# **TORONTO**

# REPORT FOR ACTION

# 99 and 109 Cartwright Avenue and 130 Bentworth Avenue – Zoning Amendment – Decision Report – Approval

Date: October 9, 2024

To: North York Community Council

From: Director, Community Planning, North York District

Ward: Ward 8 - Eglinton-Lawrence

Planning Application Number: 23 160614 NNY 08 OZ

#### SUMMARY

The application proposes to amend the Zoning By-Law to permit the redevelopment of 99 and 109 Cartwright Avenue, and 130 Bentworth.

The proposed development is a 2,440.63 square metres addition to the existing Sterling Hall School municipally known as 99 Cartwright Avenue. The building addition is two storeys in height (15 metres), with indoor classrooms and a second storey roof terrace. The proposed development includes 106 vehicles spaces (including eight barrier free spaces) and thirty-four bike parking spaces accessed via two driveways off Bentworth Avenue. A passenger drop-off area is also included at the north end of the site off Cartwright Avenue.

The proposed development is consistent with the Provincial Policy Statement (2020) and the Provincial Planning Statement (2024), and conforms with A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020). The proposed development also conforms to the City's Official Plan including Site and Area Specific Policy 452.

This report reviews and recommends approval of the application to amend the Zoning By-law.

#### RECOMMENDATIONS

The Director, Community Planning, North York District recommends that:

1. City Council amend former City of North York Zoning By-law 7625 for the lands at 99 and 109 Cartwright Avenue, and 130 Bentworth Avenue substantially in accordance with the draft Zoning By-law Amendment attached as Attachment 7 to this report.

2. City Council authorize the City Solicitor to make such stylistic and technical changes to the Official Plan Amendment and draft Zoning By-law Amendment as may be required.

#### FINANCIAL IMPACT

The Development Review Division confirms that there are no financial implications resulting from the recommendations included in this report in the current budget year or in future years.

#### **DECISION HISTORY**

In December 2013, City Council adopted Official Plan Amendment No. 231 (OPA 231) as part of the 5-year Official Plan and Municipal Comprehensive Review for Employment Lands. OPA 231 introduced two sub-designations - Core Employment Areas and General Employment Areas - located within the interior and exterior of Employment Areas, respectively, and were brought into force by the Local Planning Appeal Tribunal (LPAT; now OLT) in 2016. OPA 231 defined sensitive uses that are not permitted on Employment Lands – uses that would attract the general public and possibly disrupt industrial operations.

The subject site 109 Cartwright Avenue and 130 Bentworth Avenue are designated *Core Employment Areas* and prohibit the "school" use as it was deemed sensitive, according to Official Plan Amendment (OPA) 231, while 99 Cartwright Avenue is designated *Neighbourhoods*.

A copy of the report and decision can be found at the following link: https://www.toronto.ca/legdocs/mmis/2013/pg/bgrd/backgroundfile-63574.pdf

Site and Area Specific Policy No. 452, approved by The Minister of Municipal Affairs and Housing (the "Minister") in July 2014 without appeal, applies to 109 Cartwright Avenue and 130 Bentworth Avenue and permits the "school" use provided the owner submits a study of noise, odour, dust, and other industrial related impacts so the school is designed to not be affected by neighbouring industrial uses. To align zoning regulations with this policy, amendments to By-law 7625 are proposed to rezone the properties from their current MC designation to the M1 zone, which permits private school use.

A pre-application consultation (PAC) meeting for the school expansion was held on September 12, 2022. The subject application was received on October 13, 2022 and deemed incomplete on July 14, 2023. Additional application materials were received, and the application was deemed complete as of November 1, 2023.

The Preliminary Report is available at: <a href="https://www.toronto.ca/99cartwrightave">www.toronto.ca/99cartwrightave</a>

Staff conducted a Community Consultation Meeting for this application December 11, 2023. Community consultation is summarized in the Comments section of this Report.

#### THE SITE

#### Description

The subject site is located at the southwest corner of Cartwright and Paul David Street, west of Dufferin Street. Sterling Hall School is a private primary school with parking and grounds.

#### **Existing Use**

The existing Sterling Hall School is located at 99 and 109 Cartwright Avenue. The land at 109-111 Cartwright Avenue is currently used for industrial and commercial purposes. 130 Bentworth Avenue is currently a vacant lot.

