M TORONTO

REPORT FOR ACTION

Properties Included on the City's Heritage Register -Consideration of Objections for 87 Boston Avenue, 749-753 Broadview Avenue, and 685 Danforth Avenue

Date: June 19, 2023
To: Planning and Housing Committee
From: Chief Planner and Executive Director, City Planning
Wards: 14 - Toronto-Danforth

SUMMARY

This report responds to notices of objection received by the City of Toronto under Section 27 (7) of the Ontario Heritage Act (the "OHA") from property owners objecting to the inclusion of their properties on the City's Heritage Register.

Through Bill 108 and Bill 23, amendments were made to the OHA to establish a process whereby owners can object to a property's listing on the Heritage Register and, should they do so, a subsequent decision on the listing must be made by the municipality. Owners can object to listings at any time. Chapter 103 of the Toronto Municipal Code establishes the process for Council consideration of objections to properties included on the Heritage Register.

As a result of these new processes, City Council must be made aware of such objections on a routine basis so that they may consider the matter and render a final decision. Once Council has decided about the objection, the owner of the property must be notified of Council's decision within 90 days. Council's decision on objections to listing is final and is not subject to appeal.

In the final quarter of 2022 and the first quarter of 2023 the City received three notices from property owners objecting to the inclusion of five properties on the Heritage Register.

87 Boston Avenue749 Broadview Avenue751 Broadview Avenue753 Broadview Avenue685 Danforth Avenue

Following a review of the objections to listing submitted for these properties, staff are of the opinion that the properties at 87 Boston Avenue and 749-753 Broadview Avenue

hold cultural heritage value. Staff recommend that Council continue to include these properties on the Heritage Register.

Following a review of the objection to listing for 685 Danforth Avenue, including an assessment of information not available during the initial listing process, staff are of the opinion that the property at 685 Danforth Avenue does not hold cultural value. Staff recommend that Council remove the property from the Heritage Register.

RECOMMENDATIONS

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

1. In consideration of the objection pursuant to the Ontario Heritage Act, City Council continue to include the property at 87 Boston Avenue on the City of Toronto's Heritage Register.

2. In consideration of the objection pursuant to the Ontario Heritage Act, City Council continue to include the property at 749-753 Broadview Avenue on the City of Toronto's Heritage Register.

3. In consideration of the objection pursuant to the Ontario Heritage Act, City Council remove the property at 685 Danforth Avenue from the City of Toronto's Heritage Register.

FINANCIAL IMPACT

There are no financial implications resulting from the adoption of this report.

DECISION HISTORY

On July 16, 2021, City Council adopted By-law 670-2021 amending the City of Toronto Municipal Code Chapter 103, Heritage, in response to the More Homes, More Choice Act and in part established the process the City would follow when responding to owner's notices of objection under Section 27 (7) of the OHA. https://www.toronto.ca/legdocs/bylaws/2021/law0670.pdf

On March 29, 2023, City Council adopted By-law 288-2023 amending the City of Toronto Municipal Code Chapter 103, Heritage, in response to the More Homes Built Faster Act and amended the process the City follows when responding to owner's notices of objection under Section 27 (7) of the OHA. https://www.toronto.ca/legdocs/bylaws/2023/law0288.pdf

87 Boston Avenue

On May 11, 2022, City Council adopted TE32.10 and included the property at 87 Boston Avenue on the City's Heritage Register. <u>https://secure.toronto.ca/council/agenda-item.do?item=2022.TE32.10</u>

749-753 Broadview Avenue

On July 19, 2022, City Council adopted TE34.59 and included the property at 749-753 Broadview Avenue on the City's Heritage Register. <u>https://secure.toronto.ca/council/agenda-item.do?item=2022.TE34.59</u>

685 Danforth Avenue

On July 19, 2022, City Council adopted TE34.59 and included the property at 685 Danforth Avenue on the City's Heritage Register. <u>https://secure.toronto.ca/council/agenda-item.do?item=2022.TE34.59</u>

BACKGROUND

Ontario Heritage Act

The Ontario Heritage Act is the key provincial legislation, among other matters, for the identification, protection, management, and wise use of cultural heritage resources, including archaeology in Ontario and within municipal boundaries. This is largely achieved through listing on the Heritage Register, designation of individual properties under Part IV of the OHA, or designation of districts under Part V of the OHA.

