



CITY PLANNING REPORT **REZONING & TEXT AMENDMENT** DOWNTOWN

10420 103 AVENUE NW

To allow for high rise mixed use development.



RECOMMENDATION AND JUSTIFICATION

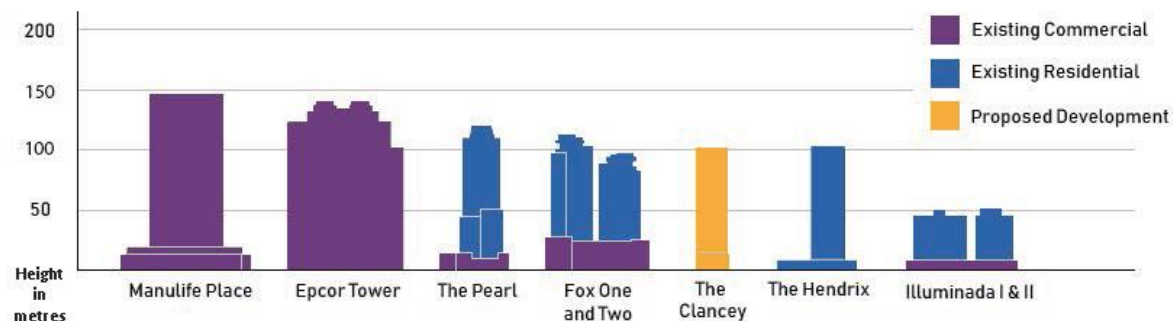
City Planning is in **NON-SUPPORT** of this application because the proposed design:

- does not adequately respect the architectural and historic character of the area;
- does not provide an appropriately sensitive and pedestrian-friendly interface on 103 Avenue; and
- does not adequately meet the intent of the Capital City Downtown Plan.

THE APPLICATION

1. CHARTER BYLAW 19007 amends maps which are appendices to Section 910 of the Zoning Bylaw to reflect changes to zoning, maximum floor area ratio and maximum height in the Special Area Downtown.
2. CHARTER BYLAW 19008 amends the Zoning Bylaw from (HA) Heritage Area Zone to (DC2) Site Specific Development Control Provision. The proposed DC2 Provision has the following key characteristics:
 - residential tower with ground floor commercial facing 104 Street NW
 - maximum height of 103 meters (approximately 28 storeys)
 - maximum FAR of 16.0
 - maximum 315 dwelling units
 - maximum tower floor plate of 850 m²
 - underground parking

This application proposes an increase in maximum Floor Area Ratio (FAR) from the existing (HA) Zone of 12.0 to 16.0, to allow for a larger building relative to the size of the subject site. Further, it seeks to deviate from the heritage character of the area by not employing the use of a podium for the portions of the tower fronting 103 Avenue NW. Apart from this, the proposed DC2 Provision is in general alignment with the existing (HA) Zone in terms of built form and use.



COMPARISON OF PROPOSED DEVELOPMENT WITH EXISTING HIGH RISE BUILDINGS IN EDMONTON

SITE AND SURROUNDING AREA

The subject site is located on the northwest corner of 104 Street NW and 103 Avenue NW, and is currently occupied by a two-storey commercial building with surface parking at the rear. The site is at the northern end of the pedestrian oriented 104 Street, which is comprised of several historic buildings between two to four storeys. To the north, south and east along 104 Street, there is a range of building types including low and high rise buildings that are historically significant/designated or are designed in a compatible style to the historic streetscape.

The site is well served by alternative modes of transportation including the current and future LRT lines, a Transit Avenue (104 Avenue NW) and the Downtown bicycle grid network.



