

Area-Specific Amendments to the Sign By-law: Six Separate Locations within the Galt Subdivision Rail Corridor

Date: May 9, 2022

To: Planning and Housing Committee

From: Chief Building Official and Executive Director, Toronto Building

Wards: 3 - Etobicoke-Lakeshore; 4 - Parkdale-High Park

SUMMARY

Toronto's Sign By-law is a harmonized, City-wide set of regulations governing signs which was adopted in 2010. The Sign By-law contains a process for any member of the public to apply to City Council to amend the Sign By-law in order to implement significant changes to the sign regulations for a specific property or area. Applications are commonly made requesting amendments to the Sign By-law to allow signs that are prohibited, to remove permissions for signs in an area, or to modify the administrative requirements of the Sign By-law. The Chief Building Official (CBO) brings applications to amend the Sign By-law together on an annual basis for City Council consideration, so that City Council can more easily assess the overall and cumulative impact of these applications on the city's built environment, and the Sign By-law itself.

This report responds to an application for multiple amendments to the Sign By-law made by Allvision Canada (the "Applicant") on behalf of Metrolinx, concerning specific portions of a railway corridor owned or managed by Metrolinx, specifically the "Galt Subdivision".

The Applicant proposes that City Council amend the Sign By-law in multiple ways:

- To exempt a specific portion of the Galt Subdivision directly adjacent to Highway 427, from an area-specific restriction that prohibits any third party signs from being erected in this location;
- To establish regulations for a sign with two rectangular sign faces, each with a vertical dimension of 4.27 metres and horizontal dimension of 14.63 metres, sign face area of approximately 62.47 square metres each (three times larger than permitted by the Sign By-law); a height of 18 metres (almost twice as high as permitted in the Sign By-law); for the two sign faces to be built in a "v-shaped" configuration, which is typically prohibited by the Sign By-law and, located within 60

metres to a Commercial Residential ("CR") Sign District and facing properties in the CR Sign District which is also prohibited by the Sign By-law ("the Proposed Sign"); and,

- To establish five new area specific prohibitions on the display of third party signs within a 100 metre radius of specific portions of rail corridors known as the "Galt Subdivision".

The proposed amendment would also modify permitting regulations in the Sign By-law so that a permit for the Proposed Sign would be contingent on the removal of five existing signs that are between 1.0 and 6.0 km away from the Proposed Sign, within the Galt Subdivision. In conjunction with these removals, the proposed amendment would introduce five new area specific restrictions that are not only unrelated to the Proposed Sign, but are also largely redundant and will result in unnecessary restrictions in the Sign By-law.

Toronto Building, in consultation with City Planning and Transportation Services, conducted a thorough review of the application, and has concluded that the Applicant's rationale is not consistent with the objectives of the Sign By-law. For the reasons set out in this report, the CBO does not support amending the Sign By-law for these locations throughout the city.

RECOMMENDATIONS

The Chief Building Official and Executive Director, Toronto Building, recommends that:

1. City Council refuse the application to amend the Sign By-law to add an area-specific amendment to Schedule 'B' of Chapter 694, Signage Master Plans and Area-Specific Amendments, to exclude a specific portion of the area defined as the Galt Subdivision from the existing area-specific prohibition on the erection or display of any third party signs contained at section 694- 24A(17); establish regulations applicable to these premises to allow for, and regulate, in addition to the signage otherwise permitted by the Sign By-law, a third party electronic ground sign, and to further amend 694- 24A to establish five new area-specific prohibitions on the display of third party signs in other portions of the Galt Subdivision.

FINANCIAL IMPACT

There are no current or known future year financial impacts arising from the recommendations contained in this report.

