

Committee of the Whole (Public Meeting) Report

DATE: Tuesday, January 17, 2023

WARD(S): 2

**TITLE: ISLINGTON M.D. DEVELOPMENTS INC. AND 7040 ISLINGTON
M.D. DEVELOPMENTS INC.
OFFICIAL PLAN AMENDMENT FILE OP.21.014
ZONING BY-LAW AMENDMENT FILE Z.21.024
7034 AND 7040 ISLINGTON AVENUE
VICINITY OF ISLINGTON AVENUE AND STEELES AVENUE**

FROM:

Haiqing Xu, Deputy City Manager, Planning and Growth Management

ACTION: FOR INFORMATION

Purpose

To receive comments from the public and the Committee of the Whole on applications to redesignate and rezone the subject lands to permit the development of a 28-storey mixed-use residential apartment building with commercial uses at grade, a total of 220 dwelling units and a Floor Space Index of 8.19 times the area of the lot, as shown on Attachments 2 to 5.

Report Highlights

- The Owner proposes a 28-storey mixed-use residential apartment building with commercial uses at grade, a total of 220 dwelling units and a Floor Space Index of 8.19 times the area of the lot
- This report identifies preliminary issues to be considered in a technical report to be prepared by the Development Planning Department at a future Committee of the Whole meeting
- These applications were previously considered at the October 5, 2021, Committee of the Whole (Public Meeting) and due to changes made by the Owner, the applications are required to return to a subsequent Public Meeting

Recommendations

1. THAT the Public Meeting report for Official Plan and Zoning By-law Amendment Files OP.21.014 and Z.21.024 (Islington M.D. Developments Inc. and 7040 Islington M.D. Developments Inc.) BE RECEIVED, and that any issues identified be addressed by the Development Planning Department in a technical report to the Committee of the Whole.

Background

Location: 7034 and 7040 Islington Avenue (the 'Subject Lands'). The Subject Lands and the surrounding land uses are shown on Attachment 1. The Subject Lands are currently occupied by an eating establishment, a single detached dwelling and outside storage of automobiles.

Date of Pre-Application Consultation Meeting: January 19, 2021

Date applications were deemed complete: July 7, 2021

Previous applications were submitted for the Subject Lands

On July 4, 2003, the Development Planning Department received applications for Zoning By-law Amendment and Site Development Files Z.03.049 and DA.03.067 (Mario Tedesco), to rezone the lands municipally known as 7034 Islington Avenue from "A - Agricultural Zone" to "EM1 - Prestige Employment Area Zone" to permit an eating establishment use within the existing detached dwelling on the Subject Lands. A Public Meeting Report was prepared for the August 18, 2003, Public Meeting and the applications were approved by Vaughan Council on January 12, 2004. The Zoning By-law Amendment was enacted which created site-specific Exception 9(1183) for 7034 Islington Avenue.

Applications to amend the Official Plan and Zoning By-law have been submitted for the Subject Lands

Islington M.D. Developments Inc. and 7040 Islington M.D. Developments Inc. (the 'Owner') submitted the following Official Plan and Zoning By-law Amendment Files OP.21.014 and Z.21.024 (the 'Applications') to amend Vaughan Official Plan 2010 ('VOP 2010') and rezone the Subject Lands to permit the previous development proposal as shown on Attachment 6, consisting of a 34-storey residential apartment building with a total of 295 dwelling units, a maximum Floor Space Index (FSI) of 7.8 times the area of the lot, 2 levels of underground parking with 5 levels of above grade parking, contained within a 6-storey podium:

1. Official Plan Amendment File OP.21.014 to redesignate the Subject Lands from "Mid-Rise Mixed Use" with a maximum height of 8 storeys and a maximum FSI of 2.5 to "High-Rise Residential" with a maximum building height of 34 storeys and a maximum FSI of 7.8 times the area of the lot, in the Vaughan Official Plan 2010 ('VOP 2010'), to permit the development.

2. Zoning By-law Amendment File Z.21.024 to rezone the Subject Lands from “EM1 - Prestige Employment Area Zone”, subject to site-specific Exception 9(1183) and “A - Agricultural Zone” as shown on Attachment 1, to “RA3 - Apartment Residential Zone” and “OS1 - Open Space Conservation Zone”, in Zoning By-law 1-88, in the manner shown on Attachment 6, together with site-specific zoning exceptions.

