

# DEPUTATION REQUEST

COMMITTEE OF THE WHOLE

OCTOBER 8, 2020

**Subject:** 201 Millway Ave, Vaughan (Request V15)

**Spokesperson:** John Zipay

**Name of Group or person(s) being represented (if applicable):** York Region  
Condominium Corporation 945

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**Brief summary of issue or purpose of deputation:**

Request for employment conversion for 201 Millway Avenue, Vaughan.

OFFICE OF THE REGIONAL CLERK

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October 13, 2020

Office of the Regional Clerk  
Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON  
L3Y 4W5

**Attn: Regional Clerk & Members of Regional Council**

**RE: Region of York Municipal Comprehensive Review  
Committee of the Whole Meeting Item F.1 – Proposed Employment Mapping  
and Employment Conversions  
201 Millway Avenue, Vaughan – Request V15**

Mr. Chairman and members of Committee, my name is John Zipay and I am here today representing York Region Condominium Corporation 945, the owners of the property municipally known as 201 Millway Avenue in the City of Vaughan.

The property is developed with a mix of mostly commercial uses occupying an outdated two-storey structure. It is located at the northwest corner of the intersection of Jane Street and Portage Parkway and borders the boundary of the Vaughan Metropolitan Centre (VMC).

We have made submissions to the Province, the Region of York and the City of Vaughan, all with the intent of persuading decision makers that the property is a prime candidate for conversion to uses other than simply employment. I am pleased to say that of the three levels of government involved, to date two of them, being the Province and the City of Vaughan, have made decisions or recommendations favourable to our request.

The Province conducted an extensive public review of Provincially Significant Employment Zones (PSEZ) much the same as what the Region is currently conducting in regard to the Regional Official Plan. The Province in its final deliberation made the decision to exempt the subject property from the Provincially Significant Employment Zone designation.

Likewise, the City of Vaughan has made a recommendation to York Region that the subject property be permitted to convert from an Employment designation to another as yet to be determined land use designation, which would be finalized through the City's own Comprehensive Official Plan Review Process which is presently underway.

Therefore, of three levels of government which have a say in future land use, the Province has determined that the subject lands are non-essential as employment from a Provincial perspective and the City has also determined that the current employment designation is no longer appropriate and should be changed.

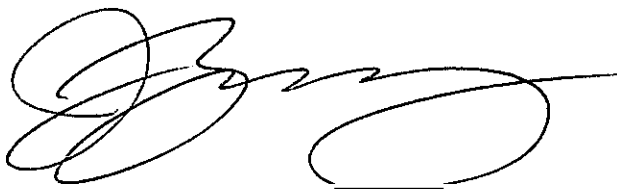
The third body to contemplate a land use change rests with you, the Region of York. Given the decisions made by the Province and the City of Vaughan, I would ask that you would be guided by their actions and that you endorse the conversion of the subject property from employment to a different designation which would be determined by the City of Vaughan through its Comprehensive Official Plan Review Process.

There is insufficient time for me to reiterate all of the reasons in support of the conversion request that were presented through our various submissions to the Province, the Regional staff and the City of Vaughan. However, as a full disclosure, I have attached copies of the detailed submissions for your consideration in making your decision.

The subject lands are located at a prime intersection of two major roads and which serves as a northern gateway to the VMC. It is surrounded on three sides by public roads being Jane Street on the east, Portage Parkway on the south, and Millway Avenue on the west, and is within a 10-minute walking distance of the Subway Station. Additionally, directly opposite the site on the south side of Portage Parkway, new high-rise residential development of 55 storeys is now built and more is under construction. The pace of adjacent land development is dynamic and construction is occurring more quickly than anticipated. Additionally, the City of Vaughan is conducting a review of the VMC Secondary Plan. Through this review, the City will be examining land uses along the north side of Portage Parkway and a possible modification to the VMC boundary to include lands adjacent to Portage Parkway within the VMC. Further it should be noted that conversion requests only occur through a Comprehensive Review of the Official Plan. The last comprehensive review was conducted 10 years ago and given the above observations, it would be inconceivable to wait another 10 years before the subject land use designation were to be revisited. The opportunity to act is now and I would encourage you to listen to your local municipal leaders in making a decision to allow the conversion.

Thank you for allowing me to present our case to you today.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Zipay', with a long horizontal flourish extending to the right.

John Zipay MSc. U.R.P., RPP

## List of Attachments

1. Planning for Employment and Employment Conversions PIC Submission, prepared by John Zipay & Associates, dated June 19, 2020
2. Letter to Mayor Bevilacqua and Members of City Council, prepared by John Zipay & Associates, dated May 19, 2020
3. Letter to Members of Regional Council, prepared by John Zipay & Associates, dated March 11, 2020
4. Proposed MTSA and Employment Conversion Response Letter, prepared by John Zipay & Associates, dated November 22, 2019

**ATTACHMENT 1**

Planning for Employment and Employment Conversions PIC Submission, prepared by  
John Zipay & Associates, dated June 19, 2020

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June 19, 2020

Regional Municipality of York  
17250 Yonge Street  
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L3Y 4W5

**Attn: Sandra Malcic, Director Long Range Planning  
Paul Bottomley, Manager of Policy, Research and Forecasting**

**RE: Region of York Municipal Comprehensive Review  
Planning for Employment and Employment Conversions PIC  
201 Millway Avenue, Vaughan**

Thank you for the opportunity to comment on the proposed Plan. On behalf of YRCC 945, John Zipay and Associates has made submissions to the Province, York Region and to the City of Vaughan with a request to have the property municipally known as 201 Millway Avenue converted from employment land to an appropriate designation which would allow mixed use development including residential. To that end a site plan was submitted which reflected a possible development scenario and was included in the submission to both the City of Vaughan and the Region of York.

Our position remains the same and therefore, we again request that the Region allow the conversion request. Subsequent to the submission to all three levels of government, it is requested that you consider the decisions made by the Province and the City of Vaughan, whereby the Province removed the property from the Provincially Significant Employment Zone and the City of Vaughan did not endorse the recommendation of the Regional Planning Department to retain the property as employment and instead has recommended to the Region that a conversion be granted.

In responding to the current recommendation by Regional staff, the following briefly reiterates some of the reasons in support of a conversion request. A more fulsome explanation is given in our previous submissions which you have.

The property is uniquely situated at the intersection of Jane Street and Portage Parkway and is adjacent to the VMC making it prime location as a northern gateway into the VMC.

The property is in proximity of the subway station on Millway and as such, higher density development of a mixed-use composition would make more effective and efficient use of this important public facility.

The southeast and south west corners of the Jane Street and Portage intersection are designated for high density development which is under construction and from a land use perspective the submission that we made is more compatible with these adjacent lands to the south and makes more sense from a land use perspective and in terms of urban design.

Portage Parkway is being proposed as a separator between the high density development to the south which is represented by modern architecture within the VMC, while the north side of the street is represented by old, mundane, low profile buildings along the street and the intersection of Jane and Portage that is perceived to be part of the VMC. The intersection of Jane Street and Portage Parkway and indeed Portage Parkway itself needs to be reviewed with the aim of creating a cohesive community thoroughfare with compatible uses and complementary design.