### **Surrounding Land Uses**

North: A two-storey industrial building on the north side of Cartwright Avenue. East: One to two-storey detached dwellings on the east side of Paul David Street South: A mix of one to two-storey commercial use buildings on the south side of Bentworth Avenue.

West: A mix of one to two-storey commercial use buildings along the south side of Cartwright Avenue.

#### THE APPLICATION

#### **Description**

The proposed development proposes a two-storey addition to the existing Sterling Hall School. This includes the demolition of an existing 1,494.01 square metres educational building at 109 Cartwright Avenue. The new addition adds 9 classrooms, 5 breakout rooms, 2 offices, 2 washrooms, 1 studio, 1 meeting room, reception, and mechanical/electrical spaces.

#### Density

The proposed density is 0.22 times the lot area.

#### Access, Bicycle Parking, Vehicle Parking and Loading

The Proposed Development includes 106 vehicles spaces (including 8 barrier free spaces) and 34 bike parking spaces accessed via two driveways off Bentworth Avenue. A passenger drop-off area is also included at the north end of the site off Cartwright Avenue.

#### **Non-Residential Component**

The proposal includes 2440.63 square metre addition to the existing school use.

#### Height

The proposed building would be 2-storeys tall with a height of 15 metres.

#### Additional Information

See the Attachments 1 - 12 of this report for the Application Data Sheet, Location Map, a site plan, and elevations of the proposal. Detailed project information including all plans and reports submitted as part of the application can be found on the City's Application Information Centre at: <a href="https://www.toronto.ca/99cartwrightave">www.toronto.ca/99cartwrightave</a>

#### **Reasons for Application**

Amendments to former City of North York Zoning By-law 7625 are required to permit the proposed building form, height, density, building setbacks and other site-specific development standards, including the use of the site for an elementary school.

#### APPLICATION BACKGROUND

#### **Application Submission Requirements**

The following reports/studies were submitted in support of the application:

- Air Quality Study
- Arborist Report
- Architectural Plans
- Block Context Plan
- Concept Site and Landscape Study
- Compatibility and Mitigation Study
- Contaminated Site Assessment
- Functional Servicing Report
- Geotechnical Study
- Hydrogeological Report
- Noise and Vibration Assessment
- Parking Study
- Planning rationale
- Public Consultation Strategy Report

- Servicing Report
- Site Grading and Drainage Plan
- Soil Volume Plan
- Stormwater Management Report
- Survey Plan
- Toronto Green Standard Checklist V.4 (Tier 1)
- Transportation Impact Study
- Tree Preservation Plan

#### **Agency Circulation Outcomes**

The application together with the applicable reports noted above, have been circulated to all appropriate agencies and City Divisions. Responses received have been used to assist in evaluating the application and to formulate the appropriate Zoning By-law standards.

#### **Statutory Public Meeting Comments**

In making their decision with regard to this application, Council members have been given an opportunity to view the oral submissions made at the statutory public meeting held by the North York Community Council for this application, as these submissions are broadcast live over the internet and recorded for review.

#### POLICY & REGULATION CONSIDERATIONS

#### **Provincial Land-Use Policies**

All decisions of Council in respect of the exercise of any authority that affects a planning matter shall be consistent with the Provincial Policy Statement (2020) (PPS (2020)), and shall conform to provincial plans including A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020) (Growth Plan (2020)), the Greenbelt Plan and others.

On October 20, 2024 the Provincial Planning Statement (2024) comes into effect and combines the PPS (2020) and the Growth Plan (2020) into a single policy document. As of October 20, 2024, all decisions of Council in respect of the exercise of any authority that affects a planning matter shall be consistent with the Provincial Planning Statement (2024) (PPS 2024) and shall conform to provincial plans including the Greenbelt Plan (2017) and others.

#### Official Plan

This application has been reviewed against the policies of the City of Toronto Official Plan as follows:

The subject sites at 109 Cartwright Avenue and 130 Bentworth Avenue are designated *Core Employment Areas*, while 99 Cartwright Avenue is designated *Neighbourhoods* 

and *Parks* on Map 17 of the Official Plan. The northern third of 99 Cartwright Avenue is designated *Neighbourhoods*, and the southern two-thirds as *Parks*.

Site and Area Specific Policy No. 452 on Map 28 of the Official Plan applies to 109 Cartwright Avenue and 130 Bentworth Avenue and permits the "school" use provided the owner submits a study of noise, odour, dust, and other industrial related impacts so the school is designed to not be affected by neighbouring industrial uses.

