Late Agenda Item

Public Hearing and Regular Council Agenda May 20, 2025

Recommendation:

That Council amend the agenda to add the following items, received after publication of the agenda:

3.3.Public Hearing "Amendment to Covenant CB215820, registered as a
condition of approval for Zoning Bylaw/Official Community PlanPages
2-8Amendment Bylaw Nos. 2068 and 2069."
Add public submissions.2-8

From:	
То:	Public Hearing Submissions
Subject:	Please support Home Hardware"s needs regarding a median in front of their store
Date:	May 15, 2025 2:55:10 PM

Please listen carefully to Home Hardware's needs. Respect them and act on their specific needs to support local business.

The City's heavy-handed approach to local people's needs was inappropriate for the marina, and its inappropriate again now. Please choose to support our citizens and existing businesses, while we still have them. Make better choices.

Adam Harris Ladysmith

EXTERNAL EMAIL: The sender is external to the Town of Ladysmith. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Received May 15, 2025

Dear Town of Ladysmith,

This is a written submission for the public hearing to consider amendments to Covenant CB215820.

I do not support removing the condition for the developer to build the roundabout from the covenant. I have organized some considerations below.

- **1130 Rocky Creek is driving the need for a roundabout.** According to my understanding of the staff reports and traffic analysis the 1130 Rocky Creek development is the <u>catalyst and tipping point</u> for needing the roundabout.
 - **Timing of the roundabout should coincide with the development**. In my opinion, the roundabout should ideally be ready for use by the opening of the new development. By removing the roundabout condition from the covenant, the development opening has the potential to be out of sync with the completion of the roundabout, meaning the development might be operational before the roundabout is installed. This would result in dangerous traffic patterns, which I understand is the reason for the proposed temporary median and the concerns from Home Hardware and their customers.
 - Cost of the roundabout should be primarily paid by the developments that need it. The expected traffic from this development is a tipping point making the roundabout the best option for traffic management on Ludlow. Certainly, the increased traffic from future developments will also require this roundabout, but those timelines are less certain and presumably they will come after 1130 Rocky Creek is built. My understanding of the latecomer fee system is that this a prime situation where it could be applied. Because this project is driving the immediate need for infrastructure upgrades, they should front a significant share of the cost. Later projects will benefit from the first developer's investment and so will pay their fair shares back to the first developer. Being "the bank" for infrastructure upgrades is one of the challenges of being the first developer in an area, however there are often strategic benefits that come with being first that help offset those challenges. Either way, this is something the developer in question signed up for when they first agreed to the conditions of the covenant in 2021.
- Business development is important. I want to be clear that I support business development in Ladysmith. Business tax revenue, jobs, and availability of local services are all important. But, I feel that some business developments benefit the community more than others, for example ones that will fill a current gap in local services or provide commercial space for existing local businesses who need space to rent.
 - **1130 Rocky Creek will have a low-medium positive impact on Ladysmith.** In the case of the proposed development at 1130 Rocky Creek, I personally see this as low

benefit, or at most medium benefit to the community. My understanding is phase 1 will be 3 commercial spaces, 2 of which already have secured tenants, with a 3rd under negotiation, all of which would be new businesses to town. Therefore, this development will likely not add additional commercial space rental opportunities for existing business in town, at least in the short term. Given that we already have a Starbucks and a dollar store in town, I don't see these businesses as greatly beneficial or filling a strong need in our community at this time. I acknowledge there will be some business tax revenue and potentially some local retail/service industry jobs, although my understanding is this is currently not the most needed category of job, as evidenced by hiring challenges at existing fast-food restaurants in town.

