

Lower Yonge Official Plan Amendment – Request for Direction Report

Date: *February 28, 2019*

To: *Toronto and East York Community Council*

From: *Director, Community Planning, Toronto and East York District*

Ward 10: Spadina - Fort York

Planning Application Number: *12 253083 STE 28 OZ*

SUMMARY

The purpose of this report is to request direction from City Council on the pending Local Planning Appeal Tribunal (LPAT) pre-hearing on the Lower Yonge Official Plan Amendment (OPA), adopted by City Council at their June 7, 8 and 9, 2016 meeting.

The Lower Yonge OPA, as amended by the 1-7 Yonge Street and 55 Lake Shore Boulevard East site-specific LPAT settlements, is scheduled to be presented to the LPAT on April 11, 2019. Choice Properties REIT (ChoiceREIT) is a Party to the upcoming LPAT Pre-Hearing and requested an OPA policy change to permit two towers on Block 7 to realize the OPA density permission of 12.5 times lot area (approximately 158,000 square meters of GFA) on 10 Lower Jarvis Street.

ChoiceREIT developed a two-tower built form demonstration model based upon the Lower Yonge OPA tall building criteria and policies. After extensive review of the two-tower demonstration model by City Planning, informed by the built form criteria of the City's Tall Building Guidelines, the Lower Yonge Precinct Plan and the Lower Yonge OPA, as amended by the site-specific LPAT settlements, Planning staff supports the proposed two tower policy amendment.

It is recommended that City Council modify the Lower Yonge OPA to permit two towers on Block 7, bounded by future Harbour Street, future New Street, Lower Jarvis Street and Lake Shore Boulevard East, in accordance with the recommendations included within this Request for Directions Report.

RECOMMENDATIONS

The City Planning Division recommends that:

1. City Council authorize the City Solicitor, together with City Planning staff and any other appropriate staff, to attend before the Local Planning Appeal Tribunal in support of a settlement of the Lower Yonge Official Plan Amendment with permissions for two

towers on Block 7, which is bounded by New Street, Harbour Street, Lower Jarvis Street and Lake Shore Boulevard East.

2. City Council authorize the City Solicitor and other City staff to take such actions, as are required, to give effect to City Council's decision.

FINANCIAL IMPACT

The recommendations in this report have no financial impact.

DECISION HISTORY

City Council received a report from the Director of Community Planning, Toronto and East York District, titled "Lower Yonge Precinct Plan – Proposals Report" on August 25, 2017, which summarized the results of Phase 1 of the Lower Yonge Precinct planning process. City Council adopted recommendations to receive the "Lower Yonge Urban Design Report" and the "Lower Yonge Transportation Master Plan Environmental Assessment", endorsed the planning and policy directions in the staff report, and directed City Planning to complete the Lower Yonge Precinct Plan in consultation with Waterfront Toronto, other City Divisions, landowners, community members and other stakeholders. The staff recommendations were adopted without amendment.
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2014.TE34.95>

Planning and Growth Management Committee were presented a report from the Director, Community Planning, Toronto and East York Division, titled "Final Report-Lower Yonge Precinct – City-initiated Official Plan Amendment and Precinct Plan" on May 10, 2016. At its meeting on June 7, 8 and 9, 2016, City Council endorsed the Lower Yonge Precinct Plan and instructed staff to request that the LPAT modify the former City of Toronto Official Plan and Central Waterfront Secondary Plan, substantially in accordance with the draft OPA attached to the staff report.
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2016.TE16.4>

City Council received a report from the City Solicitor titled "1-7 Yonge Street - OMB Hearing - Request for Direction" on January 31, 2017 which amended Item TE17.21, adopted by City Council at its meeting of July 12, 13, and 14, 2016 and provided direction regarding the February 4, 2017 LPAT Hearing for the settlement of the Official Plan and Zoning By-law Amendment applications for 1-7 Yonge Street. This direction resulted in changes to the Lower Yonge OPA, including roads and municipal infrastructure requirements, tower heights polices, PATH connections, and public park provisions.
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.CC24.3>

City Council received a report for the Acting Director, Community Planning, Toronto and East York District, titled "55 to 95 Lake Shore Boulevard East, 33-35 Freeland Street and 2 and 15 Cooper Street - Official Plan Amendment and Zoning Amendment Application - Request for Directions Report" and adopted all recommendations on April 24, 2018. Council authorized the City Solicitor, City Planning staff and other appropriate