Section 27 of the OHA gives municipalities the authority to maintain and add to a publicly accessible Heritage Register. The Heritage Register includes individual heritage properties that have been designated under Part IV, Section 29 of the OHA and properties in a heritage conservation district designated under Part V, Section 41 of the OHA. Prior to Bill 23 amendments to the OHA coming into force on January 1, 2023, Council could also include properties on the Heritage Register that had not been designated but were believed to be of "cultural heritage value or interest." Under the amended Act, Council can include properties on the Heritage Register that have not been designated but are believed to be of "cultural heritage value or interest." and meet one or more of the criteria prescribed under O. Reg 9/06.

Recent Amendments to the OHA establish a process to object to properties listed on the Heritage Register and a subsequent decision of the City in consideration of an objection received by an owner with respect to a listed property at any time.

Non-designated listed properties do not have any protection under the Ontario Heritage Act, except insofar as an owner must give Council at least 60 days' notice of their intention to demolish or remove a structure on the property. This notice provides the City time to conduct further research and evaluation of a listed property to determine if it merits designation under Part IV of the OHA, and therefore warrant conservation, or if Heritage Register - Consideration of Objections Page 3 of 17 the property does not merit listing, and may not be required to be conserved and may be demolished.

Listing a property does not necessarily mean that it will be subsequently designated, which is legally binding and requires owners to seek heritage approval for alterations or demolition. Designation arises in typically common scenarios, such as:

- a property owner gives notice of an intention to demolish the listed building and further evaluation recommends designation
- a listed property is included within a planning application and a Heritage Impact Assessment (HIA) is submitted, confirms the property contains cultural heritage value or interest in accordance with provincial criteria and proposes a subsequent evaluation to direct appropriate conservation measures within the planning approvals process
- a property is not listed on the Heritage Register, but is identified through a planning application as a potential cultural heritage resource that requires further evaluation to determine whether it meets two or more criteria under O. Reg 9/06
- a property owner wishes to take advantage of one of the city's heritage incentive programs and requests further staff evaluation and designation, as appropriate

Statements of Objection under the Ontario Heritage Act

Section 27(8) of the OHA requires that Council consider and decide on notices of objection received from property owners under Section 27 (7) of the OHA. As of January 1, 2023, this requirement applies to all properties that are included on the Heritage Register. An analysis of the prescribed criteria under O. Reg 9/06 is not required by operation of subsection 1(3) of O. Reg 9/06 if the property was included on the Heritage Register before January 1, 2023.

Should the City Clerk receive an objection under subsection 27(7) of the OHA, Chapter 103-7.3 of the City of Toronto Municipal Code describes the process by which Council will respond. If in the opinion of the Chief Planner there is sufficient time to prepare a report, the Chief Planner will prepare a report to the Planning and Housing Committee on consideration of any objections received for recommendations to Council, on a quarterly basis. Section 27(8) of the OHA requires that once Council has decided on an objection the City shall provide notice of the decision to the property owner within 90 days.

COMMENTS

The OHA requires that owners seeking to object under Section 27(7) of the OHA must serve a notice of objection on the clerk of the municipality setting out the reasons for the objection and all relevant facts. Staff have reviewed notices of objection served by property owners in the last quarter of 2022 and the first quarter of 2023, along with any

Heritage Register - Consideration of Objections

other submission materials with relevant information, and provide the following comments.

87 Boston Avenue

Staff have reviewed the notice of objection and are of the opinion that it has no bearing on the cultural heritage value of the property.