One of the reasons given to not support a conversion of the subject property is that it would destabilize the large employment lands to the north. We respectfully disagree with this concern as the property represents a very small fraction of the employment area. The location is unique because of its proximity to the VMC and to the subway station, which is within walking distance, the same as with the nearby residential development directly across the road on the south side of Portage Parkway. The argument that a conversion will destabilize this vast employment area is not logical. If that in fact were the case, then the argument should follow that the high-density residential development directly across the street should never have been approved because it would have the same destabilizing impact. We advocate that the lands which are situated at the intersection of Jane Street and Portage Parkway should have similar and compatible uses which would provide for a cohesive community on both sides of the same street.

An appropriate Official Plan should encourage compatibility of uses along the same street, good urban design and architecture, efficient use of public facilities such as the subway, and foster the development of a pedestrian friendly environment given the high density residential development that is planned and being built on the south side of Portage Parkway and at the intersection of these two streets. The current Regional proposal does not, in our opinion, achieve these objectives of good planning.

Given the evolving structural changes in employment areas which have been noted in Vaughan's Economic Development and Employment Sectors Study as having an impact on the built form so that typical manufacturing buildings are no longer the dominant aspect of employment land development, it is our opinion that now is the time to review the land use options within proximity of the current VMC boundary. This is particularly important as it relates to the Jane Street and Portage Parkway intersection. The goal should be to diversify the land use mix and to include residential as part of future development.

For the reasons outlined above and those given in our previous submissions and coupled with the decisions made by the Province and the City of Vaughan, we request that the property at 201 Millway be removed from the employment designation.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Zipay', with a stylized, cursive script.

John Zipay MSc. U.R.P., RPP

c. Paul Freeman, Chief Planner, Region of York



**ATTACHMENT 2**

Letter to Mayor Bevilacqua and Members of City Council, prepared by John Zipay & Associates, dated May 19, 2020

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May 19, 2020

Attn: Mayor Bevilacqua and Members of City Council

Your worship and members of Committee, my name is John Zipay and I am making this presentation on behalf of the owners (York Region Condominium Corporation 945) municipally addressed as 201 Millway Avenue, the land situated at the northwest corner of Jane Street and Portage Parkway which is adjacent to the Vaughan Metropolitan Centre (VMC). We have participated in the Official Plan Reviews of both the Region of York and City of Vaughan in addition to the Provincial Review Process regarding Provincially Significant Employment Zones.

With respect to the Provincial Review, I am pleased to inform you that the Province, in response to our submission, made the decision to remove the subject property from the Provincially Significant Employment Zone. It is the only property located on Portage Parkway that was granted this relief, which was based on a submission to the Province very similar to the submission made to the Region and shared with the City of Vaughan Planning Department. The Province was persuaded by our submission that this

particular parcel was unique; that it could serve to function as a northern gateway to the VMC; that its proximity to the subway station on Millway Avenue made effective use of this facility and encouraged public transit use; and that from a land use compatibility perspective with high density development on the southeast and southwest corners of Jane Street and Portage Parkway, respectively, it made good planning sense to replicate a similar type of development, but at a smaller scale. These reasons, along with others, persuaded the Province to remove this property from the Provincially Significant Employment Zone. Unfortunately, the Region and the City of Vaughan Planning Department have not been persuaded, which is why I am here today to ask that you, as a Council, not endorse the recommendation of the Planning Department in so far as this property is concerned at this time. I am requesting that you not make any decision or endorsement of a particular land use designation at this time and I am also requesting that you take a pause and direct staff to undertake a more fulsome public engagement as to the appropriate land use planning for the intersection of Jane Street and Portage Parkway by conducting a Secondary Plan Review of the VMC with particular attention to this intersection. We also support a review of land use along the rest of Portage Parkway in general.

This intersection is a significant element of the VMC. A boundary line drawn on paper down the middle of a road or through the middle of an intersection does not define the

planning relationship between two sides of the same street nor does it foster the best land use and attain the potential synergy that could evolve to create a great street or a gateway. The lands abutting the intersection of Jane Street and Portage Parkway, and perhaps the lands on the north side of Portage Parkway itself, should be part of the VMC as a transition area and planned for in a cohesive holistic way. The plan as it currently exists divides the intersection and street into two separate or distinct paradigms; one side representing modern architecture, high density, predominately residential with some mixed use, and the other side represented by mundane architecture, low profile, outdated employment buildings that have no functional synergy with the emerging modern city centre on the other side of the street. Regardless of lines on a map, the Jane Street-Portage Parkway intersection and Portage Parkway as a street are physically perceived to be a part of the VMC and should be planned as a unit and not separate entities.

As you are aware, the conversion of employment land can only occur through a Municipal Comprehensive Review of the Official Plan which occurs every 10 years. The Region and City Staff have taken a position to simply maintain the status quo as opposed to accepting the Official Plan review as an opportunity to revisit this boundary area and explore its potential in developing a contemporary and much better plan for the future. To this end, I respectfully request that Council not consider any

endorsement of the Regional and City staff position for this particular area as it would be premature until such time that the City has completed a thorough review of the VMC Secondary Plan and that a more fulsome public engagement and consultation with landowners and the general public has taken place. One possibility is to conduct a charrette with stakeholders. This was one of the very successful methods employed during the 2010 Official Plan review.

I would like to briefly comment on the reasons given by City staff for recommending non-support for the conversion. These are listed on page 329 of your agenda.

1. "VMC residential targets are being met and there is no need for additional residential."

Reply: The residential build out of the VMC is a relatively new development that has seen rapid building in the last few years and is accelerating because of the subway and a lack of affordable ground related housing. We should not wait for another 10 years before this issue is re-evaluated as in the meantime the VMC will experience much more development at an accelerated pace.

2. "Conversion of lands north of Portage Parkway for residential uses will destabilize the surrounding employment lands, which is a part of the largest and fastest growing employment area in the City."

Reply: The subject lands at this intersection of Jane Street and Portage Parkway represent a very small fraction of the current employment area. The location is absolutely unique because of its proximity to the VMC and to the Subway Station which is within walking distance, the same as with the new residential developments directly across the road on the south side of Portage Parkway, and municipally addressed as such. The extent of the subject property which also has extensive frontage on Portage Parkway is a confined parcel forming one quadrant of the intersection of Jane Street and Portage Parkway, so the argument that a conversion will destabilize this vast employment area is not logical. If that were the case, then the argument should follow that the high density residential on the south side should never have been approved. The problem in our opinion is that not enough attention was paid to how the north and south sides of the street would coexist as a community.

3. "There is no existing east/west road north of the lands that are proposed for conversion, therefore this would create an unclear boundary between residential and employment lands."

Reply: City building is not about creating artificial boundaries that are easy to recognize. It is about design, good architecture, efficient land use and

compatibility of uses, and creating memorable pedestrian friendly places, intersections and streets and the use of transitional scale between uses that should define the land use landscape. None of this is achieved under the current land use plan. The landscape and physical presence of the area is evolving and is undergoing a dynamic process of change which requires us to re-evaluate the current plan with the aim of creating something better in response to the evolving development that is taking place.

4. "Portage Parkway is an appropriate boundary between residential and non-residential because it is a truck route and follows existing property lines."

Reply: This premise really needs to be examined and re-thought. Is it still good planning to have designated this significant street as a truck route given the tremendous amount of high density residential development that is occurring on the south side? A review of the VMC Secondary Plan is absolutely necessary and should address this issue.