City staff attend the LPAT hearing to support the revised redevelopment proposal for 55 to 59 Lake Shore Boulevard East, 33 to 53 Freeland Street and 2 and 15 Cooper Street at the LPAT subject to certain matters being addressed to the satisfaction of the Chief Planner and Executive Director, City Planning, the Executive Director, Engineering and Construction Services and the City Solicitor. The revised development proposal resulted in revisions of the Lower Yonge OPA, including a reduction in minimum tower separation from 30 metres to 25 metres, infrastructure requirements, conveyance of parkland, and Holding provisions.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.TE31.15>

ISSUE BACKGROUND

The Lower Yonge Precinct Plan and OPA envision approximately 8,000 residential units and 380,000 square metres of non-residential GFA, providing future homes and workplaces for up to 13,000 residents and 15,000 employees. In its current state, the Precinct lacks a public realm, infrastructure and services necessary to support this scale of development. The Lower Yonge Precinct Plan includes recommendations on land use, public realm design, distribution of density, and built form.

The Lower Yonge OPA is a modification of the Central Waterfront Secondary Plan, which is currently not in force for the Lower Yonge Precinct. The City has been working with the three landowners on settlement of the Lower Yonge OPA in advance of the April 11, 2019 LPAT Pre-Hearing.

ChoiceREIT is a Party to the Lower Yonge LPAT process and has expressed its intent to redevelop 10 Lower Jarvis Street and 125 Lake Shore Boulevard East. The City has been working with ChoiceREIT on built form approaches, consistent with City policies and guidelines, to accommodate the 12.5 times density that the Lower Yonge OPA permits on the site, which would result in approximately 158,000 square meters of GFA. ChoiceREIT identified a two tower settlement option for Block 7, supported by a built form demonstration model that was evaluated by City Planning using the Lower Yonge Precinct Plan, OPA, and City policies and guidelines.

Development Applications

Pinnacle International is the owner of 1 and 7 Yonge Street and submitted applications to amend the Official Plan and Zoning By-law in March 2013 to redevelop the site. The application was appealed to the LPAT.

Menkes applied for an Official Plan Amendment, a Rezoning, and a Draft Plan of Subdivision in May 2016. The OPA and Rezoning applications were appealed to the LPAT on April 10, 2017.

The City has reached settlement with both Pinnacle International and Menkes on these LPAT appeals.

Provincial Policy Statement and Provincial Plans

Land use planning in the Province of Ontario is a policy led system. Any decision of Council is required to be consistent with the Provincial Policy Statement (2014) (the "PPS"), and to conform to applicable Provincial Plans which, in the case of the City of Toronto, include: the Growth Plan for the Greater Golden Horseshoe (2017) and, where applicable, the Greenbelt Plan (2017). The PPS and all Provincial Plans may be found on the Ministry of Municipal Affairs and Housing website.

However, it is important to note that the PPS 1997 was the applicable PPS when the CWSP was adopted by City Council in 2003 and deemed to be commenced. Decisions on planning matters commenced prior to November 30, 2004 were required to have regard to the PPS 1997. The PPS 1997 is applicable to the Lower Yonge OPA, which is a modification of the CWSP. Policy 1.1.2 of the PPS 1997 states that land requirements and land use patterns will be based on:

- a. the provision of sufficient land for industrial, commercial, residential, recreational, open space and institutional uses to promote employment opportunities;
- b. densities which 1) efficiently use land, resources, infrastructure and public service facilities, and 2) avoid the need for unnecessary and/or uneconomical expansion of infrastructure;
- d. development standards which are cost effective and which will minimize land consumption and reduce servicing costs; and,
- e. providing opportunities for redevelopment, intensification and revitalization in areas that have sufficient existing or planned infrastructure.

While the OPA, as a modification to the CWSP, is technically not required to be consistent with the PPS 2014, the final recommended Port Lands Official Plan modification continues to be consistent with, and in many instances exceed, the minimum standards set out in the PPS 2014.

Toronto Official Plan Policies and Planning Studies

The City of Toronto Official Plan is a comprehensive policy document that guides development in the City, providing direction for managing the size, location, and built form compatibility of different land uses and the provision of municipal services and facilities. Authority for the Official Plan derives from The Planning Act of Ontario. The PPS recognizes the Official Plan as the most important document for its implementation.

The City of Toronto Official Plan was adopted by Council in 2002 and approved by the LPAT in 2006. The 2006 LPAT Order only partially approved the Official Plan across the City, however, as it omitted areas covered by the CWSP, which was an amendment to the former City of Toronto Official Plan. Therefore, the former City of Toronto Official

Plan, not the newer Toronto Official Plan, is in force and effect within the Lower Yonge Precinct.

Section 3.1.2 of the Official Plan states that new development in Toronto will be located and organized to fit with its existing and/or planned context. New development will create appropriate transitions in scale to neighbouring existing and/or planned buildings, limit shadowing on streets, properties and open spaces, and minimize any additional shadowing and uncomfortable wind conditions on neighbouring parks as necessary to preserve their utility.

