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Written Comments

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Submitted on the Draft Environmental Impact Report on

Monterey Avenue Skate Park SCH#2015062067

Submitted by Elisabeth Russell 601 Monterey Avenue, Capitola, CA January 8, 2016 The comments are submitted after reviewing the work that was completed in the Draft EIR for Monterey Avenue Skate Park, SCH 2015062067.

Summary of Comment and Requests

These comments specifically address the issue of how noise was evaluated in the Draft EIR. The opinion of these comments is:

17-1 The Draft EIR did NOT do a complete evaluation of the noise impacts. It specifically did NOT conduct a noise evaluation of the daily time period from dusk to 8:00AM when the noise will have the most negative impact to the environment.

The Draft EIR did NOT actually evaluate the noise impacts from dusk until 8:00AM. (Appendix C, page 17) It is critical that all parties involved in this decision understand, that these are the EXACT Hours in the day where it MATTERS MOST to have the noise impact analysis completed.

The first request is: This draft EIR evaluation of the noise impacts be declared incomplete by the Planning Commission and City Council, and that staff be directed to engage the firm conducting the noise evaluation to conduct the accurate and specific evaluation of the noise impacts of the skate board park, which includes the hours from dusk to 8:00AM.

The second request is: Based on this additional noise impact data, that the noise impact mitigation measures that will work for this dusk to 8:00AM time period be identified in the EIR. These have not even been addressed at this time.

The goal of these comments is to encourage the City of Capitola in acquiring the complete noise impact data for the draft EIR, to encourage the City in identifying the actual and complete mitigation measures needed to mitigate the sound from users on the Monterey Skate Park for the full 24 hour day.

Discussion

The former U.S. Surgeon General William H. Stewart said, "Calling noise a nuisance is like calling smog an inconvenience. Noise must be considered a hazard to the health of people everywhere." The World Health Organization (WHO) working group has concluded that noise is a major threat to human well-being. The World Health Organization has documented the adverse effect of noise on humans.

Sleep disturbance is one of the major impacts of noise on humans identified by the World Health Organization. Scientific studies clearly prove uninterrupted sleep is known to be a

prerequisite for good physiologic and mental functioning in healthy individuals. When sleep disruption becomes chronic, the results are mood changes, decrements in performance and other long-term effects of health and well-being. Apart from the various effects on sleep itself, noise during sleep causes increased blood pressure, increased heart rate, increased pulse amplitude, vasoconstriction, changes in respiration, and cardiac arrhythmias are increased. Secondary effects (so-called after effects) measured the following day include fatigue, depressed mood and well-being, and decreased performance.

The residents proximate to the site of the proposed Monterey Skate Park are accurate in asking for a noise impact evaluation that clearly and accurately identifies the noise environmental impacts of a skate board park from the hours of dusk to 8:00AM. This area is their home, where they have been able to sleep without noise impacts for many years. The proposed Monterey Park Skate Park is a direct threat to their ability to sleep at night in their homes.

It is the duty of both the City Planning Commission and the City Council to do its best to protect its citizens from harm and to do its best to uphold the City's Safety and Noise Element of the General plan so that the community's exposure to excessive noise is minimized.

The current Draft EIR is NOT precise in it evaluation of the noise impacts of the proposed Monterey Park Skate Park. In order to be a precise evaluation of the noise impacts, the City must have the noise impact evaluation be continued to include all the hours of the day.

17-2 There is a current case study that I have attached to these comments. It is the case of a skate park built in a residential neighborhood in Vancouver, Canada. In this case city staff is bringing an item forward to their board to remove the skate park because it exceeds noise impact levels between the night-time hours. In this case, the City of Vancouver installed a skate park facility in a residential area close to homes. It was a a facility designed for novices and small children. However, even with the installation of a 10 foot fence, and police patrols, skate boarding during night-time hours are persistent. The City of Vancouver hired BKL Consultants on Acoustics to do a noise impact evaluation between the night-time hours. It was 100% determined that the skateboarders at the facility from dusk to morning are producing noise that exceeds the allowed night-time decibel levels.

As the April 20, 2015 report prepared by the General Manager of Parks and Recreation for Vancouver, indicates, NOT doing a thorough noise impact evaluations in the initial EIR period, is the wrong decision for city officials to make. Please read the attached case study.