AERIAL VIEW OF APPLICATION AREA

	EXISTING ZONING	CURRENT USE
SUBJECT SITE	(HA) Heritage Area Zone	2 storey commercial building
CONTEXT		
North	(HA) Heritage Area Zone	<i>Excelsior Lofts</i> , residential building (4 storeys)
East	(HA) Heritage Area Zone	<i>Affordable Storage</i> , historically designated (Horne & Pitfield Building) commercial building (4 storeys) <i>Edmonton Emergency Relief Service</i> (1 storey warehouse building)
South	(HA) Heritage Area Zone	Surface parking lot

		<i>Japanese Village</i> restaurant with above ground parkade (7 storeys)
West	(UW) Urban Warehouse Zone	<i>The Legacy</i> , residential tower (approximately 18 storeys)



EXISTING BUILDING LOOKING NORTHWEST



VIEW LOOKING SOUTH ON 104 STREET

PLANNING ANALYSIS

LAND USE COMPATIBILITY

The site is located in the Heritage sub area, and directly on the pedestrian oriented 104 Street NW. The historic character of the area has been maintained through the preservation of historically significant buildings and careful design of new buildings that respect the scale of the warehouse district. Higher density development in this area is appropriate, provided new development is compatible with the area's historical character and walkable nature. Proximity to employment centres, LRT stops, public parks, and protected bike lanes make this site a suitable location for a pedestrian oriented high rise building.

The redevelopment of this site would be positive for Edmonton's downtown, as it would allow for increased density on a site that is currently underutilized for the location. It is located in a Heritage Area and on a prominent corner along one of the City's most important pedestrian oriented streets. For this reason, there is an expectation that development along this street is held to a high standard. Part of this expectation is that any buildings in this area should be wrapped to carry the historic design elements and podium/tower configuration around the corner onto the Avenue to meet the intent and specific objectives of the Capital City Downtown Plan and to maintain the area's historic character and pedestrian friendly nature.

The proposed building meets the expectation for complementing the existing heritage character and high quality, pedestrian oriented streetscape design along the 104 Street interface; however, does not meet this for 103 Avenue NW. It is important that the heritage defining character of the podium streetwall be carried around the full facade of the public facing portion of the building and the tower is pushed away from the public realm to ensure a comfortable pedestrian experience. This is not accomplished by the proposed design. Ensuring the continued adherence to these standards and defining elements for new development is important in order to maintain the character of the Heritage Area and pedestrian friendly area that has been successfully preserved and enhanced since the approval of the Capital City Downtown Plan and the Heritage Area Zone.

CAPITAL CITY DOWNTOWN PLAN AND EXISTING SPECIAL AREA ZONING

This site is located within the Heritage Area (Sub Area 2) of the Warehouse Campus Neighbourhood of the Capital City Downtown Plan (CCDP). This area is recognized for its architectural and historical significance due to the high concentration of pre-war warehouse buildings. This sub area is focused around 104 Street NW as *“a special, pedestrian-friendly street that celebrates its architectural heritage through unique public realm features and careful attention to the design of conversion and infill development projects”*. Policy within this sub area supports *“infill development projects that respect the architectural and historic character of 104 Street and enhance the walkable nature of the street”*. Careful attention to the design of infill development projects is required, such that they will complement the area’s character and contribute to the area as a destination retail and restaurant precinct.

The Downtown Special Area Zoning was curated and adopted to achieve the objectives of the Capital City Downtown Plan. This includes the (HA) Heritage Area Zone which allows for high-rise development where special attention is given towards creating a podium streetwall to create a unique pedestrian experience that blends new development with existing historical buildings. Developing a podium/tower configuration is critical to the development of an architecturally continuous historic urban village character and a positive pedestrian environment. The use of a podium incorporates the building into the historic warehouse character, removes the massing of the tower from the streetscape for a comfortable pedestrian experience and reduces the effect of wind on the streetscape. The (HA) Zone has successfully accommodated the development of projects that illustrate this core function (allowing high rise infill while respecting the scale and character of the streetwall), such as the Encore Tower (currently under construction), the Icon Towers, the Fox Towers and the Ultima.

The contention with the proposed DC2 is that it does not provide a podium or appropriate setbacks and tower stepbacks along 103 Avenue NW, which is a requirement of the (HA) Zone (shown in the box below), and the intent of the CCDP.

Heritage Area Zone Reference Clauses

Section 910.7.5.b.i.B

Tower Stepback from the Street Wall shall be a minimum of 4.5m.

Section 910.7.5.d.ii

Any front elevation abutting a public roadway other than a lane shall be no greater than 5 Storeys or 20.0 m in Height. Any portion of the building Height greater than this shall be stepped back from the property line. Any buildings taller than 5 Storeys shall have a minimum of 3 Storeys where the building Façade is built to the property line abutting the street. The Development Officer may allow a greater building Height and number of podium Storeys for the podium provided that the Height fits contextually with adjacent buildings.