DECISION HISTORY

SB11.1 Application for Five Variances, subject to One Condition, respecting One Third Party Electronic Ground Sign located in the Galt Subdivision (approx. 10 metres west of Highway 427)

At its June 4, 2021 meeting, the Sign Variance Committee refused five variances required to issue a permit to construct one electronic ground sign displaying third party electronic static sign copy, to be located within the Galt Subdivision. The sign refused by the Sign Variance Committee is identical to the Proposed Sign with respect to the size, height and location. The CBO recommended refusal of the application since, the Applicant was not able to establish sufficient basis to meet all the nine of the established criteria mandatory for a sign variance to be granted. The Sign Variance Committee adopted the CBO recommendation and refused to grant the variances requested for the application

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2021.SB11.1>

PG 5.13 - Electronic and Illuminated Sign Study and Recommendations for Amendments to Chapter 694:

These amendments attempt to minimize the adverse impact of electronic signs by establishing separation distances between electronic signs and sensitive land uses, and reducing the maximum brightness at night. Third party electronic signs are now permitted in Employment, Utility and Commercial Sign Districts, but are specifically not permitted within 400 metres of any portion of Highway 427 within Toronto.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2015.PG5.13>

PG 5.2 - Sign By-law Enforcement: Potential Amendments to the City of Toronto Act, 2006:

City Council requested the Province of Ontario to allow the City to have the authority to govern all signs in the City by amending Subsection 110(1) of the City of Toronto Act, 2006; and requested, if such amendments were made by the Province that, prior to enacting any changes to City By-laws utilizing the authority to regulate signs lawfully erected prior to the enactment of the Sign By-law, the Chief Building Official and Executive Director, Toronto Building, to establish a working group, composed of industry representatives and other affected stakeholders to meet in public to provide advice to the Chief Building Official and Executive Director, Toronto Building about potential amendments to the Sign By-law utilizing this new municipal authority.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2015.PG3.2>

Policy and Finance Committee (Clause 3, Report 7) - Policy on Donations to the City for Community Benefits

At its meeting on September 25, 26, 27 and 28, 2006, City Council adopted the “Policy on Donations to the City for Community Benefits”. This is a City-wide policy that identifies suitable circumstances for requesting or accepting donations, and applicable approval requirements. The Policy states that:

1.2 In the case of an applicant seeking an approval, permit or license from the City or its agencies, boards or commissions, beyond matters permitted or required as part of the decision making process, voluntary donations from the applicant or their representative may only be requested or accepted at arm’s length from the decision making process:

1.2.1. Applicants seeking an approval, permit or licence shall not concurrently offer or make voluntary donations to the City or an agency, board or commission for community benefits;

1.2.2. Voluntary donations for community benefits shall not be solicited or accepted, for any purpose or community beneficiary, from applicants with a concurrent application for an approval, permit or license.

<https://www.toronto.ca/legdocs/2006/agendas/council/cc060925/pof7rpt/cl003.pdf>

COMMENTS

Annual Reporting

Area-specific amendment applications are considered together once annually. This practice allows for the applications made throughout the year to be reviewed and considered in a more comprehensive manner.

The Sign By-Law allows for applications by members of the public to amend the Sign By-Law to implement significant changes for an area. Examples of those changes include: developing a comprehensive plan for all signage on a premises, implementing a prohibition on signs in an area, altering a premises' sign district designation, or changes to administrative provisions, such as permitting requirements. The Sign By-law amendment process was not intended to be used to expand permissions for a permitted sign type that could potentially obtain approvals through the Sign Variance process.

Since third party electronic ground signs are permitted in Utility ("U") Sign Districts, the Applicant could seek approvals from the Sign Variance Committee for not meeting the minimum setbacks to sensitive land uses in the surrounding area, and to address the area-specific prohibition surrounding Highway 427. Variances could also be sought for the Proposed Sign to have a sign face area more than three times larger than permitted in a U Sign District, at a greater height than permitted.

The Sign Variance Committee is a City Board whose members are appointed by City Council to make decisions on variance applications for third party signs. As referenced in the Decision History, the Applicant filed an application to the Sign Variance Committee for variances to allow for a sign identical to the Proposed Sign in the Proposed Location. As noted, this variance application failed as the Applicant was unable to demonstrate to the Sign Variance Committee that the Proposed Sign met all nine of the mandatory criteria required to allow for the approval of the requested variances.

It is only because the applicant has combined the amendment for the Proposed Sign with a request for five unrelated area-specific restrictions that this application is proceeding as an amendment.