5. "The subject lands are important employment lands and can be considered for further intensification for employment uses."

Reply: The question should be, what kind of intensification should be permitted and does it have to be exclusively for employment? Can the

intensification in proximity of the VMC be a combination of employment and residential?

One of the conclusions of Vaughan's Economic Development and Employment Sectors Study is that structural changes are occurring in the broader economy and employment lands are increasingly driven by growth in the knowledge-based and creative class economies, such as scientific and technical services; financial; real estate; information and culture; health care and social assistance and education all of which is impacting the built form so that the typical manufacturing building form is no longer the dominant aspect. Given this conclusion, would it not make sense to take the time right now to review the land use opportunities within proximity of the current VMC boundary and in particular as it relates to the intersection of Jane Street and Portage Parkway in the context of a changing world? If the trend is toward a knowledge-based employment paradigm, could there not be a mixed use scenario which incorporates these employment uses with residential uses especially where the VMC and the current employment lands interface with each other on the same street?



Mayor and Members of Council, I simply ask that you defer making any endorsement of the Regional and City staff position in regard to the subject lands and that City staff be directed to conduct a charrette and Secondary Plan Review of VMC to consider the land use opportunities and potential in proximity of the Jane Street and Portage Parkway Intersection before Council gives any endorsement to the Region. This is a very important issue because once the decision is made it will not likely be reviewed again for the next 10 years. For your information, the submissions made to the Region, City and Province are included with today's presentation.

I thank you for the opportunity to express the views of my client and hopefully look forward to a more in-depth review and consultation before any endorsement of the Region's position is given. Land use policies should be determined by the local City Council as much as possible and the best way to achieve this is through a more fulsome public engagement.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Zipay', written in a cursive style.

John Zipay MSc. U.R.P., RPP

**ATTACHMENT 3**

Letter to Members of Regional Council, prepared by John Zipay & Associates, dated  
March 11, 2020

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March 11, 2020  
File: 5275

Regional Municipality of York  
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L3Y 4W5

**Attn: Members of Regional Council  
Region of York**

**RE: Region of York Municipal Comprehensive Review  
Planning for Employment and Employment Conversions (CW Item H.2.3)  
201 Millway Avenue, Vaughan**

John Zipay and Associates is the planning consultant for York Region Condominium Corporation 945 (“YRCC 945”), collectively on behalf of the owners of the property municipally addressed as 201 Millway Avenue in the City of Vaughan (herein referred to as the “subject property”).

The purpose of this letter is to reiterate our request that the subject property be excluded from the Regional Official Plan employment designation and that the subject property be referred to the local municipality to determine an appropriate land use designation.

### **Description of Subject Property and Context**

The subject property is located on northwest corner of Portage Parkway and Jane Street, east of Millway Avenue and immediately bordering the Vaughan Metropolitan Centre Secondary Plan area to the south. It consists of 28 employment-related condominium units and has an approximate lot area of 1.92 hectares (4.74 acres). The property has frontage onto three separate public roadways, including Jane Street (124 metres), Portage Parkway (160 metres) and Millway Avenue (113 metres) and is adjacent to a mix of uses, including employment uses to the north and west and existing and future high-rise (up to 55 storeys) mixed-use to the south. To the east, at the northeast corner of Jane Street and Portage Parkway is an office complex designated for employment uses; and in the southeast quadrant of this intersection, the lands are within the Vaughan Metropolitan Centre (“VMC”) and are occupied by high-density, high-rise (35 storeys) mixed-use development.

The subject property is located approximately 457 metres walking distance north of the Vaughan Metropolitan Centre (“VMC”) Subway Station, which is the northern terminus of the TTC Spadina Subway Extension (Line 1), and 156 metres walking distance from the Vaughan Metropolitan Centre Bus Terminal. The site abuts the northern boundary of the proposed draft Major Transit Station Area (“MTSA”) 1 for the Vaughan Metropolitan

Subway Station. The area of the proposed MTSA is bounded by Portage Parkway to the north, Maplecrete Road to the east, Highway 407 to the south and Edgeley Boulevard to the west.

### Provincially Significant Employment Zone (PSEZ)

Following submissions to the Province, the subject property was removed from the Provincially Significant Employment Zone (“PSEZ”) mapping. This suggests that the subject lands are not deemed significant on a provincial level for meeting the Province’s employment needs and achieving forecasted growth targets. Additionally, the removal from the PSEZ gives the subject property the same treatment by the Province as the lands immediately to the south outside of the PSEZ, whereas the lands to the north and west remain within the PSEZ designation. It is our opinion that this property will be better suited for a greater range and mix of uses, which includes significantly increasing the current level of employment on site and introducing compatible residential and commercial uses in a mixed-use context.

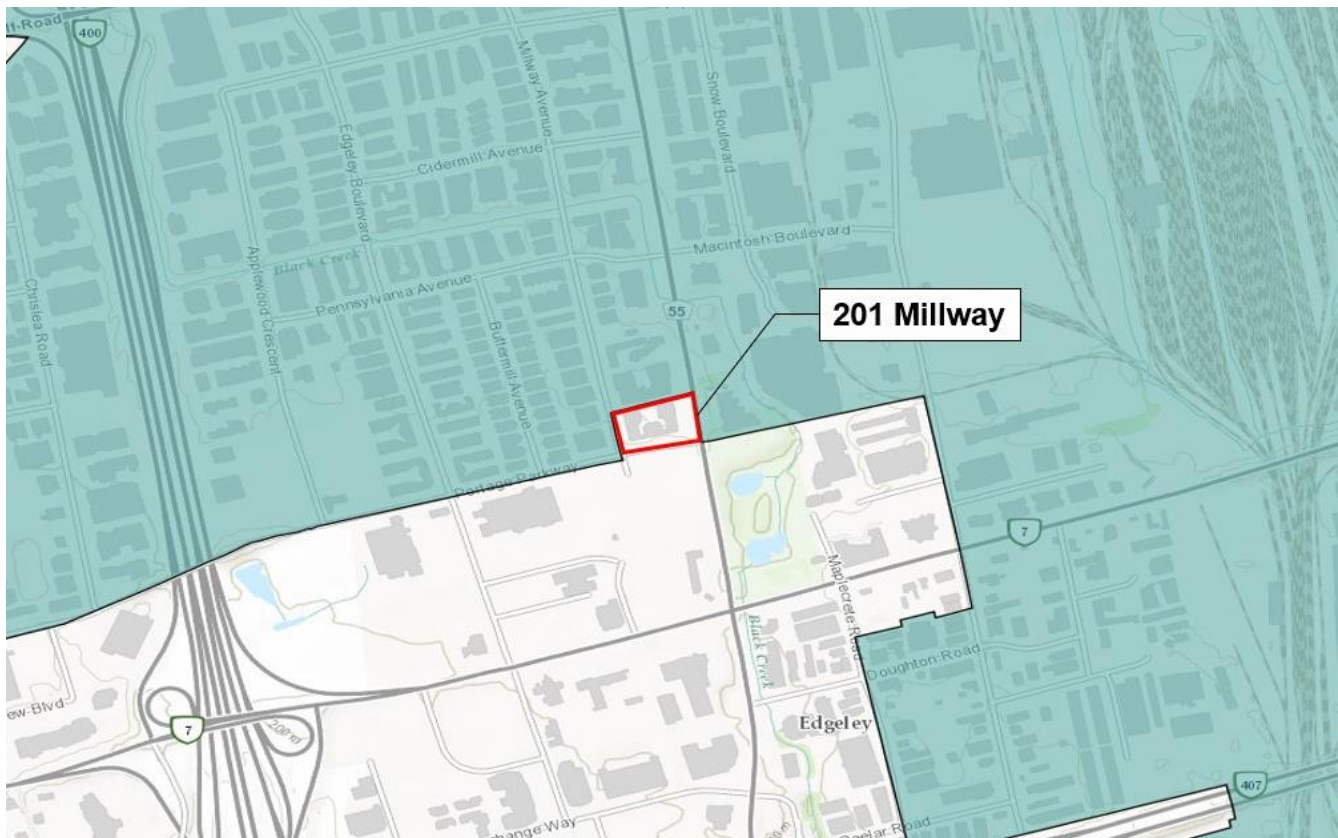


Figure 1 - Provincially Significant Employment Zone Mapping (December, 2019)