In it you can see the data that is very similar to the situation with the homes surrounding Monterey Park. (See Appendix B). These homes are located at the <u>same distance</u> from the Vancouver Park, that some of the homes on Monterey Avenue are located to the proposed Monterey Park site, so this study provides an accurate "apples to apples" comparison.

In this study, you can see that the noise levels between the hours between dusk and 8:00AM EXCEEDED the allowable noise levels.

The City of Capitola has the opportunity to avoid the mistakes made by the City of Vancouver. The City of Capitola can conduct a noise impact evaluation of the proposed Monterey Skate Park for the hours of dusk to 8:00AM, as BKL Consultants was able to do. It is imperative that the EIR reflect the accurate and true environmental impact of the proposed Monterey Skate Park. I am sure, if asked directly, the consultants who prepared the noise impact study included in this draft EIR for the Monterey Skate Park, that they would agree with me that a more complete evaluation needs to be conducted prior to approving the final EIR.

In closing, my final comments are simple. You have members of the community that are concerned about the noise impacts of the proposed Monterey Sake Park. They are particularly concerned about the noise impacts when they are trying to get their evening rest. Instead of doing an accurate evaluation of these noise impacts and accurately identifying the potential mitigation measures, this study just pretends that no one will use the skate park after it is closed. This is not an accurate environmental impact assessment in terms of reflecting real world conditions. Young adults will hop over a six foot fence at their leisure to skate at Monterey Park at all hours of the night, just as they do at the skate park in Vancouver. Neighbors proximate the skate park will have their sleep impacted. The City of Capitola General Plan requirements for night-time noise levels will be violated. It will be a complete repeat of the case that that is playing out in Vancouver now.

My request is simple. Please direct staff to engage the firm conducting the noise evaluation to conduct the accurate and specific evaluation of the noise impacts of the skate board park from dusk to 8:00AM. And to include both these impacts and the proposed mitigation measures into the EIR.

If we can build a skate park in Monterey Park with the accurate and appropriate noise mitigation that covers the noise that will occur between the hours of dusk to 8:00AM so that residents surrounding the skate park can sleep without being impacted by noise, I have no objection to the park. Please though, complete the full noise impact evaluation to determine accurately what needs to be done to mitigate the noise impact from the hours of dusk to 8:00AM.

Thank you!

Reference Studies:

Hobson, JA. Sleep. Scientific America Library. W.H. Freeman and Company, NY, NY 1989.

Ohrstrom, E. Bjorkman M. Effects of noise-disturbed sleep – A laboratory study on habituation and subjective noise sensitivity. J Sound Vibration 1998; 122: 277-290.

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LETTER 17

Attached Documents to Comments on Draft EIR for Monterey Skate Park

Date: April 20, 2015



TO: Park Board Chair and Commissioners

FROM: General Manager - Vancouver Board of Parks and Recreation

SUBJECT: Mount Pleasant Skateboard Facility Location

RECOMMENDATION

- A. THAT the Board approve locating an intermediate skill level skateboarding facility in Jonathan Rogers Park; and
- B. THAT the Board recommend one of the following options for the Mount Pleasant Park Skateboard Facility:

Option 1 - Convert the Mount Pleasant Park skateboarding facility for beginner skateboarding use;

Option 2 - Remove this facility and convert it to a grass lawn;

Option 3 - Remove this facility and engage with local residents to determine a more appropriate use for the area.

With the details for Option 1, 2 and 3 described within this report.

POLICY

The Board approves the design and development of parks.

BACKGROUND

In 2005, the Vancouver Park Board approved the Skateboard Strategy for Vancouver. This document discusses a long-term strategy, including criteria for selecting skateboard facility locations and designs that meet the needs of skateboarders, other park users, and residents living near the facilities. The report's strategic action items include:

- providing additional skateboard facilities in Vancouver;
- providing variety in the skateboarding system including destination and local serving facilities for a variety of skill levels from entry level to advanced;
- providing variation in the styles of facilities (e.g. including bowl and street style);
- and locating new skateboard facilities in parks that meet as many of the following criteria as possible:
 - where support services are available nearby (e.g. public washrooms, drinking fountain, youth worker, first aid);
 - where noise can be minimized for nearby residents;
 - where it is visible from a Park Board building or from a nearby street;

- where other established park uses or a group of park users will not be displaced; and
- where it is not significantly out of character with the park.

