

# MANAHAN CONSULTING

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## PLANNING JUSTIFICATION

### THE PROPERTY – LEGAL DETAILS

The lands have a municipal address of 605 McIrvine Road and a legal description of PCL 26018 SEC Rainy River, Pt Lot 41 River Range McIrvine Pt 2, 48R- 3747 Fort Frances.

### PURPOSE AND INTENT

The basic premise of this planning justification is that the property at 605 McIrvine Road be rezoned to either include the permitted uses found in the Institutional Zone or be rezoned into the Institutional Zone.

The immediate intent is to allow the congregation of Evangelical Fellowship Church to use the property as a place of worship – a use that is contained in the current list of permitted uses in the Institutional Zone, while in the longer term continuing a list of possible future uses that support employment and at the same time are suited to the current assembly hall building that exists on the land.

### THE PROPERTY AND SURROUNDING LANDS

The building is a one story structure with a 947 square metre footprint, situated on a parcel of land with approximately 74 metres frontage on McIrvine Road and having a lot area of 15,309 square metres. The building is complemented with asphalt parking and driveway area of approximately 5,667 square metres capable of supporting occupancy of up to 300 persons. 122 parking spaces are provided, including 6 barrier free spaces. This is well in excess of the 75 spaces that are required.

The interior of the building includes a foyer and a large open hall with complimentary side administration and client service space. The property is serviced with natural gas, as well as municipal electricity, sewer and water, telephone and municipal road.

The property is located in the west side of Fort Frances, along an interior road that accesses from King's Highway.

Lands to the east are used as a major recreation area, Fort Frances High School, Confederation College, and an elementary school. Surrounding additional uses include an old farmer's market now being redeveloped into a veterinary clinic, Peterbilt (a truck repair and fueling business), a storage yard, Uniongas shop and storage yard, and various empty lots. A Rail line also exists in the area.

McIrvine Road is a linking road providing access to the north end of Fort Frances as well as servicing the municipal landfill site, airport and numerous dwellings. Traffic flow along McIrvine Road is impacted from time to time by railway traffic intersecting the road.

#### CHURCH'S RATIONALE FOR ACQUIRING THESE LANDS

The Evangelical Fellowship Church of Fort Frances has a congregation of approximately 50 to 60 adults and about 12 children, and normally experiences parking involving 15 to 20 vehicles for Sunday morning services. Some weekday activity such as Bible study groups occur with much smaller attendance and parking.

Employment by the church has typically consisted of a Pastor and janitorial staff, and may from time to time or in the future include a youth Pastor and/or a Church Secretary.

The Church has outgrown its present location, and has a purchaser for the property if they do relocate.

The Bingo Hall building is one level -- a feature that is important to elderly and handicapped members and visitors. The hall format is immediately useable and requires minimum renovation.

There is adequate parking whereas the current location involves parking that spills into a residential street and generates congestion and overcrowding of street parking. The McIrvine Road location has significantly less traffic on weekends when the Church is most active, but the schools are closed.

The Church has considered renovation at its current site, however the square footage of the lot does not allow for any appreciable building expansion. The basement is already maximized and is not suitable for handicapped use. In addition, the cost of an elevator in a cramped space is prohibitive.

The Church obtained permission to accumulate funds in 2009 from Revenue Canada in order to save for a new building. This permission expires in 2019.

Over the last eight years the Church has also carried out a comprehensive search for alternative locations and properties that would require a financially manageable investment in renovation. This included an offer made for the old public library building. The Bingo Hall property has been found to be the most appropriate -- the existing building is useable in its current form and there is adequate parking and on site aisleway space as well as space for landscaping and on site activities.

The Bingo Hall has been vacant for an estimated 10 years save only for a short term use as a teaching facility supporting mine employment for the nearby New Gold mine being developed to the west of Fort Frances.

## RELEVANT PLANNING DOCUMENTS

### Ontario's Northern Growth Plan

The Northern Growth plan generally is a document targeted at the macro scale within the region and offers little practical guidance and direction at the property specific scale. Notwithstanding, it does encourage municipal stewardship of lands that could support employment activities and promotes residential, commercial and institutional activities to be located on full urban infrastructure.