- High value developments should be incentivized. I believe there are situations when certain business or residential developments will clearly bring significant benefit to the community, I feel it would be wise for council to consider ways to incentivize those developments, including considering strategies that reduce costs for the developer (even though that inevitably puts more burden on taxpayers overall), or cause minor inconveniences to the public, for the sake of a greater good to the community. However, I personally do not feel this is one of those situations. To be clear, I am not arguing that this project should be blocked. People have a right to build and operate businesses on their property for profit, within legal parameters, regardless of whether those businesses are perceived to bring direct value to the local area. However, I feel that the town should not make sacrifices in other areas that negatively impact the community in an attempt to ensure this project proceeds.
- Businesses are responsible for their decisions. The developer has claimed that the condition of the roundabout makes their financial plan untenable. Though I can sympathize on a human level, they made a business decision to accept the conditions of the covenant in 2021, knowing that the cost of infrastructure can and often does increase. I view this as a calculated business risk that the developer took. The town is not responsible for the developer's business decisions and should not feel obligated to provide a "bailout" in the form of removing covenant conditions to help a business that has put themselves in this situation.
- We can't know what the developer will do. There are many moving pieces in the world of commercial development, and if the town leaves the condition of the roundabout on the covenant we cannot know for certain that the developer will abandon their project as they have threatened. On the other hand, if the town removes the condition in an attempt to ensure the project goes forward, there is no guarantee that the developer will not abandon the project for other reasons. Indeed, the removal of the roundabout condition on the covenant will likely make the property much easier to sell, so that could become an attractive option for the developer.

In summary, I believe that the condition of building the roundabout should remain on the covenant on 1130 Rocky Creek. I believe the best interests of the community are served by ensuring a roundabout is built on Ludlow by the time the new development is completed, and without using additional contributions from the town beyond the \$990,000 in DCCs already committed. If these previously agreed conditions now cause the developer to abandon this project, that will be unfortunate in some ways, but I believe it will be the "lesser evil" compared with making sacrifices in the form of higher financial contributions to the roundabout by the town, and/or less than ideal traffic management on Ludlow for a period of time. I urge council not to remove this condition.

Thank you for taking the time to read and consider my thoughts on this topic.

Respectfully,

John Scott

238 Bayview Ave, Ladysmith





May 16, 2025

Town and Council of Ladysmith 410 Esplanade Ave, Ladysmith, BC V9G 1A1

Dear Mayor and Council Members,

Re: Affect of changes to traffic flow at Ladysmith Home Hardware Building Centre

I am writing to express serious concern regarding the potential changes to the traffic pattern affecting Ladysmith Home Hardware.

Any alteration to the current configuration could have significant operational consequences for the business and the broader supply chain it supports.

When the store was converted into a Home Hardware Building Centre in 2011, the Town approved the construction of a lumber warehouse and exterior racking with the understanding that specific spatial requirements were essential. These measurements were not arbitrary, they were critical to accommodate the delivery and unloading of large transport vehicles, including Home Hardware's semi-trailers and lumber b-train tractor trailers.

These vehicles require not only ample room to maneuver but also sufficient clearance on both sides to allow forklifts to unload materials safely and efficiently. Any reduction in the width or depth of this designated area would severely restrict access and make it virtually impossible to unload deliveries, effectively disrupting operations and jeopardizing the store's ability to serve contractors, tradespeople, and local customers.

A major concern is the safety of our customers and staff if we have a high volume of vehicles moving through the existing delivery and lumber area. This location has over 155,000 customer transactions a year and the proposed traffic through that area will be significant and a risk.

I urge the Town to carefully consider the practical implications of modifying the traffic pattern or dimensions of this essential delivery zone. Maintaining the current layout is not just a matter of convenience—it is a logistical necessity for the continued functioning of a key local business.

Thank you for your attention to this matter. I would welcome the opportunity to further discuss this issue and its potential impact.

Yours Sincerely,

Hans Koekemoer Territory Manager Home Hardware Stores Limited



Memorandum



1051 Vancouver Street, Victoria BC V8V 3K3, T: 250.361.3230 F: 604.629.2698

To:	Ladysmith Home Hardware Building Centre	Date:	May 16, 2025
Attention:	Sean Dunlop	Project No.:	34298
Cc:	Mike Elliott, ASct, MMCD, CA, CPWI 3, Mid-Island Lead		
Reference:	Development Access Safety Review		
From:	Borg Chan, P.Eng., PTOE, RSP1, Road Safety Specialist Varsha Miriam Joseph, Engineering-in-Training		

