

Planning Report Strathcona papastew



9009 & 9013 - 99 Street NW and 9854 & 9860 - 90 Avenue NW Position of Administration: Support



Summary

Bylaw 21075 proposes a rezoning from a Direct Control Zone (DC2.1225) to the Medium Scale Residential Zone (RM h28.0) to allow for medium scale housing. Public engagement for this application included a mailed notice, site signage, information on the City's webpage and an Engaged Edmonton webpage. Administration heard from 36 people, with approximately 28% in support, 53% in opposition and 19% sharing mixed perspectives. Most concerns were related to the reduction of architectural design regulations in the proposed standard zone compared to the current DC2 Zone, the loss of required commercial space, and the impacts of this scale of development on street parking and traffic congestion, particularly in the alley.

Administration supports this application because it:

Increases residential density near transit and active modes of transportation.

• Proposes an appropriate scale relative to the District Policy direction for mid rises in secondary corridors.

Application Details

This application was submitted by The Consulting Source on behalf of the landowner.

The proposed Medium Scale Residential Zone (RM h28.0) would allow for development with the following key characteristics:

- Mid rise multi-unit residential development.
- A maximum height of 28.0 metres (approximately 8 storeys).
- Limited commercial opportunities at ground level.

Site and Surrounding Area

	Existing Zoning	Current Development
Subject Site	Direct Control Zone (DC2.1225)	Vacant site
North	Medium Scale Residential Zone (RM h23)	Small scale housing
East	Small Scale Residential Zone (RS)	Small scale housing
South	Mixed Use Zone (MU h16 f3.5 cf)	Vacant site, small scale housing, small scale commercial (William Watson Residence - on historic inventory)
West	Medium Scale Residential Zone (RM h23)	Low rise residential buildings



View of site looking northwest from the intersection of 90 Avenue NW and the rear alley



View of site looking southeast from 99 Street NW

Community Insights

This application was brought forward to the public using a broadened approach. This approach was selected because it is in an area where previous applications have prompted extensive public response. The broadened approach included:

Mailed Notices, November 14, 2024 and January 9, 2025

Notification radius: 120 metres

• Recipients: 695

• Responses: 11

o In support: 1

o In opposition: 7

Mixed/Questions only: 3

Engaged Edmonton Webpage, November 18, 2024 to January 26, 2025

• Visited the page: 735

Submitted a question or forum response: 25

o In support: 9

o In opposition: 12

Mixed/Questions only: 4

Site Signage, December 26, 2024

• One rezoning information sign was placed on the property, angled at the corner so as to be visible from both 99 Street NW and 90 Avenue NW.

Webpage

edmonton.ca/rezoningapplications

Notified Community Organizations

- Strathcona Community League
- Scona District Community Council

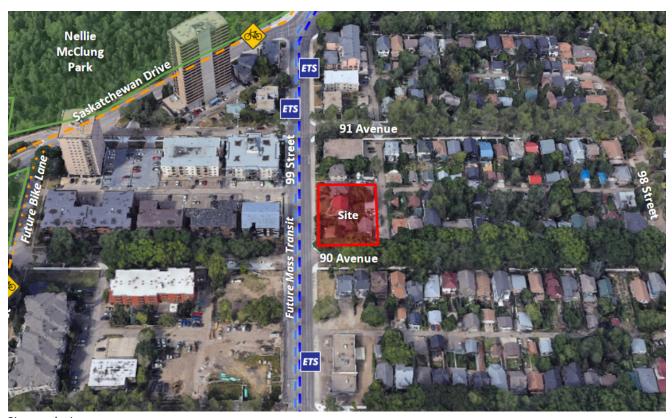
Common comments heard (number of similar comments in brackets beside comments below):

- There are significantly reduced building design & architectural requirements under the proposed RM h28.0 zoning compared to the current DC2 zoning. This prominent site needs to have an attractive building (x10).
- Develop/mandate commercial uses at ground level (x8).