### Ontario's 2014 Provincial Policy Statement

The 2014 Provincial Policy Statement narrows the perspective and in doing so begins to offer policy that has direct application. Relevant policies and guidance includes;

- Section 1.1 Building Strong Healthy Communities
  - Promote development that avoids environmental or public health and safety concerns
  - Improving access for persons with disabilities or the elderly
  - Making available sufficient land to meet the needs of land uses that exist within the community
  - Making lands available initially via intensification and redevelopment
- Section 1.1.3 making settlement areas the focus of growth and development and ensuring their long term viability.
- Section 1.2.6 speaks to compatibility of land uses, particularly where major facilities are involved.
- Section 3 Employment
  - Providing for an appropriate range of employment and institutional uses to meet long term needs of the community
  - Providing and maintaining a range of suitable employment sites

- Section 1.3.2 directs that employment lands may be converted to non-employment uses through a comprehensive review where it has been demonstrated that such lands no longer are required for employment purposes and there is a need for the conversion.

## Municipal Official Plan

The Municipal Official Plan delivers guidance and direction to Council and administration in the making of land use decisions.

- Section 4 - Land Use Designations
    - Introduces the concept and designations of living areas and employment areas
    - 4.1 Living Areas – focus on residential activity and related local commercial, institutional and recreational uses associated with everyday residential activity.
    - Small scale institutional uses to include places of worship, elementary schools, medical clinics and offices, typically within walking distances. Will require amendment to the zoning by-law.
  - Section 4.2 Employment Areas
    - Provide opportunities to develop a broad range of employment opportunity
    - To ensure that there is sufficient flexibility to adapt to change and opportunities quickly
    - To encourage development
    - The Town will protect its employment areas and will require extensive justification for any proposed conversion to non-employment uses
  - Section 4.2.2 Permitted Uses in Employment Areas
    - Will include industrial, commercial and business uses
    - The zoning by-law will further divide these areas into different Industrial, Commercial and Institutional Zones.
  - Section 5.10 Support Studies may be required including storm water management, geotechnical studies, parking and a planning justification (shall be required and shall show how policies of the official plan are being met).
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## PLANNING CONSIDERATIONS

The existing building has a distinct assembly hall building form. In addition, the existing property is not located on a main thoroughfare or highway that would typically be sought out by commercial endeavours for access and visibility.

These features most likely have contributed to the building being available for sale for an approximate period of ten years.

Some of the permitted uses in the Enterprise Zone are not well suited to the assembly building hall form. Examples include a car wash, convenience store, greenhouse, or personal service establishment. Others are sensitive to location (most often near other commercial activities, and/or to major traffic route exposure). Examples are a retail store, gas bar, or convenience store. Other permitted uses are additionally sensitive to the aesthetic of the neighbourhood around them. Examples are a hotel or motel, or a restaurant. It should be noted that the permitted use of a tavern in the Enterprise Zone could be problematic for the schools located nearby.

Some of the permitted uses in the Institutional zone appear more suited to the assembly hall use and less sensitive to location, including a community centre, community health and resource centre, day nursery, municipal government uses, place of worship, or school (i.e. a private school).

The Official Plan states that the municipality will protect its Employment lands and will, where conversion is being proposed, require extensive justification for such a requested change. In this policy statement (Section 4.2) the Official Plan does introduce the concept that conversion is a possibility. Section 4.2 also contains a statement that the municipality should apply sufficient flexibility to adapt to change.

The Bingo Hall building has been for sale for an estimated ten years, and attracted little interest. Its value as measured by a declining asking price is further evidence that the building form and location are of interest only to a minority of economic activities.

Section 4.2.2 of the Official Plan indicates that the zoning by-law will divide employment areas into different Industrial, Commercial, and Institutional Zones -- the key point being that institutional uses are seen as employment generating and zoning for institutional uses is enabled by this section. Clearly uses such as hospitals, medical clinics, municipal and government uses, nursing homes are viewed as macro employment sources, while arenas, ambulance stations, community centres, fire stations, and libraries contribute lesser employment but may well be at a level similar to that of the former Bingo Hall. A place of worship contributes employment at a very marginal level, but does indeed support positions such as Pastor, Custodian and Church Clerk or Administrator.

The commitment to protecting employment has a distinct focus on avoiding conversion, but also should involve the flexibility that is referred to in section 4.2 and also encompass other municipal actions such as capital budget spending, program and theme identification (i.e. gateway concept) and from time to time acting to ensure that chronic vacancies are addressed.

In this instance the Bingo Hall has sat empty for most of ten years, contributing nothing to the economic growth or the financial well being of the municipality.