### Conceptual Development

The conceptual development for the subject property contemplates the creation of a transitional area and gateway to the Vaughan Metropolitan Centre through the transformation of the site into a mixed-use employment and residential development, while significantly increasing the current level of employment, or greater, on the property.

The proposal contemplates the redevelopment of the existing two-storey commercial/ employment building and associated parking area into a higher-density, compact mixed-use built form. The contemplated built form and land uses will provide for an appropriate transition between the high-density VMC to the south and the surrounding low-density employment lands, while accommodating significant employment opportunities on the site. The proposed design mimics the development at the southwest corner of Portage Parkway and Jane Street but at a smaller scale to provide a transition between the very high density at the south side of Portage Parkway and the employment lands to the north. The proposed development concept similar to the development on the south side of Portage Parkway privately-owned public spaces, urban plazas and gateway features.

Given the more diverse land use permissions, as well as the current and planned physical conditions of the VMC on the south side of Portage Parkway compared with the existing and restrictive land uses and low-rise employment development of the north side of the street, it creates an environment which provides little incentive for the employment lands to the north to be redeveloped under an employment designation in a more contemporary way, creating a stark contrast between the land use designation on either side of the street

### **Analysis of Staff Report**

We have reviewed the Planning for Employment and Employment Conversion Staff Report, dated March 12, 2020, and its associated attachments, including Attachment 5 – York Region Site Specific Employment Area Conversion Assessment Summary for Request V15 as it relates to the subject property. Staff are recommending that the subject lands not be converted to non-employment uses and that they be designated as employment in the Regional Official Plan for the following reasons:

- 1. Lands are part of a larger contiguous employment area and non-employment uses would destabilize and/or adversely affect the overall viability of existing and/or future employment uses in the employment area.*
- 2. The conversion would impact a currently logical employment boundary.*
- 3. Lands should be retained as employment as they provide an appropriate transition between the employment area and the adjacent non-employment uses and may offer the potential for more permissive employment uses to be assessed through the development of the Region's employment policy framework.*

While the three reasons stated above may appropriately apply to the majority of the employment designated lands in proximity to the subject property, it is our opinion that the subject property has unique attributes which sets it apart from the general surrounding employment lands. The reasons provided in the staff report are general and not specific in terms of an evaluation as the assessment fails to recognize the special attributes and unique locational characteristics of the subject property to make it a candidate for different and enhanced treatment.

More specifically, reason #1 as stated in the staff report, considers the subject property in the context of a large contiguous employment area where non-employment uses would destabilize and/or adversely affect the overall viability of existing and/or future employment uses in the broader employment area. To the contrary, although the subject property is within a larger employment area, its specific location at the intersection of

Jane Street (an Intensification and Rapid Transit Corridor) and Portage Parkway (a Major Collector Road) coupled with the abutting land uses at this intersection, give this property and intersection a unique locational attribute to be considered in the context as a gateway to the VMC. The subject property is effectively on the edge of the broader employment area, within 500 metres of the VMC Subway Station MTSA, and is directly opposite and across the street of a high-density mixed-use development on the southeast and southwest corner of Portage Parkway and Jane Street.

Furthermore, as indicated previously, the Province as a result of our request has removed the subject property from the PSEZ which in our view indicates that the Province recognizes the property to be different and not the same as the surrounding employment area in proximity to this site. Thus, in our view, to allow a broader range and mix of uses at this site, including office and residential uses as contemplated, would not destabilize or adversely affect the existing or future employment uses in the surrounding employment area. The conversion of this property in the context of the overall employment area does not represent a significant amount of land. Accordingly, it would not destabilize the intended employment function of the larger area, but rather support and enhance the long-term viability and function of the surrounding employment area as well as the function of the VMC and MTSA.

Regarding reason #2, that a conversion would impact a currently logical boundary, we submit that given the planned physical conditions of the VMC lands immediately to the south of Portage Parkway approved for residential uses ranging from 35 to 55 storeys in height, the current employment area boundary is not logical nor appropriate given the current low-rise nature of the existing outdated employment development that has occurred in the past. As a Major Collector street and a key artery for pedestrian and vehicular movement, it is not appropriate that Portage Parkway act as a separation between modern current built form, high-density and diverse land uses on the south side juxtaposed with bland, low-rise and outdated employment buildings on the north side. The stark contrast between the land use designations on either side of the street will create an unappealing and inappropriate corridor with respect to community design and community living. With respect to the subject property in particular, since it is at a major intersection and within walking distance to the VMC Subway Station and Bus Terminal, and directly opposite to a high-rise residential mixed-use development, we are of the opinion that the subject property be viewed in the context of a gateway to the VMC. This would provide the opportunity to complement the uses within the VMC while also replacing and enhancing the existing employment uses currently on site. It will allow for the long-term protection of the larger employment area, while also providing for a complementary transition to the height and density planned for the VMC.

Regarding reason #3, permissions for solely employment uses will not provide an appropriate transition between the VMC lands to the south and the broader employment area to the north. Given the location of the subject property abutting an area that is planned to accommodate the greatest heights and densities in the City to support the downtown function of the VMC, the lands along the north side of Portage Parkway represent a unique condition. These lands should no longer function as a typical transition between what has been a traditional employment area and a non-employment area as typically found elsewhere in the City. Given that we have an opportunity to think outside the box and be innovative, it is our view that we should consider use, density and transition at a higher scale than has been experienced in the past. In this case, a complementary transition in height and density is required juxtaposed to the Transit City developments on the south side of Portage Parkway. As such, a traditional transition through employment uses will not be sufficient and will result in a stark contrast between the north and south sides of the street as described above. In order to provide for

an appropriate, attractive and viable transition between these areas, a greater mix of uses is required beyond employment uses.

In their Report, York Region Staff indicate that “some employment areas are more appropriately designated by local municipalities and not in the Regional Official Plan”. We submit that the subject lands are precisely the type of property which is more appropriately dealt with by the local municipality rather than at the Regional level for the reasons provided above. Largely, this relates to the land use considerations associated with these lands including land use compatibility with the VMC to the south and the need for an appropriate transitional area, the availability of municipal infrastructure to service the lands, and the range of community facilities and services available in the area, including the VMC Subway Station within 500 metres walking distance from the site.

