

Committee of Adjustment Applications Analyses and Service Improvements

Date: November 21, 2019

To: Planning and Housing Committee

From: Chief Planner and Executive Director, City Planning

Wards: All

SUMMARY

In 2018 and 2019, the Planning and Housing Committee, the Special Committee on Governance and City Council directed staff to investigate and report back on a variety of matters related to the Committee of Adjustment (CoA). These directions can be broadly grouped into two categories: various analyses of CoA applications and decisions, and requests for process and service improvements.

As requested, staff conducted an analysis of CoA and Toronto Local Appeal Body (TLAB) decisions on variances to legalize structures that are already built, with the intent of determining whether they were treated similarly to cases where there has been no illegal construction. The analysis revealed that after-the-fact variance applications, which represent approximately 3% of all minor variance applications, are not treated in a markedly different manner by the CoA or TLAB than all other applications, though the CoA appears slightly more likely to refuse this type of application. By law, both adjudicative bodies are to consider the applications as if the construction does not exist and make a determination on the merits of the application under the criteria under section 45(1) of the *Planning Act*.

Staff were also asked to provide a breakdown of applications according to building type, size, complexity and the nature of the variances. This breakdown, which is included in the body of this report, will be used to formulate possible streaming options for minor variance applications and could be used for evaluating amendments to Zoning By-law 569-2013.

This report also summarizes recent enhancements to the CoA review and approvals process and evaluates other possible improvements. In formulating these, staff considered the End-To-End Review of the Development Review Process Final Report ("End-to-End Review"), the Toronto Local Appeal Body Chair's 2018 Annual Report and input from a variety of stakeholders. City Planning may also partner with a post-secondary institution to undertake further research on the organizational structure of the CoA to better engage and empower residents in the process.

Recently implemented service enhancements include more formally encouraging dialogue with neighbours earlier in the review process; redesigning the public notice sign and improving other communication tools for residents; the adoption of new public facing policies such as an application fee refund policy; and the harmonization of various hearing practices like agenda vetting. Other recent improvements include the increase in number of panel members from 30 to 35, the assignment of members to districts rather than specific panels to allow for greater flexibility in scheduling, and increased remuneration rates for CoA panel members. These changes should improve the ability of City Planning to meet service standards and adjust to changing development activity across the city.

Processing timelines have in fact improved significantly since 2017 and staff are working toward further improvements by considering various changes to how applications are processed and hearings are organized.

Further, as requested by Council, staff considered the feasibility of CoA hearings commencing at 1:00 p.m. to run into the evening. Staff have considered this request and are not recommending this change.

Finally, also as requested by Council, staff evaluated the feasibility of hosting regular information sessions on CoA and TLAB practices and procedures, and have concluded that hosting public drop-in information sessions between one and two times annually is feasible and will work toward holding the first public information session by mid-2020.

RECOMMENDATIONS

The Chief Planner and Executive Director, City Planning recommends that:

1. City Council receive this report for information.

FINANCIAL IMPACT

There are no financial impacts arising from this report.

DECISION HISTORY

At its meeting on March 31 and April 1, 2016, City Council approved a one-year Mediation Pilot Project on a city-wide basis for minor variance and consent applications, and directed the City Manager in consultation with the Director, Court Services to report to the Executive Committee one year after the implementation of the Mediation Pilot Project with an evaluation.

See: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2016.EX13.1>

The Acting Deputy City Manager, Cluster A and the Interim Deputy City Manager, Cluster B submitted a report to the June 19, 2018 meeting of the Executive Committee summarizing and evaluating the CoA Mediation Pilot Project (MPP) and recommended not continuing the MPP. Executive Committee referred this matter back to staff and requested various follow-up work on this item.

See: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.EX35.7>

At its June 7, 2018 meeting, the Planning and Growth Management Committee received the 2017 Annual Report from the Chair of the Toronto Local Appeal Body for information and requested staff conduct an analysis of Committee of Adjustment and Toronto Local Appeal Body decisions regarding requests for variances to legalize structures that are already built, with the intent of determining whether they are treated similarly to cases where there has been no illegal construction.