- Good place for density. Greater density in the area is a good thing for retail and transit use (x6).
- Street parking and traffic are already congested and this will make it worse (x6).
- Good scale and appropriate for the area. Need to see more of these (x5).
- Glad to see this land redeveloped as there are currently derelict issues (x5).
- Still concerned about height being too tall (x4).
- The new building would have worse privacy and overlook problems to the east (x4).

A full "What We Heard" Public Engagement Report is found in appendix 1.

Application Analysis



Site analysis context

The City Plan

By increasing residential density along a major transit route in the core of the city, this application contributes to the Big City Move of "A Community of Communities" by helping meet the target of having 50% of trips made by transit and active transportation.

Scona District Plan

In the Scona District Plan, this site is within the 99 Street Secondary Corridor. Secondary Corridors are envisioned to be vibrant residential and commercial streets that support low-rise and mid rise built forms, and serve as a local destination for surrounding communities. As

redevelopment occurs, some sites will redevelop as wholly residential, wholly commercial, or as a mixed-use development.

District Policy 2.4.7.2 supports mid rise development within Secondary Corridors along arterial roadways and collector roadways. Mid rise is defined as 5-8 storeys in height, and 99 Street NW is an arterial roadway.

The Scona District Plan identifies the site as having a commercial frontage design influence meaning development is encouraged to include commercial land uses oriented towards the street at street level. Administration worked with the applicant to explore mixed use zoning with a commercial frontage modifier, but the applicant ultimately wanted to ensure flexibility relative to commercial uses. The RM h28.0 Zone has opportunities to incorporate commercial uses at the ground level but there are no policies that would mandate commercial uses here. The applicant has been strongly encouraged to pursue this, especially given the nature of the public feedback in this regard.

Land Use Compatibility

The proposed RM h28.0 Zone is a similarly equivalent standard zone to the current DC2.1225 Zone. Key differences between the current and proposed zones are as follows:

- The current DC2.1225 Zone mandates 150 square metres of commercial space at ground level whereas in the proposed RM h28.0 Zone, commercial space would be optional.
- There is a greater potential for the building massing to be further east under the proposed RM h28.0 Zone. The ground level setback is decreased from 8.0 m to 3.0 m and there would be no stepback requirement above the first storey. Other existing stepback requirements above the first storey for the north and west facades would also no longer be required.
- The architectural controls and design regulations under the current DC2.1225 Zone are more prescriptive than under the proposed RM h28.0 Zone and the DC2 has detailed building elevations appended to the Zone, providing greater assurance of the shape and detailing of the building.

At the time that the current DC2 Zone was developed, policy direction for this corridor was for lower intensity buildings and the larger scale was seen as a deviation from the expected land use development pattern for the area. As such, a Direct Control zone was seen as necessary to ensure the compatibility of a larger building with the area and to mitigate impacts of a taller building. With new policy direction from The City Plan and in the Scona District Plan and District Policy to intensify this corridor as a whole, the use of a Direct Control zone is no longer considered necessary. While this would lead to the loss of some architectural control of the design, this is seen as an appropriate trade-off to allow greater flexibility for development of this site and corridor in alignment with current policy direction.

The proposed rezoning is compatible with the existing surrounding development, and will bring additional residents into the area to support the evolving commercial node at the intersection of 99 Street NW and 89 Avenue NW.

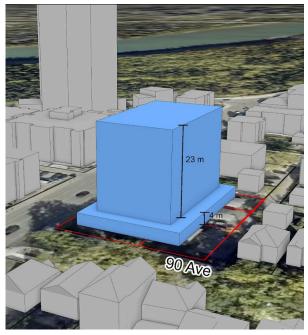
The current DC2.1225 has uses that are not permitted in the proposed RM h28.0 Zone including: Bars and Neighbourhood Pubs, Breweries, Wineries and Distilleries, Cannabis Retail Sales, Creation and Production Establishments, Liquor Stores, and Private Education Services. The uses in the RM Zone are compatible with the surrounding area, as a majority of sites along 99 Street NW are also zoned RM.

A comparison between key elements in the current and proposed zone is provided in the table below.