The Town of Ladysmith (the Town) recently proposed traffic plan to extend the existing raised median on Ludlow Road from Highway 1 (Trans-Canada Highway) to the further north; however, the original constructing of a roundabout at the intersection of Ludlow Road and Rocky Creek Road is on hold. Under this design, vehicles exiting 1010 Ludlow Road (Ladysmith Home Hardware Building Centre) would be restricted to making right-hand turns only. This restriction would force drivers either using other alternatives – travelling longer routes to their destinations or marking illegal and unsafe U-turns at intersections and private properties. All of them could create the unexpected driver's behaviours and generate unnecessary traffic conflicts and severe collision risk. Therefore, Ladysmith Home Hardware has engaged ISL Engineering to conduct traffic engineering services in reviewing the potential safety issues with the extension of the existing raised median along Ludlow Road.

As shown in **Figure 1**, the existing vehicular access to the customer parking lot of the Home Hardware Building Centre (Customer Access) is located at the east side of Ludlow Road, about 75 metres north of the signalized intersection with Highway 1. The access is operated at stop-controlled from the east leg and currently allows all traffic movements (left and right turns for both entering and exiting traffic). Due to the all-movements allowed at the Highway 1 intersection, the majority of the entering traffic is right-turning from Ludlow Road northbound while the majority of exiting traffic is left-turning to Ludlow Road southbound.

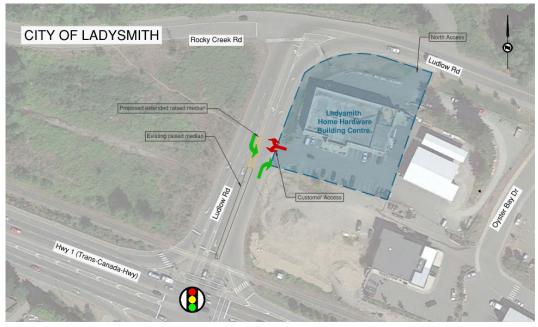


Figure 1

Subject Site and Surrounding Road Network

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Memorandum



Another vehicular access is located on the north side of the building (North Access); however, it is mainly used for loading/unloading trucks and employee parking lot. It is noted there is no vehicular connection for two parking lots due to significant level changes.

To verify the existing conditions and better understand traffic patterns, including left-turn movement for Home Hardware Property, ISL staff conducted a field review on Tuesday, May 13, 2025. Photos from the site visit are presented in Figure 2.



Ludlow Road Northbound (Facing North)

Ludlow Road Southbound (Facing South)

Figure 2 Site Visit Photos (May 13, 2025)

It is noticed that left-turn vehicles exiting the parking lot will cross the southbound left-turn lane at the intersection of Highway 1 and Ludlow Road; however, no major traffic issues were observed due to low southbound traffic volumes and long left-turn bay length (over 50 metres long) during site observation.

With the proposed extension of the raised median along Ludlow Road, the following possible routes and traffic operations for left-turn vehicles exiting the Home Hardware customer's parking lot were identified and the potential traffic and safety impacts were also discussed (also illustrated in Figure 3):

- 1. Turning right to Ludlow Road and Oyster Bay Drive before returning to Highway 1 at the signalized intersection with Transfer Beach Boulevard: Travelling for additional 1.5 kilometres long distance and the connecting logging road is narrow, riddled with potholes, and no lighting, creating the off-road collision risk, particularly long and heavy trucks, such as commercial B-train tractor-trailers. The route passes through Transfer Beach, a key attraction and the "Crown jewel" of Ladysmith tourism with high traffic tourism and vehicles generated in the summertime, further creating the traffic conflicts between vehicles/pedestrians and commercial vehicles.
- 2. Turning left to Rocky Creek Road before returning to Highway 1 at the interchange with Rogerson Road: Travelling for an additional 2.0 kilometres long distance and no southbound left-turn is allowed to Highway 1 westbound at the intersection, limiting the traffic destined to the Town Centre.
- 3. U-Turn at the end of the proposed extended raised median: Drivers may not be aware of the restricted leftturn and make u-turn as soon as possible, creating traffic conflicts and collision risks for southbound vehicles heading to the Highway 1 intersection and northbound left-turn vehicles to Rocky Creek Road.