See: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PG30.10>

In considering Item PH4.5 “Committee of Adjustment Panel Size and Structure” in April 2019 the Planning and Housing Committee and City Council directed staff report back on a variety of issues related to the Committee of Adjustment.

See: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.PH4.5>

At its April 30, 2019 meeting, the Planning and Growth Management Committee received the 2018 Annual Report from the Chair of the Toronto Local Appeal Body for information and requested staff report back on several items related to this report.

See: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.PH5.7>

On November 1, 2019, the Special Committee of Governance recommended that City Council direct the Chief Planner and Executive Director, City Planning to consider partnering with a post-secondary institute to undertake research on the organizational structure of the Committee of Adjustment to better engage and empower residents in the process.

See: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.GV5.1>

COMMENTS

Analysis of After-the-Fact CoA and TLAB Decisions

At its June 7, 2018 meeting, the Planning and Growth Management Committee requested that the Director of Zoning and Committee of Adjustment conduct an analysis of CoA and TLAB decisions regarding requests for variances to legalize structures that are already built, with the intent of determining whether they are treated similarly to cases where there has been no illegal construction. Applications to legalize structures that are already built are also known as after-the-fact minor variance applications.

In response to this direction, staff studied minor variance applications received by the CoA during an 18-month period (May 1, 2017 to October 31, 2018). Of the approximately 5,600 applications received during this period, staff identified 154 as after-the-fact applications, which represents about 3% of minor variance applications. After-the-fact applications include proposals to legalize recently completed construction

as well as cases of older non-compliant construction. Non-compliant construction covers situations where construction was completed without a permit or not in compliance with an issued permit, and cases where the need for a variance was missed by either the applicant or City staff in the review of a proposal.

An analysis of decisions made during the sample period revealed that the CoA refused a slightly higher rate of after-the-fact minor variance applications than not after-the-fact applications. The CoA only approved 85% of after-the-fact applications but approved 91% of all other minor variance applications.

During the study period, 17 after-the-fact minor variance applications were considered by the TLAB. Of the 17 TLAB appeals, 13 of which were appeals of CoA decisions to refuse the variances, the tribunal refused two of the applications (12% refusal rate). Out of all of the decisions rendered by the TLAB in 2018, the tribunal refused applications in 13% of the cases.

Analysis of these decisions reveal that the CoA and TLAB are not treating after-the-fact variance applications in a markedly different manner than all other applications, though the CoA appears slightly more likely to refuse this type of application. It is important to note that neither the CoA nor the TLAB is supposed to take into consideration the fact that the construction has already occurred when considering a minor variance application. By law, both adjudicative bodies are to consider the applications as if the construction does not exist and make a determination on the merits of the application under the criteria under section 45(1) of the *Planning Act*.

On May 11, 2016, the Planning and Growth Management Committee directed staff to bring forward an inter-divisional strategy to address after-the-fact applications to the Committee of Adjustment. Given the small number of after-the-fact applications and the appropriate resolution of those cases, staff do not believe an inter-divisional strategy to address after-the-fact applications would add value for the effort involved.

CoA Application Type Analysis

At its April 4, 2019 meeting, the Planning and Housing Committee directed staff to report back on additional options to improve service standards for the Committee of Adjustment, such as creating a separate stream for less complex applications and any small zoning by-law amendments necessary; and as part of that report, to provide a breakdown of applications according to building type, size, complexity and nature of variance.

In responding to this request, staff analysed all minor variance applications received by the CoA over a two-month period (April and May 2018) for a total sample of 548 decisions.

In the sample, 91% of the applications were for low-rise residential buildings, 5% were mixed-use commercial residential applications and 3% were employment industrial applications. Of the low-rise residential applications, 82% were for detached houses, 13% were for semi-detached houses, while duplexes, triplexes, fourplexes and townhouses made up the other 5% of these applications.

One-third of all proposed developments were for new detached houses and another third of applications were for additions to existing low-rise residential buildings.

Staff reviewed all variances requested from city-wide Zoning By-law 569-2013 and tabulated the most common types of zoning standards from which applicants request a minor variance. See the chart below for these results.