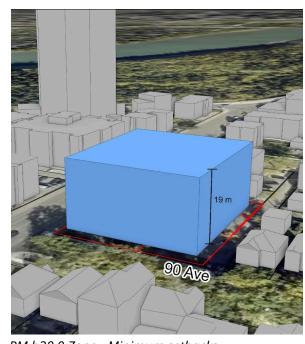
	DC2.1225 Zone Current	RM h28.0 Zone Proposed
Typical Uses	Residential with required commercial space	Residential with optional commercial space
Maximum Height	27.0 m (30.0 m for rooftop amenity area)	28.0 m
Maximum Floor Area Ratio	3.1	3.8
Number of Dwellings	No minimum 65 maximum	18 minimum No maximum
Minimum Setback (99 Street NW)	3.5 m	4.5 m (residential ground floor) 1.0 m (commercial ground floor)
Minimum Setback (90 Avenue NW)	4.5 m	3.0 m (residential ground floor) 1.0 m (commercial ground floor)
Minimum North Setback	2.5 m	3.0 m
Minimum East Setback (Alley)	8.0 m	3.0 m

Building	West - 4.0 m	No stepbacks required.
Stepbacks	South - 0.0 m	
Above the First	East - 2.0 m	
Storey	North - 1.5 m	

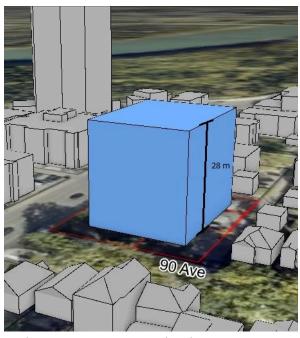
Below is a massing comparison of the current and proposed zones. Two potential options of the proposed zone are used. One where the minimum setbacks are adhered to and one that maximizes the height. Because of the limit on floor area ratio, the building cannot be built to both the maximum height and the minimum setbacks.



DC2.1225 Zone



RM h28.0 Zone - Minimum setbacks
Attachment 2 | File: LDA24-0401 | Strathcona



RM h28.0 Zone - Maximum height

While it is difficult to compare shadow impacts between the current and proposed zones because of the variety in options available under the proposed RM h28.0 Zone, the impacts of the maximum height version of the RM h28.0 Zone and the current DC2 Zone are very similar. A full sun shadow study is found in Appendix 2.

Environment

A Phase 1 Environmental Site Assessment was reviewed and it was determined that there is a likelihood of on site ground contamination. Further assessment and/or delineation will be required at the development permit stage prior to permit approval. The site will likely require the implementation of a risk management plan and/or remedial action plan as part of the site redevelopment.

Mobility

Upon redevelopment, vehicular access to the site will be from the abutting north-south lane only, and the owner will be required to upgrade the entirety of this lane between 90 Avenue NW and 91 Avenue NW to a fully paved commercial standard within the available right-of-way.

The site is identified as a Pedestrian Priority Area in the Scona District Plan and accordingly, improvements will be required along 99 Street NW and 90 Avenue NW to ensure an appropriate interface between the building and the public realm. The nature of these improvements will depend in part on whether the ground floor uses are residential or commercial. This will be reviewed in further detail at the development permit stage.

Through the public engagement process, several community members raised concerns about congested street parking along the adjacent avenues east of 99 Street NW. These avenues do not currently have any parking restrictions and parking demands may increase with this development. Traffic Operations will continue to monitor curbside parking demand and work with the neighbourhood to apply tools to manage this where needed, and in line with the City's Curbside Management Strategy.

ETS operates local and frequent bus routes along 99 Street NW. A mass transit bus route is anticipated to operate nearby on 99 Street NW as part of the future mass transit network associated with the 1.25 million population scenario of the City Plan. This route is anticipated to follow similar routing as current ETS frequent bus routes in the area.

Urban Design

With the proposal of a standard zone and no detailed building design, review of this project by the Edmonton Design Committee has been deferred to the development permit stage.

Utilities

A Drainage Servicing Report was reviewed and accepted with this application, and directs the future sanitary and storm servicing requirements. Onsite stormwater management and a reduced discharge rate are requirements of the proposed development.

