



BOARD REPORT

TO: Chair and Directors

SUBJECT: Electoral Area F: ALR Exclusion Application No. LC2612F

DESCRIPTION: Report from Laura Gibson, Planner II, dated October 2, 2024
PIDs 008-596-051 and 008-596-042, Lee Creek

RECOMMENDATION: THAT: ALR Exclusion Application No. 2612F proceed to Stage 2 - Public Consultation as per the requirements of CSRD ALR Exclusion Policy P-24, this 17th day of October 2024.

Corporate Vote Unweighted Majority

SUMMARY:

This Agricultural Land Reserve (ALR) exclusion application is for two properties in Lee Creek (15.1 and 16.4 ha), which are accessed by a private road off the end of Lee Creek Drive and are entirely located within the ALR. The properties are a shared interest, meaning each property has multiple owners. There are seven owners on title for the west property and seven owners on title for the east property. The Bush Creek East wildfire in summer 2023 destroyed eight of the dwellings that formerly existed on the properties. Five dwellings remain on the east property and two remain on the west property. The Agricultural Land Commission (ALC) will not allow the owners to rebuild the dwellings that were lost to the wildfire as the current ALC regulations only allow for one primary dwelling and one secondary dwelling per parcel. The properties were included into the ALR in 1981 following a request made by the property owners. The owners are now seeking an ALR Exclusion to facilitate rebuilding their dwellings. Scotch Creek/Lee Creek Zoning Bylaw No. 825, as amended (Bylaw No. 825), has site specific regulations for each subject property, allowing the east property to have eight dwelling units and the west to have six dwelling units. This totals a permitted 14 dwellings between the two properties, one less dwelling than what existed prior to the wildfire. A zoning amendment will be required to Bylaw No. 825 if more than seven homes are proposed to be rebuilt.

BACKGROUND:

ELECTORAL AREA:
F

LEGAL DESCRIPTION:

East property: Block A of North East ¼ of Section 31 Township 22 Range 11 West of the 6th Meridian Kamloops Division Yale District

West property: Block A of North West ¼ of Section 31 Township 22 Range 11 West of the 6th Meridian Kamloops Division Yale District

PID:

East property: 008-596-051

West property: 008-596-042

CIVIC ADDRESS:

East property: 1787, 1802, 1804, 1810, 1837, 1854, 1866, and 1900 Lee Creek Drive, Lee Creek

West property: 1875, 1885, 1888, 1902, 1904, 1-1904, 1935, and 1937 1940 Lee Creek Drive, Lee Creek

SURROUNDING LAND USE PATTERN:

North = Vacant crown land

South = Vacant crown land, Rural Residential

East = Rural Residential (vacant)

West = Vacant crown land

CURRENT USE:

East property: Five single detached dwellings, two accessory buildings (shop, mill), some small gardens.

West property: Two single detached dwellings, one accessory building (community centre), two small orchards and some small gardens.

PROPOSED USE:

East property: Rebuild up to three single detached dwellings

West property: Rebuild up to five single detached dwellings

PARCEL SIZE:

East property: 15.06 ha (37.22 ac)

West property: 16.4 ha (38.44 ac)

DESIGNATION:

[Electoral Area F Official Community Plan Bylaw No. 830](#)

AG – Agriculture

ZONE:

[Scotch Creek/Lee Creek Zoning Bylaw No. 825](#)

AG - Agriculture

AGRICULTURAL LAND RESERVE:

100%

SOIL CAPABILITY:

East property: 80% Class 6 limited by Topography and Stoniness and 20% Class 7 limited by Shallow Soil Over Bedrock/Bedrock Outcroppings and Topography. Not indicated as improvable.

West property: Approximately 86% of the property is 80% Class 6 limited by Topography and Stoniness and 20% Class 7 limited by Shallow Soil Over Bedrock/Bedrock Outcroppings and Topography; the remaining 14% of the property is 70% Class 7 limited by Topography and Adverse Climate and 30% Class 6 limited by Topography and Stoniness. Not indicated as improvable.

See attached "Agricultural_Capability_Classification.pdf" for information on interpretation of soil classification mapping.

HISTORY:

CSRD File No. 1553-F (1978) – Request from subject property owners to be included in the ALR. Inclusion was eventually successful, and the land was included into the ALR in 1981. See Key Concepts/Issues below for more details.