Most Common Zoning Standard to Request a Minor Variance	Percent of Applications Requesting a Minor Variance
Floor Area	44
Side Yard Setback	34
Lot Coverage	27
Main Wall Height (Detached House)	22
Front Yard Setback	20

The most common variance is for an increase to the allowable floor area, followed by requests for relief from side yard setback and lot coverage standards.

Staff also calculated how many variances from city-wide Zoning By-law 569-2013 were applied for per application.

Number of Requested Minor Variances	Percent of Applications
1	16
2	16
3	19
4	13
5	9
6	9
7	4
8 or more	12

Of minor variance applications, 51% request three variances or fewer and only 12% request eight or more variances.

Staff also analyzed the magnitude of some of the most common minor variances requested for residential low-rise applications.

By-law Standard (Zoning By-law 569-2013)	Percentage of Applications Seeking 1%-10% Increase Over By-law Standard	Percentage of Applications Seeking 11%-20% Increase Over By-law Standard	Percentage of Applications Seeking 21% to 50% Increase Over By-law Standard	Percentage of Applications Seeking 51% or More Increase Over By-law Standard
Maximum Floor Area	14%	19%	40%	27%
Maximum Lot Coverage	44%	28%	26%	2%
Maximum Building Height	85%	12%	3% (highest increase was 33%)	N/A

For the most commonly sought minor variance (maximum floor area), 40% of applicants requested an increase of between 21% to 50% more than the zoning by-law allows while close to one-third of applicants requested an increase of 51% or more above the zoning by-law standard.

Although side yard setbacks are the second most commonly sought variance, staff did not measure the magnitude of the increases requested as a percentage because the measurements are so small that the percentage increase is not an instructive number.

For the third most commonly sought variance, which is an increase to the maximum allowable lot coverage, 44% of applicants requested a 10% or smaller increase to the by-law standard, while 28% of applicants requested an increase of between 11% and 20%, and 26% of applicants requested an increase of between 21% and 50% over what is allowed in the Zoning By-law.

Finally, for increases to the maximum building height, 85% of applicants requested variances of 10% or less to the by-law standard, with only 15% requested minor variances in the 11-33% range.

Staff are not recommending any zoning amendments in this report, but this data will be used as part of the ongoing review of existing regulations in Zoning By-law 569-2013. It is also being used for the development of possible streaming options for CoA applications, which are outlined below.

Application Streaming Options

Staff were directed to consider different options for streaming CoA applications. There are two main ways CoA applications can be streamed: during application intake, processing and review, and/or in how applications are grouped within a hearing itself.

Intake, Processing and Review Streaming Options

Currently, CoA applications are streamed through their intake, processing and review in several broad categories. Consent applications and minor variance applications are subject to different application requirements and fees, processing timelines and levels of review by staff. Within minor variance applications, there are several different fee categories for different types of minor variance applications, but there is no formal streaming program.

Minor variance applications currently are grouped into three different fee categories:

- additions and alterations to existing dwellings with three units or less,
- new residential dwellings with three units or less, and
- all other residential, commercial, industrial or institutional uses.

Applications are generally processed on a first-come, first-served basis and are processed and scheduled based on the subject property's location within four geographic based districts, which are aligned with the four Community Council areas. District staff also conduct a pre-circulation review to determine if there are any issues that need to be addressed in advance of a hearing which may impact scheduling.

Minor variance applications could be further streamed according to their complexity, and/or their subject matter (e.g., residential vs employment industrial).

The complexity of a minor variance application could be approached or measured in several different ways, such as:

- the number of requested variances (e.g., applications with three or fewer variances requested are processed in one stream and applications with four or more variances are processed in a different stream);
- the magnitude of requested variances (e.g., a certain percentage increase over the zoning by-law standard as the threshold for different streams); and/or
- the scale and/or type of the proposed building/structure (e.g., larger scale projects, such as new builds and additions over a certain size, e.g., total area of the addition(s) is 100 square metres or more, could be streamed separately from smaller projects, such as small-scale additions, accessory structures and decks).

Staff will continue to explore how best to divide applications into simple and complex streams. In formulating different options, staff involved in development review, residents groups, and applicants will be consulted.