In addition to the policies identified above, new development will also be massed to define the edge of streets, parks and open spaces to ensure adequate access to sky views for the proposed and future uses.

Section 3.1.3 requires tall building proposals to address key urban design considerations that include: demonstrating how the proposed building and site design will contribute to and reinforce the overall City structure; taking into account the relationship of the site to the topography and other tall buildings; and providing high quality, comfortable and usable publicly accessible open space areas.

Toronto Official Plan policies may be found here: <https://www.toronto.ca/city-government/planning-development/official-plan-guidelines/official-plan/>

Former City of Toronto Official Plan

The former City of Toronto Official Plan is in force for the lands subject to the Lower Yonge OPA. This Plan supports the precinct planning approach and comprehensive level of analysis for precinct areas. It sets out a policy framework, including goals and objectives, for the waterfront in Chapter 14.

The area subject to the Lower Yonge OPA is within the Central Bayfront area of the former City of Toronto Official Plan. A set of planning and urban design principles for development in both the Central Bayfront and East Bayfront is set out in Policy 14.28. These principles set out the need for further planning and development to address land use, open space, built form and infrastructure. Development is directed to be phased at an appropriate pace. To further this comprehensive planning framework, cooperative arrangements among landowners and public agencies and levels of government are recommended to realize both public and private objectives, including the creation of an appropriate streets and blocks plan.

Planning and urban design principles in Policy 14.28 specify that new development in the Central Bayfront will develop at moderate to high intensity. Development is to step down in height to the water and preserve expansive views from the City to the water.

Central Waterfront Secondary Plan

The Central Waterfront Secondary Plan (CWSP) was adopted by City Council on April 16, 2003 as an amendment to the former City of Toronto Official Plan. It was appealed

in its entirety, and although large parts of the Plan have now been approved by the LPAT, the Plan is not yet approved and in force for the Lower Yonge Precinct. Notwithstanding the above, the CWSP has been used as the guiding policy document for waterfront redevelopment and policy implementation. Similar to the Official Plan, the Lower Yonge Precinct is designated Regeneration Areas.

The purpose of the CWSP is to identify key public priorities and opportunities, as well as an implementation process for waterfront revitalization. The document is based on four core principles:

- A. Removing Barriers/Making Connections;
- B. Building a Network of Spectacular Waterfront Parks and Public Spaces;
- C. Promoting a Clean and Green Environment; and
- D. Creating Dynamic and Diverse New Communities.

A precinct-level implementation strategy is the tool detailed within the CWSP to provide for comprehensive and orderly development and to implement its policies. Precinct plans and subsequent implementing zoning by-laws have been developed for East Bayfront, West Don Lands, and the Keating Channel.

Prior to the preparation of zoning by-laws or development permit by-laws within Regeneration Areas, the CWSP requires Precinct Implementation Strategies to be prepared in accordance with the policies contained in Section 2.2.

The Central Waterfront Secondary Plan can be viewed at:

https://www.toronto.ca/wp-content/uploads/2019/02/8e22-CityPlanning_2006-OP_CWSP_Final.pdf

Lower Yonge Precinct Plan and Official Plan Amendment

The Lower Yonge Precinct Plan and implementing draft OPA was endorsed by City Council on June 7/8, 2016. The Precinct Plan provide the comprehensive planning framework intended to guide development in the Precinct and establishes a common vision for the redevelopment of Lower Yonge.

The Lower Yonge Precinct is envisioned to be a vibrant, mixed-use, complete community that derives its character from its waterfront context and the large central park at its heart. It will be a home and workplace for people of all incomes, as well as a destination to visit, Lower Yonge will be a green, sustainable neighbourhood with streets and sidewalks that are inviting to both pedestrians and cyclists. The area will be characterized by mid-rise base buildings framing the public realm at a human scale, and broadly spaced towers ensuring sunlight, good wind conditions and ample views of the sky from all streets and the park.

The OPA establishes a set of planning policies with graphics, intended to guide future private and public investment, under the general themes of public realm, infrastructure, development and implementation. The Precinct Plan provides the background and rationale for the OPA, as well as additional measures and details for each of the elements in the OPA.

The Precinct Plan and draft OPA (page 49 of the Final Staff Report) can be found at: <http://www1.toronto.ca/wps/portal/contentonly?vgnextoid=bd6ec6f87bdb1410VgnVCM1000071d60f89RCRD>

The Lower Yonge OPA is a modification of the CWSP, which is not yet in force for the Lower Yonge Precinct. It is anticipated that the CWSP, amended to include the Lower Yonge OPA, will be brought into force for Lower Yonge as part of the CWSP LPAT process.