SITE COMMENTS:

A site visit was completed by Planning staff for this application on June 14, 2024 (see attached "LC2612F_Maps_Plans_Photos_Redacted.pdf"). The subject properties have varied topography with steep slopes on the north sections and bedrock outcroppings throughout. On the west property, there are five sites where single detached dwellings were lost to the wildfire. The foundations that remain reflect that the homes were very modest in size. Three single detached dwellings remain on the west property, as well as a community centre which is shared by all the property owners (which contains a recreation area and kitchen). On the east property, two single detached dwellings were lost to the wildfire and six single detached dwellings remain standing. There is also an accessory building (shop) and a small pond on the east property, as well as two small orchards with fruit trees, each approximately 0.2 ha. On both the east and west properties, some of the dwellings have or had small personal gardens.

BYLAW ENFORCEMENT:

There is no bylaw enforcement related to this file.

POLICY:

See attached "LC2612F_BL830_BL825_Excerpts.pdf".

[Electoral Area F Official Community Plan Bylaw No. 830](#)

- 1.2 Sustainable Planning Principles
- 6.0 A Well-Housed Community
- 6.1 Housing Affordability and Special Needs
- 11.3 Agriculture

[Scotch Creek/Lee Creek Zoning Bylaw No. 825](#)

- 1.0 Definitions
- 3.19 Secondary Dwelling Unit
- 5.3 Agriculture Zone

See attached "LC2612F_ALC_Policy_Excerpts.pdf".

- House Legislation in the ALR
- ALC Policy I-26 – Non-adhering Residential Use Applications
- ALC Exclusion Application Guide

[ALR Exclusion](#)

As a result of Bill 15-2019, as of September 30, 2020, private landowners are no longer able to make an application to the ALC for exclusion from the ALR; only the Provincial Government, local or First Nation governments or prescribed public bodies may make such applications.

The CSRD adopted [ALR Exclusion Policy P-24](#) on December 9, 2021, to establish a procedure to follow when reviewing requests for exclusion from private landowners. [ALR Exclusion Policy P-24](#) (see attached

"ALR_Exclusion_Policy_Graphic_P-24.pdf") establishes a set of considerations for the CSRD to consider when reviewing an application for exclusion from the ALR. The purpose of these considerations is to provide some guidance for the CSRD Board and staff in evaluating an ALR exclusion application as well as give insight to property owners to evaluate the likelihood of their application for exclusion being supported by the CSRD and, if supported, the likelihood of the ALC approving exclusion.

The considerations, like most OCP policies, are guidelines to inform the Board's consideration of the application. The Board will determine its support, or not, for an application based on the details of the specific application for a property. The initial application fee is \$650. If this application proceeds to public consultation, the property owner will be charged a subsequent fee of \$1000. If the CSRD Board ultimately motions to send the application to the ALC, the applicants will also be charged the \$750 ALC application fee.

FINANCIAL:

There are no financial implications associated with this application.

KEY ISSUES/CONCEPTS:

History

According to the agent's letter included with the application, the subject properties were originally occupied in the 1970s through a lease from the Province of British Columbia as part of the Homestead Act (see attached "LC2612F_Letters_of_Rationale_redacted.pdf"). The Homestead Act allowed persons to improve and eventually claim crown land. The original lessee, who invited others to live on the land with him, forming the "Lee Creek Village" which still exists today, applied to include the land in the Agricultural Land Reserve in 1978.

The following history is summarized from letters in the CSRD's historic paper file for the ALR inclusion application, which may be incomplete (see attached "LC2612F_Historic_ALR_Inclusion_File_Documents_redacted.pdf"). The Province's Lands Management Branch, who leased out the land, had no objections to the land being included in the ALR. The CSRD reviewed the application and supported the request for inclusion and commented, "Most of the site is capable of agricultural development requiring intensive effort, such as now being undertaken on this property by the Lee Creek commune." According to the application form for the ALR inclusion request, at the time, the land was used for two or more acres of orchards, one acre of garden, four pigs, four to six sheep, and two colonies of bees.