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- 4. U-Turn at the North Access to Home Hardware Building Centre: Drivers exiting the parking lot may not expect vehicles making U-turn at the access location; creating the traffic conflict and collision risk. The horizontal ramp at the access also reduces the driver's visibility and further increases the collision risk. Similar safety issues for vehicles making u-turns at private property, opposite to the North Access.
- 5. U-Turn at the accesses to private properties along Rocky Creek Road: Drivers exiting the accesses may not expect vehicle making U-turn at the access location; creating the traffic conflict and collision risk. In addition, follow vehicles may not expect vehicles slowing down and u-turning at the private accesses, creating rear-end and sideswipe collision risk.
- 6. U-Turn at the intersection of Ludlow Road and Oyster Bay Drive: Drivers have intention making wide U-turn at the north side of this large 5-legged stop-controlled intersection; creating the traffic conflict with vehicles entering from other intersection approaches and generating severe right-angle or head-on collision risk.

Therefore, extending the raised median along Ludlow Road will restrict vehicles exiting the access to the customer parking lot of the Home Hardware Building Centre to the right-in-right-out operations. Drivers are required to either travelling longer and lower road standard alternative routes or making illegal and unsafe u-turns, creating unexpected traffic conflicts and severe collision risk.

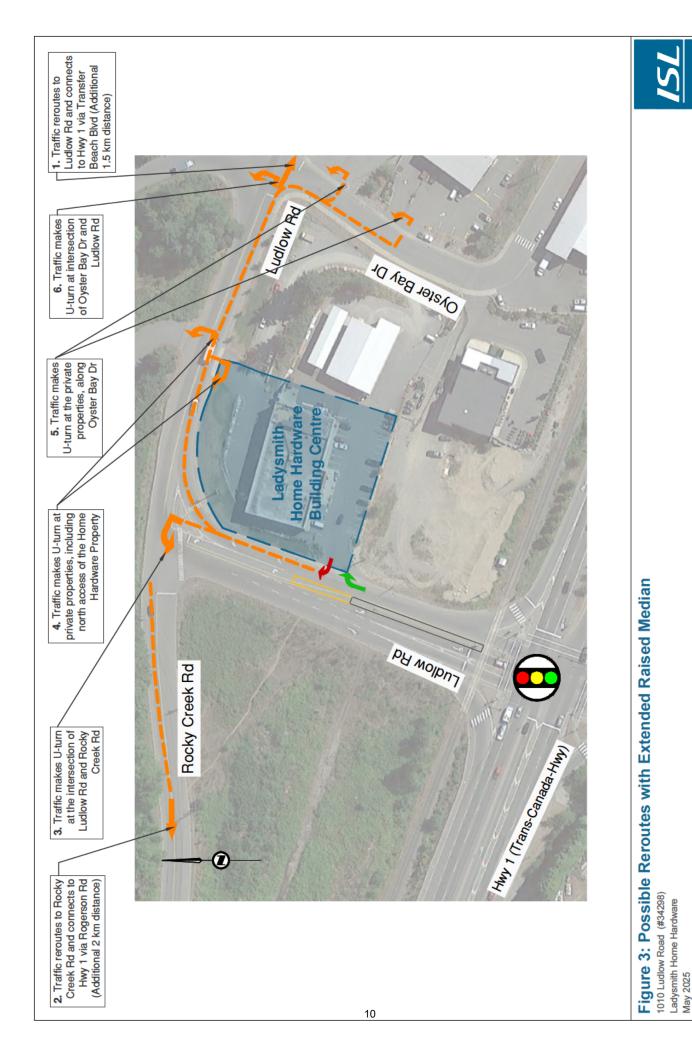
To improve the safe operation of the left-turn operation for exiting traffic without the extension of the raised median along Ludlow Road, the following safety improvement measures could be considered:

- Reduce the access width to reduce wide vehicle turning;
- Paint checkerboard painting marking outside the access location to avoid vehicles stopping at the northbound lane; and,
- Install STOP sign and NO BLOCKAGE tab at the access location.