The property at 87 Boston Avenue was identified through a Heritage Analysis Report (March 2016) conducted by Unterman McPhail Associates through the City of Toronto's Carlaw and Dundas District Landscape and Public Realm Improvements study. Following Toronto and East York Community Council's request in October 2021 for an update on the status of the heritage reports for the historic industrial buildings in the Carlaw – Dundas Study Area, staff conducted further evaluation and a recommendation for inclusion on the City's Heritage Register was adopted by Council on May 11, 2022.

The owner has submitted an objection on the grounds that the listing is not needed because they have conserved the building through previous renovations. The objection also expresses concern that listing could devalue the property, and result in additional costs and additional time to conduct a Heritage Impact Assessment should the owner decide on further renovations that are deemed "demolition." The objection is appended to this staff report as Attachment 2.

Staff are of the opinion that the subject property meets the criteria prescribed by Ontario Regulation 9/06 and is believed to hold cultural heritage value or interest. As such, despite the notice of objection, staff recommend that the property should remain listed on the City's Heritage Register.

749-753 Broadview Avenue

The properties at 759, 751 and 753 Broadview Avenue were identified through the Danforth Avenue (Segment 2) Cultural Heritage Resource Assessment (July 2022) conducted by staff through the Danforth Avenue Complete Street and Planning Study. Following the completion of the Planning Study, staff conducted a further review of all properties identified through the Danforth Avenue II Cultural Heritage Resource Assessment, and a recommendation for inclusion on the City's Heritage Register of 225 properties, including the subject properties at 749-753 Broadview Avenue, was adopted by Council on May 11, 2022.

The subject properties at 749-753 Broadview Avenue were listed using a listing statement (reasons for inclusion) that identifies the cultural heritage value of 220 properties, including the subject properties, through their general design and contextual values. The listing statement is included in Attachment 3.

The owner has submitted an objection on the grounds that the properties are not on Danforth Avenue but were identified through the Danforth Planning Study, and that the subject properties were unfairly targeted since not all properties on Broadview Avenue were reviewed. The objection also states that the properties have no heritage features, that the reasons for listing are too vague, and that the listing adds additional burden to Heritage Register - Consideration of Objections Page 5 of 17

the owner. Through the objection, the owner requests financial compensation and a reduction in property taxes as a result of their properties being listed. The objection is appended to this staff report as Attachment 4.

Staff have reviewed the notice of objection submitted by the owner of the properties at 749-753 Broadview Avenue and are of the opinion that the subject properties meet the criteria prescribed by Ontario Regulation 9/06 and hold cultural heritage value or interest. As such, despite the notice of objection, staff recommend that the properties should remain listed on the City's Heritage Register.

685 Danforth Avenue

The property at 685 Danforth Avenue was identified through the Danforth Avenue (Segment 2) Cultural Heritage Resource Assessment (July 2022) conducted by Staff through the Danforth Avenue Complete Street and Planning Study. Following the completion of the Planning Study, staff conducted a further review of all properties identified through the Danforth Avenue II Cultural Heritage Resource Assessment, and a recommendation for inclusion on the City's Heritage Register of 225 properties, including the subject property at 685 Danforth Avenue, was adopted by Council on May 11, 2022.

The subject property at 685 Danforth Avenue was one of five properties listed through the Danforth II Cultural Heritage Resource Assessment using an individual listing statement, which is included in Attachment 5.

The owner has submitted an objection on the grounds that the property was constructed after 1930, while others on Danforth Avenue were predominantly built in the previous two decades. The objection further notes that the front façade was rebuilt in 1975, that the property was selected as a redevelopment site for an assignment in the University of Toronto's architecture program, and that in the 1980s, the City of Toronto approved plans (unbuilt) to extensively change the property for use as a Shoppers Drug Mart.