In the general vicinity, a few commercial restaurants along the Highway are closed and vacant. Economic planning should have regard to such trends in an area and explore measures to ensure that such vacancies do not become widespread or dominate an area. The flexibility referred to in the Official Plan is well suited to be used as a tool to achieve broader land use activities where this is occurring.

Lands across the street are zoned Institutional and reflect both a macro scale economic level of activity in the high school and college and living area scale activity at the elementary school level. The Institutional Zone exists now in this immediate area and there would not be an element of intrusion should these lands be added to that zone. Land uses in the Institutional Zone would also be compatible with the nearby existing institutional zoned uses.

At the same time, most of the uses in the Institutional Zone continue to offer employment opportunities at some level, and thus the overall intent and integrity of the Employment Area Official Plan designation is maintained.

Surrounding land uses include industrial activity: such lands owned by Loblaws as a possible food store, small vacant lands and a Union Gas vehicle storage shop; Peterbilt truck repairs and a new vet clinic, and the schools and activity area. The intended church would be entirely compatible with the schools and activity area and the vet clinic, and would, due to its off-hour activity focus, not encounter adverse affects from the truck repair, food store or gas company vehicle storage operations. The former Bingo Hall property is laid out so that an area of landscaping exists along the lot line abutting the Peterbilt property and an additional separation area appears to exist separating the two uses. The Church could further landscape their lands to if they wished to do so.

From a practical perspective as well, the current church location is problematic to its surrounding area and perhaps even to the Highway (parking and the possibility of children straying onto the highway). Resolution of such areas where off site impacts denigrate surrounding neighbourhoods and where safety and well being may be at risk is an objective of the Official Plan and municipal planning program. In this case, the desired relocation rectifies existing problems and does not create similar issues at the chosen new location.

Traffic generated by the Church would be expected to be much less than that involved in a maximum capacity of 300 persons attending the former Bingo Hall, perhaps



involving more than one sitting. In addition, church activities focus on Sundays and a few evening study classes (typically at a much less than full congregation level of attendance). Total traffic volume can be expected to be reduced where compared to the Bingo Hall. Ample parking is provided, and the property has well laid out aiseways and driveways to meet the needs of a congregation that has typically involved 50 to 60 adults and their dozen or so children.

The Congregation has obtained a traffic opinion from a professional firm indicating that traffic generation from the Church would be less than that generated from the prior Bingo Hall, and that such traffic would occur in off hours to normal business traffic with the possible exception of a wedding or a funeral. The traffic opinion concludes that a full traffic transportation impact and pedestrian study is not needed for the church relocation to this property.

In other related planning considerations, the location is within the generally built up area of the municipality and is serviced by a full array of urban services. There are no outstanding wetlands, archaeological or agricultural resource issues or concerns or matters of drainage that would arise from use of the building for institutional uses as opposed to Enterprise Zone uses.

## CONCLUSION

The Official Plan in section 4.2 indicates that Institutional Zoning is a part of the zoning package that should be applied to the Employment Area land use designation, and the request being made in this instance is to rezone to the Institutional Zone.

The Institutional Zone already exists in the immediate area.

The Institutional Zone appears to contain a list of permitted uses that are more suited to the current building form and location.

The expected church relocation and immediate use of this property is not incompatible with the surrounding character of the area. At the same time the Institutional Zone contains alternative uses of land that continue to implement the employment objective of the official plan.

A ten year vacancy and underutilization of the property is a clear and definitive demonstration of the lack of ability of the current asset (the building hall form) and the location of the property to participate in a meaningful way in the real estate marketplace.

Given the unique building form and location, and the history of underutilization of these lands, along with the Official Plan support to using the Institutional Zone as well as more direct Enterprise zoning to achieve employment objectives, a rezoning to the

Institutional Zone would be consistent with the Official Plan. The inherent and in Section 4.2 specifically stated need for flexibility allow such broader application in local problematic situations such as where a viable property has remained vacant for an extended time period.

Should the municipality be reluctant to support an Official Plan conformity, applications to site-specifically amend the Official Plan and at the same time amend the zoning by-law would also be consistent with good planning principles and objectives.

## RECOMMENDATION

That the property at 605 McIrvine Road be removed from the Enterprise Zone and be rezoned to the Institutional Zone.

An accompanying Official Plan site specific amendment could be added to clarify and confirm the intent to terminate a lengthy vacancy situation and to establish a long term continuation of opportunity for employment related use that is consistent with the assembly hall building form on the property.