On October 5, 2021, the Committee of the Whole received a Public Meeting report on the Applications which considered the previous development proposal as shown on Attachment 6. The following comments concerning the previous development proposal were received:

- Grant Evers, Humber Summit Residents Association, letter dated October 5, 2021
- Grant Evers, deputation on behalf of the Humber Summit Residents Association, October 5, 2021
- Martin Quarcoopome, Weston Consulting, deputation on behalf of the Owner, October 5, 2021

The following is a summary of the written comments received for the previous development proposal. The written comments have been organized into themes as follows:

Over-Intensification

- The 34-storey tower is an unnecessary addition to a plan which already represents over-intensification
- Vaughan Council has approved development on Islington Avenue – Files OP.19.013, Z.19.035 and DA.20.007 (Phase 1) to permit the development of 22 storey and 32 storey residential apartment buildings containing 547 units and DA.18.015 (Phase 2) to permit 103, 4-storey back-to-back street townhouses within 11 blocks
- Other development applications in the immediate area under review by the City of Vaughan include: Files OP.18.009 and Z.18.015 - 43 townhouse units at 7386 Islington Avenue; Files OP.08.017 and Z.16.022 – two, 19 storey residential apartment buildings with a total of 490 units; and File DA.22.066 – 2 residential apartment buildings consisting of 22 and 30 storeys with a total of 450 units
- The Humber Summit Resident’s association estimates a total population increase of 5,930 residents for the area, as a result of the Development, the approved and other proposed developments along Islington Avenue
- Another tower of 34 floors is unnecessary in this area as Islington Avenue and Steeles Avenue is not the site of a major transit station area (‘MTSA’) where greater intensification may be justified by a subway or LRT;
- Concerned that intensification is proposed beyond what the present infrastructure can accommodate
- Intensification proposes burdens on communities and should be avoided

Compatibility

- It is difficult to accept that the 34-storey tower complements the already approved structures in the area
- The development will tower over the long-established commercial establishments located at the north-west corner of Islington Avenue and Steeles Avenue West
- The development should be provided at an appropriate scale, given the existing context

Traffic Impacts

- The traffic study submitted with the applications notes that the intersection of Islington Avenue and Steeles Avenue West currently operates at capacity during the AM and PM peak rush hours
- A redesign of Steeles Avenue West and Islington Avenue intersection, similar to the redesign of Weston Road and Highway 7 intersection should be considered
- Assuming an increase in population of 6000 on Islington Avenue, the impact on traffic congestion would be enormous.
- The traffic study concludes that the spatial restrictions of the roads cannot be overcome.
- The estimates provided in the traffic study are conservative estimates that do not consider all of the traffic volume that the development on Islington Avenue will generate, should all development applications be approved
- Collision data should also be taken into consideration in the traffic study
- A total of 238 vehicle collisions were reported to the police near the Subject Lands, between Steeles Avenue West to Muir Avenue/Millwick Drive, in the City of Toronto
- The Development will only exacerbate traffic congestion
- No mitigative measures are proposed to address traffic impacts for drivers, cyclists, and pedestrians
- The Owner should contribute significantly to improving the existing transportation network along Islington Avenue, especially as it concerns bicycle lanes to make bicycle travel along Islington Avenue safe and inviting
- The walk score for the development is 31. A score this low indicates that residents in the building would be car dependent

Absence of Retail

- The proposal does not accommodate any retail
- As there is no grocery store within the immediate area, everything would have to be done by getting into individual cars
- The Development should include retail shopping to discourage car dependency
- A planned community which does not provide any retail, does not address the needs of families. Supermarkets are essential
- A development of this size requires retail within walking distance or a very short drive

Types of Units

- The Development proposes 295 units, 71% of which would be 1-bedroom and 29% which are proposed to be 2-bedroom units. This allocation does not address the housing needs of families

No Lands Allocated for a School/Daycare

- The Development does not set aside land for a future school, meaning that all school-aged children would be required to be bussed to schools north of Highway 7
- The Development should accommodate a daycare facility on site
- A development of this size requires a school within walking distance or a very short drive

Environmental Impact & Warning Clauses

- The Development is located in proximity to the former 45-acre Thackery Landfill site where 2.2 million tonnes of non-hazardous waste has been buried
- Will the respective owners, leasers, etc. be informed of the above and that the City of Vaughan is considering harvesting the methane gas emitted into the atmosphere to sell to the electricity grid?