Staff have reviewed the notice of objection submitted by the owner of the property at 685 Danforth Ave. The notice of objection includes new information that was not available to staff at the time of listing, referencing alterations to the north, front façade of the building made in 1975. As a result of this information, staff have undertaken additional research, including reviewing historic building permits at Building Records and have determined that significant alterations were made to the building, including the removal of a parapet containing significant elements of the building's design, including a royal cipher of King George VI (Attachment 7). All window openings and the main entrance opening on the front façade were also altered, with brick infill reducing their height.

Staff have assessed the heritage integrity of 685 Danforth Avenue relating to its design value in light of the alterations described above and have concluded that the remaining physical features of the building no longer support the design value of the property as a purpose-built post office. As a result of this new information, staff recommend that the property at 685 Danforth Avenue be removed from the Heritage Register.

Staff have reviewed the notices of objection submitted by property owners under Section 27(7) of the OHA. Staff believe that 87 Boston Avenue and 749-753 Broadview Avenue hold cultural heritage value or interest. Staff are of the opinion that these properties should continue to be listed on the Heritage Register.

As a result of reviewing new information related to 685 Danforth Avenue, staff no longer believe that the subject property holds cultural heritage value or interest. Staff are of the opinion that this property should be removed from the Heritage Register.

CONTACT

Mary L. MacDonald, MA, CAHP Senior Manager, Heritage Planning Urban Design, City Planning Tel: 416-338-1079 Fax: 416-392-1973 E-mail: Mary.MacDonald@toronto.ca

SIGNATURE

Gregg Lintern, MCIP, RPP Chief Planner and Executive Director City Planning

ATTACHMENTS

Attachment 1 - Listing Statement (Reasons for Inclusion), 87 Boston Avenue Attachment 2 - Notice of Objection, 87 Boston Avenue Attachment 3 - Listing Statement (Reasons for Inclusion), 749-753 Broadview Avenue Attachment 4 - Notice of Objection, 749-753 Broadview Avenue Attachment 5 - Listing Statement (Reasons for Inclusion), 685 Danforth Avenue Attachment 6 - Notice of Objection, 685 Danforth Avenue Attachment 7 - Selected Images, 685 Danforth Avenue

ATTACHMENT 1



View of the principal (east) elevation of 87 Boston Avenue (Heritage Planning, 2022)

Year Built: 1921

Description: Located on the east side of Boston Avenue south of Dundas Street East and east of Carlaw Avenue, the property at 87 Boston Avenue contains a one-storey garage type building that was constructed in 1921.

The one-storey, red brick building with stone detailing at 87 Boston Avenue contains an ornamental stepped parapet articulated with stone detailing and a stone horizontal band below that is punctuated by four decorative moldings with lozenge reliefs. Flanking these decorative moldings are ornamental brick details with soldier course and stack bond patterns punctuated by stone cubes that are set above the three openings.

The property was constructed for the William Wrigley Jr Co., whose name can be seen in the decorative stone panel in the principal (east) elevation ("W.M. Wrigley Jr. Co."). The company was founded in Philadelphia by William Wrigley Jr, who began making gum in 1891. Wrigley's gum production was an essential supply to Canadian soldiers participating in WWI and WWII and its production was not compromised during the war.

The subject property is located at the rear of the two former William Wrigley Jr Co. Ltd warehouse/factory buildings at 235 and 245 Carlaw Avenue and the garage presumably serviced those buildings.

Heritage Register - Consideration of Objections

The property at 87 Boston Avenue supports the historic character of Leslieville surrounding the intersection of Dundas Street East and Carlaw Avenue where it is part of an important collection of former factory/warehouse and garage buildings that were constructed in the first two decades of the 20th century when the area was developed as a manufacturing centre.

NOTE: While the Heritage Toronto plaque (2018) for the William Wrigley Jr Co. Factory buildings at 235 and 245 Carlaw Avenue states that the property at 87 Boston Avenue was a fire hall, City Directories indicate that it was a garage.