Attached : traffic opinion



## **897515 ONTARIO LIMITED - MANAHAN CONSULTING**

897515 Ontario Limited is a legal corporation owned and operated by Don Manahan. Don is a member of the Ontario Professional Planning Institute and has been involved in the field of land use planning for approximately 35 years, focussing upon Northwestern Ontario.

Don has been employed in various Ontario government land use planning regional offices; was City Planner and Deputy Director of Planning in the City of Thunder Bay; and has been in private consulting for in excess of 15 years.

897515 Ontario Limited delivers planning consulting services to a number of municipalities in the Thunder Bay area, and has been involved in planning activities as far west as Ignace, Red Lake, and Kenora. Typically services relate to specific problem resolution, or to the processing of planning documents (including official plan updates, zoning amendments). The company also works with local development companies, private citizens, and participates in various projects and studies (i.e. providing land use advice to land appraisers; participating in detailed studies, or providing Ontario Municipal Board planning representation).

A second area of involvement has been the Ontario Municipal Board and Don has given planning evidence at an estimated 40 Board hearings, and been qualified, without being contested, as an expert in the field of land use planning at each of these.

Don is also a member of Thunder Bay Ventures and Chairman of the Investment Committee for that organization (a Fednor supported organization providing loans to qualifying economic development initiatives that generated or that maintain employment opportunities, where traditional financial institutions are not prepared to fund or to fund in total).



May 16, 2017

17M-01100-00-101

Cheryl Rogoza, Treasurer  
Evangelical Fellowship Church  
560 Webster Avenue  
Fort Frances, Ontario P9A 3H8

RE: Letter of Opinion Regarding Traffic Transportation Impact and Pedestrian Study

Dear Cheryl:

#### INTRODUCTION

WSP Canada Group Limited (WSP) was retained by the Evangelical Fellowship Church (Church) to provide an opinion of the need to prepare a Traffic Transportation Impact and Pedestrian Study for the conversion of a former bingo hall to a church facility. The Church is proposing to purchase and convert the former bingo hall building located at 605 McIrvine Road.

#### BACKGROUND

The Town of Fort Frances identifies McIrvine Road is a Class 4 Collector roadway; this reflects the road geometry, posted speed, maintenance standards, expected traffic volumes, etc. McIrvine Road is a two lane undivided paved roadway with rural drainage and no sidewalks.

According to information provided by the Town's Operations & Facilities Division, in the area in question (north of Kings Highway) McIrvine Road has a posted speed of 50 km/hr, reducing to 30 km/hr in the school zone. The Town expects that traffic levels for a Class 4 Collector would be between 2,000 to 3,000 vehicles per day (vpd). The intersection at Kings Highway and McIrvine Road is controlled by traffic signals. Staff at the Operations & Facilities Division noted that traffic volumes can be high at start/end of school day to/from the Fort Frances High School and Confederation College across the street, with southbound queues at the traffic signals at Kings Highway. Traffic is considered light at other times of the day, with no traffic issues, and minimal on a Sunday.

The former bingo hall is on a 3.78 acre (1.53 hectare) parcel on the west side of McIrvine Road. The building is located in the southeast corner, with one private approach onto McIrvine Road near the midpoint of the property frontage, immediately north of the building. The building size is around 10,190 sq. ft. and was originally designed to accommodate up to 300 people. There is a paved parking lot with around 120 spaces, including six barrier-free spaces – the spaces are located to the north and west of the existing building.

#### TRAFFIC GENERATION

WSP has been asked to comment on the difference in traffic generation between a bingo hall and the proposed church use. WSP reviewed the Institute of Transportation Engineers' (ITE) *Trip Generation Manual - 9<sup>th</sup> Edition* to compare estimated trip generation.

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Land Use 473 addresses Casino/Video Lottery Establishment – there are no bingo hall-specific trip rates. The only available rate is for the afternoon (pm) adjacent street peak hour, with a trip rate of 13.43 vehicles per hour (vph) per 1,000 sq. ft. of building area, with 56 percent inbound, and 44 percent outbound. Forecast trips would therefore be  $13.43 \times 10.19$  for around 135 trips, with 75 vph inbound and 60 vph outbound.