In 1980, as part of reviewing the inclusion application, the Agricultural Land Commission (ALC) requested that a soil report be prepared by a Professional Agrologist. A Provincial Agrologist concluded that most of the acreage has limitations for agriculture due to topography, stoniness, and shallowness to bedrock, but also determined that a small acreage of Class 5 soil could be designated on an area referred to as the Lee Creek Bench, and the agrologist ultimately supported inclusion into the ALR (see attached "LC2612F_Soils_Report_1980-02-07_redacted.pdf"). The ALC wrote a letter to the Ministry of Agriculture stating that the dedication and hard work of the commune brought the somewhat marginal land into a relatively high level of agricultural productivity and that those efforts proved that the land, if intensively managed, had capabilities which merited its inclusion in the ALR. The ALC requested that the Ministry of Agriculture support the inclusion.

The Ministry of Agriculture did not initially support the inclusion on the grounds that the land under application did not conform with the guidelines used to dedicate Agricultural Land Reserves (generally,

Class 1 to 4 soils) and stated that “in this instance, the land has an agricultural capability of 5, 6 and 7 with no opportunity for an improved rating.” The ALC wrote another letter to appeal this decision and drew attention to the fact the present agricultural use and good farm management were evidence of the capability of the land to support agriculture. The Ministry of Agriculture subsequently provided approval for the land to be included in the ALR. The CSRD received notification from the ALC of the land’s inclusion into the ALR on June 4, 1981.

The CSRD does not have a record of how many single detached dwellings existed on the property at the time of the inclusion into the ALR. The agent indicates there were five dwellings on the west property and four on the east property at the time of inclusion. The Scotch Creek/Lee Creek Zoning Bylaw No. 825, which was adopted in November 2005, recognized what was existing on the subject properties at the time of the zoning bylaw adoption through two special regulations which permit the east property to have eight dwelling units and the west to have six dwelling units. The agent indicates that by August 2023, there were seven single detached dwellings on the west property and eight on the east property, and a total of eight dwellings were destroyed by the Bush Creek East Wildfire. The owners want to rebuild the dwellings that were lost.

The properties currently remain 100% in the ALR. The ALC currently regulates how many dwellings can be on a property in the ALR. Only one principal residence (maximum floor area of 500 m²) and one additional residence (maximum floor area of 90 m²), are permitted for each parcel (see attached “LC2612F_ALC_Policy_Excerpts.pdf”). This means the property owners cannot rebuild the homes they lost to the wildfire. The ALC has a route to apply for a Non-Adhering Residential Use (NARU) application to seek approval for additional residences, however, the Commission is bound by legislation that only allows them to approve a NARU application if the additional residence is necessary for farm help. This is not the case for the subject property.

The letter of rational submitted by the agent notes that the property owners are primarily seniors who are incapable of continuing to intensively manage the land to make it suitable for agriculture. Therefore, they are seeking exclusion from the ALR in order to rebuild the dwellings that were lost to the wildfire.

ALR Exclusion Policy P-24 Considerations

The CSRD’s ALR Exclusion Policy P-24 contains a series of considerations for the CSRD Board to consider when deciding to support an exclusion application.

1. Official Community Plan Policies

The subject properties are designated Agriculture in the Electoral Area F Official Community Plan Bylaw No. 830 (adopted June 2009). The land would have been designated Agriculture because it was in the ALR at the time the plan was written. There are no other properties designated Agriculture in the vicinity of the subject properties. If the properties were not in the ALR, they would have likely been designated RR – Rural Residential like the surrounding parcels. The maximum density permitted in the RR designation is 1 unit per hectare (0.4 units per acre). If the owners were to rebuild the dwellings that were lost to the wildfire, neither property would exceed 1 unit per hectare the proposed density of each is approximately 1 per 2 hectares).

OCP Bylaw No. 830 only speaks to ALR exclusions in Scotch Creek and in the defined Settlement Areas, which the subject properties are not in. However, the CSRD has created ALC Exclusion Policy P-24 to establish conditions to review ALR exclusion requests on a case-by-case basis.

OCP policies include in Section 6, A Well-Housed Community, to provide a range of housing types and tenures to meet the needs of the community and to encourage affordable, appropriate housing for seniors to allow North Shuswap residents to age in place, close to friends and family.

Furthermore, Section 6.1, Housing Affordability and Special Needs, specifically states that the Regional District strongly supports innovative approaches to creating affordable housing such as rent-to-own, cooperatives, mixed market and non-market projects, and public-private partnerships.