The strategy acknowledges skateboarding as an important recreational activity that needs a proactive approach, and provides a framework for capital investments in skateboarding by identifying overall priorities and by setting out location criteria to identify and assess candidate sites for new skateboard facilities.

Currently, a variety of sizes and styles of skateboard facilities are located throughout Vancouver, including bowls, ramps, hip-boxes, and street-style layouts. Skateboard facilities are open to everyone and can be reserved for regular practice, a special event, or tournament. Data for skate park use is collected by park board staff who comment that each skateboard facility is well utilized with the largest facilities (Downtown Skateboard Plaza, Kensington, and Hastings) attracting dozens of users during peak times. The popularity of new facilities at Kensington Park and at Mount Pleasant Park indicates that supply has not fully caught up with demand.

There are a total of 9 skateboard facilities on publicly owned land in Vancouver, 7 of the 9 facilities are located in parks (China Creek, Coopers, Hastings, Kensington, Mount Pleasant, Quilchena, Strathcona) and 2 of the facilities are located in Engineering Street right of ways (Downtown Skateboard Plaza and Leeside Tunnel) as shown in Appendix A.

Mount Pleasant Park is a 1.12 hectare park situated at Ontario Street and 16th Avenue. The future of the park has been subject to extensive public discussion since 2000 when Council and the Board decided to move the community centre to a new location at 1 Kingsway. A recommended concept plan for the Mount Pleasant Park upgrade was developed, was well supported by the community, and was adopted by the Board in October 2010. Throughout 2011-2012 the park was constructed in accordance with the adopted concept plan, including a small skate boarding facility for young children as a conversion of the former wading pool.

The skateboard facility is designed for novices; however, what works well for young children learning to skateboard is also fun for skateboarders of all ages and skill levels. The fun of skateboarding comes from the tricks you are performing and not necessarily from the obstacles you are performing them on. Since opening in 2012, the facility is well used by all users, including children in the day and primarily by young adults in the evenings.



DISCUSSION

Skateboarding at Mount Pleasant Park was occurring after 10 pm and prior to 6 am, which causes significant unintended noise impacts for nearby residents, especially at night when used by young adults. Staff did not anticipate the need, the high use by adult skateboarders, and the noise resulting from this location.

Noise has been the top concern for residents, and an independent noise assessment was arranged. The results of this study indicate that the skateboarders at this facility are producing noise that exceeds decibel levels for this Quiet Zone as outlined in Noise Control By-law No. 6555. The noise assessment report is attached as Appendix B.

Staff retained an independent engagement consultant (Verlaan) to dialogue with stakeholders and residents to review the issues and to make recommendations for improvements. As a result in 2013, staff produced an action plan to improve the situation and met with the residents and the Vancouver Skateboard Coalition on several occasions. A copy of the report is attached as Appendix C. Siting and designing a new skateboard facility in the Mount Pleasant neighbourhood for older and more skilled skateboarders is integral to the ongoing management of the issues as indicated in the independent consultant's report. Staff therefore embarked upon a location study for a new facility in 2014.

Location Study for the Mount Pleasant Neighbourhood Skateboard Facility

Two park sites in Mount Pleasant neighbourhood were identified as feasible park locations for a new facility and no other available City owned sites were found.

Robson Park (located at Kingsway and St. George Street) and Jonathan Rogers Park (located at Manitoba and West 7th Avenue) were rigorously reviewed, involving the application of the Skateboard Strategy's location criteria to assess the suitability of each park (see Appendix D for more comparison information).

In January 2014, a public consultation professional (Verlaan) was engaged to conduct one-onone interviews with stakeholders with interests proximate to both sites. As no obstacles were identified that warranted excluding either location, a park design professional (Golder and Associates) was engaged in February 2014 to take a public consultation process forward and to focus stakeholder and community input on determining which of two proposed locations is the most suitable for the new facility.

In April 2014, public engagement opportunities (including a well-attended open house held in the Mt. Pleasant Community Centre lobby and an on-line questionnaire) ensured broad awareness of this initiative and resulted in 367 completed questionnaires.

The public consultation process provided an opportunity to understand the needs of the community and the benefits and impacts that a new skateboard amenity could have on the park and surrounding neighbourhood. The engagements were promoted via emails to local stakeholders, on the City's website, through social media, through an advertisement in the Vancouver Courier and through the delivery of notices to business and residents in a 2-block radius around each park.