There is a deficiency in on-street fire protection adjacent to the property in terms of hydrant spacing. Edmonton Fire Rescue Services (EFRS) may be able to perform an Infill Fire Protection Assessment (IFPA) at the Development Permit stage to potentially alter or lessen on-street fire protection infrastructure upgrades, assuming certain criteria are met.

The applicant/owner will be responsible for all costs associated with infrastructure changes required by this application.

Appendices

- 1. "What We Heard" Public Engagement Report
- 2. Sun Shadow Study

Written By: Andrew McLellan

Approved By: Tim Ford

Branch: Development Services

Section: Planning Coordination



What We Heard Report Strathcona Blok 99 LDA24-0401



Public Engagement Feedback Summary

Project Address: 9009 & 9013 - 99 Street NW and 9854 & 9860 - 90 Avenue NW

Project Description: The City has received a rezoning application from The Consulting

Source. The current zone is a Direct Control Zone (DC2.1225) and the proposed zone is the Medium Scale Residential Zone (RM h28.0) which would allow for mid rise multi-unit residential development with a maximum height of 28.0 metres (approximately 8 storeys) and limited commercial opportunities at ground level. In the Scona District Plan, the site is located within the 99 Street Secondary

Corridor.

Engagement Online Engagement Webpage - Engaged Edmonton:

Format: https://engaged.edmonton.ca/blok99

Engagement Dates: November 18, 2024 - January 26, 2025

Number Of Visited Engaged Edmonton page: 735

Engagement Submitted a question or forum response on Engaged Edmonton: 25

Participants: Contacted the planner directly: 11

About This Report

The information in this report includes summarized feedback received between November 18, 2024 and January 26, 2025 through online engagement via the Engaged Edmonton platform or by directly contacting the file planner by phone or email.

The public feedback received will be considered during the planning analysis to ensure the review of the application takes local context into consideration and is as complete as possible. It will also be used to inform conversations with the applicant about potential revisions to the proposal to address concerns or opportunities raised.

This report is shared with everyone who emailed the file planner and all web page visitors who provided their email address for updates on this file. This summary will also be shared with the applicant and the Ward Councillor, and will be an Appendix to the Council Report should the application proceed to a Public Hearing.

Engagement Format

The Engaged Edmonton webpage included an overview of the application, information on the development and rezoning process and contact information for the file planner. Two participation tools were available for participants: one to ask questions and one to leave feedback. The engagement opportunity was communicated to the public through mailed notices and as part of the City's weekly public service announcements (PSA). Due to a disruption of mail service in November and December 2024, a second notice and PSA were completed in January 2025, and the engagement phase was extended to allow participants who may have missed the first notice more time to share their feedback.

The comments collected on Engaged Edmonton and through phone calls and emails are summarized by the main themes below, with the number of times a similar comment was made by participants recorded in brackets following that comment. The questions asked and their answers are also included in this report.

Feedback Summary

Respondents both in opposition and support cited similar reasons for their position. Some saw the height and scale as too much for this location and some felt this was an ideal location for it. Similarly, the potential lack of parking was seen as both a positive and negative aspect of the potential development. There was a high level of consensus about worries that the proposed standard zone would have fewer design requirements and could lead to a less attractive building. Most of the people who shared a mixed perspective or who overall indicate support for this rezoning still cited this concern.

Number of Responses:

In Support: 10 In Opposition: 19

Mixed: 7

What We Heard

The following section includes a summary of collected comments with the number of times a comment was recorded in brackets (comments received once do not have a number).

Reasons For Opposition

Built Form/Site Layout

- There are significantly reduced building design & architectural requirements under the proposed RM h28.0 zoning compared to the current DC2 zoning. This prominent site needs to have an attractive building (x10).
- Still concerned about height being too tall (x4).
- The new building would have worse privacy and overlook problems to the east (x4).
- Shadow impacts of a tall building (x3).
- A tall building will have wind impacts around the site (x2).
- Not the place for a tall building. It should be on Saskatchewan Drive.