Explanatory Note

A 4.5 m Setback between the front of the building and upper building Storeys is a common technique used to reduce the perceived mass of a building and promote the pedestrian scale of the street.

The DC2 was compared to the (HA) Zone, as it was specifically designed for development in this area. As the (HA) Zone currently applies to the full site all the way to the laneway on the west side of the site, the character and pedestrian focused design elements should also be carried along this entire facade. The following table provides a comparison of the proposed DC2 with requirements of the (HA) Zone.

Zoning Comparison		
Regulation	Existing HA Zone	Proposed DC2
Height	115.0 m	103.0 m
Floor Area Ratio	12	16
Tower Floor Plate	900 m ²	850 m ²
Maximum Density (# of units)	N/A	315
Architectural Treatment	historic/brick character for all podium facades facing public roadways lower than 3 to 5 storeys	historic/brick character for east facade and only a portion of south facade lower than 3 storeys
Minimum setbacks for lower stories: West/rear (from lane) East/front (from 104 Street) North/interior side South/flanking side (103 Avenue)	N/A 0.0 m N/A 0.0 m	west half/east half 0.0 m 0.0 m 0.0 m 2.0m/0.0 m
Minimum setbacks for tower: West/rear (from lane) East/front (from 104 Street) North/interior side South/flanking side (103 Avenue) Minimum balcony setback from property line on south	N/A 4.5 m N/A 4.5 m 2.5 m	west half/east half 3.0 m 7.0 m 2.4 m 2.0 m/0.0 m 0.0 m

DESIGN ELEMENTS

The application proposes a residential high rise tower, slightly shorter than that which is allowed under the current zoning. It includes main floor commercial development fronting onto 104 Street NW and an articulated residential entrance facing 103 Avenue NW, providing access to the residential within the rest of the building. The design of the tower provides visual variation, such that it looks like two separate towers in order to add interest and character to the skyline.

104 Street NW Interface

The podium along 104 Street NW provides a positive pedestrian realm by providing commercial at grade and a generous tower stepback providing a large amenity area overlooking 104 Street. This amenity area would be designed for gardens, green roof aspects and children's play areas.

The proposal includes a three storey podium along 104 Street NW, partially wrapping 103 Avenue NW, which is appropriately scaled and compatible with the historic pedestrian oriented character of the street. This podium facade is to be clad with high quality materials with brick as the dominant material, in conjunction with vertical and horizontal elements provided by the glazing and masonry. It is worth noting that the design has taken a modern interpretation of the historical requirements in a similar way to the recently rezoned Mackenzie Building (former Blue Plate Diner site), through minimal ornamentation and darker brick. At this rezoning stage, basic heritage design elements have been included in order to match the character of the historical streetscape, but the detailing will be determined at the development permit stage in consultation with heritage planning.



RENDERING LOOKING NORTHWEST

103 Avenue NW Interface

The blockface along 103 Avenue NW is a continuation of the 104 Street NW streetscape and is within the Heritage Area. In line with this, the DC2 proposes upgrading and widening the public realm along 103 Avenue NW. This will increase the minimum sidewalk width to 3.5 metres from

curb to property line from the current 2.1 metres. This aligns with the current guidelines outlined in the *Downtown and the Quarters Downtown Streetscape Design Manual: Green and Walkable* and provides a much needed increase in the public realm.

Active uses are provided for roughly two thirds of the south facing at-grade facade. Due to the site size constraints, a portion of the southern facade will not be glazed, but rather be solid wall, as the waste room is adjacent to 103 Avenue NW. This concern has been partially mitigated through the provision of public art along this portion of blank wall.