ATTACHMENT 2

Notice of Objection 87 Boston Avenue



City Clerk, Attention: Administrator, Secretariat, City Clerk's Office Toronto City Hall, 2nd Floor West 100 Queen Street West Toronto, ON M5H 2N2

We received notification of the inclusion of our home at 87 Boston Avenue, Toronto that it has been included in the Heritage Register.

As per the directions on the letter, please accept this email as our objection to the inclusion of our home on the Heritage Register.

Having purchased the property nearly 20 years ago, we have spent hundreds of thousands of dollars to convert the building into our home, and it has therefore been preserved, and therefore, is not needed to be included. All our work was in accordance with the building code and, of course, we had building permits drawn for our improvements. We have no intention of demolishing our home, and placing the property on the City's Heritage Registry, may actually devalue our property, as prospective future purchasers may see the incumbrance as a restriction and therefore a lesser valued property. Should we decide on further renovations that are deemed "demolition", placement of our property on the list will also lead to additional costs and additional time to conduct a Heritage Impact Assessment. It is clear that this community benefit is at our personal expense, without any financial compensation.

We request that 87 Boston Avenue be removed from the Heritage Registry.

Please confirm receipt of our objection and we look forward to hearing from you.

Yours truly,

Martin Cohen

Listing Statement (Reasons for Inclusion) 749-753 Broadview Avenue

The following Listing Statement (Reasons for Inclusion) was applied to 220 properties identified as meriting listing on the Heritage Register through the Danforth Avenue (Segment 2) CHRA, including the properties from 749-753 Broadview Avenue:

The historic context statement completed for Danforth Avenue (Segment 2) CHRA identifies Danforth Avenue (including a portion of Broadview Avenue immediately south of Danforth Avenue) from Broadview Avenue to Carlaw Avenue as having a historic main street form that was developed primarily, and with notable consistency, from approximately 1910-1929. The collection of historic buildings along this corridor defines a continuous street wall of low-rise buildings, articulated by a rhythm of narrow storefronts with recessed entrances, and punctuated by landmarks including banks, places of worship, and theatres.

Into the present day, the Danforth Avenue corridor has maintained a strong sense of place and character as a functioning historic main street that has served an increasing diversity of ethno-cultural communities, shifting from early British communities to include Italian, Estonian, Ukrainian, Greek, and Ethiopian communities, among many others. It is the heart of tight-knit neighbourhoods framing it to the north and south, including Riverdale, Playter Estates, the Pocket, and Danforth Mosaic.

The historic context statement also identifies the study area as being defined by the following themes which are identified with the recommended properties:

Community Building: Early settlement; Land division and subdivision; Places of Worship Industry, Manufacturing and Economic Activity: Main street retail; Live music venues; Commercial redevelopment

The following properties are good examples of the Main Street Commercial Row, Main Street Commercial Block, Bank, and Place of Worship typologies that support the historic context of the Danforth Avenue study area. All of the recommended properties meet Ontario Regulation 9/06, the provincial criteria prescribed for municipal designation, which the City also applies when assessing properties for its Heritage Register.

This Listing Statement is followed by a chart listing 220 properties.

The entries for 749-751 Broadview Avenue and 753 Broadview Avenue are excerpted below:

Address	Date of Construction	Building Type	Theme
749-751 Broadview Avenue	c. 1909	Main street, commercial row	Early settlement/land division and subdivision
753 Broadview Avenue	c. 1911	Main street commercial row	Early settlement/land division and subdivision



View of the principal (east) elevation of 749-753 Broadview Avenue (Heritage Planning, 2019)

ATTACHMENT 4

Notice of Objection

749-753 Broadview Avenue



Sept. 2,2022

page 1 of 2

To: Served on the City Clerk, City Clerk's Office

For Re:

- 1. 749 Broadview Avenue,
- 2. 751 Broadview Avenue and
- 3. 753 Broadview Avenue.

<u>Objection and Appeal to the Inclusion of these properties on the Heritage</u> <u>Registry</u>

Previously submitted to:

- 1. The Toronto Preservation Board and Toronto and East York Community Counsel
- 2. For Inclusion at the East York Community Counsel meeting on June 29, 2022.