Impact and Redevelopment

- The Development is located within the City of Vaughan, but will impact residents of Humber Summit in Toronto, on a daily basis
- The need for redevelopment along this stretch of Islington Avenue is clear
- A policy of intensification need not compel municipalities to accept every high-rise development application that comes forward
- The Development must improve the community in which it is built
- The Development will block the southerly view of the approved 32 and 22 storey Primont (Islington) Inc. development

Revised Official Plan and Zoning By-law Amendment Applications have been submitted

The Owner has revised the Applications as follows to permit a 28-storey mixed-use residential apartment building with commercial uses at grade, a total of 220 dwelling units, a maximum Floor Space Index (FSI) of 8.19 times the area of the lot and 2 levels of underground parking with 5 levels of above grade parking, contained in a 5-storey podium ('the Development'), as shown on Attachments 2 to 5:

1. Official Plan Amendment File OP.21.014 to redesignate the Subject Lands from "Mid-Rise Mixed-Use" with a maximum building height of 8 storeys and a maximum Floor Space Index ('FSI') of 2.5, to "High-Rise Mixed-Use" in the Vaughan Official Plan 2010 ('VOP 2010') and permit a maximum building height of 28-storeys and a maximum Floor Space Index (FSI) of 8.19 times the area of the lot.

2. Zoning By-law Amendment File Z.21.024 to rezone the Subject Lands from “EM1 - Prestige Employment Area Zone”, subject to site-specific Exception 9(1183) and “A - Agricultural Zone” as shown on Attachment 1, to “RA3 - Apartment Residential Zone” and “OS1 - Open Space Conservation Zone” Zoning By-law 1-88, in the manner shown on Attachment 2, together with the site-specific zoning exceptions identified in the Table 1 of this report.

The Applications are returning to Public Meeting as a result of changes to the Development and a discrepancy in the calculation of FSI

The Applications are returning to a Public Meeting due to changes in proposed use, building height, unit count and FSI. The previous development proposal as shown on Attachment 6, proposed a 34-storey residential apartment building with a total FSI of 7.8 and a unit count of 295 dwelling units, whereas the revised Development as shown on Attachments 2 to 5 contemplates a 28-storey mixed-use residential apartment building with commercial uses at grade, 220 units and a total FSI of 8.19.

The original FSI calculation for the Development of 7.8 did not take into consideration the floor area of the above grade parking structure or the net lot area, as per the definition of FSI in VOP 2010. At the time of preparation of the October 5, 2021, Public Meeting report, the development limits had not been confirmed by the TRCA to determine the net lot area. The FSI for the previous development proposal of 34-storeys, as shown on Attachment 6, was approximately 12.83 when the above grade parking structure and net lot area is considered.

Public Notice was provided in accordance with the Planning Act and Council's Notification Protocol

- a) Date the Notice of Public Meeting was circulated: December 23, 2022.

The Notice of Public Meeting was also posted on the City's website at www.vaughan.ca and a Notice Sign was installed along Islington Avenue in accordance with the City's Notice Signs Procedures and Protocols.

- b) Circulation Area: To all property owners within 500 m of the Subject Lands and to the West Woodbridge Homeowner's Association, the Humber Summit Resident's Association and to anyone on file with the Office of the City Clerk having requested notice.
- c) No comments have been received on the revised Applications as of December 13, 2022, by the Development Planning Department.

Any written comments received will be forwarded to the Office of the City Clerk to be distributed to the Committee of the Whole as a Communication and be reviewed and addressed by the Development Planning Department in a future technical report to the Committee of the Whole.