Based on the public consultation feedback received, and the compatibility with the criteria outlined in the Skateboard Strategy for Vancouver, Jonathan Rogers Park is the preferred candidate location for a new skateboard facility. This is the location local residents' show a preference for where 56% of respondents think Jonathan Rogers is a suitable location for a skateboard facility compared to only 48% for Robson Park. The survey results are illustrated in Appendix D. The questionnaire also revealed that 75% of respondents live or work within 1 kilometre of either Robson or Jonathan Rogers Park and 32% of respondents skateboard themselves or have children that skateboard, noted in Appendix D.

Jonathan Rogers Park is located in a light industrial zone and is surrounded by a variety of local businesses. It has a public washroom and has street frontage on all sides. The new midsized skateboarding facility will need to be fully integrated with existing park uses, including the community garden, an out-of-service wading pool, and playground. Complimentary park upgrades including the demolition of the out-of-service wading pool and a new playground can be included with this project.

A skateboard facility located in Jonathan Rogers Park will benefit from easy access to public transit; good visibility from surrounding streets; close proximity to support services (including a drinking fountain and washroom located in the field house); and compatibility with the informal character of park. This aligns with the criteria for skateboard facilities outlined in the Skateboard Strategy.

Staff will continue to collaborate with local residents, business owners and interest groups to produce a coordinated final design for the eastern portion of the park that includes the skateboard facility if approved, the community garden, playground and other amenities. The final design for the skateboard facility will be confirmed through this upcoming process and there is a great opportunity to renew the eastern portion of the park to suit a range of ages, and outdoor recreation interests in an accessible space.

A budget of \$200,000 is available for the skateboard facility and funds for related and needed park improvements at Jonathan Rogers Park such as: playground upgrades, wading pool removals and conversions, and accessible pathways and design fees, are also available in the 2015-2018 Capital Plan.

Addressing the Mount Pleasant Park Skateboard Facility

Subsequent to the noise assessment and consultant's report, staff made efforts to address noise impacts; one of the Mount Pleasant skateboard facility features was modified and a 10' high chain link fence and signs were installed around the perimeter in 2013. The skateboard facility entry gates are manually locked and unlocked daily at 9pm and 9am, respectively. Signs note permitted hours of use (9am-9pm), respect for nearby neighbours, and safety information - illustrated in Appendix E.

Despite efforts to address impacts to neighbouring Mount Pleasant Park residents, noise complaints are on-going. When the weather is ideal for skateboarding, Park Rangers regularly attend Mount Pleasant Park after closing time to address after-hours use. The Vancouver Skate Coalition volunteer and promote positive behaviors, cleanliness and use, and the staff Skate Park Host has a regular presence at the Mount Pleasant skate park.

Additional adjustments to the skateboard facility features and size and programming may be needed to promote use by children learning to skateboard and to reduce its use by skilled skateboarders.

Going forward, possible directions to consider for the Mount Pleasant Park skateboard facility are:

1. Converting the Mount Pleasant Park skateboarding facility for beginner skateboard use, at an estimated cost of \$25,000, and continuing with the monitoring by Park Rangers, volunteers, the staff skate host, and promotion of children's programs;



2. <u>Removing this facility and converting it to a grass lawn at an estimated cost of</u> \$40,000; or



3. <u>Removing this facility and engaging with residents to determine another</u> appropriate use for the facility, such as a garden or a tricycle run for young children, at a cost to be determined when the use is identified.

Funding to address the issues at the Mount Pleasant Park Skateboard Park can be prioritized in the 2015 capital budget.

SUMMARY

The recommended location for a new skateboard facility in the Mount Pleasant neighbourhood is Jonathan Rogers Park, as it is supported by community members and skateboarding enthusiasts, and as it is the park location that aligns best with the criteria outlined in the Vancouver Skateboard Strategy. Detailed design discussions, including working closely with local stakeholders, residents, and skateboarding enthusiasts to explore a renewal plan for the eastern portion of the park will begin after Park Board approval of the location. Construction of the facility and related park improvements can begin in 2016.