The Owner of 751 Broadview Avenue as noted on your letter dated May 11, 22 (copy previously attached), which includes 749 Broadview Avenue, and 751 Broadview Avenue, and 753 Broadview as listed on the chart attached to your May 11, 22 letter (also previously attached), that indicates that the said properties are recommended for inclusion on the Heritage Registry as a Listed Property.

This is a letter of Objection and Appeal from the Owner to the inclusion on the Heritage Registry and is with regards to all of the above noted properties 749 Broadview Avenue, and 751 Broadview Avenue, and 753 Broadview Avenue.

These properties referenced from the Danforth Planning Study are actually located on Broadview Avenue and are <u>not</u> on Danforth Avenue and should <u>not</u> be listed and should <u>not</u> be part of any Danforth Listings on your Heritage Listing.

The above is misleading to all property Owner's on Broadview Avenue, the Danforth Planning Study pertains to Danforth Avenue, and not to Broadview Avenue, and unless you include all properties on Broadview Avenue in the Study, then none should be included, as you are unfairly targeting and listing these properties without reviewing and listing other properties on Broadview Avenue.

Further, these properties have **no** Heritage characteristics, and **!!Q** Heritage features whatsoever, and should **not** be listed on the Heritage Register.

page 2 of 2

In addition, the reason provided for listing these properties is extremely vague and would also apply to all properties on Broadview Avenue, and all properties on Danforth Avenue, and almost all properties along all streets in Toronto, and if you list these properties on the Heritage Register you should also be listing all properties on Broadview Avenue, and all properties on Danforth Avenue, and almost all properties along all streets in Toronto, and if you list these properties on Danforth Avenue, and almost all properties along all streets in Toronto, and as this is not being done, these properties are being unfairly targeted and listed, and these properties also should **not** be listed on the Heritage Register. Your basis on this matter is unfair, has no merit and is unacceptable.

Also, this is being done without the consent of the property Owner and if listed this is now an additional burden being put on the property Owner by the City, and further, certain property Owner's rights that have existed with these properties to this date are now being taken away from the property owner by the City, all of this is being done without any compensation by the City to the property Owner, especially during this very difficult, ongoing financial and economic crisis.

If these properties are listed on the Heritage Register, the property Owner should be provided with financial compensation, and a reduction in property Taxes, as the property Owner does **!!Q!** want these properties to be listed on the Heritage Register and these properties should **not** be listed on the Heritage Register.

Please advise of the compensation and reduction in Property Taxes that will be provided to the property Owner of the properties listed on the Heritage Registry.

Lastly, please remove 749 Broadview Avenue, and 751 Broadview Avenue, and 753 Broadview Avenue from the Heritage Registry as a Listed Property.

Please confirm receipt of this letter, and removal of these properties to be listed in the Heritage Registry.

Sincerely, ACI Architects Inc. For the Property Owner of these properties

- CC: Mary MacDonald, Senior Manager, Heritage Planning- Mary.McDonald@toronto.ca
 - Gary Miedema, Senior Manager, Heritage Planning- Gary.Miedema@toronto.ca
 - Justin Niddrie, Toronto & East York Community Counsel, City Clerk's Office, teycc@toronto.ca
 - Hertpb@ toronto.ca

Listing Statement (Reasons for Inclusion) 685 Danforth Avenue



View of the principal (north) elevation of 685 Danforth Avenue (Heritage Planning, 2020)

Year Built: c.1938

Description: Located on the south side of Danforth Avenue, east of Pape Avenue, the property at 685 Danforth Avenue comprises a one-storey, former post office building. The property was constructed in c.1938 and named Post Office J. It remained in use by Canada Post for over 70 years. The subject property is clad in buff brick with inlaid brick and stone detailing. Designed with the horizontality of the Art Moderne style, it contains simplified, classically inspired ornamentation, including the stone door surround in the principal (north) elevation with rounded, thin columns and fluted stonework.