### **Conclusion and Recommendation**

The March 12, 2020 Staff Report sets out that properties may be appropriately assessed by the local municipality through a local Municipal Comprehensive Review process. In consideration of the special attributes associated with the subject property, its unique locational context, and its removal from the PSEZ, we request that the subject property be excluded from the Regional Official Plan employment designation and be referred to the City of Vaughan to determine an appropriate designation.

Thank you for the opportunity to provide these comments. Please contact the undersigned should there be any questions related to the content of this submission.

Yours truly,

A handwritten signature in black ink, appearing to read 'John Zipay', with a stylized, flowing script.

John Zipay, MSc., U.R.P., RPP

cc. YRCC 945

**ATTACHMENT 4**

Proposed MTSA and Employment Conversion Response Letter, prepared by John  
Zipay & Associates, dated November 22, 2019



John Zipay and Associates  
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November 22, 2019  
File: 5275

Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON  
L3Y 4W5

Attn: Paul Freeman, Chief Planner  
Regional Municipality of York

Dear Sir,

**Re: Proposed MTSA and Employment Conversion Response Letter  
201 Millway Avenue, City of Vaughan  
Vaughan Metropolitan Centre**

John Zipay and Associates is the planning consultant for York Region Condominium Corporation 945 ("YRCC 945"), collectively on behalf of the owners of the property municipally addressed as 201 Millway Avenue in the City of Vaughan (the "subject property"). John Zipay and Associates has been engaged to provide assistance to YRCC 945 with respect to the York Region Municipal Comprehensive Review ("MCR") process and associated land use studies.

Previous submissions under Weston Consulting letterhead were filed with the Region of York on behalf of YRCC 945 as part of the ongoing MCR process requesting that the subject property be considered for conversion from employment uses to permit a greater range and mix of uses, including employment, commercial and residential mixed uses. In response to this request, a letter was received from the Region of York on July 15, 2019 advising that based on the results of their analysis, Regional Staff are recommending that the subject property not be converted to non-employment uses. A subsequent meeting was held with Regional Staff on August 8, 2019 to review this preliminary recommendation. A submission to the Ministry of Municipal Affairs and Housing was also filed on February 28, 2019 requesting that the subject property be removed from the Provincially Significant Employment Zone ("PSEZ").

The Region released a Staff Report dated October 10, 2019 which provided an update on the status of the employment conversion process to date. The Report identified that Regional Staff have largely completed the 'Phase 1' portion of their assessment of the requests filed for employment conversion, which included the application of the Region's employment conversion criteria only. We understand that 'Phase 2' of the evaluation process is to include a broader analysis and discussions with local municipal staff and stakeholders on employment planning and a more general assessment of employment areas. This will consider the context within the Regional and local structure, implications on land budget and infrastructure, and the changing nature of job delivery. Phase 2 will also assess the designation of employment lands in the Regional Official Plan and whether some employment areas should have more permissive uses or be appropriate for mixed-use (including non-employment uses).

At this time, we are requesting that the employment conversion request for the subject property be revisited

as part of the Region's second phase of evaluation in light of the proposed intensification and Major Transit Station Area ("MTSA") direction released as part of the Planning for Intensification Background Report, dated April, 2019, and the associated Attachment 2: Draft Major Transit Station Areas and Additional Strategic Growth Areas. This letter is intended to provide comments on this intensification and MTSA direction, as well as request consideration for the subject property to be added to the MTSA boundary applicable to the Vaughan Metropolitan Centre Subway Station (MTSA 1). This letter further requests that reconsideration be given to the conversion of the subject property to allow for mixed employment and non-employment uses. It is our opinion that this property will be better suited for a greater range and mix of uses, which includes maintaining the current level of employment on site and introducing compatible residential uses in a mixed-use context.

**Subject Property and Surrounding Area**

The subject property is located at the northwest corner of Portage Parkway and Jane Street, immediately bordering the Vaughan Metropolitan Centre Secondary Plan Area to the south. It consists of 28 employment-related condominium units and has an approximate lot area of 19,288 square metres (1.92 ha) in a rectangular shape. The subject property has frontage onto three separate public roadways, including Jane Street (124 m), Portage Parkway (160 m) and Millway Avenue (113 m). The site is further located approximately 457 metres walking distance north of the Vaughan Metropolitan Centre ("VMC") Subway Station, which is the northern terminus of the TTC Spadina Subway Extension (Line 1), and 156 metres walking distance from the SmartCentres Place Bus Terminal (refer to Attachment 2). Further, the property is adjacent to the Jane Street / Portage Parkway intersection on its eastern property line and the Millway Avenue / Portage Parkway intersection at the southwest corner giving the property direct pedestrian access to the subway station.

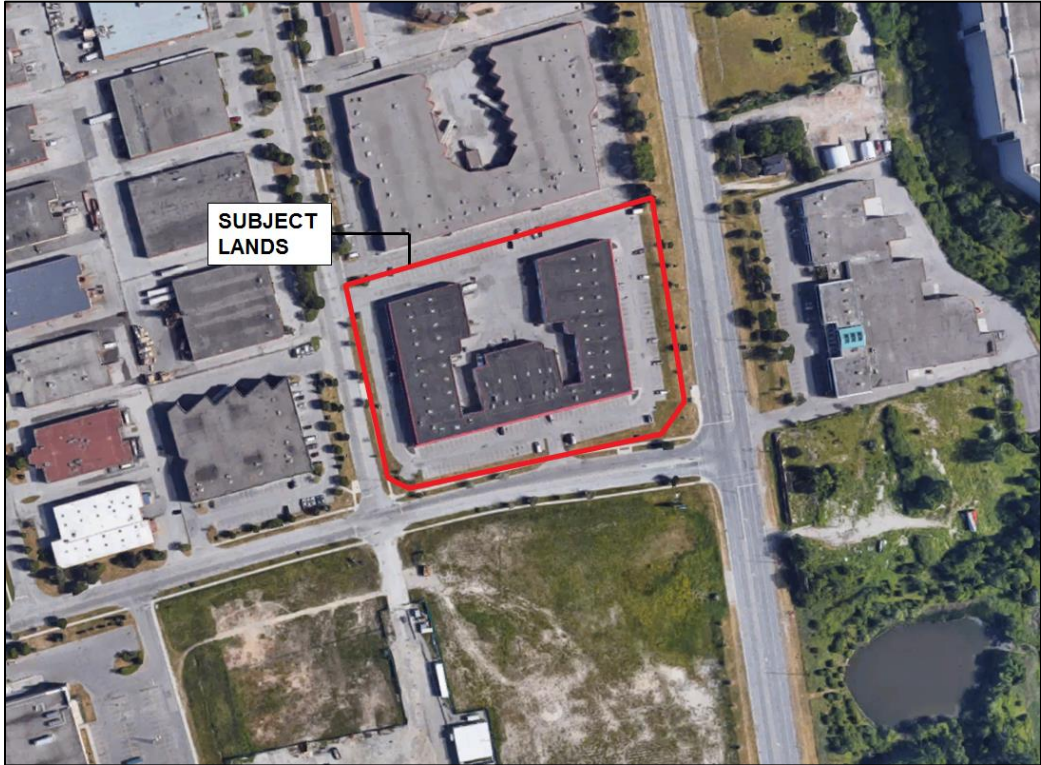


Figure 1: Aerial Photo of the Subject Property

The subject property abuts the northern boundary of the proposed draft MTSA 1 for the Vaughan Metropolitan Subway Station. The draft area of the proposed MTSA is bounded by Millway Avenue to the north, Maplecrete Road to the east, Highway 407 to the south and Edgeley Boulevard to the west (refer to Figure 2).