General Manager's Office Vancouver Board of Parks and Recreation Vancouver, BC

Prepared by: Parks Planning & Development

DB/TM/BH/clc

LETTER 17



APPENDIX B Mount Pleasant Skateboard Facility Noise Assessment Report

August 17, 2012

File: 1486-12A

Vancouver Board of Parks and Recreation 2099 Beach Avenue Vancouver, BC V6G 1Z4

Attention: Tiina Mack

Dear Tiina:

Re: Noise Assessment for Mount Pleasant Skateboard Park

BKL Consultants visited the site of 62 West 16th Street on July 13th, 2012 to measure the current noise levels on this property. Our objective was to quantify and assess noise from the skateboard park and to identify any opportunities for noise mitigation. It is our understanding that the primary concern is the intrusion of skateboard park noise and associated outdoor speech at the park area directly opposite the residence.

Noise Assessment Criteria

Sound levels are measured according to a logarithmic decibel (dB) scale. As a general 'rule of thumb' human beings usually perceive an increase in sound level of 10 dB as being twice as loud. A decrease of 10 dB would be perceived as being half as loud. An increase or decrease of less than 3 dB is generally not noticeable subjectively. Whether or not skateboard park noise is a significant disturbance to the residents depends primarily on the Signal to Noise Ratio (SNR) which describes the skateboard park noise at the point of reception in the neighbour's property relative to ambient noise levels at the time. It also depends upon the characteristics of the intruding sound. For example, variable sounds with information content such as loud voices or music, are more annoying than steady broadband noise sources such as road traffic.



The City of Vancouver noise by-law 6555 states:

"No person shall make or cause, or permit to be made or caused, any noise or sound in a street, park or similar public place which disturbs or tends to disturb unreasonably the quiet, peace, rest, enjoyment, comfort or convenience of persons in the neighbourhood or vicinity."

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Tiina Mack

Additionally this by-law provides quantitative requirements of 55 dBA at the property line of the receiver during the day and 45 dBA at night for 'quiet zones' generally qualified as residential areas.

Noise Monitoring Results

Noise levels were measured on the balcony of 62 West 16th Avenue since the unattended noise monitoring equipment could not be left at the property line where bylaw noise limits apply. Cadna/A acoustic modelling software was used to adjust the levels measured on the balcony to the levels that would have occurred at the property line. Three distinct noise sources were dominating the environment. These were traffic noise on West 16th Avenue, noise from skateboarding activities (mostly loud clapping sounds of skateboards landing on concrete with the occasional ringing of metal impacting with metal) and human noise (people talking, shouting and cheering) in the park.

Property line values are shown in Table 1 below. The skateboard park noise and human noise was quantified using a slow-response A-weighted maximum level, as specified in the noise by-law. Ambient noise levels vary considerably over time depending upon traffic volumes but for the purpose of our assessment, we have compared skateboard noise against the background levels that exist in the absence of skateboard park noise, human noise and traffic noise. In Table 1, background noise levels are presented as Equivalent Sound Levels (L_{eq}) which is an energy average sound level. Night time hours shown below are between 10pm and midnight. A Signal to Noise Ratio of 10 dBA or more is quite significant as it indicates that the intruding noise (the "Signal") sounds approximately twice as loud as the ambient noise (the "Noise"). It should also be noted that setting the sound level meter on "Slow Response" as specified in the noise bylaw, underestimates the subjective perception of impact noises. On the other hand, noise from the skateboard park will be less intrusive than indicated in Table 1 on many occasions since traffic noise levels can be well above the background noise level. For example, the L_{eq} of the average vehicle pass-by is estimated to be approximately 54 dBA.

Avenue						
Time Frame	Background level L _{eq} (dBA)	Skateboard Noise L _{ASmax} (dBA) <i>(SNR)</i>	Human Noise L _{ASmax} (dBA) <i>(SNR)</i>			
Friday night	42	57(15)	54 <i>(12)</i>			
Saturday morning	44	67 <i>(23)</i>	n/a			
Saturday night	44	59 <i>(15)</i>	56 <i>(12)</i>			
Sunday morning	39	70 (31)	60 <i>(21)</i>			
Sunday night	41	70 (29)	n/a			

Table 1: Nois	e Levels at	Property	Line of 6	2 West 16th	Avenue
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Tiina Mack

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Noise Mitigation

Opportunities for noise mitigation are very limited. Apart from limiting hours of use, the only practical noise mitigation measure would be a transparent noise barrier between the skateboard facility and the sidewalk on the north side of the road. Therefore, we investigated the requirements and potential benefits of this approach.