Traffic/Parking/Safety

- Street parking and traffic are already congested and this will make it worse (x6).
- Development needs more parking (visitor and commercial) so as to not impact street parking (x3)
- Alley congestion during construction will be an issue (x3).
- Very concerned about open option parking. People in this area rely on street parking, particularly some with limited mobility who need to park in front of their house.

General/Other

- The owner does not do basic site care like clearing sidewalks of snow or securing garages. Do not believe they will follow rules during construction (x3).
- Don't like the loss of a density limit (x2).
- Concerned without the development sunset clause in the DC2 Zone, the developer will just delay actually building under the proposed standard RM h28.0 Zone (x2).
- Online engagement is not real engagement (x2).
- Not supportive without ground level commercial (x2).
- Worried HVAC systems will be noisy (x2).
- Concerned about construction impacts on surrounding properties.
- The current DC Zone was created with lots of negotiations with the community. The new zone would go against all that hard work.
- The developer seems favoured over the community if they get to make this change despite the previous DC negotiations that involved the community.

Reasons For Support

Built Form/Site Layout

- Good scale and appropriate for the area. Need to see more of these (x5).
- Fine with any height the developer wants to build.
- Glad to see only 8 storeys and not a tall tower.

Traffic/Parking/Safety

- Street parking is not an inherent right to neighbours and people should park on their own land.
- Not concerned about potential lack of parking. More parking brings more cars/driving/danger/pollution, and I want less of all of that.
- Underground parking increases the cost of units and works against affordable housing.

General/Other

- Good place for density. Greater density in the area is a good thing for retail and transit use (x6).
- Glad to see this land redeveloped as there are currently derelict issues (x5).
- Edmonton needs to build more up than out (x2).
- Commercial uses being optional is better than mandated. Let the market decide if it should go here or not (x2).
- Please build this. We are in a housing crisis (x2).
- Removing the density cap is a good idea that will help build new affordable housing.

Suggestions For Improvement

- Develop/mandate commercial uses at ground level (x8).
- Should be a range of types of units (1 bedroom, 2 bedroom 3 bedroom, etc.) (x2).
- Limit to 6 storeys.
- The building should be built to net zero ready. Consider geothermal.
- The building should still have a podium, otherwise it looks like a boring box.
- Wider setbacks from 99 Street.

Questions & Answers

1. Is the City giving up on requiring street level commercial units for proposed developments on 99th Street?

The recently approved Scona District Plan and District Policy do not have policies that require ground level commercial uses in Secondary Corridors like 99th Street. Policy 2.4.8.1 of the District Policy encourages it for sites like this that are identified as for "commercial frontage", but it does not fully require it.

City Administration has conveyed this preference for commercial frontage to the applicant but in the proposed RM h28.0 Zone, it will be optional and up to them if they want to pursue it at the Development Permit stage. The Bateman lands nearby also had this option.

Secondary Corridors are anticipated to have a mixture of residential and commercial development along them, which you note is happening in this area. However, this mixture is not being mandated within every site and building.

2. What is the minimum size of a unit that would be allowed under building code? What would the theoretical maximum number of units be on this site and what would be the theoretical maximum number of occupants.

The proposed zoning would not regulate a maximum number of dwellings.

If the building were developed entirely of micro-suites (approximately 350 square feet), in theory there could be approximately 180 dwellings, or 950 dwellings per hectare of land.

It should be noted that the above scenario of micro-suites is extremely unlikely and not what is typically being built in Edmonton right now. For example, the recently approved development permit for a new building at 99th Street and 89th Avenue under the same RM h28.0 Zone is approximately 470 dwellings per hectare with a variety of dwelling sizes.

470 dwellings per hectare on the proposed rezoning site would be approximately 90 dwellings. The applicant has indicated 81 dwellings as their current intent, though this is subject to change.

It is very difficult to accurately estimate the number of people that will sleep in a building under the proposed zone. There are too many variables for types of occupancy and zoning does not regulate, for example, whether someone lives alone in a 2-bedroom dwelling or with 3 other people. As well, applicable regulations of the building code cannot be estimated at this stage without any kind of specific building design or construction materials known.

3. Does the 1.0 meter setback apply to all subsequent residential floors above, or would residential require further setback, also noting the likelihood for balcony extensions?