Land Use 560 addresses Church facilities. Trip rates are provided on a per 1,000 sq. ft. basis and a per seat basis. Forecast trip generation for a weekday, based on the ITE rates, are:

- 9.11 vpd/1,000 sq. ft. –  $9.11 \times 10.19$  for around 95 vpd
- 0.56 vph/1,000 sq. ft. in the am street peak hour –  $0.56 \times 10.19$  for around 5 vph
- 0.55 vph/1,000 sq. ft. in the pm street peak hour –  $0.55 \times 10.19$  for around 5 vph
- 0.61 vpd/seats –  $0.61 \times 300$  for around 185 vpd

Forecast trip generation for a Sunday, based on the ITE rates, are:

- 36.63 vpd/1,000 sq. ft. –  $36.63 \times 10.19$  for around 375 vpd
- 12.04 vph/1,000 sq. ft. in the peak hour –  $12.04 \times 10.19$  for around 125 vph
- 1.85 vpd/seats –  $1.85 \times 300$  for around 555 vpd
- 0.61 vph/seats in the peak hour –  $0.61 \times 300$  for around 185 vph

As can be seen, there are different results for trip generation per building size vs. seats, but in all cases, the forecast trips are significantly less for the weekday peak hour since the highest activity period for this church is on a Sunday.

The above analysis assumed full capacity of the building. However, the Church has indicated that there will be minimal activity on weekdays, with the pastor at the site at times, along with possible visitors. A Tuesday Bible study/prayer service typically attracts less than 10 vehicles, including the pastor. It is assumed that this would result in up to 10 entry trips and 10 exit trips in less than one hour at either end of the service. Assuming this is during the evening, this should have a minimal traffic impact, and is likely less than the bingo hall may have generated during the same time period.

The primary service for the Church is on Sunday morning, with up to 25 vehicles entering, including the pastor. It is assumed that this would result in up to 25 entry trips and 25 exit trips in less than one hour at either end of the service. Given that the Town staff indicated that there is light traffic on McIrvine Road on a Sunday, the traffic related to the Church is not expected to be problematic.

#### TRAFFIC TRANSPORTATION IMPACT STUDY GUIDELINES

The Town of Fort Frances *Official Plan* (October 2011) discusses Traffic Transportation Impact Studies (TTIS) in Section 5.10.4. It does not identify specific trigger points which would result in the requirement to prepare a TTIS, but does note that a study may be required, based on terms of reference developed by the Town.

MTO has specific TTIS guidelines, but also do not specify a trigger point when a study is required. The City of Thunder Bay have guidelines for a Traffic Impact Study (TIS), which includes a trigger point for requiring a TIS to be prepared, specifically, "When a proposed development is expected to generate 100 or more vehicle trips in total (inbound and outbound) during the peak design hour".

WSP has prepared many TIS's in a variety of road jurisdictions, and have found that the most significant traffic volumes occur in the weekday morning or afternoon peak hour, or in an area of intensive retail development, possibly midday on a Saturday. Sundays are generally a lower traffic volume day on roadways.

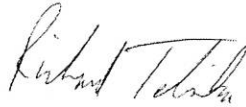
#### CONCLUSIONS

In conclusion, WSP does not believe that a Traffic Transportation Impact and Pedestrian Study is required for the Church for the following reasons:

- Traffic generation is expected to be less than the previously approved use, namely, a bingo hall.
- Typically, peak traffic times for churches are on Sunday morning; the exception may be for a funeral or wedding service, although these are not regular events.
- Roads are generally designed to accommodate peak traffic, which typically occurs during weekday morning or afternoon peak hour, or in the case of an area of intensive retail development, midday on a Saturday. This generally means that surplus capacity on the street is available on a Sunday.

We trust that this letter provides the needed information on the need for a Traffic Transportation Impact and Pedestrian Study. If there are questions concerning the contents of this letter, contact the undersigned at [richard.tebinka@wsp.com](mailto:richard.tebinka@wsp.com) or at 204-272-2003.

Yours sincerely,



Richard Tebinka, P.Eng.  
Regional Manager

RST/kr

In Canada, **WSP** is one of the largest professional services firms with approximately 8,700 employees; mainly engineers, technicians, scientists, environmental experts and architects based in all Canadian provinces.

**WSP** is a home-grown Canadian multinational firm with a global market leadership that ranks them in the top 10 in the world. For more information visit: [www.wsp-pb.com/en/WSP-Canada/Who-we-are/](http://www.wsp-pb.com/en/WSP-Canada/Who-we-are/)

**Richard Tebinka, M.A.Sc., FITE, P.Eng.**

Richard is an accomplished project manager with more than 35 years of experience providing transportation studies for many residential, commercial, industrial, and institutional developments in the western provinces, northwestern Ontario, Minnesota, and North Dakota.