Previous Reports/Authority

The following are links to a previous report regarding the Subject Lands:

[August 18, 2003, Committee of the Whole Public Meeting \(Item 3, Report No. 59\)](#)

[January 5, 2004, Committee of the Whole Report \(Item 12, Report No. 1\)](#)

[October 5, 2021, Committee of the Whole Public Meeting \(Item 4, Report No. 44\)](#)

Analysis and Options

An amendment to Vaughan Official Plan 2010 is required to permit the Development

Official Plan Designation:

- “Community Area” and partially located within “Natural Areas” and “Primary Intensification Corridor within Employment Areas” on Schedule 1 – Urban Structure by VOP 2010
- The Subject Lands are designated “Mid-Rise Mixed-Use” with a maximum building height of 8-storeys and a maximum FSI of 2.5 by Schedule 13 – Land Use, VOP 2010
- The Subject Lands are also subject to the policies of VOP 2010, Volume 2, Site Specific Policy 13.12- Steeles/Islington Avenue Services Review Area
- The Owner proposes to redesignate the Subject Lands to “High-Rise Mixed-Use” with a maximum building height of 28-storeys and a maximum FSI of 8.19 times the area of the lot
- An amendment to VOP 2010 is required to permit the proposed building height and density

Council enacted By-law 001-2021 as the new Vaughan Comprehensive Zoning By-law

On October 20, 2021, Council enacted By-law 001-2021 as the new Vaughan Comprehensive Zoning By-law. A notice of passing was circulated on October 25, 2021, in accordance with the *Planning Act*. The last date for filing an appeal to the Ontario Land Tribunal (‘OLT’) in respect of By-law 001-2021 was November 15, 2021. By-law 001-2021 is currently under appeal and, when in force, will replace Zoning By-law 1-88, as amended.

The Applications were deemed complete by the City on July 7, 2021. According to the transition provisions of Section 1.6.3 of Zoning By-law 001-2021, as complete applications were received prior to the enactment of Zoning By-law 001-2021, the Applications will not be subject to Zoning By-law 001-2021.

Amendments to Zoning By-law 1-88 are required to permit the Development **Zoning:**

- “EM1 - Prestige Employment, subject to site-specific Exception 9(1183) and “A - Agricultural Zone in Zoning By-law 1-88
- These zones do not permit the proposed Development

- The Owner proposes to rezone the Subject Lands to “RA3 - Apartment Residential Zone” and “OS1 - Open Space Conservation Zone”, as shown on Attachment 2, together with the following site-specific zoning exceptions identified in Table 1 below:

Table 1:

	Zoning By-law 1-88 Standard	RA3 Residential Zone Requirement	Proposed Exceptions to the RA3 Residential Zone Requirement
a.	Definition of Parking Space	A rectangular area measuring at least 2.7 m by 6 m	A rectangular area measuring at least 2.7 m by 5.7 m
b.	Permitted Uses	Retail Convenience Store with an accessory outdoor patio is not a permitted use	To permit a Retail Convenience Store with an accessory outdoor patio
c.	Minimum Lot Area	67 m ² per unit	14.05 m ² per unit
d.	Minimum Front Yard (Islington Avenue)	7.5 m	4.5 m
e.	Minimum Rear Yard (West)	7.5 m	7 m
f.	Minimum Interior Side Yard	4.5 m	1.8 m (north side) 5.6 m (south side)
g.	Minimum Parking Requirements	<p>Residential 1.5 spaces/unit x 220 units = 330 spaces</p> <p>Visitor 0.25 spaces/unit x 220 units = 55 spaces</p> <p>Commercial 5.5 spaces/ 100 m² (205 m²) = 12 spaces</p> <p>Total Parking Required = 397 spaces</p>	<p>Residential 0.915 spaces/unit x 220 units = 202 spaces</p> <p>Visitor 0.18 spaces/unit x 220 units = 40 spaces</p> <p>Commercial 2.9 spaces/ 100 m² x 185.25 m² = 6 spaces</p> <p>Total Proposed Parking = 248 spaces</p>
h.	Minimum Amenity Area	132 One Bedroom Unit x 20 m ² /unit = 2,640 m ²	132 One Bedroom Unit x 10.78 m ² /unit = 1,422.96 m ²

	Zoning By-law 1-88 Standard	RA3 Residential Zone Requirement	Proposed Exceptions to the RA3 Residential Zone Requirement
		88 Two Bedroom Unit x 55 $\text{m}^2/\text{unit} = 4,840 \text{ m}^2$ 0 Three Bedroom Unit x 90 $\text{m}^2/\text{unit} = 0 \text{ m}^2$ Total required amenity area = 7,480 m^2	88 Two Bedroom Unit x 10.78 $\text{m}^2/\text{unit} = 948.64 \text{ m}^2$ 0 Three Bedroom Unit x 90 $\text{m}^2/\text{unit} = 0 \text{ m}^2$ Provide a total amenity area of 2,371.60 m^2
i.	Maximum Building Height	44 m	97 m
j.	Minimum Landscape Strip	6 m	1.9 m along Islington Avenue and shall permit walkways and driveways across the said strip
k.	Canopy Encroachment	Canopies may encroach into required setbacks up to a maximum of 0.5 m	Canopies shall encroach into required setbacks up to a maximum of 3 m

Additional zoning exceptions may be identified through the detailed review of the Applications and will be considered in a technical report to a future Committee of the Whole meeting.