Applicant's Amendments Proposal

The Applicant is proposing multiple area-specific amendments to the Sign By-law:

Part A: To exempt a portion of the Galt Subdivision approximately 10 metres from the western limit of Highway 427 ("Proposed Location") from City Council's prohibition on third party signs within 400 metres of the limits of Highway 427 within the City; and to establish new regulations to allow the display of one electronic ground sign displaying third party electronic static sign copy within 60 metres of a CR Sign District and facing properties in that Sign District. The Proposed Sign would have two sign faces in a "v-shaped" configuration, with a sign face area and height in excess of what is normally allowed within the City of Toronto for signs of this type. The application also proposes to amend the permitting requirements of the City to require that, prior to any sign permit being issued for the Proposed Sign, five existing third party ground signs displaying static copy in five unrelated locations throughout the city be removed and all associated permits be revoked.

Part B: In conjunction with the sign removals mentioned above, the Applicant also proposes that new area-specific restrictions be introduced in order to prevent the construction of new third party signs at or within 100 metres of the locations where these existing signs are proposed to be removed.

Part A: The Proposed New Electronic Ground Sign

Site Context - Highway 427

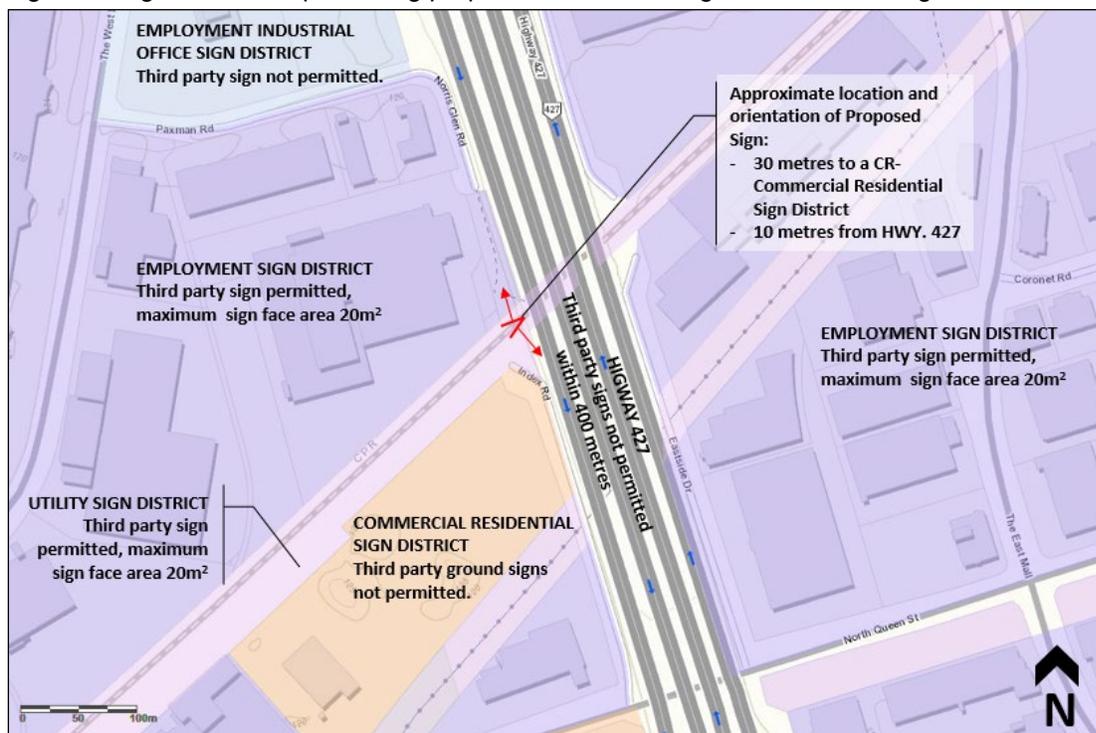
The Proposed Location is designated as a U Sign District, in Ward 3 - Etobicoke-Lakeshore, see Figure 1. The Proposed Sign and related support structure are to be located approximately 10 metres west of Highway 427 and above the tracks on CP Rail lands. Although third party electronic ground signs are permitted in U Sign Districts, the Sign By-law specifically prohibits third party signs within 400 meters of Highway 427.

There are no third party electronic signs located in the surrounding area, with the closest third party electronic sign of similar size and height being more than one kilometer away from the Proposed Sign.