See Attachment 3 of this report for the Land Use Map. The Official Plan should be read as a whole to understand its comprehensive and integrative intent as a policy framework for priority setting and decision making.

The Official Plan can be found here:

https://www.toronto.ca/city-government/planningdevelopment/official-plan-guidelines/official-plan/

#### Zoning

The site is excluded from the new City of Toronto Zoning By-law No. 569- 2013. As such, the former City of North York Zoning By-law No. 7625 continues to apply. The site is zoned Industrial Zone One (M1) and Industrial Commercial (MC) under Zoning By-law 7625. The M1 and MC zones permit a range of industrial uses, including manufacturing, warehousing, and limited commercial uses such as offices and school use. While the M1 zone focuses more on traditional industrial activities, the MC zone would introduce additional commercial use permissions onto an Employment-designated property, which currently does not allow uses such as elementary schools (up to Grade 8).

#### **Design Guidelines**

The following design guidelines have been used in the evaluation of this application:

- Complete Street Guidelines
- Green Surface Parking Lots

The City's Design Guidelines may be found here:

https://www.toronto.ca/citygovernment/planning-development/official-planguidelines/design-quidelines/

#### **Toronto Green Standard**

The TGS is a set of performance measures for green development. Applications for Zoning By-law Amendments, Draft Plans of Subdivision and Site Plan Control are required to meet and demonstrate compliance with Tier 1 of the Toronto Green Standard.

#### Site Plan Control

The development is subject to Site Plan Control. An associated site plan application for the subject site will be made at a later date.

#### **COMMUNITY CONSULTATION**

A virtual Community Consultation Meeting ("CCM") was held by Community Planning staff on December 11, 2023. The CCM was attended by approximately 15 people, in addition to the local ward councillor's representative, staff, and the applicant team. Community Planning staff presented the planning policy framework and an overview of the application review process, and the applicant presented the development proposal. Comments and questions raised at the meeting included:

- School expansion compatibility with surrounding Employment Areas that contain various industries, businesses, and facilities.
- Configuration of the addition and landscaping.
- Improvement of the Parks designated portion of the site.
- Public realm improvements.
- Parking and on-site circulation.

The issues raised through community consultation have been considered through the review of the application and the recommendation of this report.

#### **COMMENTS**

#### **Provincial Policy Statement and Provincial Plans**

Staff's review of this application has had regard for the relevant matters of provincial interest set out in the Planning Act. Staff has reviewed the current proposal for consistency with the Provincial Policy Statement (2020), the Provincial Planning Statement (2024), and conformity with the Growth Plan (2020). In the opinion of Staff, the proposal is consistent with the PPS (2020) and the PPS (2024), and conforms with the Growth Plan (2020).

Policy 4.1 (2020) and 6.1.5 (2024) of the PPS recognize that the Official Plan is the most important vehicle for implementation of the PPS and assists in implementing the Growth Plan by setting out appropriate land use designations and policies.

Policies 2.8.3 and 3.5 of the PPS (2024) emphasize the importance of land use compatibility, particularly concerning adjacency to employment areas. The environmental studies submitted with the application conclude that the proposal effectively minimizes negative impacts from nearby industries on the school, thereby fulfilling the conditions of Site and Area Specific Policy No. 452. Various peer review studies demonstrate that there will be no adverse effects on surrounding employment uses, and any necessary mitigation measures will be addressed through the site plan.

The proposal also supports complete communities by introducing green spaces and a rooftop garden, enhancing usability and providing appropriate transitions to sensitive land uses, aligning with the objectives outlined in Section 2.8.1e of the PPS (2024).

Consequently, Staff have concluded that the proposal is consistent with the PPS and conforms to the Growth Plan.

#### **Land Use**

This application has been reviewed against the Official Plan policies described in the Policy and Regulation Considerations section of this report. The existing school is on the lands of 99 Cartwright Avenue, which are designated as *Neighbourhoods* and *Parks* in the Official Plan. The proposed addition, parking, and other alterations are on the lands of 109 Cartwright Avenue and 130 Bentworth Avenue designated *Core Employment Areas*, and subject to SASP 452 which permits school uses subject to studies demonstrating compatibility to nearby impactful industries and the nearby City's Bentworth Yard, to the satisfaction of the City. The applicant has submitted studies which were peer reviewed on behalf of the City. The studies concluded that the proposed development is compatible and therefore conforms to the policies in SASP 452. Please see the below sections of this report for more detailed information with regards to the studies.