We trust this Technical Memorandum fulfils the Client's requirements. If there are any questions, please do not hesitate to contact the undersigned.

Yours truly,

Borg Chan, M.Sc., P.Eng., PTOE, RSP1, FITE Project Manager and Road Safety Specialist



Received May 20, 2025

1130 ROCKY CREEK ROAD APPLICANT ADDITIONAL SUBMISSION

Information on Financing Mechanisms

Any financing mechanism used to collect funds for the roundabout from local property owners will apply equally and proportionately to 1130 Rocky Creek Road.

This includes if Ladysmith decides to implement a Local Service Area as has been discussed during TOL Council meetings. 1130 Rocky Creek Road will pay exactly the same proportion of costs as other properties.

The Local Service Tax cannot be vetoed and turned down by any one property. It requires more than 50% of property owners voting against it for it to be turned down. The Latecomers Agreement prepared by TOL Staff in 2021 could form the basis of a Local Service Area as 37 properties benefitting from the roundabout have already been identified.

In fact, the allocations to existing properties that have already been developed makes it more appropriate for a Local Services Area as drafted.

The Local Service Area properties have been identified and costs have been allocated on a per hectare basis to 37 properties in 2 identified areas, including 1130 Rocky Creek Road.

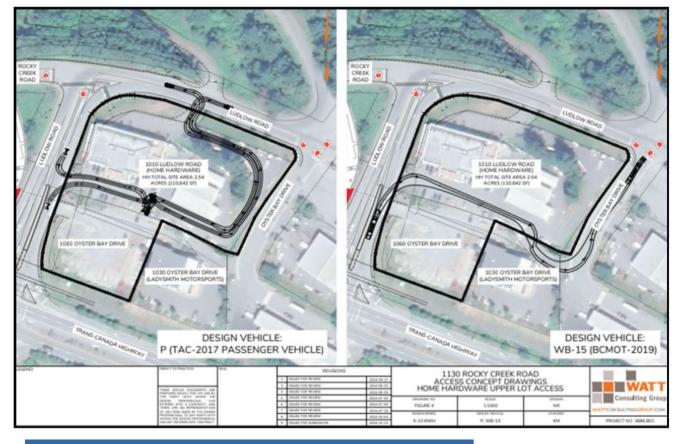
Example: Home Hardware, Ladysmith Motorsports, 1130 Rocky Creek Road, Western Forest Products (WFP) and TOL Waterfront lands total more than 50% of the potential Local Service Area.

Additional Information on Traffic Changes

Please see the following pages for additional information on traffic movements in the area and previous access approvals

- Page 2 Traffic approvals summary
- Page 3 Map outlining approved traffic movements for 1130 Rocky Creek Road
- Page 4-5 Home Hardware access approvals
- Page 6-8 Original TOL direction in 2017 and 2018 from TOL Council Meetings

HOME HARDWARE TRAFFIC APPROVALS



Additional Information on Traffic Changes

We have prepared this information to help clarify the confusion regarding traffic changes that have been proposed by the Town of Ladysmith.

These changes are **unrelated** to our development at 1130 Rocky Creek Road and were originally proposed by Town of Ladysmith on **Dec 18, 2017** and **Oct 15, 2018** - see pages 6-8

TOL Bylaws do not permit the left turn onto upper Ludlow Road from HH

- Please see pages 3-5
- Home Hardware's upper Ludlow Road Access was originally approved as Right In, Right Out only.
- The Left turn onto Upper Ludlow Road was never approved and was expected to be closed in the future