The portion of the rail corridor where the Proposed Sign will be located is within 400 metres of the Highway 427, and is one of 74 specific areas throughout the city where City Council has determined that third party signs should not be permitted. These 74 area specific restrictions were imposed by City Council based on the determination that third party signs in these locations are inconsistent and incompatible with the surrounding area, and would not contribute positively to the quality of Toronto's appearance.

The area-specific amendment requested by the Applicant would not only allow a third party sign in a location City Council specifically determined was not suitable for third party signage; it would also allow for a third party sign that is not consistent with the regulations for a U Sign District because of the larger sign face area, height, and due to the fact that it is located within 60 metres of a CR Sign District and will be facing properties in that CR Sign District.

Figure 1: Sign District Map showing proposed location of Sign and Surrounding Premises



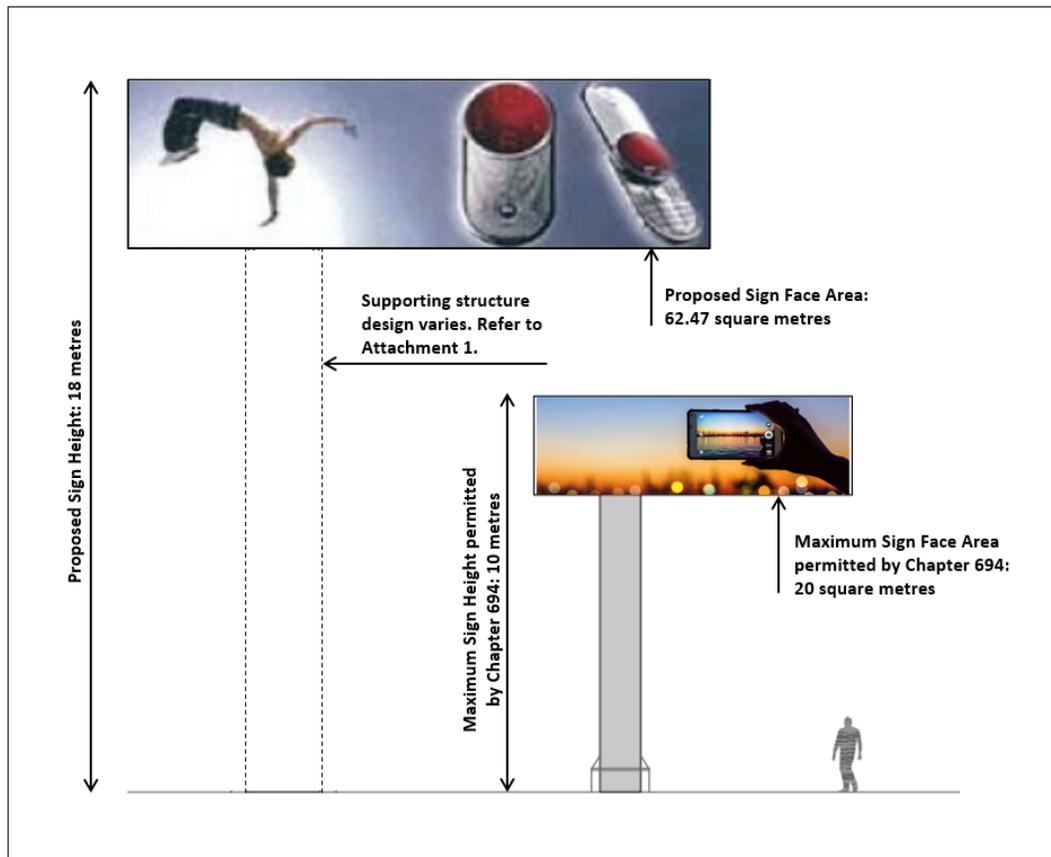
Area Compatibility

The Proposed Sign will be located near the intersection of Highway 427 and the Galt Subdivision rail corridor. The larger surrounding area is predominantly comprised of low-rise industrial uses, goods storage and transfer facilities, and retail. According to the Applicant's Submission, the nearest residential areas are located approximately 800 metres north of the site on the west side of Highway 427 and 1,300 metres to northeast

side of the Highway. Immediately to the south of the property there is retail centre, with a range of retail, service and restaurant uses.