The subject property is located at the southeast edge of an area containing primarily employment uses, directly adjacent to the VMC, which is a mixed-use area that has experienced significant change in recent years. The VMC is considered Vaughan's new downtown, and is currently being redeveloped to include a broad range and mix of land uses in a high-density context based on its designation as an Urban Growth Centre under the Growth Plan and the associated permissions of the Vaughan Metropolitan Centre Secondary Plan. The subject property is adjacent to a mix of uses, including employment uses to north and existing and future high-rise (up to 55 storeys) mixed-use to the south. To the east, at the northeast corner of Jane Street and Portage Parkway is an office complex designated for employment uses; however, in the southeast quadrant of this intersection, the lands are within the VMC and are occupied by high-density, high-rise (35 storeys) mixed-use development. On the western boundary of the subject property, the lands are designated employment and are occupied by low-rise buildings.

### **Portage Landowners Group**

The Portage Landowners Group ("Portage Landowners") have land holdings on the north side of Portage Parkway, west of Jane Street and east of Applewood Crescent (the "Portage Lands"), as shown in Attachment 2 to this submission. The Portage Lands include our client's property located at 201 Millway. A formal request has been made to the Region of York by Malone Given Parsons ("MGP") on behalf of the Portage Landowners Group asserting that the Region's current MCR process should consider opportunities for the planning for a future transition from the VMC and that as part of this process, the Portage Lands should be converted to permit non-employment uses to recognize their location as a transitional area from the VMC to the existing employment area to the north.

We are generally supportive of the position held by the Portage Landowners and agree that given the locational context of the Portage Lands adjacent to the northern boundary of the VMC, transitional heights and densities are required in this area. This submission is generally consistent with the Portage Landowners' request in that we maintain that an employment land conversion should be granted for the Portage Lands in order to allow for the addition of non-employment uses along this corridor in order to support the lands as a transitional area between the high-density character of the VMC and the low-density employment area. We also hold that given the strategic location of the subject property (201 Millway) as a corner site with frontage along an Intensification Corridor and a Regional Rapid Transit Corridor (Jane Street), as well as its location within 500 metres of the Vaughan Metropolitan Centre Subway Station and 300 metres of the SmartCentres Place Bus Terminal, the failure to convert these lands would represent a lost opportunity to diversify the land use and make efficient use of this land, which has the potential to support increased heights and densities.

### **Planning Policy Context**

#### *Growth Plan for the Greater Golden Horseshoe (2019)*

The Growth Plan for the Greater Golden Horseshoe, 2019 (the "Growth Plan") generally defines Major

Transit Station Areas as “the area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as *“the area within an approximate 500 to 800 metre radius of a [higher order] transit station, representing about a 10-minute walk.”* As previously noted, the subject property is located just over 400 metres from the VMC subway station, which falls within the definition of a higher order transit stop. Additionally, the property is also within 300 metres of the SmartCentres Place Bus Terminal, which is a 9-bay YRT bus terminal within the VMC, also falling within the definition of a higher order transit station. Attachment 2 to this submission demonstrates the approximate 500 and 800 metre radii from the subway station and the bus terminal taken from the closest station entrances, which are consistent with the Growth Plan’s definition of MTSA.

The Region’s ongoing MTSA delineation exercise is required by the Growth Plan, which mandates through Policy 5.2.5.3 that in order to support the implementation of the minimum intensification and density targets set out by the Growth Plan, upper- and single-tier municipalities will delineate Major Transit Station Areas in their official plans through an MCR. The Region has prepared a draft delineation of the Vaughan Metropolitan Centre Subway Station MTSA as part of their ongoing MCR process, which includes lands within a 500 metre radius of the subway station, as well as lands outside the 500 metre radius to the south of the station (see Figure 2). The draft MTSA 1 has a proposed gross area of 99.41 hectares (245.6 acres) and excludes the lands within 500 metres of the subway station located on the north side of Portage Parkway.

With respect to the delineation of MTSA, Section 2.2.4.2 of the Growth Plan directs that MTSA on priority transit corridors or subway lines be delineated *“in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station.”* As currently proposed, the draft delineation of the MTSA 1 boundary does not appropriately maximize the size and area of the MTSA based on the number of potential transit users. The draft delineation excludes lands that are located within 500 metres of the subway station and 300 metres of the bus terminal, including the subject property, which are within walking distance and provide opportunity to increase potential transit users. Additionally, the draft boundary does not meet the minimum distance requirements of 500 metres, where the Growth Plan calls for even greater distances of up to 800 metres and a 10-minute walking distance.

It is noted that the 2019 Growth Plan came into force and effect on May 16, 2019 replacing the 2017 Growth Plan which took effect on July 1, 2017. York Region’s draft MTSA delineations and general intensification direction were released in April, 2019, which predates the updates to the 2019 Growth Plan, including significant updates to the MTSA policies. As a result, it appears that the draft delineations are based on the previous definition of MTSA, which defined these areas as within a 500 metre radius of a higher order transit station. Under the 2019 Growth Plan, the definition was expanded to be the area within 500 to 800 metres of a transit station, which fully encompass the subject property as well as the lands beyond the subject property generally within the Portage Lands.



# Vaughan Metropolitan Centre Subway Station

On Subway Line 1 / Highway 7 BRT Corridor  
Near Highway 7 and Millway Avenue, Vaughan