Following a preliminary review of the Applications, the Development Planning Department has identified the following matters to be reviewed in greater detail

	MATTERS TO BE REVIEWED	COMMENT(S)
a.	Conformity and Consistency with Provincial Policies, York Region, and City Official Plan Policies	<ul style="list-style-type: none"> ▪ The Applications will be reviewed for consistency and conformity with the Provincial Policy Statement, 2020 (the 'PPS'), A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019, as amended (the 'Growth Plan'), the policies of the York Region Official Plan, 2010 ('YROP') and VOP 2010 ▪ The Applications will be reviewed in consideration of VOP 2010 policies, particularly those related to building height, density, and Site-Specific Policy 13.12- Steeles/Islington Avenue Services Review Area

	MATTERS TO BE REVIEWED	COMMENT(S)
b.	Appropriateness of Amendments to VOP 2010 and Zoning By-law 1-88	<ul style="list-style-type: none"> ▪ The appropriateness of the amendments to VOP 2010 will be reviewed in consideration of the proposed land use designation, building height and density, access, lot coverage, landscaping, setbacks, including those to natural features, amenity areas, parking, compatibility with surrounding land uses and the City-wide urban design guidelines ▪ The appropriateness of the proposed rezoning and site-specific exceptions identified in Table 1 will be reviewed in consideration of the existing and planned surrounding land uses
c.	Required Applications	<ul style="list-style-type: none"> ▪ Should the Applications be approved, the Owner will be required to submit a Site Plan Application to be reviewed by City staff ▪ In accordance with Bill 109, the approval of Site Development Applications has been delegated to the City of Vaughan Director of Development Planning and/or the Director of Policy Planning and Special Projects for approval ▪ Should the Applications be approved, the Owner will be required to submit a Draft Plan of Condominium Application to be reviewed with the Applications in a future technical report ▪ The Subject Lands are proposed to be developed as a standard condominium ▪ Should the Applications be approved, the Owner will be required to submit the Site Development Application and Draft Plan of Condominium Application via the AMANDA portal
d.	Studies and Reports	<ul style="list-style-type: none"> ▪ The Owner submitted studies and reports in support of the Applications which are available on the city's website at https://maps.v Vaughan.ca/planit/ (PLANit Viewer) and must be approved to the satisfaction of the City or respective approval authority. Additional studies and/or reports may be required as part of the application review process

	MATTERS TO BE REVIEWED	COMMENT(S)
e.	Allocation and Servicing	<ul style="list-style-type: none"> The availability of water and sanitary servicing capacity for the Development must be identified and allocated by Vaughan Council, if the Applications are approved. If servicing allocation is unavailable, the lands will be zoned with a Holding Symbol "(H)", which will be removed once servicing capacity is identified and allocated to the lands by Vaughan Council
f.	Design Review Panel ('DRP')	<ul style="list-style-type: none"> The DRP reviewed the Applications on October 27, 2022 The DRP commented on the overall massing and transition of the built form, especially as it concerns the above grade parking located within the podium, the ground floor plan and the inclusion of active uses and the pedestrian realm as it relates to the development
g.	Public Agency/Municipal Review	<ul style="list-style-type: none"> The Applications must be reviewed by York Region and the Toronto and Region Conservation Authority and external public agencies and utilities, municipalities including the City of Toronto and the Public, Separate, and the School Boards The City of Toronto Council adopted a protocol in 2011, directing staff to report to Council on major applications within 1 km of the municipal boundary that will add over 10,000 m² of GFA, over 100 dwelling units or over 150 additional two-way vehicular trips generated The Development meets the criteria, therefore Planning staff at the City of Toronto will be reporting to Council to seek direction on the applications. The City of Toronto has informed that a technical report cannot proceed to Vaughan Council for these Applications until the City of Toronto has reported to their Council to seek direction on the Applications
h.	Parkland Dedication	<ul style="list-style-type: none"> The Applications will be reviewed in consideration of the requirements of the <i>Planning Act</i> and the City of Vaughan's Parkland Dedication Policy
i.	Community Benefits Charges	<ul style="list-style-type: none"> The development meets the criteria for Community Benefits Charges ('CBC'). The City passed the CBC By-law on September 14, 2022, which is therefore the applicable mechanism used to collect community benefits