Zoning By-laws

The former City of Toronto Zoning By-law 438-86, as amended, is applicable to the lands within the Lower Yonge Precinct. All of the lands within the CWSP area were excluded from the City of Toronto harmonized Zoning By-law 569-2013.

The ChoiceREIT property at 10 Lower Jarvis Street is zoned IC D3 N1.5. This industrial-commercial zoning permits a variety of industrial and commercial uses in buildings with a maximum density of 3.0 times the lot area with a maximum of 1.5 times the lot area for certain non-residential uses. The Zoning By-law does not specify a height limit on these blocks.

City-wide Tall Building Design Guidelines

In May 2013, City Council adopted the updated city-wide Tall Building Design Guidelines and directed City Planning staff to use these Guidelines in the evaluation of all new and current tall building development applications. The Guidelines establish a unified set of performance measures for the evaluation of tall building proposals to ensure they fit within their context and minimize their local impacts.

The city-wide Tall Building Design Guidelines are available at: http://www1.toronto.ca/city_of_toronto/city_planning/urban_design/files/pdf/tallbuildings.pdf

Official Plan Amendment 352 - Updating Tall Building Setbacks Downtown

On October 6, 2016, City Council adopted Official Plan Amendment 352 – Downtown Tall Building Setback Area. The purpose of OPA 352 is to establish the policy context for tall building setbacks and separation distances between tower portions of a tall building in the Downtown. At the same meeting, City Council adopted area specific Zoning By-laws 1106-2016 and 1107-2016 (also under appeal) which provide the detailed performance standards for portions of buildings above 24 metres in height.

COMMENTS

Local Planning Appeal Tribunal Process

A Pre-Hearing related to the Lower Yonge OPA was held on March 8, 2018. A second Pre-Hearing was held on September 25, 2018. ChoiceREIT is a Party to these LPAT

proceedings as one of the three Lower Yonge landowners.

Staff have been working with the three Lower Yonge landowners to finalize any changes to the OPA that resulted from the LPAT settlements for both 1-7 Yonge Street, and 55 to 59 Lake Shore Boulevard East, 33 to 53 Freeland Street and 2 and 15 Cooper Street.

The Lower Yonge OPA, as amended by site-specific LPAT settlements, is scheduled to be presented to the LPAT on April 11, 2019. It is the City's intent to request that the LPAT amend the CWSP to include the OPA and bring the CWSP into force for Lower Yonge within the former City of Toronto Official Plan. The City is working toward agreement regarding a modified draft of the OPA that will be introduced at the LPAT Pre-Hearing.

As part of this LPAT process, ChoiceREIT, has been in settlement discussions with City Planning regarding potential development options to realize the OPA density permission of 12.5 times the lot area on 10 Lower Jarvis Street, which is approximately 158,000 square meters of GFA. ChoiceREIT proposed a change to Map J8 of the Lower Yonge OPA which would permit two towers on Block 7, as well as a series of criteria regarding the placement, built form and height of the towers. See Attachments 1 and 2 for the location of Block 7 and the OPA permissions for maximum numbers of towers (by block), as adopted by City Council at its meeting on June 7, 8 and 9, 2016.

ChoiceREIT requested that the City evaluate a two-tower built form demonstration model that was based upon OPA policies and tall building criteria. Community Planning evaluated the demonstration model and concluded that the two tower policy changes proposed by ChoiceREIT were feasible and generally consistent with the Lower Yonge Precinct Plan, OPA, and relevant City policies and guidelines.

Demonstration Model

The two-tower demonstration model contemplates two tower forms with heights of 52 and 60 storeys. These heights are between the height of towers proposed for 55 Lake Shore Boulevard East and the two towers under construction on the Daniel's City of the Arts northern block at 143 Lake Shore Boulevard East. The proposed overall heights of the buildings are consistent with the policies of the Lower Yonge OPA, as they step down from 55 Lake Shore Boulevard East (Block 5) to East Bayfront.

The floor plate of both towers is 750 square metres, which is consistent with the Lower Yonge Precinct Plan and the Tall Building Guidelines. Section 3.2.1 of the Tall Building Guidelines direct a tall building to have a maximum floorplate area of 750 square metres to create slender towers that do not fill the entire block and allow penetration to its interior spaces. The towers are oriented to preserve sky views to the waterfront from a number of Downtown locations and from Sugar Beach, looking toward the Downtown.

