing through the foam, the treated water is put back into the environment or reused onsite.

Low Energy, Low Operating Cost

Under the Ontario Ministries of Research & Innovation and Education's Green Schools Pilot Initiative, Waterloo Biofilters reduced energy costs by **up to 84%** and reduced operating costs by **up to 70%** compared to aeration technologies.



Nitrogen Removal

Standard Waterloo systems remove up to **50-65% total nitrogen**, helping to reduce nitrate levels in groundwater and protect surface waters. With the **WaterNOx-LS™** system add-on, up to **95% TN removal** can be achieved passively and cost-effectively.

Phosphorous Removal

With the **Waterloo EC-P™** system add-on, greater than **95% total phosphorus** can be removed – helping protect surface waters from blue-green algae and lake eutrophication. Compact and low energy, the Waterloo EC-P™ permanently removes phosphorus without chemicals or additional sludge production.

Small Footprint

A Waterloo is discrete and minimizes raised mounding and tree removal. A variety of product configurations are available to suit your unique site conditions and personal tastes.

Few moving parts

Less energy use

No noisy air compressor

Seasonal Performance

Whether for seasonal or year-round use, the Waterloo is designed to withstand extreme cold temperatures and can easily handle variable flow rates.

Made in Canada
Tough Enough for Canada

Commercial Products

Waterloo Basket Biofilters are constructed of a rigid steel mesh coated for corrosion protection, yet are lightweight and easy to maneuver onsite. Basket Biofilters are placed in locally-available concrete tanks for a completely below ground installation.

Waterloo Shipping Container Biofilters are pre-assembled, modular, and easily transportable. Shipping Container Biofilters are insulated for winter operation, painted to blend in onsite, and have a control room that can be expanded to house system add-ons such as UV disinfection and chemical dosing pumps.

Waterloo Bulk-Filled Tank Biofilters use locally-available concrete or fiberglass tanks that are outfitted as treatment units onsite thereby reducing transportation costs. These completely below-ground installations maximize tankage volume used for treatment reducing the overall footprint.

Waterloo PE-5 Biofilters are constructed of polyethylene tanks housed in a new or existing maintenance building for year-round use. Highly modular PE-5 Biofilters are ideal for phased-in developments where the wastewater system can expand over time alongside the facility.

Proved and Approved

The Waterloo Biofilter has been thoroughly tested and proven effective by numerous 3rd party verification programs. We pride ourselves on the high treatment levels our technology consistently demonstrates.

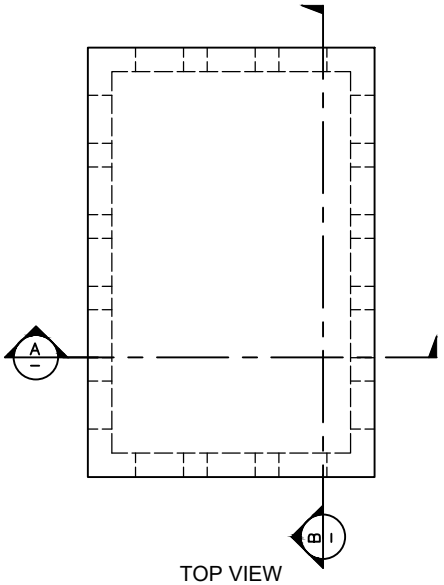
Is *yours* a Waterloo?