2. *Zoning*

The subject properties are zoned AG - Agriculture in the Scotch Creek/Lee Creek Zoning Bylaw No. 825 (adopted November 2005). As with the Agriculture designation in Bylaw No. 830, this zone would have been applied to the properties because they were in the ALR and not because of their agricultural potential. None of the other properties in the vicinity of the subject properties are zoned Agriculture.

The subject properties have site specific regulations to allow for more dwellings than the AG zone typically permits. The east property is permitted a density of one dwelling per 1.7 ha, which equals eight dwellings. The west property is permitted a density of one dwelling per 2.5 ha which equals six dwellings. The site specific regulation also allows the public assembly facility (community centre) on the west property.

The philosophy of the zoning bylaw was to identify what existed on properties at the time the zoning bylaw was adopted, which was in November 2005.

If the ALR exclusion is successful, the owners will be able to rebuild up to a total of seven single detached dwellings as per the site specific regulation in Bylaw No. 825. A zoning bylaw amendment would be required to rebuild the eighth dwellings on the east parcel.

3. *Soil Capability*

According to the Land Capability Classification for Agriculture in British Columbia (see soil classification in attached "LC2612F_Maps_Plans_Photos_Redacted.pdf" and "Agriculture_Capability_Classification.pdf"):

Approximately 92% of the properties are 80% Class 6 limited by Topography and Stoniness and 20% Class 7 limited by Shallow Soil Over Bedrock/Bedrock Outcroppings and Topography; the remaining 8% of the properties are 70% Class 7 limited by Topography and Adverse Climate and 30% Class 6 limited by Topography and Stoniness. The soils are not indicated as being improvable.

Class 6 soils are considered nonarable but capable of producing native or uncultivated perennial forage crops. Land in Class 6 provides sustained natural grazing for domestic livestock and is not arable in its present condition. Land is placed in this class because of severe climate, or the terrain is unsuitable for cultivation or use of farm machinery, or the soils do not respond to intensive improvement practises. Some unimproved Class 6 lands can be improved by draining and/or diking.

Class 7 land may have limitations equivalent to Class 6 land but they do not provide natural sustained grazing by domestic livestock due to climate and resulting unsuitable natural vegetation. Also included are rockland, other non-soil areas, and small water-bodies not shown on maps. Some unimproved Class 7 land can be improved by draining or diking.

A.B. Dawson, P. Ag., did a site visit to the property to further assess the soils and prepared a Soils Report dated February 7, 1980 (see attached "LC2612F_Soils_Report_1980-02-07_redacted"). A copy of the soils report was in the historic CSRD ALR inclusion file. Dawson refers to an area as the Lee Creek Bench, which much of the two properties fall into and which,

when cleared, has potential for agriculture due to its south aspect, low elevation, and Class 1a climate. However, Dawson notes that most of the acreage has limitations for agriculture due to topography, stoniness, and shallowness to bedrock. The conclusion for soil classification by Dawson was (for both the east and west properties combined):

Approximately 17.5% of the properties are 70% Class 7, limited by Shallow Soil or Bedrock Outcroppings and Topography, and 30% Class 6 soils, limited by Topography and Shallow Soil or Bedrock Outcroppings. The other 82.5% of the properties are 60% Class 5 soils, limited by Topography and Stoniness, 20% Class 6 soils, limited by Topographic and Stoniness, and 20% Class 6 soils, limited by Shallow Soil or Bedrock Outcroppings and Topography.

This means approximately 50% of the properties could be considered Class 5 soils.

Land in Class 5 is generally limited to the production of perennial crops or other specially adapted crops. Productivity of these suited crops may be high. Some Class 5 lands can be used for cultivated field crops provided unusually intensive management and/or the use of particularly well-adapted crops. Where adverse climate is the main limitation, a broader range of cultivated field crops may be grown, but periodic crop failure can be expected under average conditions. Note that in areas that are climatically suitable for growing tree fruits and grapes, stoniness and/or topography are not significant limitations.

Generally, land with Class 1 to 4 soils is included in the ALR, as Class 5 has limitations that restrict its capability to producing perennial forage crops or other specially adapted crops.

4. *Farm Classification*

The east parcel currently has farm classification from BC Assessment.