A minimum 25 metre tower separation distance is achieved between the two towers, and adjacent proposed or constructed towers. Section 3.2.3 of the Tall Building Guidelines directs tall building development to provide a setback of 12.5 metres to the side or rear property lines in order to achieve a separation distance of 25 metres between tower forms. OPA 352 and Zoning By-laws 1106-2016 and 1107-2016,

currently under appeal to the LPAT, provide policy and zoning standard direction for tall buildings to provide for a minimum 12.5 metre setback.

Evaluation of the Proposed Policy Change

The Lower Yonge Precinct Plan's guiding principles include a focus on good urban form where residential towers should be slender, with maximum floor plates of 750 square metres, and commercial towers would be broader, ensuring that ample sky views are preserved, view corridors to Lake Ontario are protected, pedestrian comfort is improved, and sunlight is able to reach streets and open spaces.

The proposed two tower option was carefully assessed using the demonstration model to examine shadow impacts, pedestrian-level views, and views from other areas of the Downtown and Central Waterfront. The objective during this assessment was to ensure that two towers on Block 7 could fit harmoniously within their existing and planned context; can be massed to minimize shadow; and have adequate porosity between them to allow for views of the sky; and access to light from both the public realm and buildings in the vicinity.

Additional OPA criteria that were used during the demonstration model evaluation were:

- a minimum tower separation distance of between 25 to 30 metres
- tower setbacks above base buildings, ranging from five to ten metres.
- a transition in heights from Lake Shore/Gardiner Expressway down to Lake Ontario; and,
- a transition down in heights from west to east, reflecting higher heights to the north and west and lower heights in East Bayfront.

The two-tower demonstration model was also evaluated against the city-wide Tall Building Design Guidelines, including sections on context analysis, fit and transition in scale, sunlight and sky view, views from the public realm, floor plate size and shape, tower placement, and separation distance.

The demonstration model confirms that the tower heights and built form achieve the permitted density on 10 Lower Jarvis Street. The demonstration model towers step down from 55 Lake Shore Boulevard East (Block 5) to East Bayfront, which is consistent with the policy direction in the OPA. The floor plate of both towers is 750 square metres, which is consistent with the OPA and the Tall Building Guidelines.

The demonstration model confirmed that a minimum 25 metre tower separation distance was achieved between the two towers, and adjacent proposed or constructed towers, with application of the setback and setback requirements included within the Precinct Plan.

Staff worked closely with ChoiceREIT and analyzed views not only from the south (including Sugar Beach), but also from St Lawrence Market, Berczy Park, and Crombie Park to ensure that permitting two towers on Block 7 was able to preserve sky views, and views to the waterfront and Downtown. The views and shadow impact resulting from the ChoiceREIT demonstration model are acceptable.

The demonstration model was assessed to determine the feasibility of permitting two towers on Block 7, based upon Lower Young OPA, Precinct Plan and City policies, as well as a series of very specific criteria, such as views. After extensive review of the demonstration model, based upon the built form criteria of the City's Tall Building Guidelines, the Lower Yonge Precinct Plan and the Lower Yonge OPA, as amended by the site-specific LPAT settlements, permitting two towers on Block 7 generally complies with policies of the Lower Yonge OPA and the Lower Yonge Precinct Plan.

The specific requirements represented in the demonstration model, including setbacks, stepbacks, view corridors, separation distance, tower orientation, and floorplate size must be met to accommodate two towers on Block 7. The recommended OPA modification introduces a new built form policy that includes these demonstration plan requirements.

Recommended Policy Change

The Lower Yonge OPA, as amended by the site-specific settlements, is recommended to be further amended to permit ChoiceREIT's settlement proposal, supported by a two-tower demonstration model tested by City Planning in relation to applicable City policies. The recommended amendments to the OPA include:

- a) Modification of Map J8: Land Use and Number of Towers to permit two towers on Block 7, as specified in Attachment 3; and,
- b) The addition of Tall Building policies in Section 6.5: Built Form that are specific to Block 7 will include the following criteria that must be met for the inclusion of two tall buildings on Block 7, as specified in the ChoiceREIT demonstration model:
 - i) will have a minimum separation distance of 25 metres between towers, measured immediately above the base buildings, from the exterior wall of the buildings, excluding balconies;
 - ii) will have a maximum floorplate size of 750 square meters;
 - iii) will step down from tower heights on Block 5, to the west, decreasing toward the tower heights on 143 Lake Shore Boulevard to the east;
 - iv) will step down from tower heights north to south, decreasing toward the tower heights on Block 8;
 - v) may include a Tower Area Ratio greater than 20%, which will be determined through the zoning process;
 - vi) will orient the two towers to maximize the view corridor from Sugar Beach toward the Downtown; and,
 - vii) will comply with all setbacks and stepbacks in the Lower Yonge Precinct Plan.