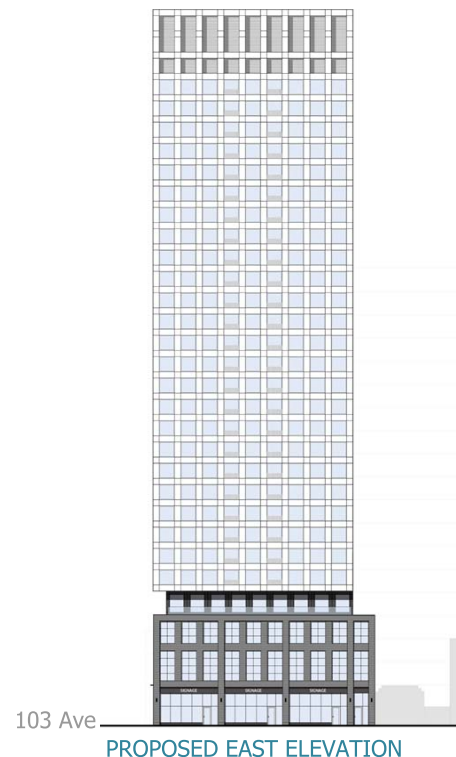


PROPOSED LOWER LEVELS OF SOUTH (103 Avenue) ELEVATION

As proposed, the historically sensitive design elements wrap the corner for a portion of the 103 Avenue facade. This does not meet the expectation of historical podium and pedestrian oriented design along the full length of the building. The urban warehouse village character should not stop at the 104 Street frontage, but should be carried along the full frontage of 103 Avenue to integrate with the development within the Urban Warehouse Zone to the west, which has very similar character requirements with regards to podium/tower stepback design.

Although the brick design wraps partially onto 103 Avenue, it is not in the configuration of a podium with tower stepback above. As such, while there is a visual break at the fourth storey, the tower extends back to the property line from the fifth to the 28th storey, losing the improvement to the public realm that would be afforded from a podium design.

The western half of the south facade does not include any historic elements, podium or tower stepbacks. This portion of the tower is partially glazed and setback only 2.0 metres, with balconies



PROPOSED EAST ELEVATION

projecting back to the property line from the third to the 26th storey negating the benefits of the setback.

Together, the full length of the 103 Avenue facade does not meet the current policy of providing a 4.5 m stepback above a three to five storey podium, meaning that the tower directly abuts the pedestrian realm. The use of a podium would successfully address the two fundamental issues: the continuation of the scale and character of the warehouse area; and the separation of the mass of the tower from the public realm creating a comfortable pedestrian environment and mitigating some of the tower's negative effects (wind down washing and perceived massing).

Administration recognizes that a podium design may not be desired for every tower. There are other ways to mitigate the impact of a tower on the pedestrian realm. This can be accomplished through the provision of a greater tower setback or a large public plaza space. The proposed additional 1.4 metres of sidewalk width will help to improve the public realm along this interface. However, it is not considered sufficient to address the concerns of the missing podium and stepback on this facade which would push the tower back a minimum of 4.5 metres from the public realm.



In a location where the enhancement and preservation of a 3-5 storey warehouse heritage character and a comfortable public realm in a constrained environment are both the goals and objectives, the podium tower configuration is not only mandated by regulation, but is a proven concept that has successfully integrated numerous modern towers in the Heritage Area. These past projects in the area are of similar location and size and have employed the required podium/stepback treatment while meeting the desired density and unit counts.

Tower Separation

The minimum tower separation within the Heritage Area Zone is 25 metres. The proposed tower meets this separation distance in all directions. To the west is the Legacy tower, which is separated by approximately 33 metres. To the north is the 4-storey Excelsior building, which is a loft conversion and is not expected to be redeveloped. Further, current development rights allow a tower to be built on this property with these proposed separations.

Sun Shadow Impacts

A Sun Shadow Study was provided as part of this application to demonstrate the potential impacts on adjacent properties and the public realm (see Appendix 1). Shadows will generally be cast over existing development to the east, north and west. The proposed tower has a lower

height and smaller floorplate than the current zoning permissions, and therefore the sun shadowing would be very similar.

EDMONTON DESIGN COMMITTEE (EDC)

On May 21, 2019 this application was reviewed by the Edmonton Design Committee (EDC). The committee provided a recommendation of support with three conditions:

- Section 10 of the proposed Direct Control Regulations (Contributions) - Establishing a stronger level of financial commitment to adequately fulfill the community amenity contributions identified related to public realm and public art.
- The Committee supports the opportunity to widen the 103 Avenue sidewalk. If this widening cannot occur, the Committee recommends exploring a setback for the main floor commercial units on 103 Avenue to accommodate a Frontage Zone for greater public realm activation.
- Increasing amenity space to better conform to current best practice of 7.5 m² per unit.