Notice of Objection 685 Danforth Avenue

RECEIVED OFFICE OF THE CITY CLERK-13 WEST

Vibrant Services Limited 248 - 1 St Thomas Street Toronto, ON. M5S 3M5

Nov 9, 2022

The City Clerk Attention: Administrator, Secretariat, City Clerk's Office Toronto City Hall, 2nd Floor, West 100 Queen Street West Toronto, ON. M5H 2N2

Re: Inclusion of the building at 685 Danforth Avenue in the Heritage Register.

We are very surprised that this ordinary one story building that once housed a Postal Office has been included as a heritage property. It is one of the very few structures designated as heritage buildings on that part of Danforth Avenue that was built well after 1930. (As representatives of the owners we can only find construction plans dating to 1975 when it was rebuilt including the front fai;:ade which is referred to as the reason for it being designated as heritage worthy. The insurers of the building state that it was originally built in 1951.)

We would like further information in respect of the reasons for its inclusion but are unable to access <u>http://app.toronto.ca/tmmis/view/AgendaltemHistory.do?item=2022.TE34.59</u>- as per your notice. This address is "not available" according to the City's website.

Some time ago the Department of Architecture of the University of Toronto selected a few buildings on major streets of Toronto that their panel decided most required development; 685 Danforth was one. Students were given the project/competition to design a suitable replacement for any of the sites. As a student who did a design for 685 Danforth won the competition we may be able to find records at the University. It is difficult to reconcile the building's new heritage designation with the above.

In the 1980's after the Post Office notified the owners that they did not plan to renew their Lease, the owners together with Shoppers Drug Mart submitted plans for the extensive renovation of the building for Shopper's use. The plans which included major changes to the front fai;:ade and additional floors were accepted by the City. Construction did not proceed and the Post Office remained as tenants.

We request that 685 Danforth's Heritage designation be re-considered.

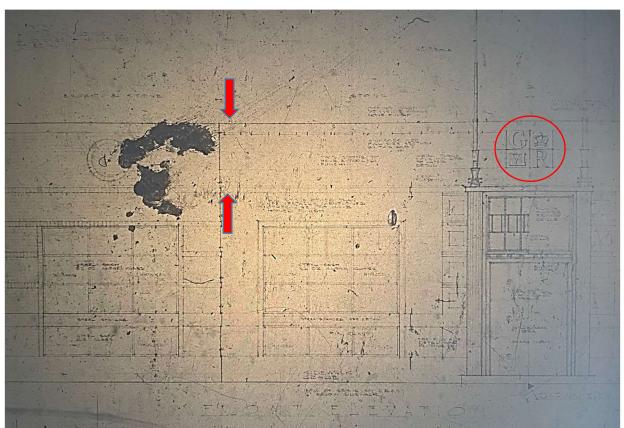
Your truly,

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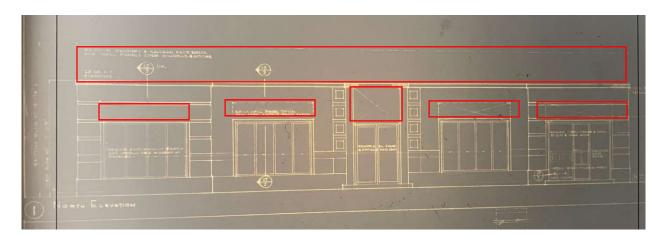
Martin Ossip / Vibrant Services Limited

ATTACHMENT 6

Selected Images of 685 Danforth Avenue



Detail, architectural plans for Post Office J, 685 Danforth Avenue, 1938. East side of building including main entrance at right, showing parapet (between red arrows) including a royal cipher for King George VI (red circle) flanked by flag poles, and original window and entrance detailing.



Elevation detailing planned alterations to the structure's height and composition, 1974. Alterations include removal of parapet and partial brick infill of window and door openings.