MTSA 1

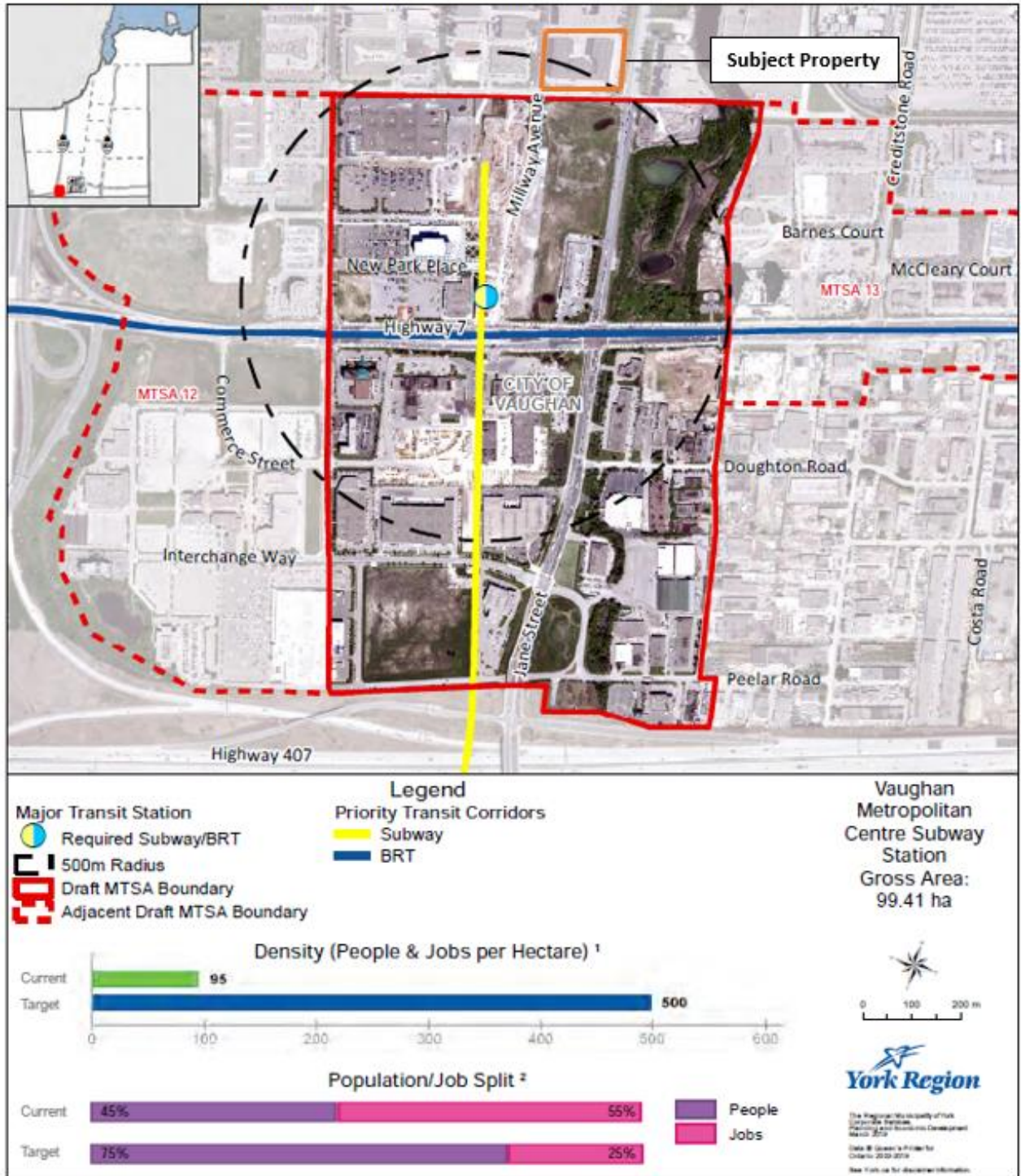


Figure 2: Draft MTSA 1 Delineation

Based on the policies of the 2019 Growth Plan, it is our opinion that the subject property is appropriate for inclusion in the VMC Subway Station MTSA boundary, being within 500 metres of the subway station and 300 metres of the bus terminal. The subject property offers significant opportunity for redevelopment and intensification in order to support the minimum targets set out for MTSA's and to increase transit ridership to support the investment in higher order transit, while also providing an opportunity to create an appropriate transition to the existing employment area north of Portage Parkway. In conjunction with the other Portage Lands, a mixed-use transition area should be created between the high-density character of the VMC to the south and the low-density nature of the employment area to the north. As part of such a transition area, the subject property would provide the opportunity to complement the uses within the VMC while also replacing and enhancing the existing employment uses currently on site. This will allow for the long-term protection of the larger employment area, while also providing for a complementary transition to the height and density planned for the VMC.

### Regional and Municipal Official Plans

Both the current York Region Official Plan ("YROP") and City of Vaughan Official Plan 2010 ("VOP") identify the subject property for employment uses. Additionally, the subject property is located immediately north of the Vaughan Metropolitan Centre Secondary Plan area and has frontage on Jane Street, which is identified as an Intensification Corridor and Regional Rapid Transit Corridor. The property's frontage along Jane Street is also notable given the role of Jane Street as the primary linkage between the Vaughan Metropolitan Centre to the south and the Vaughan Mills Centre to the north. With both areas permitting high-density, mixed uses, there is opportunity for the lands along Jane Street to supplement and complement the uses and densities in these two major centres of the City, as well as support current and future transit investment on Jane Street to support its function as the only major corridor linking the VMC and Vaughan Mills. The YROP recognizes the importance of Jane Street as a Regional Rapid Transit Corridor and a link between these two major centres.

The York Region Transportation Master Plan, 2016 ("YRTMP") identifies Jane Street as part of the Viva Network Expansion Plan, which is to include curbside Viva Bus services and later evolve into a rapidway with dedicated bus lanes by 2041. The plan also explores the opportunity of a possible future extension of the Line 1 subway north along Jane Street. The YROP and the YRTMP both identify the Jane Street corridor as a priority for current and future transit investment.

As previously noted, the subject property is located within 500 metres of the VMC Subway Station and 300 metres of the SmartCentres Place bus terminal, and should therefore be included within the MTSA 1 boundary. Further to the policies of the Growth Plan discussed above, York Region has developed Draft Guidelines to Delineate and Set Density Targets for Major Transit Station Areas to guide the establishment of MTSA's. This document provides a number of principles for the delineation of these areas across the Region, including that MTSA's should:

1. *Reinforce the planned regional and local municipal urban structure*
2. *Provide a diverse range and mix of land uses, if the MTSA is not located in an employment area (e.g. residential, employment, community services)*
3. *Include existing higher density land uses*
4. *Include areas that are anticipated or ideally situated to develop or redevelop to higher densities*
5. *Connect with adjacent MTSA's so that as much of the priority transit corridors are included, as*

*possible*

6. *Be walkable*
7. *Collectively support the creation of complete communities for the broader community beyond the MTSA boundaries*
8. *Collectively provide a range of amenities (e.g. parks, schools, cultural facilities, retail, etc.)*
9. *Collectively provide opportunities to live and work along the priority transit corridors.*

Based on the requirements of the Growth Plan, as well as the guidelines set out by the Region for the delineation of MTSA's, the subject property is appropriate for inclusion within the VMC Subway Station MTSA boundary. The redevelopment of the lands and the requested conversion to allow for a mix of employment and non-employment uses on site to support the function of the MTSA and achieve the objectives outlined above represents an opportunity that should be considered and supported.

The Vaughan Metropolitan Centre Secondary Plan ("VMCSP") identifies the lands immediately south of the subject property as within the Station Precinct and as appropriate to accommodate high-rise, high-density development up to 30 storeys in height and up to 5.0 FSI in density. The Station Precinct is intended to accommodate a broad mix of uses, including a mix of high- and mid-rise uses, including residential, office and retail uses. Further to the policies of the VMCSP, applications for Official Plan Amendment, Zoning By-law Amendment and Site Plan Approval have been filed with the City to permit three 35, 45 and 50 storey residential towers on the lands immediately south of the subject property. Additionally, the lands to the southwest of the subject property have been approved for two 55-storey residential towers. Given the height and density both planned and approved for the lands to the south, it is appropriate for the subject property to accommodate higher densities and a greater mix of uses in order to provide for a more adequate transition between the high-rise, high-density uses to the south and the lower rise employment/ commercial uses to the north.

The subject property, in conjunction with the Portage Lands area, offers an opportunity to create a mixed-use transition area that will recognize the VMC as the main focus of growth and intensification as the City's Urban Growth Centre, while also providing complementary land uses that will assist in providing a transition from the high-density character of the VMC to the low-density nature of the existing employment area to the north of Portage Parkway. The subject property represents an opportunity for redevelopment and intensification in a form that complements the heights and densities along the southern side of Portage Parkway while replacing and enhancing the existing employment uses. The intent is not to compete with the function of the VMC, but rather complement it in a way that also provides for the protection of the long-term viability of the existing employment area.