#### **Air Quality and Noise Impact**

A Noise and Vibration Study dated September 27, 2023 and a Noise and Vibration Peer Review Response, prepared by HGC Engineering, dated May 9, 2024 were submitted in support of the application.

The study identified that the predicted sound levels at the plane of the windows exceed the applicable limits. However, HGC Engineering noted that these requirements can be met using standard fixed glazing assemblies. This issue does not affect the feasibility of the proposed expansion and will be addressed through a future Site Plan Control application.

For stationary noise sources around the site, the assessment indicated that their frequency and duration need to be confirmed with the facilities to account for worst-case operational scenarios. Additionally, the operational assumptions for roofing works, as verified in the Response to Peer Review Comments dated May 9, 2024, ensure that sound levels during worst-case scenarios remain within applicable limits. The Peer Reviewer has confirmed that the operational assumptions are acceptable and concludes that the proposed school extension is compatible with the surrounding environment.

The nearest railway line (GO Transit Newmarket Subdivision) was determined to be over 500 metres from the Site. As a result, no vibration impact is anticipated at the Site.

#### **Compatibility and Mitigation Study**

Given the site's proximity to industrial facilities to the north, south and west of the site, an Air Quality Study dated September 2023 and a Compatibility/Mitigation Study dated June 2023 were submitted in support of the application. The potential influence areas of several industrial facilities and operations at some facilities were determined to extend beyond the site and were discussed in the report and concluded that odour impacts are not anticipated from these operations. Based on the description of the operations and no existing complaints, the Peer Reviewer finds this conclusion reasonable.

The report noted that no adverse air quality impacts are anticipated from other surrounding facilities. Since the proposed development does not introduce any elevated sensitive receptors, the Peer Reviewer agreed that air quality impacts at the proposed school extension will be similar to the existing school building.

The Compatibility/Mitigation Study concludes that the proposed school expansion is not expected to impact potential new land uses or the expansion of existing land uses surrounding the site from an air quality perspective. Additionally, no facilities in the vicinity of the proposed development are expected to have any air quality concerns.

#### **Built Form, Height, Massing**

The proposed 2 storey addition is massed to be consistent with the surrounding low-rise development, with a height of 15 metres. Given the existing and planned context for the subject site and the surrounding area, the proposed built form, including height and massing, is appropriate. The proposal conforms with the Official Plan and is in keeping with the character of the surrounding low-rise buildings. The proposed building is massed to create a pedestrian-friendly environment at-grade and limit the impact on surrounding properties. An increased side setback with a minimum of 3.5 metres is provided on the east side of the addition to allow sufficient landscaping that buffers the adjacent industrial property.

#### Streetscape Design & Public Realm

This application has been reviewed against the Official Plan policies and design guidelines described in the Policy and Regulation Considerations Section of this report. The Official Plan states that development in Employment Areas is to provide a "...high quality public realm with a connected, easily understood, comfortable and safe network of streets, parks and accessible open spaces; and providing landscaping on the front and any flanking yard adjacent to any public street, park and open space to create an attractive streetscape, and screening parking, loading and service areas" (Policy 4.6.7).

The applicant will provide a 2.1 metre widened public sidewalk on Cartwright Avenue and Paul David Street and this will be secured through a future Site Plan Control approval. The proposed main entrance is reoriented southward and accessed from Bentworth Avenue, where there is no existing or proposed public sidewalk on the north side of the street. The proposed main entrance is also further from the sidewalk than the existing entrance.

Staff acknowledge that the proposal reduces curb cuts, the width of driveways and minimizes service and vehicular impacts on the public realm, improving safety and sensory appeal. Given the numerous entrances in the existing building and proposed addition, opportunities have been identified to enhance permeability to allow better user access throughout the open space.

The streetscapes along Cartwright Avenue and Bentworth Avenue are improved with the preservation of street trees and the provision of soft landscaping within the front setback. The proposed addition is set back over 54 metres from Cartwright Avenue. This increased setback allows for an expanded green space and maximized soft landscaping, including private trees, shrubs, and ground cover. Detailed landscape and streetscaping elements will be determined and secured through the Site Plan Control process.