	MATTERS TO BE REVIEWED	COMMENT(S)
j.	Affordable Housing	<ul style="list-style-type: none"> ▪ The Applications will be reviewed in consideration of Provincial, Regional and City policies to ensure that the development provides an appropriate level, range and mix of unit sizes
k.	Toronto and Region Conservation Authority (TRCA)	<ul style="list-style-type: none"> ▪ The Subject Lands contain natural features associated with a valley corridor of the Humber River and are located within TRCA's Regulated Area. The TRCA must review the Development and a permit is required pursuant to Ontario Regulation 166/06 ▪ A site visit was conducted with TRCA staff on July 16, 2021, at which the physical top-of-bank and dripline of contiguous vegetation were staked ('development limits'). The development limits were confirmed by the TRCA in a letter dated October 27, 2022 ▪ In accordance with Section 3.2.3.10 of VOP 2010, natural features shall be conveyed into public ownership (City or TRCA) for long-term protection and enhancement
l.	Access and Parking	<ul style="list-style-type: none"> ▪ The Owner is proposing access to the Development via Islington Avenue that leads into an underground parking garage with 2 levels of underground parking and 5 levels of above grade parking located within a podium ▪ Islington Avenue is identified as a Regional Road by YROP 2010 with a planned right-of way width of up to 36 m. York Region shall review the location and design of the proposed access from Islington Avenue and shall identify any required road widenings, conveyances, and access requirements ▪ The appropriateness of the above grade parking and overall design of the podium shall be reviewed to the satisfaction of the City
m.	Other Agreements May be Required	<ul style="list-style-type: none"> ▪ Should the Applications be approved, the Owner may be required to enter into a development agreement with the City of Vaughan Development Engineering Department for the installation of any proposed service connections and agree to pay for design and construction of any improvements to the municipal infrastructure, should it be determined that upgrades are required to the infrastructure to support the Development

	MATTERS TO BE REVIEWED	COMMENT(S)
		<ul style="list-style-type: none"> Additional agreements with the City of Vaughan regarding discharging groundwater, excavation, shoring, encroachments, and payment of associated fees may also be required
n.	Tree Protection	<ul style="list-style-type: none"> The Owner will be required to provide a detailed tree preservation study to the satisfaction of the City and may be required to enter into any Tree Protection Agreement in accordance with the Tree By-law 052-2018 and the City's Tree Protection Protocol

Financial Impact

There are no financial requirements for new funding associated with this report.

Broader Regional Impacts/Considerations

The Applications have been circulated to the York Region Community Planning and Development Services Department for review and comment. Any issues will be addressed when the comprehensive report is considered. The Owner has requested exemption from Regional Approval for Official Plan Amendment File OP.21.014.

Comments received from York Region dated November 18, 2022, identify that the Development proposes significant increases in height and density which do not align with the planned urban structure of the Vaughan Official Plan or York Region Official Plan. Increasing heights and densities on a site-specific basis may over burden the immediate area and will have cumulative impacts to the Region's Road network, water, and wastewater systems. For these reasons, York Region has not granted an exemption for Official Plan Amendment File OP.21.014, and the Region remains the upper-tier approval authority for the application.

Conclusion

The preliminary issues identified in this report and any other issues identified through the processing of the Applications will be considered in the comprehensive review of the Applications. Comments from the public and Vaughan Council expressed at the Public Meeting or in writing will be addressed in a technical report to a future Committee of the Whole meeting.

For more information, please contact Rebecca Roach, Planner, Development Planning Department, ext. 8626.

Attachments

1. Context and Location Map
2. Site Plan and Proposed Zoning
3. Landscape Master Plan and Ground Floor Plan
4. Building Elevations
5. Perspective Rendering
6. Previous Development Proposal

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