During the measurement period of three days, the maximum skateboard levels shown above for Sunday morning and Sunday night were reached less than 1% of the time. As such, we based our preliminary design on a more representative statistic, the level exceeded for 5% of the time (L_5). This value is 65 dBA as opposed to the L_1 level of 70 dBA. As discussed with you previously, any noise , barrier at this site would have to be at least partially transparent so as not to obscure the skateboard facility from the street. It would also have to avoid existing trees.

In order to determine the type and placement of noise barrier that would be most appropriate for this site, we utilized our sound modelling software. Input data consisted of aerial photos (taken prior to construction of the skateboard park) plus sound level measurement data acquired during our visit to the site. Noise level contours for the current situation, as computed by the software, are shown in Figure 1. In order to most effectively attenuate the current levels, a noise barrier located as shown in Figure 2 is recommended. The effectiveness of such a barrier would depend upon its height so we have produced noise contours for two different heights. Figure 3 shows the contours for a 2m high barrier and Figure 4 shows contours for a 2.5m high barrier. Specific requirements for the noise barrier are outlined below.

Sound Barrier Requirements

To effectively mitigate noise for residents, the sound barrier should have the following properties:

Location

The noise barrier should be located as close to the edge of the skate park as possible. The barrier needs to extend beyond the east and west edge of the skateboard park as shown in Figure 2. This configuration will also reduce human noise related to activity in the playground area adjacent to the skateboard park.

<u>Height</u>

A 2m high barrier would provide approximately 9 dBA of sound attenuation at the receiving property line. This would be adequate to reduce noise levels at the property line of the most affected properties to the daytime bylaw limit (55 dBA) for 95% of the time. A 2.5m high barrier would provide an additional 2 dB of attenuation, resulting in an overall 11 dB reduction in noise levels at the property line. The table below summarises the predicted attenuation of noise at the property line of the nearby residences on West 16th with regard to different barrier heights.

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Barrier height (m)	Property line levels (dBA)	Attenuation achieved (dBA)	
no barrier	64	n/a	
1.5	57	7	
2	55	9	
2.5	53	11	

Table 2: Estimated Property Line Levels on West 16th Avenue

Material

The denser the material the better its ability to inhibit transmission of sound. However, in the case of outdoor noise barriers bending of sound over top of the barrier is generally what limits the attenuation achieved so a minimum surface weight of 10 kg/m2 (2 lbs/ft2) is more than adequate. It is very important that there are no gaps in the barrier that could allow sound to pass through or under the barrier so there must be no gap between the bottom of the barrier and the ground. As noted above, the barrier must allow for adequate site lines into the skateboard area but this does not necessarily mean that the entire barrier need be transparent. For example, the bottom 1m could be a concrete or brick wall with upper sections of the barrier transparent. One noise wall manufacturer that offers transparent barriers is **Armtec**, 604-278-9766 (ask for Doug Carter) but there are likely a number of others. Potential suppliers should be contacted and asked to provide their recommendations considering such factors as durability and maintenance of the transparent panels.

Side-effects (sound reflection)

It should be noted that placing a barrier in this position will likely cause traffic noise from West 16th Avenue to be reflected off the barrier and directed towards the residential units. This will result in a maximum 3 dBA increase in traffic noise, but this may be an acceptable trade off to the reduction in skateboard park noise as traffic noise is less intrusive in nature. Although some skateboard noise will also be reflected off the barrier towards the houses on the north side of West 15th Avenue, it is unlikely to result in a perceptible increase at these locations.

Conclusions

Construction of a transparent noise barrier would significantly reduce day time levels for the majority of skateboard park noise as shown in Figures 3 and 4. Unfortunately, it is not possible to attain the necessary attenuation to meet night-time bylaw requirements using a barrier alone. This is especially true since there are trees in the immediate area of the skateboard park that may limit the height of a barrier. A possible solution may be to restrict the use of the skateboard to day-time hours only. The bylaw defines "daytime" as the hours between 7:00 am and 10:00 pm on weekdays and Saturdays and between 10:00 am and 10:00 pm on Sundays.

Detailed design of the structural, environmental and aesthetic requirements for the barrier is not within our current scope of work but we would be pleased to provide additional services if required to assist

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Tiina Mack

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August 17, 2012

you in further assessment of this proposed approach. If you have any questions in the meantime, please let us know.

Sincerely,

BKL Consultants Ltd.

per:

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Briét Coetzer MMus (Technology), EIT

Enclosures