Grouping applications according to land use is another option for streaming. Creating separate streams for residential, commercial, employment industrial and institutional is one option that has been suggested, though given that 91% of the applications are for low-rise residential buildings, the residential stream would have the vast majority of

applications. Various stakeholders have requested that employment industrial applications be considered at special CoA meetings, or by specialized panels because these applications can raise unique and specialized issues. This was also suggested in the End-To-End Review. Given the small number of commercial and/or employment industrial applications received, it is likely not feasible to hold separate meetings for these types of applications within the current geography-based scheduling system. In order to collect enough employment industrial applications to have them considered in a timely manner they would have to be removed from the geography-based approach currently used.

As mentioned above, currently CoA applications are administered by one of the four CoA district offices based on the address of the subject property. The districts correspond to the Community Council boundaries. Based on data collected from January 1, 2019 to October 23, 2019, CoA application volume per district is as follows: Scarborough 11%, Etobicoke York 22%, North York 26%, and Toronto and East York 41%. Application volume is not evenly distributed between the four districts, resulting in differing processing times per district. Staff are currently exploring options to better balance the application volumes across districts in order to provide more consistent processing timelines for applicants.

Streaming within hearings

Another option for streaming different application types is to schedule them according to application type within the hearing itself. CoA staff currently try to group simple and more complex applications together to achieve efficient hearings and will continue to refine this process.

Ongoing Review of the CoA Processes

During its April 2019 meeting, City Council directed staff to report back on the ongoing review of the CoA and related processes, as directed by Executive Committee through Item EX35.7 at its June 19, 2018 meeting, including any related recommendations identified in the comprehensive departmental assessment of the development review process.

Item EX35.7 summarized and evaluated the CoA Mediation Pilot Program, and staff were asked to report back on the following in relation to this item:

- a review of the CoA and related processes with a view to better serve the public and enhance dialogue between applicants and the public, including an examination of opportunities to further improve communication and strategies for enhancing informal engagement of residents;
- recommended improvements to the CoA and related processes to address planning issues related to residential applications; and
- a request be made to the Chair of the Toronto Local Appeal Body to consider improvements to the CoA process that would create improved opportunities to resolve disputes prior to CoA hearings that are fair and reasonable to neighbours.

Staff were also asked to consider the Toronto Local Appeal Body Chair's 2018 Annual Report as part of the report on the ongoing review of the Committee of Adjustment.

Finally, at its November 1, 2019 meeting, through Item GV5.1, the Special Committee on Governance recommended that City Council direct the Chief Planner and Executive Director, City Planning to consider partnering with a post-secondary institute to undertake research on the organizational structure of the Committee of Adjustment to better engage and empower residents in the process.

1. Enhancing Neighbour Engagement Prior to Hearing

As directed by Executive Committee, City staff requested the Chair of the TLAB to consider improvements to the CoA process that would create improved opportunities to resolve disputes prior to CoA hearings that are fair and reasonable to neighbours. City staff discussed possible improvements with Ian Lord, Chair of the TLAB, in December 2018 and his input was considered in the drafting of this report. City Planning staff also met with representatives of the Federation of North Toronto Residents' Associations (FoNTRA) and their input was also considered and incorporated where possible.

During consultations for this report, the most consistent suggestion was that in order to resolve disputes and improve development, dialogue between applicants and neighbouring residents has to occur earlier in the CoA review process.

City Planning staff have responded to this input by implementing several process improvements that should encourage earlier and more effective engagement of residents in the CoA process.

a. Formally Encouraging Neighbour Dialogue

To increase early dialogue between applicants and the public, the CoA application form has been updated to encourage consultation between an applicant and immediate neighbours. The application form now includes an advisory note to applicants that they are strongly encouraged to consult with their neighbours in advance of their hearing.

b. Notice Sign Review and Redesign

Staff are currently redesigning the Notice of Public Hearing signs to make them more visible and understandable to residents, with the goal of improving resident engagement in the CoA process. The *Planning Act* regulations require a notice sign with basic application information to be posted on the subject property at least 10 days before a minor variance is heard and 14 days before a consent application is heard. The signs must be clearly visible and legible from a public highway. Currently, CoA notice signs are printed by applicants on tabloid size (28 by 43 centimetres) colour coded paper to differentiate between variances and consents with wording provided by the City. The signs can be difficult to read from the sidewalk or road. The new signs will be larger (60.96 x 45.72 centimetres) and will be printed on weather-durable material so they can be more easily posted outdoors. They have also been designed with a new style that is consistent with other City of Toronto development review notices to improve recognition. The new design was developed in consultation CoA and City Planning Graphics and Visualization staff and the Toronto Planning Review Panel, which is a resident advisory group that provides input into the planning process.