If commercial uses are developed at ground level, making the minimum required setback from streets 1.0 metre, the residential floors above would also only have a 1.0 m setback requirement. Balconies could then project from the building to the property line, but not over it.

4. Can commercial space be developed along both 99 Street & 90 Ave extensions?

Commercial space could be developed facing either or both of 99 Street NW and 90 Avenue NW.

5. Will design criteria for articulations apply to the building's north boundary?

Yes, the design regulations under subsection 5.1 of the <u>RM Zone</u> would apply to the north facing wall of the building as it faces a residentially zoned property.

6. Will the 5 year deadline to develop that is within the current DC2 Zone, or a similar deadline, apply to the RM h28.0 Zone if the change is approved?

Unlike the current Direct Control Zone (DC2.1225), standard zones like the proposed RM h28.0 Zone do not allow for customized regulations. As such, there would be no such similar deadline under the RM h28.0 Zone, if approved.

7. What will be the status of the alley closure if the rezoning application is approved?

The current Direct Control Zone (DC2.1225) does not contemplate any alley closure. There is also no proposed closure as part of the proposed zoning change to the RM h28.0 Zone. The alleys will remain open as they are now, regardless of whether this proposed rezoning is approved or not.

In addition, the north-south alley between 90 Avenue NW and 91 Avenue NW is required to be upgraded to a commercial alley standard, in expectation of an increase in use, should the development occur. The developer would be responsible for the cost of this upgrade. This requirement would be the same under both the current DC2 Zone and the proposed RM h28.0 Zone

There is a regulation in the current DC2 Zone that refers to "removal of the existing access to 90 Avenue NW", but this is referring to the existing driveway access directly from 90 Avenue NW into the site <u>further west than the alley</u>. Under the proposed RM h28.0 Zone, this will still be a requirement of the developer, at their cost.

8. How, specifically, will the changes sought increase their chances of developing the site?

Response From The Applicant:

The change in zoning will increase the chances of the site being redeveloped by allowing for more flexibility in aspects like height, density and uses, allowing us to design a building that meets both market demands and the community's needs. The RM h28.0 Zone permits development forms and intensities that allow for a more efficient and effective use of the land, which cannot be fully realized under the current DC2 zoning. All of these things increase the viability of the site for redevelopment and cannot be met under the constraints of the current DC2 Zone.

9. How long is this build going to take? Will the City require the developer to build within a certain time limit? And if yes, will the City fine the developer for not meeting these requirements?

The City does not control when the developer chooses to start building. However, once the City issues permits, they will expire if the work is not begun under the permit within 1 or 2 years, depending on the type of permit.

10. Will all properties on the block be automatically rezoned to this zoning as per city bylaws?

No, if approved, this rezoning will only apply to 9009 & 9013 - 99 Street NW and 9854 & 9860 - 90 Avenue NW.

11. Is the City requiring that the lots be cleaned up and secured, graffiti removed?

Landowners are generally responsible for what happens on their property. If the site is not secure and is unsafe, the City will work with the landowner to properly fence or modify the property to make it safe. All debris from demolition should be removed as a condition of the demolition permits.

12. What steps will be taken to prevent bird collisions with the windows of this proposed building?

The Zoning Bylaw does not have regulations or requirements to specifically address this.

13. Why is there another requested rezoning?

Anyone has the right to submit a rezoning application at any time and have it considered by City Council. The landowner/developer has not developed under the current Direct Control Zone and they are seeking another change that they have indicated will increase their chances of developing the site.

14. Could you elaborate on what "limited" or "minimal" retail means?

The only commercial uses allowed under the proposed RM H28.0 Zone are: Food and Drink Service, Health Service, Indoor Sales and Service, Minor Indoor Entertainment, Office and Residential Sales Centre. In addition, Food and Drink Services, Health Services, Indoor Sales and Services, Minor Indoor Entertainment and Offices must only be located on the Ground Floor of residential buildings and the maximum Floor Area is 300 m² per individual establishment.

15. When demolition of the present structures begins there is a possibility that asbestos will be present. What safety measures will be taken to address that so the closest neighbour and the rest of us will remain safe from asbestos particles floating in the air?