The DC2 was modified to meet the contribution requirements, and to require the 103 Avenue sidewalk to be widened to a minimum of 3.5 metres. The condition to increase the private amenity to 7.5 m² per dwelling was not addressed.

The formal response letter from the Edmonton Design Committee is found in Appendix 2 to this report.

PUBLIC CONTRIBUTIONS

C582 - Developer Sponsored Affordable Housing

The proposed DC2 Provision provides the option for the City to purchase 5% of any proposed unitized residential dwellings at 85% of the market price or receive an equivalent cash in lieu contribution.

C599 - Community Amenity Contributions

A required contribution for this proposal of \$208,684 is required to comply with City Policy C599 Community Amenity contributions in Direct Control Provisions. The proposed application complies with this policy through the provision of the following amenities:

- public art on the south facade to activate the blank wall created by the waste room, and the north podium facade adjacent to 104 Street NW;
- a minimum of two 3-bedroom family oriented dwellings; and
- public realm improvements along 103 Avenue NW.

TECHNICAL REVIEW

All comments from affected City Departments and utility agencies have been addressed.

PARKING, LOADING AND VEHICULAR ACCESS

As noted above, the development will address the public realm on 103 Avenue NW, widening the existing narrow sidewalk to meet the guidelines within the City's *Streetscape Design Manual for Downtown and the Quarters Downtown*. This widening will result in the loss of two on-street EPark stalls.

Vehicular parking is to be provided in an underground parking garage as per the Zoning Bylaw requirement for the adjacent (HA) Zone. Vehicular access and loading are provided with access from the lane. Secure bicycle parking will be provided at a rate of 0.5 spaces per dwelling, exceeding Zoning Bylaw requirements.

ENVIRONMENTAL CONTAMINATION

Phase I and Phase II Environmental Site Assessments (ESA) were submitted and reviewed with this application. They revealed the existence of on site contamination on the property, which will need to be removed prior to development in order to make the site suitable for all intended uses. The proposed DC2 Provision has a regulation that requires additional site assessment work, including Remedial Action Plan(s), Final Remediation Report and/or Risk Management Plan(s), to be dealt with prior to the issuance of a Development Permit for the construction of the building. This will ensure the site is fully remediated to the required standard prior to or during construction.

The applicant is also applying for a Brownfield Redevelopment Grant to help remediate the site. The Brownfield Redevelopment Grant Program promotes redevelopment of qualified brownfield properties by helping cover some of the testing and remediation costs. There is no timeline at this point regarding this application.

PUBLIC ENGAGEMENT

PRE-APPLICATION NOTICE

January 29, 2019

- Number of recipients: 720
- Number of responses in support: 2
- Number of responses with concerns: 21
- Common comments included:
 - concern with impact on character of 104 Street
 - concerned with height and impact of building on surrounding buildings
 - increased traffic and parking issues
 - concerned with density of proposed development
 - concerned with separation space between towers
 - concerned with having more construction in the area
 - support for more development in the area

ADVANCE NOTICE

March 18, 2019

- Number of recipients: 722
- Number of responses with concerns: 6
- Common comments included:
 - concerned that the building will not maintain the historic character of 104 Street
 - the market is saturated, no need for another apartment building
 - traffic and parking concerns
 - concerns for sun shadow/reflection, privacy and wind impacts

PUBLIC MEETING June 13, 2019	<ul style="list-style-type: none">• Number of attendees: 20• Feedback is summarized the "What We Heard Report" in Appendix 3.
WEBPAGE	<ul style="list-style-type: none">• edmonton.ca/downtown

City Planning worked closely with the applicant to address some of the concerns related to the character of 104 Street, and the heritage character of the building. As the current zoning allows a taller building with a similar unit count to the proposed building, certain concerns relating to height and traffic generated by the building did not impact the proposal.

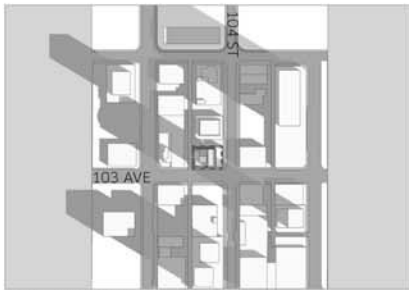
CONCLUSION

City Planning recommends that City Council **REFUSE** this application.