The new signs will be piloted in Scarborough starting in January and will be rolled out across the city early in 2020.

c. Enhanced Application Information Centre - AIC 2.0

The City Planning Division recently launched an enhanced version of the Application Information Centre (AIC or AIC 2.0). AIC 2.0 allows residents to learn about CoA applications in their neighbourhood far in advance of a hearing and increases the opportunity for early dialogue with an applicant.

AIC 2.0, which is now map-based, allows members of the public to review all application materials for free from any computer or mobile device for active and recently completed consent and minor variance applications. Application materials are posted on the AIC when received by staff and members of the public can view and download these materials at their convenience. This allows interested residents to learn about CoA applications well in advance of the formal notice period required by the *Planning Act*. It also means residents can learn about applications outside of the formal notice area (60 metres from the subject property) by searching for applications within various distances from a particular address or intersection.

d. Improved CoA Communications to Residents

Staff have made changes to the CoA web-page in order to improve its usefulness for all CoA stakeholders, including interested residents, and will continue to make ongoing improvements. Staff are also working on improved how-to guides for the public which will be available in print and on the CoA web-page.

City Planning staff will also begin updating and standardizing the language on public notices to make them more understandable for residents.

e. Partnership with Post-Secondary Institution

The Special Committee on Governance recently recommended that City Council direct City Planning to consider partnering with a post-secondary institute to undertake research on the organizational structure of the Committee of Adjustment to better engage and empower residents in the process. If adopted by Council, staff will move forward with this matter.

2. Improvements to Committee of Adjustment Review Process

City Planning has been reviewing and refining many aspects of the CoA approvals process since reporting to Council last. During the fall of 2018, two staff were hired by City Planning to work on Committee of Adjustment process improvements: a Project Coordinator and a Web Content Coordinator. With these new staff positions filled, the division has been able to accelerate process improvements.

In addition to inputs from a variety of stakeholders, staff have considered the Toronto Local Appeal Body Chair's 2018 Annual Report and the recommendations in the End-To-End Review in their on-going review and improvement of the CoA.

a. Adoption of City-wide Policies and Harmonization of Practices across Districts

City Planning staff have been creating new, and refining existing, city-wide operating policies and harmonizing processes across the four CoA district offices in order to increase consistency and predictability for all users. For example, staff developed an application fee refund policy, which was implemented November 1, 2019. Staff also updated the CoA Rules of Procedure and published them on the CoA webpage so the public can access them easily.

CoA staff have also been harmonizing how hearings are organized and information is communicated to the public across the districts. Agenda vetting, where uncontested items are heard at the beginning of a hearing and contested or more complex items are heard later, was implemented in 2019 to bring consistency to how meetings are run across the city. Staff are also harmonizing public facing documents, such as hearing agendas and district webpages, across districts.

The above improvements implement various improvement opportunities identified in the End-to-End Review with respect to adopting standard city-wide interpretations of policies, procedures, rules and guidelines and making those interpretations available online to improve consistency across districts, and adopting consistent agenda vetting.

b. Changes to Panel Size, Structure and Compensation

In April 2019, City Council adopted various staff recommended changes to the size and structure of the CoA. Through Item PH4.5, Council increased the size of the CoA from 30 to 35 members, increased the flexibility of how members are assigned to panels and districts and eliminated the practice of holding CoA hearings at the York Civic Centre. These changes allow staff to respond to changes in application volume and development patterns across the city more easily and have already created improvements in customer service as well as administrative efficiencies.

Additionally, through Item EX2.5, City Council increased the remuneration paid to CoA panel members as of April 1, 2019. The full day per diem was increased from \$350 per day to \$460, the annual chair stipend was increased from \$1500 to \$2500 and a non-chair member annual stipend of \$1500 was introduced.