In addition to the recommended Lower Yonge OPA policy modifications, additional policy changes may be proposed, based upon the ChoiceREIT demonstration model, to the satisfaction of the City Solicitor and Chief Planner and Executive Director, City Planning.

Community Planning recommend that City Council authorize the City Solicitor and other City staff to take such actions, as are required, make further policy changes to the Lower Yonge OPA which are consistent with the ChoiceREIT demonstration model.

Conclusion

The ChoiceREIT two-tower demonstration plan for Block 7 was evaluated to ensure that key Precinct Plan and OPA tall building criteria were able to be met. The performance measures that were given priority in this evaluation were tower separation distance, building and tower setbacks, views, shadow impacts, and transition in overall height. The City's assessment of the demonstration plan confirms that an OPA policy change that permits two towers on Block 7 is generally consistent with the Lower Yonge Precinct Plan, OPA, Official Plan, and City policies and guidelines.

City Planning support the amendment of the Lower Yonge OPA to permit two towers on Block 7, as represented in the ChoiceREIT demonstration plan and as specified in this report, as good planning.

Community Planning recommends that City Council support these policy changes and authorize the City Solicitor, together with City Planning staff and any other appropriate staff, to attend before the Local Planning Appeal Tribunal in support of a settlement of the Lower Yonge Official Plan Amendment with permissions for two towers on Block 7.

CONTACT

Anthony Kittel, MCIP, RPP, LEED-AP, Project Manager, Tel. No. 416-392-0758
E-Mail: Anthony.Kittel@toronto.ca

SIGNATURE

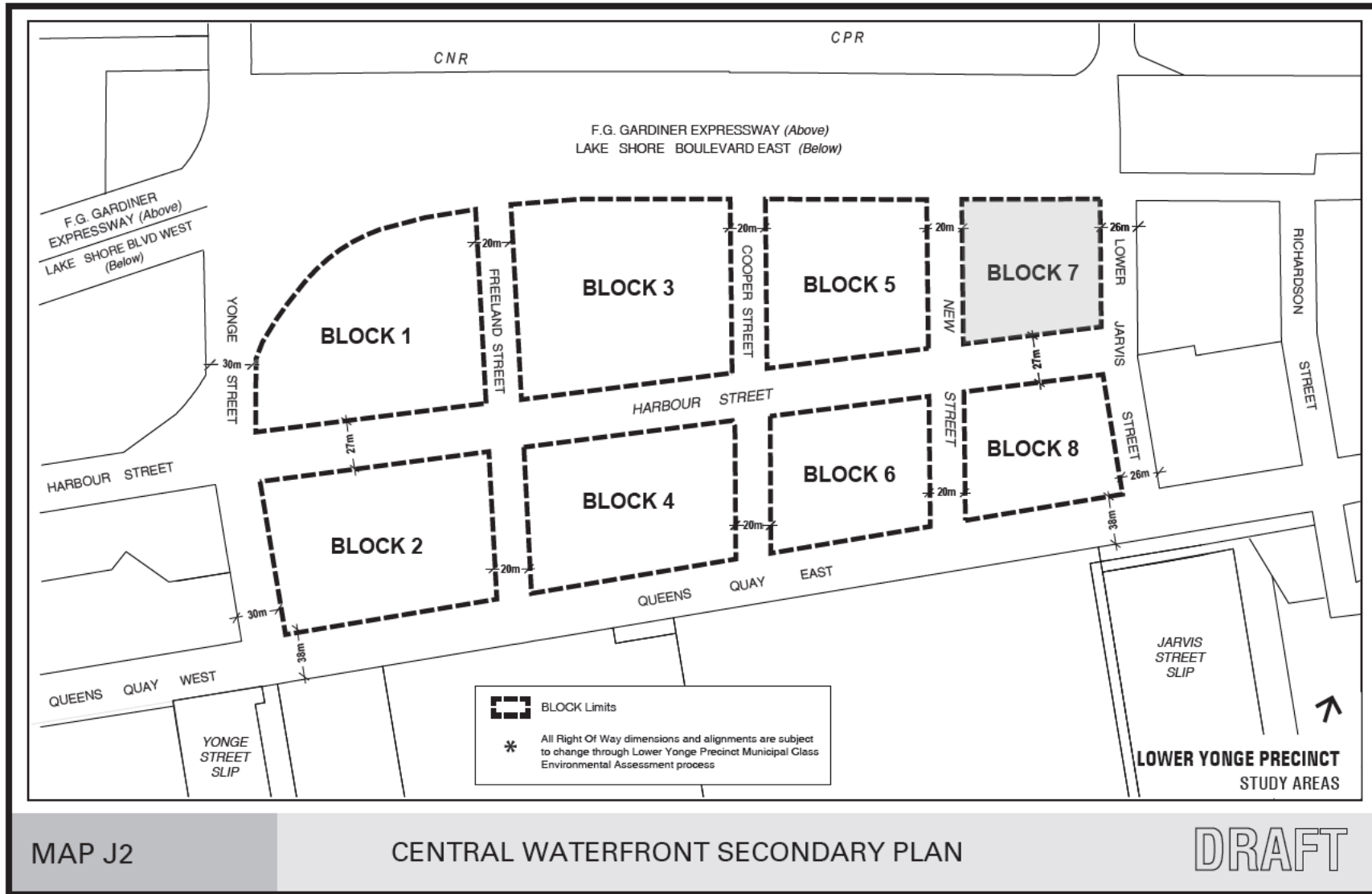
Lynda H. Macdonald, MCIP, RPP, OALA
Director, Community Planning
Toronto and East York District