#### Access, Parking and Loading

A Transportation Operations Assessment Study, dated September 20, 2023, by WSP Canada Inc, was submitted in support of the proposed development. A Transportation Study Addendum, dated June 28, 2024, by WSP Canada Inc., was submitted in support of the proposed development. The consultant has determined that the slight increase in Ground Floor Area (from 733.69 to 946.62 square metres) will not significantly impact trip distribution. It is also noted that the amount of programmed teaching space remains the same between the original submission and the current one. Similarly, staffing levels are expected to remain consistent, and any increase in the student population is anticipated to be minor compared to current levels. The consultant estimates that this will result in an increase of only 4 to 7 trips during peak hours. The consultant concludes that traffic generated by the site can be accommodated by the adjacent street system without any need for intersection improvements. Transportation Review accepts the conclusions of the report.

The existing driveway accesses on Cartwright Avenue and Paul David Street will be retained, and a new driveway with a pick-up/drop-off (PUDO) facility is proposed from Bentworth Avenue. However, Transportation Review has noted that the new loop driveway will significantly increase the number of driveways and access points, potentially elevating the risk of conflicts between students and vehicles, particularly given that this is a school site. This matter will be further address through a future Site Plan Control application.

The application proposes a total of 106 parking spaces, including 8 accessible spaces, which is below the 130 spaces required by By-law 7625. Despite this shortfall, Transportation Review supports the proposed parking supply.

The application is also proposing two Type "B" loading spaces, which meet the requirement of Zoning By-law 7625. Overall, the submitted studies and plans meet the requirements and are acceptable to Transportation Review.

#### **Parkland**

In accordance with Section 42 of the Planning Act, the Owner is required to satisfy the parkland dedication requirement through cash-in-lieu. As per Toronto Municipal Code Chapter 415-29, the appraisal of the cash-in-lieu will be determined under the direction of the Executive Director, Corporate Real Estate Management. Additionally, Toronto Municipal Code Chapter 415-28 requires that the payment be made prior to the issuance of the first above-ground building permit for the land to be developed.

#### **Tree Preservation**

The applicant submitted a Tree Protection Plan, Arborist Report, Landscape Plan and Public Utilities Plan. The application is subject to the provisions of the City of Toronto Municipal Code, Chapter 813 Articles II (Street Trees by-law) and III (Private Tree by-law). The proposed building would require the injury or removal of two City-street trees and one private tree. The applicant is required to provide payment in-lieu of the by-law required planting for the shortfall between the number of trees required and the number of trees proposed in accordance with Municipal Tree Protection By-law (MCC 813). Urban Forestry does not object to the proposed Zoning By-law Amendment application. Outstanding comments from Urban Forestry will be addressed through the Site Plan Control process, including requirements to submit tree planting deposits to ensure the planting and survival of new City trees.

#### Servicing

The applicant submitted Sanitary Sewer Analysis, Functional Servicing and Stormwater Management Report with their application which demonstrates that the proposal can be accommodated by the existing servicing infrastructure. Engineering Review staff have accepted the conclusions of these reports. Functional Servicing, Stormwater management and Erosion and Sediment Control Plan will be further reviewed as part of the Site Plan Approval process.

#### **Toronto Green Standard**

Council has adopted the four-tier Toronto Green Standard (TGS). The TGS is a set of performance measures for green development. Applications for Zoning By-law Amendments and Site Plan Control are required to meet and demonstrate compliance with Tier 1 of the Toronto Green Standard. Tiers 2, 3 and 4 are voluntary, higher levels of performance with financial incentives. Tier 1 performance measures are secured on site plan drawings and through a Site Plan Agreement.

The applicant is required to meet Tier 1 of the TGS. The applicant is encouraged to achieve Tier 2 or higher to advance the City's objectives for resilience and to achieve net-zero emissions by 2040 or sooner. Other applicable TGS performance measures will be secured through the Site Plan Approval process.

#### Conclusion

The proposal has been reviewed against the policies of the Provincial Policy Statement (2020), the Provincial Planning Statement (2024), A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020), and the Official Plan. Staff are of the opinion that the proposal is consistent with the PPS (2020) and the PPS (2024) and conforms with the Growth Plan (2020). Furthermore, the proposal provides educational use that is appropriate for the site and the existing physical character. Staff recommend that Council support approval of the application.