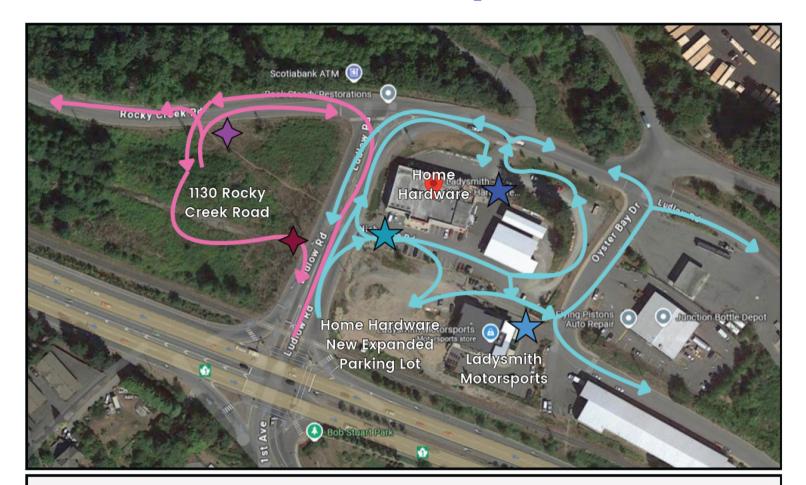
Traffic Changes Proposed 2017 and 2018

- Please see pages 6-8
- TOL Staff proposed the 'traffic circle' at Ludlow Road and Rocky Creek Road
 - To support Waterfront Area Expansion
 - To facilitate U-turns for Home Hardware

2

• On Oct 15, 2018, TOL Council approved the Ludlow Road median extension

Map of Approved Accesses for Home Hardware & 1130 Rocky Creek Road



Home Hardware Access Points



Upper Ludlow Entrance/Exit: Right In, Right Out Only



Lower Ludlow Entrance/Exit: Full Movement Intersection



Oyster Bay Access: Legal easements through Motorsports; TOL Bylaw requires this is open at all times

1130 Rocky Creek Road Access Points



Upper Ludlow Exit: Right Out Only



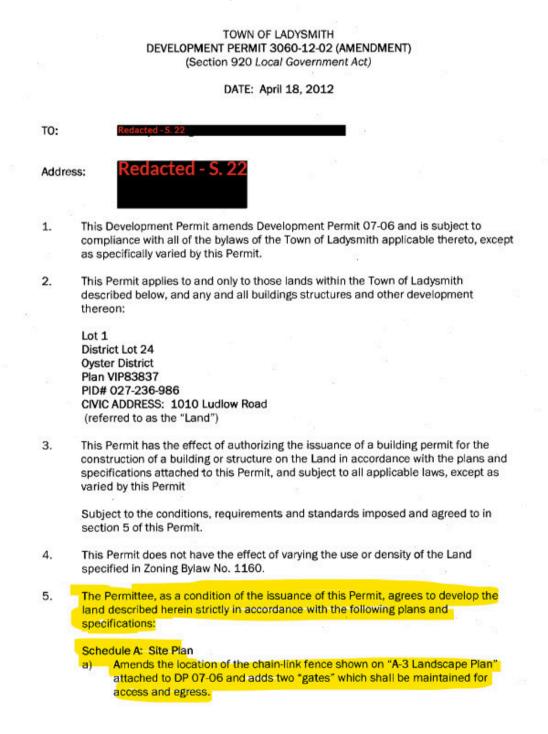
Rocky Creek Entrance/Exit: Full Movement Intersection

Note: The **left-turn** out of the **Upper Ludlow Road Entrance/Exit** is the **least safe option** for Home Hardware customers to exit the property. Both **Lower Ludlow** and **Oyster Bay Drive** are **safer options**.

Home Hardware Access Approvals

Please see this Development Permit Amendment from April 2012, which outlines approved traffic access to the site:

- Right-in, Right-Out only for Upper Ludlow Road access
- Gates that must be maintained for access and egress to Oyster Bay Drive and Lower Ludlow Road (Current Lower Parking Lot access)



Home Hardware Access Approvals

NOTE: The Ludlow Road driveway access to the site was originally approved as right-in, right-out. While the left-out functions today it may not in the future and the ability to make a left-out may be eliminated

b) Adds a Drive-Thru Canopy and T-Shed which shall be sited as generally shown on Schedule A, so as to maintain a minimum 10 metre wide driveway for future access to Oyster Bay Drive for large delivery vehicles and to permit efficient and safe, on-site vehicular and pedestrian circulation as approved by DP 07-06.