Farm classification is a voluntary program. Owners of land who want all or part of it classified as farm must apply to the local assessor. Farm Classification is a benefit which is intended to encourage the farming of land, and production of local food sources. The Classification of Land as a Farm Regulation sets out income thresholds, which are to be achieved in order to obtain farm classification. BC Assessment is required to confirm a farm continues to meet the income thresholds, to ensure a property should maintain its farm classification, and the associated benefits - such as regulated land rates, which result in lower assessed values on which property taxes are based.

Due to privacy reasons, BC Assessment was not able to share specific details regarding the farm classification for the east parcel. In the agent's letter of rationale, the agent describes the farm class being a result of a "you-pick" orchard and some garden produce sales at the local farm markets. However, as noted by the other owners, the orchards were failing to produce much fruit, and the gardens required intensive management which is not able to be sustained by the older residents of the properties. The agent has indicated that the two previous owners who had farmed some of their share of the property passed away in 2022. Other owners have indicated they do not plan on taking over these limited agricultural activities. Therefore, it is likely that the farm class status will be removed from the property in the near future.

5. *Surrounding Uses*

There are no agricultural uses occurring on any adjacent parcels and no adjacent ALR land.

North = Vacant crown land

South = Vacant crown land; Rural-1, Rural-2, and Country Residential zoned properties

East = Vacant. Was redesignated from Rural and Resource to Rural Residential and rezoned from Rural 1 to Country Residential in April 2021 to facilitate a proposed subdivision to 9 lots with a minimum parcel size of 2 ha. (Subdivision not yet completed.)

West = Vacant crown land

6. *Slopes and Hazards*

The topography of the property varies greatly, with much of the north portions of the properties steep-sloped (35-100% grade).

Both properties have overlap with an area identified as a low risk of rockfall or shallow landslide hazard in the BGC 2023 report because of the wildfire burn. This potential hazard would need to be evaluated by a Qualified Professional as part of the building permit process, if the owners are able to proceed with rebuilding.

7. *Public Interest*

Public interest would mean there is a community benefit that could not be realized without the successful exclusion of the property from the ALR. There is no corporate CSRD strategic public interest if the exclusion is successful or not; for example, using the subject properties for a CSRD project such as a recreational facility, sewage treatment plant, etc. However, there is a community public interest in allowing eight families to rebuild their homes that were lost to the wildfire, most of which were constructed decades prior.

8. *Is another ALC approval more suitable?*

No, the alternative is a Non-Adhering Residential Use application which would not be approved as the proposed additional dwellings are not for farm help.

Letters of Rationale

A series of Letters of Rationale prepared by the individual property owners and the agent for the application were submitted along with this application for exclusion (see attached "LC2612F_Letters_of_Rationale_redacted.pdf"). In the letters, most of the owners state they do not use or have plans to use the property for agriculture. The orchards and gardens that do exist never produced on a large scale, just enough for local farm markets, and have been negatively impacted by climate change in recent years. A lack of water is a specific challenge and that has only been exacerbated by the loss of tree cover from the wildfire.

The owners describe how they worked together as the original homesteaders and have established a strong community over the last several decades. While they used to do lots of work to manage the land and grow their own food, they are now seniors who are less fit to do so. All they hope for is to rebuild what they lost to the wildfire. Most of them have nowhere else to go and limited incomes.

Analysis

The properties would have been designated Agriculture in Bylaw No. 830 and zoned Agriculture in Bylaw No. 825 because they were in the ALR at the time the bylaws were adopted. The properties would have been given other designations and zones if they were not in the ALR, similar to the adjacent properties which are not in the ALR.

The subject properties were not initially included in the ALR because of their soil classification (Class 6 and Class 7 that are not improvable). The general practice was to include lands having a Canada Land Inventory agricultural rating of Class 1 to 4. In the soils report which was prepared for the original

inclusion application in 1980, the best soils identified were, if irrigated, Class 5 soils (not indicated to be improvable), still below the rating usually included in the ALR. These Class 5 soils accounted for approximately half of the subject properties. The intensive management by the lessee/owners at the time, which created some agricultural potential, was seen as justification for including the land. The intensive management cannot be maintained by the current owners, who are now much older. Furthermore, the challenges faced by climate change and lack of water will continue to limit agricultural potential of the land.

In reviewing the history of the ALC regulations it appears that historically, residences were permitted only for those engaged in the operation of the farm, but there was no maximum number of residences for a parcel. The ALC rules are now much stricter, specifically limiting the number of residences to one primary residence and one secondary residence per parcel. As this property has a long history of being a shared interest, the residents likely never would have opted for inclusion into the ALR if they had known what the future restrictions would be.