#### CONTACT

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#### **SIGNATURE**

David Sit, MCIP, RPP, Director Community Planning, North York District

#### **ATTACHMENTS**

#### **City of Toronto Data/Drawings**

Attachment 1: Application Data Sheet

Attachment 2: Location Map

Attachment 3: Official Plan Land Use Map

Attachment 4: Site and Area Specific Policy 452

Attachment 5: Existing Zoning By-law Map: North York Zoning By-law 7625
Attachment 6: Existing Zoning By-law Map: Toronto Zoning By-law 569-2013

Attachment 7: Draft Zoning By-law Amendment 7625

#### **Applicant Submitted Drawings**

Attachment 8: Site Plan

Attachment 9: North Elevation Attachment 10: East Elevation Attachment 11: South Elevation Attachment 12: West Elevation Attachment 1: Application Data Sheet

APPLICATION DATA SHEET

99 CARTWRIGHT AVE Date Municipal Address: June 27, 2024

> 109 CARTWRIGHT AVE Received:

130 BENTWORTH

**AVENUE** 

23 160614 NNY 08 OZ Application Number:

Application Type: Rezoning

Project Description: Application to amend the Zoning By-law to allow a 2-storey

> addition to an existing private educational institution building (Sterling Hall School) and associated surface parking. The application also includes alterations to the existing building and

parking.

Architect Applicant Agent Owner

IAN TORONTO GRAHAM

DISTRICT

SCHOOL BOARD

**EXISTING PLANNING CONTROLS** 

Official Plan Designation: **Employment** Site Specific Provision: **SASP 452** 

Areas

Zoning: M1; MC(H) Heritage Designation: Ν Height Limit (m): Site Plan Control Area: Υ

PROJECT INFORMATION

Site Area (sq m): 30,367 Frontage (m): 151 Depth (m): 168

**Building Data** Existing Retained **Proposed** Total Ground Floor Area (sq m): 6,099 4,605 1,288 5,893 Residential GFA (sq m): Non-Residential GFA (sq m): 2,441 6,099 4,605 7,046 2,441 Total GFA (sq m): 6,099 4,605 7,046 1 2 2 Height - Storeys: 15 15 Height - Metres:

Lot Coverage Ratio 19.41 Floor Space Index: 0.23

(%):

Floor Area Breakdown Above Grade (sq m) Below Grade (sq m)

Residential GFA:

Retail GFA: Office GFA:

Industrial GFA:

Institutional/Other GFA: 6,497 266

Residential Units
Existing Retained

by Tenure

Freehold:

Rental:

Condominium:

Other:

**Total Units:** 

Total Residential Units by Size

Rooms Bachelor 1 Bedroom 2 Bedroom 3+ Bedroom

Proposed

Total

Retained:

Proposed:

**Total Units:** 

Parking and Loading

Parking Spaces: 106 Bicycle Parking Spaces: 34 Loading Docks: 2

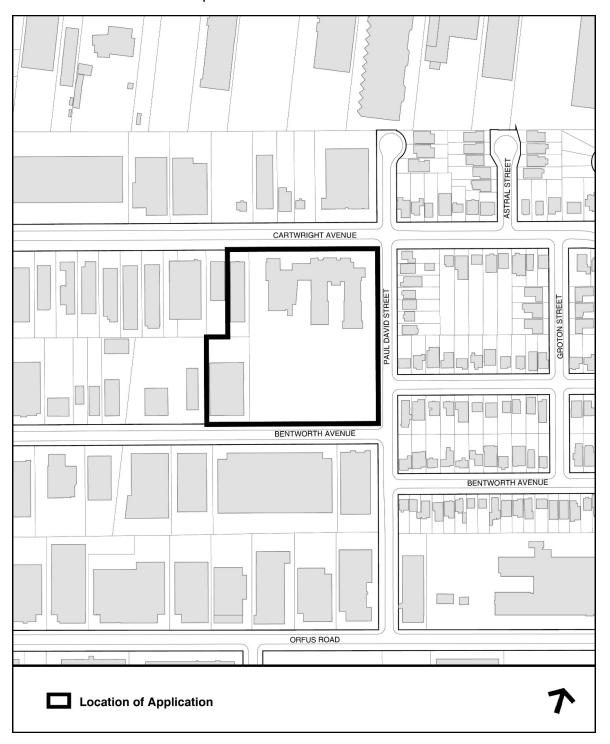
CONTACT:

Caia Yeung, Community Planner

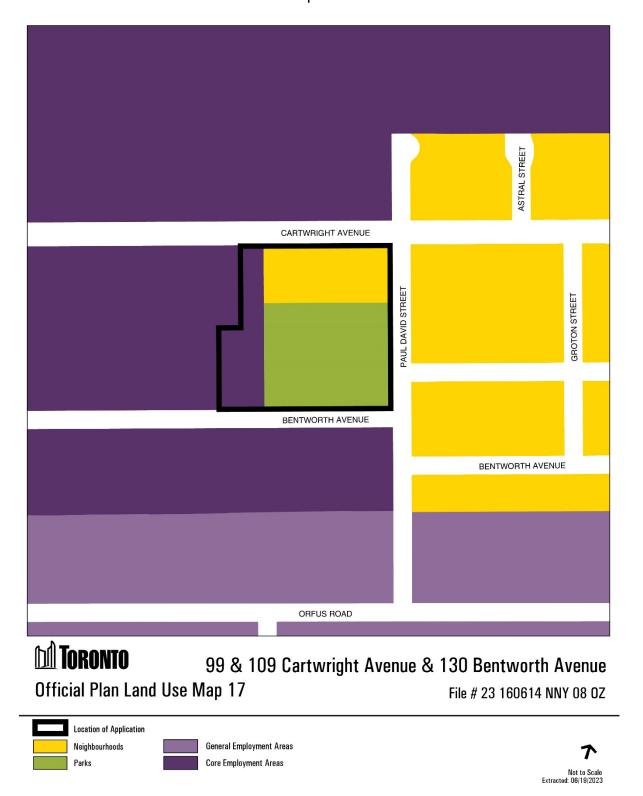
416-396-7429

caia.yeung@toronto.ca

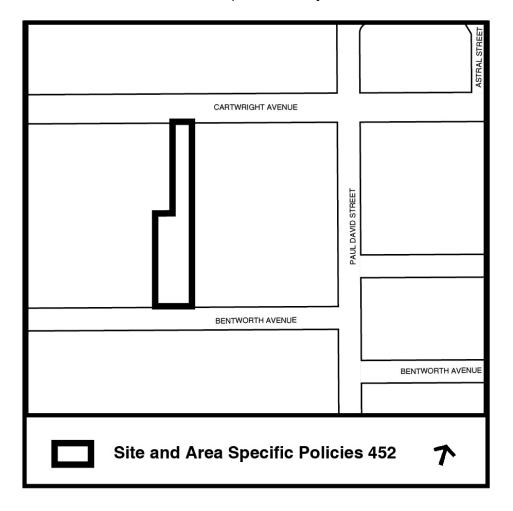
# Attachment 2: Location Map



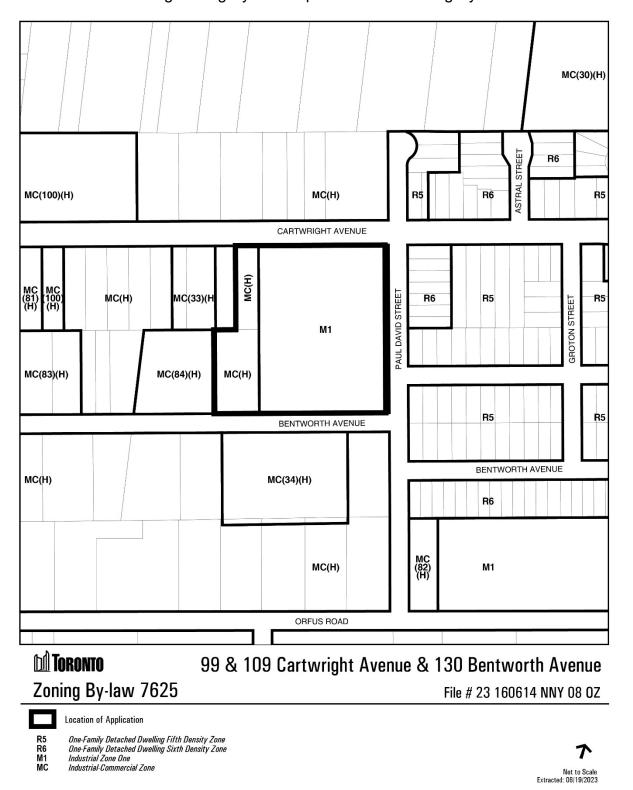
Attachment 3: Official Plan Land Use Map