The Proposed Sign would contain two rectangular sign faces measuring 4.27 metres vertically by 14.63 metres horizontally, has two sign faces with sign face area of approximately 62.47 square metres each in a “v-shaped” configuration. The Proposed Sign will also have an overall height of 18 metres. It exceeds the maximum permitted sign face area by more than 3 times; and is almost twice the maximum permitted height (See Figure 2).

Figure 2: Proposed Sign Size in comparison with Sign By-law requirements



The Applicant's submission discusses the impacts of the Proposed Sign on several of the surrounding properties. However, the Applicant has provided no details on how the Proposed Sign, located approximately 10 metres from Highway 427, will not adversely affect this high-volume Provincial highway, which has 14 travel lanes at this location (see Figure 3).

As previously stated, the area within 400 metres of Highway 427 is one of 74 specific areas throughout the city where City Council has determined that third party signs should not be permitted. These 74 area specific restrictions were imposed by City Council on the determination that third party signs in these locations are inconsistent and incompatible with the surrounding area, and would not contribute positively to the quality of Toronto's appearance.

The 74 area-specific prohibitions enacted by Council are not only due to traffic concerns, but reflect a variety of other matters, including but not limited to concerns about the relationship between such large purpose built structures and encouraging development in the surrounding area to its highest and best use.

When amendments were made to the Sign By-law in 2015 to expand the permissions for electronic signs throughout the city, the area-specific restrictions applicable to third party signs, including the restriction on third party signs along Highway 427, were neither removed nor amended.

Figure 3: Proposed Sign looking south along Highway 427 (rendering provided by applicant, sign highlighted by staff)



The area-specific prohibition applicable to the Proposed Location, which is a direct and complete prohibition on any third party signs within any premises within 400 metres of any limit of Highway 427, is consistent with the Ministry of Transportation ("MTO") Corridor Management Policy which requires a 400-metre separation between provincial highways and third party signs in most areas throughout the province.

The Applicant's Submission Package states that although the Toronto Sign By-law contains restrictions that do not allow third party signs along King's Highways, the Minister of Transportation has granted an approval for this proposed location through a Minister's Order issued in November, 2019 ("the Minister's Order").

It is important to note that the Minister's Order does not approve the Proposed Sign; the Minister's Order only exempts the location identified as 43.622013, -79.555262 West of Highway 427, north of QEW, from the application of subsections 34(5) and 38(4) of the Area-Specific Sign By-law Amendment - Galt Subdivision (Hwy 427)

Public Transportation and Highway Improvement Act (the “PTHIA”). An approval of the Proposed Sign would generally be in the form of a permit issued by the Ministry of Transportation.

The Minister's Order suggests that Metrolinx work with the MTO on a monitoring program to determine if there are any adverse impacts from the placement of the signs, as well as a review after one year from installation to determine if any changes should be made.

Although the Applicant's Submission Materials identify that other electronic ground signs similar in height, size, and setback to highways that were constructed in the City of Toronto between 2019-2020, their submission materials do not make any mention of, or provide any details of a one-year review. The Applicant has also not provided results from any monitoring program(s) around the impacts of these previously approved signs, or provided any comments on a monitoring program for the Proposed Sign.

It should also be noted that the area-specific restrictions in the Sign By-law are completely independent of the MTO requirements for signs located adjacent to highways. The Minister's Order exempting the Proposed Sign from the MTO Corridor Management Policy, has no relationship to City Council's direction that no third party signs should be constructed within 74 separate locations within the City, either within 400 metres of any limit of Highway 427, or any of the other areas where City Council has determined that third party signs should be prohibited.

Finally, although the Applicant's submission provides comments on the impacts of the Proposed Sign on several surrounding properties, however there are no details on how the Proposed Sign, significantly larger and taller than permitted by the Sign By-law and only 10 metres from Highway 427, will not adversely affect this high-volume Provincial Highway, which has 14 lanes of travel at this location.

Modification to Permitting Requirements:

As mentioned above, the Applicant has proposed the removal of five third party ground signs displaying static copy as part of their application, as well as new area-specific restrictions that would prevent any new third party signs from being constructed in areas where removals are proposed.

The signs proposed to be removed are all located in Utility Sign Districts where third party ground signs are permitted by the Sign By-law. These signs generally comply with the copy display, size and height requirements for third party ground signs in Utility Sign Districts. Staff also have no record of receiving any complaints from the public about the impacts on surrounding areas of any of these signs.