The above changes implement various improvement opportunities identified in the End-to-End Review, such as centralizing Etobicoke York Committee hearings at a single location, establishing an additional panel or adding more members particularly in Toronto and East York, and increasing the compensation level of panelists.

c. Staff Resources Added in the Committee of Adjustment and Community Planning

Three senior planners and three assistant planners were hired on a temporary basis in Community Planning in 2018 to focus on CoA applications. With these staff in place, Community Planning has been able to increase the percentage of applications where they provide comments to approximately 40%, providing interested residents and panel members more information and analysis on applications. CoA and Community Planning staff have been working closely with these senior planners to improve the reporting

practices and to harmonize how applications are reported on and reviewed across districts.

d. Panel Member Training

Staff are implementing a more comprehensive training program for the CoA members recently appointed for the 2019-2022 term. Members attended a mandatory all-day training session in September 2019 in advance of their first meetings. Further in-house training will occur in November 2019 and early in 2020. Panel members are also encouraged to attend training sessions run by the Ontario Association of Committees of Adjustment. Additionally, the panel member manual was updated prior to the new term commencing. One of the improvement opportunities identified in the End-to-End Review was improving training for panelists once appointed.

e. Processing Timelines

Recent process improvements combined with a decrease in application volume has led to significant improvements to the processing timelines for CoA applications. In 2017, it took an application 12 weeks to move from intake to hearing, averaged across the four districts. Currently, that number is down to just over seven weeks. Given circulation and notice requirements, an application takes a minimum of five to six weeks to move from application receipt to a hearing. There are longer processing timelines in the Toronto and East York district given the high volume of applications in that district.

Feasibility of Committee of Adjustment Meetings Commencing at 1:00 p.m.

At the Planning and Housing Committee meeting on April 30, 2019, through Item PH5.7, staff were asked to report back on the feasibility of Committee of Adjustment hearings commencing at 1:00 p.m. with proceedings to continue into evening hours, to improve accessibility for residents.

Staff considered this request and do not recommend making this change. There would be significant increased costs and operational challenges to running CoA meetings if they started at 1:00 p.m. and the change would not benefit enough stakeholders to outweigh the increased costs.

Costs would come from several sources, including staff overtime and additional per diem payments to panel members. Normal working hours for City staff that run CoA meetings is 8:30 a.m. to 4:30 p.m., so staffing meetings beyond 4:30 p.m. generates overtime costs. Further, if meetings started at 1:00 p.m., more meetings with fewer items would have to be held than currently scheduled in order to have them end at a reasonable hour in the evening. Currently, most CoA hearings have approximately 40 items and last 6 to 8 hours, or longer. If meetings did not start until the afternoon, meetings with 40 items could go late into the evening, which is not desirable for residents, applicants, panel members and may risk decision quality. Meetings that have run late into the evening have generated significant complaints from panel members and members of the public in the past.

Afternoon and evening hearings also may not be more convenient for all residents. Many residents wishing to participate in a CoA meeting may have work, family or

personal commitments in the afternoon and evening that impact their ability to participate in hearings during those hours.

Staff are not recommending meetings commence at 1:00 p.m. In fact, until January 1, 2018, CoA meetings in the Etobicoke York district started at 1:00 p.m. This practice was discontinued due to the costs, operational challenges and complaints received.

Instead, staff are working to improve residents' ability to participate in CoA hearings in other ways, such as segmenting CoA meetings into smaller time-slots to bring more certainty as to when a particular matter may be heard. Further, if residents are not able to attend a CoA hearing, they can make their views known by submitting written comments in advance of a meeting.

Feasibility of Public Information Sessions on the CoA and TLAB Practices and Procedures

Staff were asked to report back on the feasibility of hosting regular information sessions on Committee of Adjustment and Toronto Local Appeal Body practices and procedures, as specified in the Toronto Local Appeal Body Chair's 2018 Annual Report. Staff have considered this request and have concluded that hosting public drop-in information sessions between one and two times annually is feasible given current CoA and TLAB staffing levels without additional resources required. TLAB and CoA staff will work together on an implementation plan and will work toward holding the first public information session by mid-2020.

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