APPENDICES

- 1 Sun Shadow Study
- 2 Edmonton Design Committee Letter
- 3 "What We Heard" Public Engagement Report
- 4 Application Summary

Appendix 1 | File: LDA19-0115 | Downtown | September 23, 2019



9 AM, MARCH 21



9 AM, JUNE 21



9 AM, SEPTEMBER 21



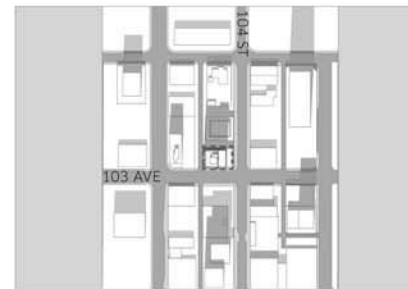
9 AM, DECEMBER 21



12 PM, MARCH 21



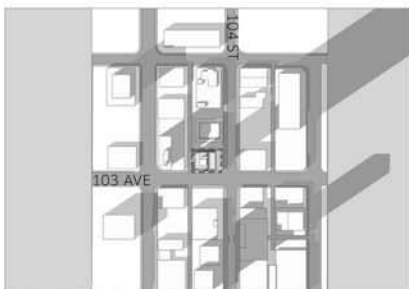
12 PM, JUNE 21



12 PM, SEPTEMBER 21



12 PM, DECEMBER 21



3 PM, MARCH 21



3 PM, JUNE 21



3 PM, SEPTEMBER 21



3 PM, DECEMBER 21



EDMONTON • DESIGN • COMMITTEE

May 23, 2019

Mr. Peter Ohm, Chief Planner
City Planning, Sustainable Development
7th Floor, 10111 - 104 Avenue NW
Edmonton, AB T5J 0J4

Dear Mr. Ohm:

Re: **Wexford Tower Ice District (Rezoning)**
Michael Rivest - DIALOG

As determined by the Edmonton Design Committee at the meeting on May 21, 2019, I am pleased to pass on the Committee's recommendation **of support with conditions** for the Wexford Tower Ice District (rezoning) project submitted by DIALOG.

The Committee strongly supports the design direction of this project, and in particular the contemporary architectural response to the historic character of 104 Street Promenade and the planning context of the HA Heritage Area Zone.

In addition, the Committee supports the design of the western portion of the tower, and in particular the setback and placement of balconies and entrance canopy, as an appropriate alternative to a continuous podium along 103 Avenue.

The Committee does recommend that the Applicant continue to work with Administration to address the following:

- **Section 10 of the proposed DC Regulation (Contributions) - Establishing a stronger level of financial commitment to adequately fulfill the community amenity contributions identified related to public realm and public art.**
- **The Committee supports the opportunity to widen the 103 Avenue sidewalk. If this widening cannot occur, the Committee recommends exploring a setback for the main floor commercial units on 103 Avenue to accommodate a Frontage Zone for greater public realm activation.**
- **Increasing amenity space to better conform to current best practice of 7.5 m2 per unit.**

You will notice that a copy of this letter is also being sent to the applicant. I hope this will inform your future discussions with the applicant as this project proceeds.

Yours truly,

Edmonton Design Committee

A handwritten signature in black ink, appearing to read 'Wes Sims', followed by a period.

Wes Sims
Architect AAA
EDC Chair

WS/ps

- c. DIALOG - Michael Rivest
City of Edmonton - Heather Vander Hoek
Edmonton Design Committee

WHAT WE HEARD REPORT

The Clancey - Downtown Public Engagement (LDA19-0115)

PROJECT ADDRESS: 10420 - 103 AVENUE NW

PROJECT DESCRIPTION: Rezoning from (HA) Heritage Area Zone to (DC2) Site Specific Development Control Provision to allow for the development of a mixed-use high rise building.