ATTACHMENTS

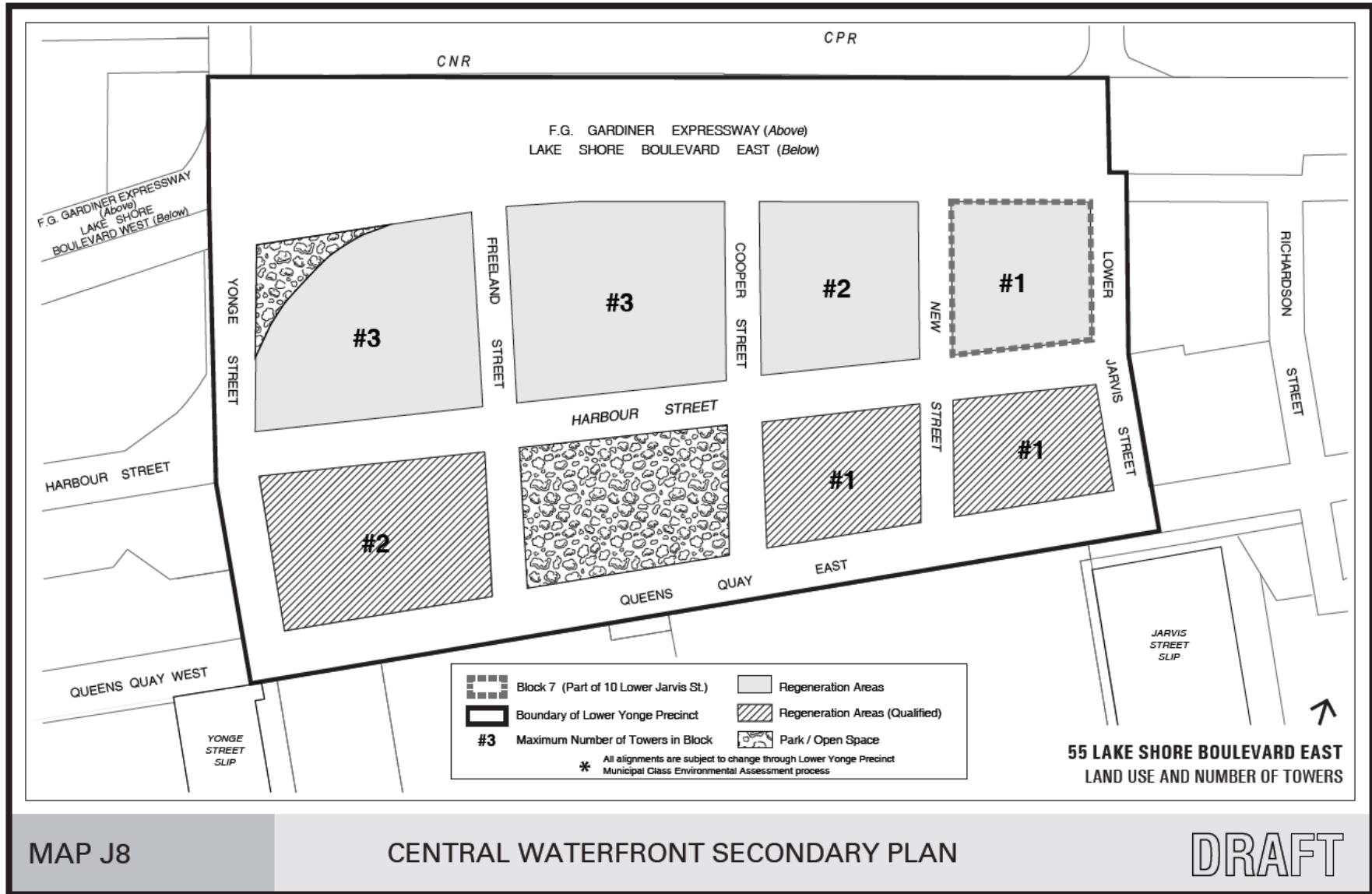
Attachment 1: OPA MAP J2: Study Areas (Including Block Numbers)