CAN/BNQ Certification

	Median Concentration	Percent Removal
$cBOD_5$	4 mg/L	98%
TSS	4 mg/L	> 98%
Fecal Coliforms	17,900 cfu/100mL	> 99%

ETV Verification

	Median Concentration	Percent Removal
$cBOD_5$	7 mg/L	96%
TSS	5 mg/L	97%
Total Nitrogen	13 mg/L	65%



TOP VIEW
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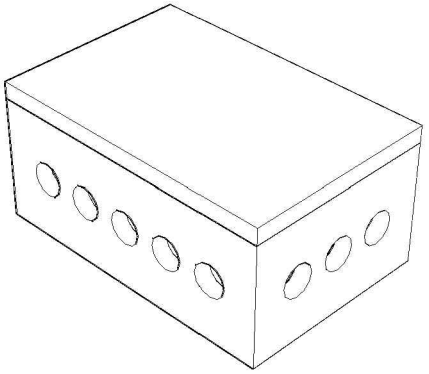

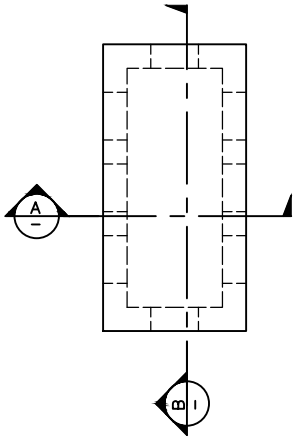

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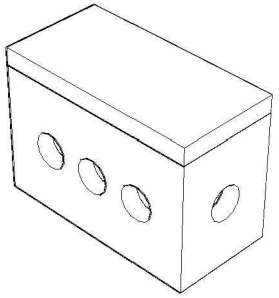
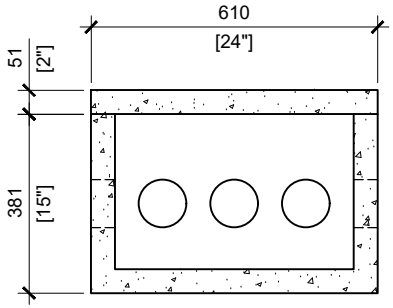
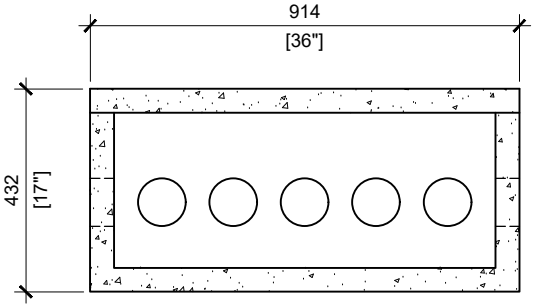
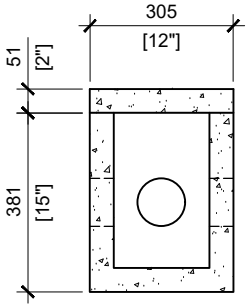




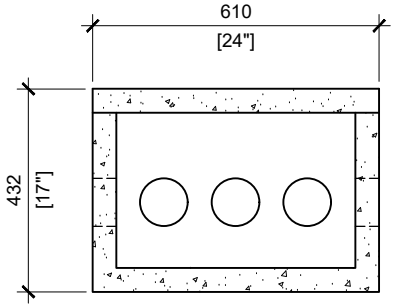
SECTION A
SCALE:1/16



SECTION B
SCALE:1/16



SECTION A
SCALE:1/16



SECTION B
SCALE:1/16

LARGE DISTRIBUTION BOX

1 INLET - 15 OUTLET

SMALL DISTRIBUTION BOX

1 INLET - 7 OUTLET

BROOKLIN CONCRETE PRODUCTS

MANUFACTURED:
BROOKLIN, ON
1-800-655-3430

CONCRETE: 35MPa/5000PSI
AIR ENTRAINMENT: 6-8%
REINFORCEMENT: STEEL TO CSA CAN A23.1 /A23.3 G30.18 Fy=400MPa

UNIT WEIGHT:
LARGE: 515lbs / 234kg
SMALL: 226lbs / 103kg
CPA CERTIFIED
MEETS CAN/CSA-B66

DRAWN BY:
S.RIMLAND

DATE:
JAN/2019

DISTRIBUTION BOXES

LARGE & SMALL CONCRETE DISTRIBUTION BOXES