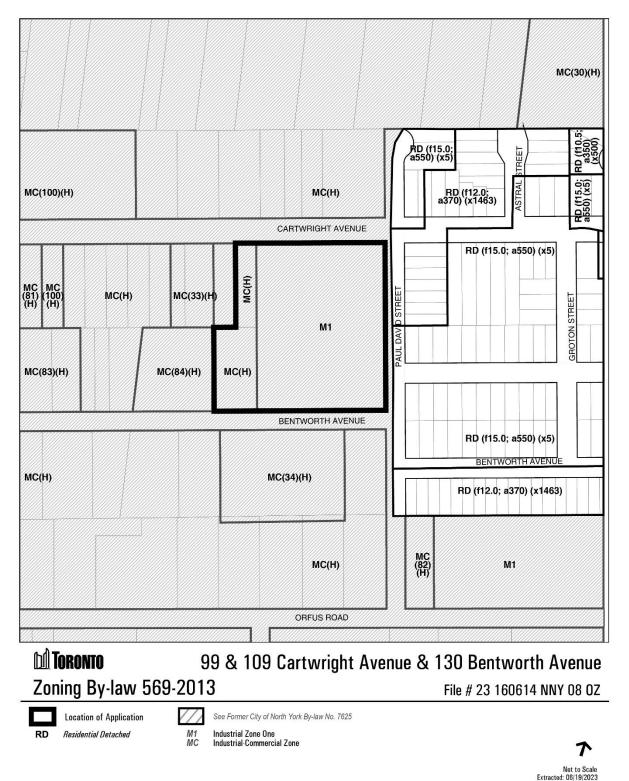
Attachment 4: Site and Area Specific Policy 452



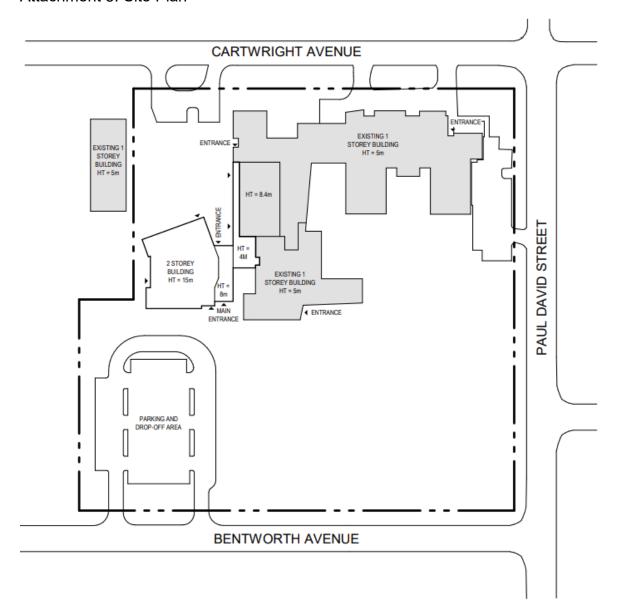
Attachment 5: Existing Zoning By-law Map: North York Zoning By-law 7625



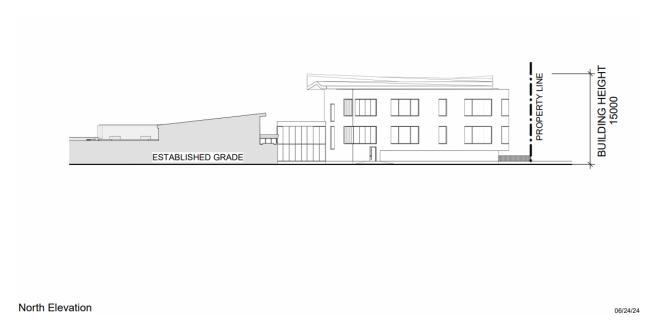
Attachment 6: Existing Zoning By-law Map: Toronto Zoning By-law 569-2013



Attachment 7: Draft Zoning By-law Amendment 7625
The draft by-law amendment is available under a separate cover.



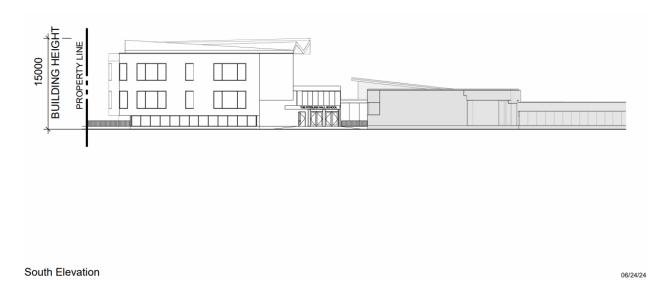
# Attachment 9: North Elevation



## Attachment 10: East Elevation



# Attachment 11: South Elevation



# Attachment 12: West Elevation