Attachment 2: OPA MAP J8: Land Use and Number of Towers
Attachment 3: Modified OPA Map J8: Two Towers of Block 7

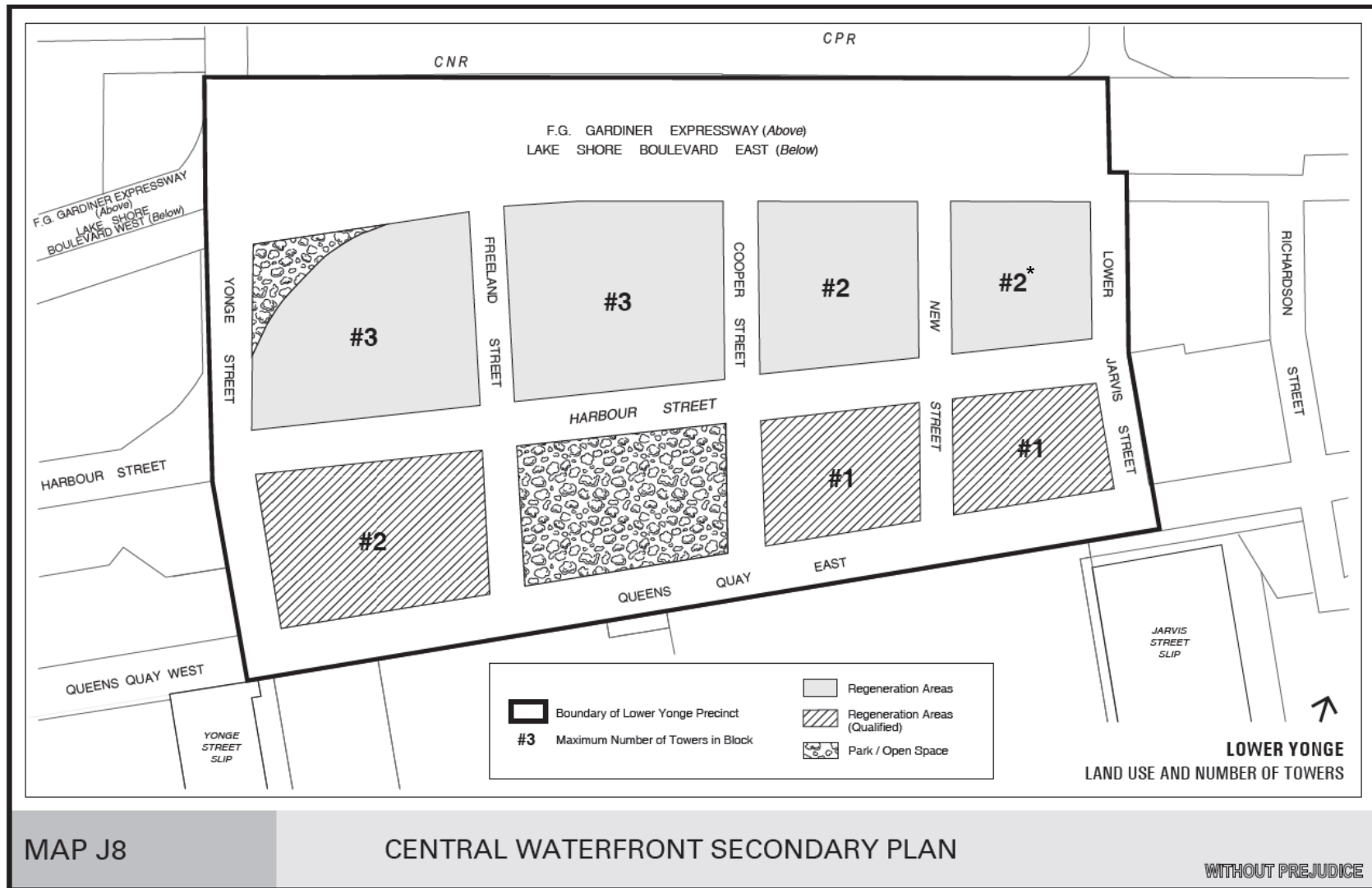
Attachment 1: OPA MAP J2: Study Areas (Including Block Numbers)



Attachment 2: OPA MAP J8: Land Use and Number of Towers



Attachment 3: Modified OPA Map J8: Two Towers of Block 7



*NOTE: Permitting Two Towers on Block 7 is subject to the Lower Yonge OPA modification recommended in this report and future LPAT Decision.