NOTE: The Ludlow Road driveway access to the site was originally approved as rightin, right-out. While the left-out functions today it may not in the future and the ability to make a left-out may be eliminated.

Schedule B: Building Elevation

- Adds a Drive-Thru Canopy and T-Shed with exterior finishing (metal siding and roof) to match the Home Hardware Building Centre.
- 6. Notice of this Permit shall be filed in the Land Title Office at Victoria under s.927 of the Local Government Act, and upon such filing, the terms of this Permit 3060-12-02 or any amendment hereto shall be binding upon all persons who acquire an interest in the land affected by this Permit.
- If the Permittee does not substantially start any construction permitted by this Permit within six months of the date of this Permit as established by the authorizing resolution date, this Permit shall lapse.
- The plans and specifications attached to this Permit are an integral part of this Permit.
- This Permit prevails over the provisions of the Bylaw in the event of conflict.
- Despite issuance of this permit, construction may not start without a Building Permit or other necessary permits.

APPROVED PURSUANT TO DELEGATION BYLAW 2007, No. 1614, AMENDMENT BYLAW 2008, No. 1654. ON THE **18th** DAY OF **A**pril **2012**.

cted - S.

CORPORATE OFFICER

Redacted - S. 22	
OWNER (ł
Ren Dunko	
PLEASE PRINT NAME	

PAGE 2 OF HOME HARDWARE APPROVALS

Ludlow Median approved Oct 15, 2018

TOL first proposed closing the left turn out of Home Hardware at a TOL Council meeting on October 15, 2018 and passed a motion to add this to the 2019-2023 Financial Plan

		STAFF REP	ORT TO COUNCIL	
From: Meeting File No: RE:		October 15, 2018 8620-20 (WAP)	ctor of Development Serv EA PLAN: TRANSPORTA	
That Co 1. R a 2. C r 3. D r 2 4. D	Receive the ind Associa Confirm the ecommend Town's prop Direct staf ecommend 2023 Finand Direct staff	Waterfront Area Plat tes Ltd. dated Septemi e inclusion of the ed by the Ludlow Ro posed new Developme f to include the ex ed by the Ludlow Roa cial Plan for discussion to discuss the iden	Ludlow Road/Rocky Cre adway Driveways Feasibi nt Cost Charges program. tension of the median d Driveways Feasibility A	eek Road roundabout ility Assessment in the on Ludlow Road as ssessment in the 2019-
5. R Is PURPO The pur transpor	Refer the Corri sland Corri SE: pose of thi rtation rev	in the second second	REPORTS CS 2018-407	Waterfront Area Plan: Transportation Review Moved and seconded: That Council consider separately each recommendation from the report entitled "Waterfront Area Plan: Transportation Review". Motion carried. Moved and seconded:
		CIL DIRECTION That Council provide e be undertaken in supp • Transportation Revie Highway traffic assess Ludlow Road and the Rocky Creek Road • Municipal Servicing	CS 2018-408	That Council receive the Waterfront Area Plan: Transportation Review prepared by RF Binnie and Associates Ltd., dated September 21, 2018. ar Council Meeting Minutes: October 15, 2018 Page 6
				<i>Motion carried.</i> <i>Moved and seconded:</i>
			CS 2018-409	That Council confirm the inclusion of the Ludlow Road/Rocky Creek Road roundabout recommended by the Ludlow Roadway Driveways Feasibility Assessment in the Town's proposed new Development Cost Charges program. <i>Motion carried.</i>
			CS 2018-410	Moved and seconded: That Council direct staff to include the extension of the median on Ludlow Road as recommended by the Ludlow Road Driveways Feasibility Assessment in the 2019-2023 Financial Plan for discussion. Motion carried.