Anyone demolishing a building shall first ensure that any asbestos-containing materials with the potential to release fibres have been dealt with as per Alberta Occupational Health and Safety (OHS) regulations. OHS provides guidance and administers oversight of asbestos remediation. The City does issue Demolition Permits for buildings but before doing so, we require the submission of an Asbestos Management and Utilities Disconnect form.

16. Will we be able to access the backlane garage entrances? Will the garbage and recycle trucks have access? Where will all the construction vehicles park while construction is

ongoing? Large concrete trucks, delivery trucks, etc park and wait for long periods of time with their motors running. Where will they 'park and wait'?

All Development Permit drawings are reviewed by Waste Services to ensure that the planned location for waste storage and access will work for the City's vehicles and collection standards.

There is no doubt that construction would be temporarily disruptive to some of the surrounding properties as well as the alleys and roads. Before construction begins, Building Permits and OSCAM Permits will need to be reviewed and approved by the City to address these kinds of issues to ensure a plan is in place to limit disruption as much as possible.

17. Will there be balconies overlooking homes on the east side of the building? What sort of privacy screens will be installed on the balconies?

Under the proposed zone, there are not any regulations that would address privacy impacts on properties to the east. There could be balconies facing east.

18. Is construction concrete or wood? If 8 stories, it should be concrete construction.

The Building Code will require any building over 6 storeys to be built from non-combustible material (typically concrete/steel) and not standard timber/wood.

Next Steps

The planning analysis, and how feedback informed that analysis, will be summarized in Administration's report to City Council if the proposed rezoning goes to a future City Council Public Hearing for a decision.

The administration report and finalized version of the applicant's proposal will be posted for public viewing on the <u>City's public hearing agenda</u> website approximately three (3) weeks prior to a scheduled public hearing for the file.

When the applicant is ready to take the application to Council:

- Notice of Public Hearing date will be sent to surrounding property owners and residents and applicable nearby Community Leagues and Business Associations.
- Once the Council Public Hearing Agenda is posted online, members of the public may register to speak at Council by completing the form at edmonton.ca/meetings or calling the Office of the City Clerk at 780-496-8178.

Appendix 1 | File: LDA24-0401 | Strathcona | March 17, 2025

- Members of the public may listen to the Public hearing on-line via edmonton.ca/meetings.
- Members of the public can submit written comments to the City Clerk (city.clerk@edmonton.ca).

If you have questions about this application please contact:

Andrew McLellan, Planner 780-496-2939 andrew.mclellan@edmonton.ca

SUN SHADOW STUDY

30N 3HADOW		<u> </u>
MAR/SEP 21	DC2.1225 Current Zone	Proposed RM (h28.0) Potential Built Form Example - Maximum Height
9AM	91 AVENUE NW 90 AVENUE NW 90 AVENUE NW	90 AVENUE NW 90 AVE
12PM	91 AVENUE NW 93 AVENUE NW 93 AVENUE NW	91 AVENUE NW 91 AVENUE NW 90 AVENUE NW 90 AVENUE NW
3PM	91 AVENUE NW 90 AVENUE NW 90 AVENUE NW	91 AVENUE NW 90 AVENUE NW 90 AVE
6PM	SO AVENUE NW.	90 AVENJE NW

SUN SHADOW STUDY

JUNE 21	DC2.1225 Current Zone	Proposed RM (h28.0) Potential Built Form Example - Maximum Height
12PM	91 AVENUE NW 90 AVENUE NW 90 AVENUE NW	91 AVENUE NW 91 AVENUE NW 90 AVENUE NW 90 AVENUE NW
3PM	91 AVENUE NW 91 AVENUE NW 90 AVENUE NW 90 AVENUE NW	SO AVENUE NW SO AVE
6PM	VI AVENJE NIV	SO AVENUE NW 90 AVE
9PM	91 AVENJE NW 93 AVENJE NW 90 AVENJE NW	91 AVENUE NW 93 AVENUE NW 90 AVENUE NW

SUN SHADOW STUDY