OCP Bylaw No. 830 policies encourage a range of housing types and tenures to meet the needs of all residents in the community and specifically states that the Regional District will strongly support innovative approaches to creating affordable housing such as cooperatives like the Lee Creek Village. When it comes to seniors housing projects specifically, however (i.e. group housing, assisted living projects, and residential complex care facilities), those are directed to Scotch Creek where there are already services and amenities, and the terrain provides for pedestrian-friendly environment. However, while most of the owners of the subject properties are seniors, this proposal is not considered a seniors specific housing project.

During the site visit to the subject properties, several of the residents of the subject properties who lost their homes to the wildfire noted that they have been living temporarily with friends or family members, some in other communities. They expressed that they are seniors who are not capable of intensively managing the land for agricultural use and who do not have the funds to purchase or rent elsewhere.

Rationale for Recommendation

Staff are recommending that the Board support this application for exclusion and that the application proceeds to Stage 2 – Public Consultation for the following reasons:

- The subject land was never intended to be placed in the ALR by the ALC and was only added by request of the residents, and not without hesitation by the Ministry of Agriculture,
- The residents have now lost their homes to a wildfire that was out of their control and wish to rebuild what they lost so they can return to their home and properties,
- According to the agent, 9 dwellings existed prior to inclusion into the ALR in 1981, and the Scotch Creek/Lee Creek Zoning Bylaw No. 825 includes a special regulation to recognize the 14 dwellings that existed prior to the zoning bylaw's adoption in 2005,
- If the ALC will not allow them to rebuild what they lost while the land is in the ALR, it seems reasonable for the land to be excluded from the ALR to facilitate rebuilding given that the land would never have been included in the ALR were it not at the request of the residents over 40 years ago, and,
- There is no suitable alternative application through the ALC to seek another approval for the dwellings.

IMPLEMENTATION:

If the Board supports the staff recommendation to proceed to Stage 2 - Public Consultation requirements for an ALR exclusion application, the landowner will be charged a subsequent fee of \$1000, staff will create an ALR exclusion application in the ALC Portal, and staff will move forward with

the public consultation requirements for an ALR exclusion application, as established by the ALC Act. Public consultation will include posting a notice of application sign on the property, mailing copies of the application to affected First Nations, and holding a public hearing, including advertising for the public hearing in two issues of a local newspaper.

COMMUNICATIONS:

If the Board supports the staff recommendation to proceed with the public consultation requirements for an ALR exclusion application, CSRD staff will send a copy of the application to affected First Nation governments, have a sign advising of the application prepared and posted at the driveway entrance to the subject properties, advertise a public hearing in at least two issues of a local newspaper, and host a public hearing for the subject application.

Planning staff reached out to the ALC to request that they waive the requirement for a sign given that the property is so rural and only traffic proceeding up the Adam Plateau Forest Service Road would see the sign, but the ALC said the requirement could not be waived. The ALC said one sign for both properties instead of one for each property would be acceptable.

DESIRED OUTCOMES:

That the Board endorse the staff recommendation.

BOARD'S OPTIONS:

1. *Endorse the Recommendation.*
2. *Deny the Recommendation.*
3. *Defer.*
4. *Any other action deemed appropriate by the Board.*

Report Approval Details

Document Title:	2024-10-17_Board_DS_LC2612F.docx
Attachments:	<ul style="list-style-type: none">- LC2612F_Letters_of_Rationale_redacted.pdf- LC2612F_Maps_Plans_Photos_Redacted.pdf- ALR_Exclusion_Policy_Graphic_P-24.pdf- LC2612F_BL830_BL825_Excerpts.pdf- LC2612F_ALC_Policy_Excerpts.pdf- LC2612F_Historic_ALR_Inclusion_File_Documents_redacted.pdf- Agriculture_Capability_Classification.pdf- LC2612F_Soils_Report_1980-02-07_redacted.pdf
Final Approval Date:	Oct 8, 2024

This report and all of its attachments were approved and signed as outlined below:



Corey Paiement

No Signature - Task assigned to Gerald Christie was completed by assistant Jennifer Sham

Gerald Christie



Jennifer Sham



John MacLean