Table 1 contains a list of the locations where existing third party ground signs are proposed to be removed.

Table 1: Ground Signs proposed to be removed

	Location of Ground signs to be removed	Ward	# Sign Faces
1	West of The West Mall / North of The Queensway (North of Rail Corridor)	3	2
2	East of The West Mall / North The Queensway (South of Rail Corridor)	3	1
3	East of The West Mall / North of The Queensway (North of Rail Corridor)	3	1
4	North of Dundas Street West and West of Scarlett Road	4	2
5	North of Dundas Street West and East of Scarlett Road	4	2

The proposed removals will eliminate approximately 149 square metres of advertising space (sign face area) throughout the city (8 static sign faces with an area of approximately 18.6 square metres each), whereas the Proposed Sign has a sign face area of approximately 125 square metres of electronic static sign copy. As such, these sign removals will not result in a significant reduction of advertising space in the city.

Figure 4: Location of Signs proposed to be removed in relation to the Proposed Sign



As it can be seen from the Map in Figure 4, none of the signs proposed to be removed are located in proximity to the Proposed Sign; two of the signs are located in completely

different parts of the city, and have no relationship to where the Proposed Sign is to be located.

Due to their location between 1.2 and 6.6 km away from the Proposed Sign, the proposed sign removals would do nothing to reduce sign clutter, the potential impacts of the Proposed Sign on any adjacent properties, or on the intersection of Highway 427 and the Galt Subdivision where the Proposed Sign is to be located.

Impact of 2017 Legislative Amendment to City of Toronto Act, 2006

In the past, Applicants have made proposals for amendments to the Sign By-law, which included the voluntary removal of existing signs as a condition for additional signage permissions to be granted elsewhere in the City. City Council would review such proposals, and where they were deemed appropriate, approved complex and multi-faceted amendments to the Sign By-law required to grant additional sign permissions as well as have existing signs removed.

On May 5, 6 and 7, 2015, City Council requested the Province of Ontario to allow the City to have the authority to govern all signs in the City by amending Subsection 110(1) of the City of Toronto Act, 2006. This would allow City Council to address previously authorized signs that did not comply with the Sign By-law, in a holistic and appropriate fashion.

In response to this request, the Province of Ontario enacted the Modernizing Ontario's Municipal Legislation Act, 2017, which among other things amended Subsection 110(1) of the City of Toronto Act, 2006. The effect of this legislative change provides the City with the authority to pass By-laws that can regulate lawfully existing signs, including requiring compliance with standards not previously applicable to the signs, or the removal of non-compliant or signs.

As a result, applications proposing the removal of existing signs that may be contributing to sign clutter or are otherwise non-compliant with the Sign By-law are no longer necessary for the City to have them removed; the City has the authority to simply pass a By-law to remove these signs.

Donations to the City of Toronto for Community Benefits:

The City's Donations to the City of Toronto for Community Benefits Policy sets out City Council's approach to ensure that voluntary donations from a party seeking an approval, permit or license from the City may only be requested or accepted at arm's length from the decision making process, to ensure that City decisions occur within an ethical framework that preserves the integrity of municipal decision making processes.

The Donations to the City of Toronto for Community Benefits Policy addresses both donations made to the City and its agencies, boards and commissions, and donations requested or encouraged by Councillors or staff which are directed to other organizations, or community agencies.

As part of their Submission Materials, The Applicant has included the following:

That Metrolinx will be the recipient of net advertising sign revenues for re-investment in public transportation initiatives;

That 15% of advertising time on each digital screen shall be provided for non-commercial advertising to Metrolinx and the community at large;

In addition to the non-commercial advertising outlined above, local and provincial authorities shall have access to the screens for emergency messaging, such as pandemics, natural disasters, and amber alerts;

For a period of 6 months following the installation of the proposed sign, the applicant shall provide 25% of available space for economic recovery initiatives related to Covid-19.

It is staff's position that City Council should not consider this information in making its decision. Neither the Sign By-law nor any other City policy explicitly allow a benefit provided by an applicant to the City, a local community or other organization to be a factor that staff or City Council should consider in deciding whether to approve or deny an application.