PROJECT WEBSITE: <https://www.edmonton.ca/104-street-103-avenue>

EVENT TYPE: Public Engagement Session

MEETING DATE: Thursday, June 13, 2019

NUMBER OF ATTENDEES: 20

ABOUT THIS REPORT

The information in this report includes feedback gathered during and after the June 13, 2019 Public Engagement Session. This report is shared with everyone who provided their email address during the event on June 13, 2019. This summary will also be shared with the applicant and the Ward Councillor. If/when the proposed rezoning advances to Public Hearing this report will be included in the information provided to City Council.

MEETING FORMAT

The meeting format was a station-based open house where attendees were able to view display boards with project information and ask questions of City Staff, the applicant, architect and developer. Participants were invited to share their feedback on a “Graffiti wall” by offering general feedback by answering two questions;

- What do you like about this application?
- What did you dislike about this application?

We also received 6 forms with written comments, 1 email and 16 sticky notes. The comments we received are summarized by main themes below.

WHAT WE HEARD

The following information summarizes responses received from the written feedback and the main themes that emerged. The number of times a comment was received by participants are recorded in brackets following that comment.

Built Form, Materials, and Design

- Concerns regarding the proposed materials and lack of retention of the old warehouse district on 104 Street, including red brick and cornices (x5)
- Sun/shadow impacts to neighbouring buildings, especially east facing units in the Legacy (located to the west of this property), which will lose the sun in the morning, and receive reflection off the proposed building in the afternoon (x5)
- Would like a wind impact and professional sun/shadow study to be provided to the public
- The proposed building is too high, and disproportionate to neighbouring buildings
- Concerns that pedestrian realm was not considered in the proposed design
- Concerns regarding the privacy of east facing units in the Legacy building
- Concerned that the 3.0 metre setback from the lane is insufficient
- Concerns about the lack of heritage retention along 104 Street
- A lower and slimmer building design would be preferable
- Concerned about the increased per floor density
- Concerns about microclimate impacts

Traffic and Parking

- Concerns about the traffic impacts with the increased density to the area (x4)
- Concerns about the potential impacts to pedestrian and driver safety due to the location of the parkade entry and loading area (x2)
- Concerns about the narrow alleyway that the proposed building will need to share with the Legacy building
- Concerns about potential road and sidewalk closures once construction begins
- Concerns about the limited parking provided by the proposed building

Other

- Concerns regarding the lack of floor plans and landscape plans (x3)
- Concerns about nightclubs and bars listed as permitted uses rather than discretionary uses
- Concerns regarding construction noise on top of the already noisy atmosphere that comes with Rogers Place

GRAFFITI WALL FEEDBACK

The following information are comments that were received on sticky notes at the engagement event.

What do you Like?

- The overall design, reasonable height, good podium/retail (x9)
- 3-bedroom options (x2)
- Happy to see development on this corner

What do you Dislike?

- Would like to see “nightclubs” taken out of the listed uses

RESPONSES TO QUESTIONS

- The sun shadow and wind studies are located on the [application website](#) for this application under the “Technical Reports Under Review” Section
 - Regarding the request for certain uses to be “discretionary”. As the proposal is for a Direct Control, there is no separation of permitted or discretionary uses, as every development permit in a Direct Control Zone is considered Class B, and will be treated similarly to how discretionary uses are treated in standard zones.
-

If you have questions about this application please contact:

Heather Vander Hoek, Planner

780-423-7495

heather.vanderhoek@edmonton.ca

Planning Coordination

CITY PLANNING



APPLICATION SUMMARY

INFORMATION

Application Type:	Text Amendment, Rezoning
Charter Bylaws:	19007, 19008
Location:	North of 103 Avenue NW and west of 104 Street NW
Address:	10420 103 Avenue NW
Legal Descriptions:	Lots 171 - 172, Block 4, Plan NB1
Site Area:	1,391 m ²
Neighbourhood:	Downtown
Notified Community Organizations:	Downtown Community League Downtown Business Improvement Area Rosssdale Community League
Applicant:	Stantec Consulting

PLANNING FRAMEWORK

Current Zone:	(HA) Heritage Area Zone
Proposed Zone:	(DC2) Site Specific Development Control Provision
Plans in Effect:	Capital City Downtown Plan
Historic Status:	None

Written By:	Heather Vander Hoek
Approved By:	Tim Ford
Branch:	City Planning
Section:	Planning Coordination