Richard's multidisciplinary project experience includes policy planning and implementation such as transportation master plans and development plans, as well as project-specific development including commercial, residential and office construction.

In recognition of his extensive background and expertise in transportation planning, in 2013 Richard was appointed as a member of the Board of Directors of the Association of Consulting Companies, Manitoba. For more information visit: [www.mmmgrouplimited.com/experts/richard-tebinka/](http://www.mmmgrouplimited.com/experts/richard-tebinka/)



Evangelical Fellowship Church  
560 Webster Ave.  
Fort Frances, Ontario  
P9A 3H8

May 28, 2017

Town of Fort Frances  
320 Portage Avenue  
Fort Frances, Ontario  
P9A 3P9

Re: Applications for Re-zoning & Official Plan Amendment

To Whom It May Concern,

We have been saving and searching for a new church building since 2009. In all that time we've found nothing that suits our needs as well as the former Bingo Building located at 605 McIrvine Road. Our current building is very cramped, and young parents are always afraid that their young children will slip out of the building and run onto the highway. Some of us have mobility issues and going downstairs for potlucks is difficult. Parking on Webster Avenue is not ideal for us as well as the neighbors. The entrance onto Kings Highway can be risky due to the blind corner – especially in the winter. The Bingo Building will meet the most of our needs for the most affordable price. We would be so grateful if you would approve our applications for re-zoning and Official Plan amendment. Thank you for your time and consideration.

Sincerely,

The Congregation of the  
Evangelical Fellowship Church

David & Melba Caravan  
Anne McCaig

Mark & Margrit  
Seiber

Catherine Albert  
Margrit Gerber  
Susanne Gerber  
Trent & Val Evans

M. P.  
Tina P.  
Shelby Parker

Camelia J.  
A. Fisher  
Melissa Wilson  
Kathleen

T. White  
M. Whitfield

W. O.

X Bz  
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May 30, 2017

Town of Fort Frances,  
320 Portage Avenue,  
Fort Frances, On P9A 3P9

RE: Property owners at 605 McIrvine Road roll # 010-006-08870-0000  
(former Fort Frances Bingo Hall)

To Whom it May Concern:

We are writing this letter to support the Evangelical Fellowship Church's  
Application for rezoning of the property our company owns at 605 McIrvine Road.

This property has basically been vacant since December 2006. It was a new building  
that was constructed and finished in mid-2006 to relocate the Fort Frances Bingo Hall.

The business was relocated in July 2006 but due to numerous economic factors which  
included non-smoking regulations and unfair competition with the Aboriginal Bingo Hall  
the business never became viable. After months of large losses, a financial decision was  
made to close the business.

We actively advertised the property for sale/and or lease. There was no interest or inquiries  
basically until December 2013 when Seven Generations Education Institute inquired about  
renting the property to use for a training school. We entered into a one year lease in Feb  
2014 with them after they applied for a minor zoning variance to allow for the school  
usage which was approved by the Town. There was never traffic studies requested for this.  
Seven Generations vacated the property two months early as the funding ran out.

Since then, there were no other inquires for lease or purchase until the Evangelical  
Fellowship Church called our Real Estate agent in September 2016 and subsequently an  
Offer was presented and accepted.

Cont'd

605 McIrvine Road, Fort Frances, On

As you can appreciate we were very pleased that finally we would be able to sell this property which has been a financial hardship for the company for the last ten years.

It was a brand new 10,000 sq.ft. building back in 2006. We have maintained the building, paid taxes, utilities, insurance (at a premium because for the vacancy) and had it regularly inspected to keep it in good shape for the last 10 years.

We would hope that the Church's application for rezoning will be approved given the fact the Seven Generations school had been given approval for their minor variance and that there is a High school immediately across the road from the Bingo Hall Property.

The Church would be a low traffic generator for most of the week days, peaking mainly in the evenings and Sundays in comparison to other business that are located on McIrvine and surrounding streets.

We have been a good corporate owner within the Town of Fort Frances keeping our vacant building well maintained and strongly support the rezoning application of the Church so the Sale can be completed so this property does not continue to be a financial burden for us.

We hope that the Town can see its way clear to approve the rezoning application for the Evangelical Fellowship Church.

Yours truly,

Karen Romanyk  
Administrator/Controller  
(Former Fort Frances Bingo Hall )  
1921495 Ontario Limited (formerly 1251597 Ontario Limited)  
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