TOL COUNCIL OCTOBER 15, 2018 AGENDA AND MINUTES EXCERPTS

Ludlow Median & Roundabout Background

TOL first proposed closing the left turn out of Home Hardware at TOL Council meeting on October 15, 2018 and explicitly outlined that the roundabout upgrade is being recommended to allow vehicles to make a U-turn to access Highway 1 from Home Hardware (Blue Highlight)

Local Road Design Concept:

The study also provides further detail for the local road design concept included in the Waterfront Area Plan. This information is timely as new private development is being proposed on Oyster Bay Drive adjacent to the north end of the WAP area, and a site planning process is commencing for the Arts and Heritage Hub (Area 9 on the WAP concept plan) which also fronts onto Oyster Bay Drive. Staff will use this concept in discussion on both initiatives.

Ludlow Driveways:

The report also includes a separate review of driveways in the Ludlow Road and Rocky Creek Road area. The driveways for these developments are important to consider as pre-existing conditions and given their proximity to the northern entrance to the waterfront area. This driveway assessment has been used by staff when discussing subdivision and development applications on these parcels.

The key findings of the study are:

- The proposed driveway access at 1030 Oyster Bay Drive (Oyster Bay Quay/XTend Rentals) is recommended to be consolidated with the existing Home Hardware access to become a RIRO configuration. Alternatively, a right-in access at 1030 Oyster Bay Drive will accommodate ingress traffic, while egress traffic can exist the property via the existing driveway along Oyster Bay Drive. The intended rightin only configuration at the existing Home Hardware access must also be enforced.
 - Note: The subdivision of 1030 Oyster Bay Drive is proceeding with its own right-in driveway. The right-in only at Home Hardware would become mandatory if the median is extended on Ludlow Road.
- The existing median along Ludlow Road can be extended to enforce the RIRO restriction at 1130 Rocky Creek Road (corner property) and the consolidated Home Hardware access.
 - o Note: This work is included in the staff recommendations.
- The existing stop-controlled intersection of Rocky Creek Road and Ludlow Road is recommended to be upgraded to a roundabout to allow vehicles to make a U-turn to access Highway 1 from Home Hardware. This change would help enforce the RIRO configuration at the Home Hardware access and the proposed XTend Rentals access. The roundabout should accommodate the large vehicles using the intersection to access the lumber mill.
 - Note: This upgrade is included in the draft new DCCs program.
- Two driveway accesses are recommended for 1130 Rocky Creek Road development – one on Rocky Creek Road and one on Ludlow (RIRO)
 - Note: a new assessment would be required if a use is proposed with higher traffic demands such as a drive-through restaurant or coffee shop.

TOL Proposed 'Traffic Circle' in 2017

At the recommendation of TOL Staff, Council approves a Transportation Review of the driveways on Ludlow Road and the potential for a traffic circle at Ludlow Road and Rocky Creek Road. This was the report that R.F. Binnie & Associates Ltd completed, commonly referred to as the Binnie Report

The Binnie Waterfront Transportation Review did not recommend a traffic circle. TOL Staff identified this as a potential and recommended that the Council pass a motion authorizing the study of Ludlow Road existing and future driveways in the context of the Waterfront Area Plan and to incorporate a potential traffic circle at Ludlow Road and Rocky Creek Road.

From: Meeting Date: File No: RE:	Felicity Adams, Director of Development Services December 18, 2017 6520-20 WAP Waterfront Area Plan Transportation Review and Municipal Servicing Review
 undertaken in sup Transportation traffic asse potential f 	TION: ovide early budget approval for the following two studies to be oport of the Waterfront Area Plan: ation Review including a detailed Ludlow Road/TransCanada Highway essment, including existing and future driveways on Ludlow Road and the or a traffic circle at Ludlow Road and Rocky Creek Road Servicing Review
which was budgete review for the entii coordination purpo Transportation Rev The purpose of the • determine a • review exist • recommend	view: Waterfront Area Plan Transportation Review is to: nticipated traffic volumes to be generated by the new development, ing and new intersection volumes, and improvements by phase.
	f this study, "transportation" includes vehicles of all types, pedestrians, transportation. The rail corridor crossings are also included in the
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