Moreover, if the City directly benefits from any of the above arrangements such that the arrangement could be considered a donation to the City, various sections of the Donations to the City of Toronto for Community Benefits Policy either do not allow a donation, or require that the donation be considered separate from the approval process.

Comments from other City Divisions:

Staff from City Planning have reviewed the application and were not in support of the requested amendment because of the Proposed Sign's size, configuration, and proximity to Highway 427.

With respect to possible concerns about traffic safety, Transportation Services was consulted throughout the development of the Sign By-law and is in agreement with the regulations in the Sign By-law governing signs located within 400 metres of any limit of any portion of Highway 427 contained within the municipal boundaries of the City. As the application seeks to allow the Proposed Sign to be located well within the required 400-metre separation distance from the Highway 427, Transportation Services does not support the application as it is not in keeping with the requirements in the Sign By-law for this area.

Part B: Proposed Area Specific Restrictions

As mentioned above, the Applicant's requested amendment contains the proposed removal of five third party ground signs displaying static copy as a condition of permitting the Proposed Sign, as well as the enactment of five new area specific restrictions that would prevent any new third party signs from being constructed in areas where removals are proposed.

Table 2: Location of Proposed Area-Specific Restrictions

Location Number	Location of Proposed Area Specific Restrictions	Ward
1	West of The West Mall / North of The Queensway (North of Rail Corridor)	3
2	East of The West Mall / North The Queensway (South of Rail Corridor)	3
3	East of The West Mall / North of The Queensway (North of Rail Corridor)	3
4	North of Dundas Street West and West of Scarlett Road	4
5	North of Dundas Street West and East of Scarlett Road	4

The new area specific restrictions, proposed within 100 metres of the locations where these five existing signs are to be removed, will prevent the construction of new third party signs in districts where the Sign By-law currently allows for third party ground signs, including some private properties, as illustrated in Figures 5 and 6 below.

It is staff's position that these five proposed area specific restrictions do not reflect a balanced approach to the issue of ensuring that third party signs are permitted or prohibited where appropriate to their surroundings and will generally be a duplication of restrictions that are already found in the Sign By-law.

Locations 1, 2 and 3 - Proposed area-specific restrictions at the intersection of the West Mall and Galt Subdivision (rail corridor)

Locations 1, 2 and 3 are close to the intersection of The West Mall and the Galt Subdivision. The introduction of new area-specific restrictions where these signs are to be removed will not only affect the Galt Subdivision but prohibit new ground signs to be erected at neighbouring premises located in Employment Sign Districts, where third party ground signs are a permitted sign type.

The three signs in this location are each third party ground signs currently displaying static copy. There are a total of four sign faces between the three signs currently at these locations.

This area-specific restriction has little connection to the Proposed Location approximately 1.2 kilometres away. In addition, much of the area to the west of these signs is an Open Space ("OS") Sign District which does not permit third party signs either within the OS Sign District or within at least 30 metres of it (See Figure 5). As a result, the impact of these three area specific restrictions would only effect a small portion of the premises immediately to the east of the West Mall.

Figure 5: Sign District Map showing location of Signs 1, 2 and 3 to be removed and proposed area-specific restriction



It is staff's position that while the proposed removal of the three signs noted above may reduce sign clutter in at the intersection of The West Mall and Galt Subdivision, the proposed area specific restrictions will largely overlap each other and will be largely redundant.

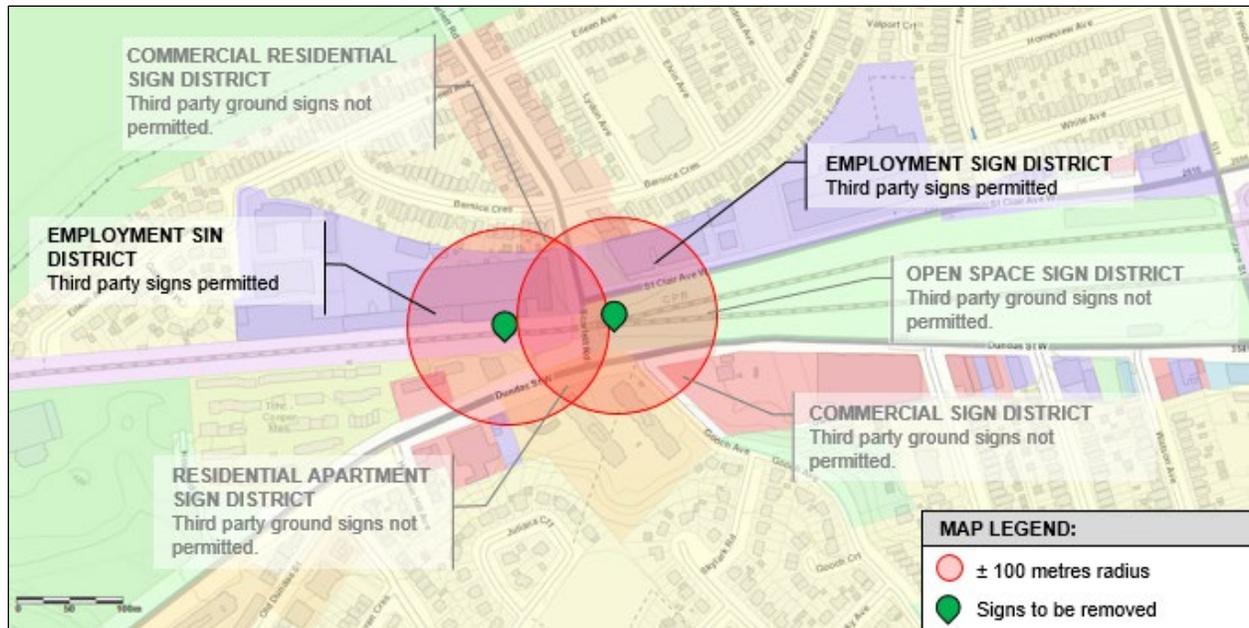
In addition, these proposed area-specific restrictions may place an unnecessary prohibition on the ability of nearby property owners to construct new third party signs, where otherwise such signs may be appropriate.

Locations 4 and 5 - Proposed area-specific restrictions at the intersection of Dundas Street West and Scarlett Road

Locations 4 and 5 are located on the north side of Dundas Street West and are in close proximity to the Scarlett Road Bridge reconstruction project. These locations currently contain ground signs currently displaying static copy each with two sign faces.

Much of the area near locations 4 and 5 is designated as Residential ("R"), Residential Apartment ("RA"), Commercial Residential ("CR") or Open Space ("OS") Sign Districts. The R, RA or OS sign districts do not permit third party signs either within them or within at least 30 metres of them (See Figure 6).

Figure 6: Sign District Map showing location of Signs 4 and 5 to be removed and proposed area-specific restriction



As a result, there are few, if any opportunities for new third party signs to be constructed in the area surrounding the intersection of Dundas Street West and Scarlett Road. The Proposed area specific restrictions are largely redundant in light of the fact that the majority of the area proposed to be covered, consists of Sign Districts where third party signs are not permitted.

It is staff's position that while these proposed sign removals may result in the removal of signs that would no longer be permitted by the Sign By-law, the proposed area-specific restriction is largely redundant given the current restrictions in the Sign By-law.

Conclusion

The Applicant has not provided any basis as to why City Council should amend the Sign By-law to exempt a specific portion of the Galt Subdivision from a Sign By-law prohibition on any third party signs being erected in this specific location; and further establish regulations for this location to allow for, and regulate, a third party electronic ground sign with sign faces three times larger and almost twice as tall as the electronic ground signs generally permitted in U Sign Districts throughout the City.

The Applicant has also not provided a basis to establish five new area specific prohibitions on the display of third party signs within specific portions of premises defined as the Galt Subdivision. The area-specific restrictions that have been proposed by the Applicant will only make a minimal contribution to the objective of the Sign By-law to reduce sign clutter. As well, these five proposed area-specific restrictions do not reflect a balanced approach to the issue of ensuring that third party signs are permitted or prohibited where appropriate to their surroundings, and will be largely a duplication of restrictions that are already found in the Sign By-law.

As such, it is the position of the CBO that the current regulations for the properties discussed in this report are appropriate, and should not be modified as requested by the Applicant.

CONTACT

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SIGNATURE

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ATTACHMENTS

1. Draft of Proposed Area-Specific Amendment - Specified Portions of Galt Subdivision