The Secondary Plan identifies Portage Parkway as a Major Collector street and contemplates a future BRT rapidway station at the intersection of Portage Parkway and Jane Street. Given the higher order nature of the proposed future transit along Jane Street, the subject property will be located within the MTSA of the future Jane/Portage BRT station. This provides further support for the intensification of the subject property for mixed uses, including higher density residential uses to support the existing and planned higher order transit investments and increase the number of potential transit users within walking distance of higher order transit facilities.

Based on our evaluation of the physical and policy context of the subject property, it is our opinion that the subject property is appropriate for an employment conversion in order to support the intensification and

complete community function of the VMC Subway Station MTSA, provide a more appropriate transition from the approved and planned high-density residential uses immediately to the south, to support the function of the VMC area as an Urban Growth Centre, to encourage increase transit ridership and support current and future investment in higher order transit facilities, and to support Jane Street as an intensification corridor and major connection between the VMC and Vaughan Mills. The subject property should be converted to allow for non-employment uses and should be included in the VMC Subway Station MTSA boundary, in accordance with Provincial policy direction and the objectives of the YROP and VOP.

### **Transition: City Building and Liveable Communities**

This submission has put forward a strong case for conversion based on a number of locational attributes of the subject property, such as being within proximity of higher order transit routes and facilities, its adjacency to high density development along the south side of Portage Parkway, and the fact that the property falls within 500 metres of the VMC Subway Station which defines the subject property as being within a Major Transit Station Area.

Portage Parkway is a Major Collector street. Given the more diverse land use permissions, as well as the current and planned physical conditions of the VMC on the south side of the street compared with the existing and restrictive land uses and low-rise employment development of the north side of the street, it creates an environment which provides little incentive for the employment lands to the north to be redeveloped under an employment designation in a more contemporary way. In terms of a liveable city, complete communities, and city building in the context of urban design and built form within a City Centre, it is not appropriate for a major road, such as Portage Parkway which functions as a major artery for pedestrian and vehicular movement, to act as a separation between modern current architecture, high-density and diverse land uses on the south side juxtaposed with bland, low-rise and out-of-date employment buildings on the north side. The stark contrast created by the current VOP designations between the two sides of the street will create an unappealing appearance with respect to community design and community living.

The principles of complete communities, city building through design, and liveable and animated streetscapes should be another factor in consideration of the north side of Portage Parkway. Conversion to a more diverse range of land uses and consideration of a transition of height and density along the north side of Portage Parkway would incentivize landowners to redevelop this area of Portage Parkway resulting in more contemporary architecture along both sides of the street and ultimately creates a more liveable community and animated streetscape. This would also serve to make more efficient use of infrastructure, services and land. This can be achieved through a transition area along the north side of Portage Parkway that would be complementary to the VMC.

### **Development Opportunity**

As described in our previous submission (Attachment 1) and with recognition of the importance of employment areas to the Region's economy, this request proposes to preserve employment uses on the subject property, while also providing for residential and commercial development in a mixed-use context similar to other developments in the area. The proposal for the subject property would comprise a mixed-use development, consisting of an office and residential uses with ground level commercial, similar in nature to the developments occurring in the VMC, but at a lower scale. The proposed redevelopment of the property would provide for significantly more employment GFA than the current condition.



Given the context of the subject property directly adjacent to the Vaughan Metropolitan Centre Secondary Plan area, approximately 416 metres from the VMC Subway Station, and located at a corner site with frontage onto a designated Intensification Corridor (Jane Street), there are many factors that support the development of the subject property for mixed-uses and greater densities. The subject property has three frontages, as it fronts onto Jane Street, Portage Parkway and Millway Avenue. These three frontages in addition to the property's corner location at the exterior edge of the employment area and abutting the VMC, present a unique context that is accommodating to the redevelopment of the site in a manner that does not compromise the integrity of the employment area.

### **Employment Lands Conversion**

A formal request for employment lands conversion was submitted for the subject property as part of the original submission filed with the Region on March 18, 2019. It is recognized that in order to facilitate the conversion of the subject property, the criteria set out by Section 2.2.5.9 of the Growth Plan, as well as the additional conversion criteria developed by York Region.

Our previous submission letter addressed each of the 14 criteria conversion individually for the subject property and came to the conclusion that the proposal adequately addresses the criteria and is suitable for conversion. Largely the proposed conversion will maintain a significant amount of employment GFA to support the employment goals of the Region and protected the viability of the employment area over the long-term, while also providing for a more appropriate transition to the land uses within the VMC and better supporting the MTSA objectives for the VMC Subway Station MTSA. Based on the nature of the proposed redevelopment of the subject property to achieve a true transition between the VMC and the employment area to the north, the site will have the ability to create more jobs that what currently exist today. The subject property does not fall under the two mandatory criteria which prohibit support for conversions on a site-specific basis for lands within recently designated and largely vacant employment areas (Criterion 6) or for lands in areas where the entire perimeter of the site is surrounded by employment area lands (Criterion 7). Please refer to Attachment 1 for a full evaluation of the 14 criteria for employment conversion as they relate to the subject property.

Based on the information presented in this submission and the analysis contained in Attachment 1, it is our opinion that the subject property is appropriate for conversion to allow for the accommodation of a mix of employment and non-employment uses. Given the physical and policy context of the subject property and the appropriateness of including the site within the VMC Subway Station MTSA, we believe that the request for conversion should be revisited as part of the Region's Phase 2 assessment. In our opinion, the subject property is an appropriate candidate for more permissive uses, including mixed-uses containing non-employment uses.

### **Proposed Provincially Significant Employment Zone ("PSEZ")**

The Ministry of Municipal Affairs and Housing's proposed Amendment 1 to the Growth Plan released on January 15, 2019, was approved and came into effect as the 2019 Growth Plan on May 16, 2019. The amendment allowed the Minister to identify a number of employment areas as Provincially Significant Employment Zones ("PSEZ"), in particular, within Zone 10 (400-407, Vaughan North), which includes the subject property. Comments to the Ministry of Municipal Affairs and Housing were submitted on behalf of

YRCC 945 respecting the proposed PSEZ mapping, including justification as to why the subject property should not be considered as Provincially Significant Employment Lands. It is our understanding that notwithstanding the proposed PSEZ mapping, the Region's position is to proceed with considering conversion requests comprehensively through the MCR process.

### **Summary**

Based on the location of the subject property at the southeast corner and periphery of the existing employment area, and considering the changing land use context being experienced immediately south of the property within the VMC, it is our opinion that:

- The subject property is appropriate for inclusion in the MTSA 1 (VMC Subway Station) boundary being within 416 metres of the VMC Subway Station and 300 metres of the SmartCentres Place Bus Terminal with frontage on Jane Street, which is a designated Regional Rapid Transit Corridor.
- The subject property forms part of the Portage Lands. This request is supportive of and complementary to the request for conversion filed on behalf of the Portage Landowners and we maintain that an employment conversion should be granted for the Portage Lands in order to support the lands as a transitional area between the high-density character of the VMC and the low-density employment area.
- The subject property would be better suited for a greater range and mix of uses, which includes maintaining the current level of employment on site and adding to it, while also introducing compatible residential uses in a mixed-use context.
- Increased density permissions for the subject property would allow the site to develop in accordance with intensification and transit-oriented development objectives of the Province, Region and municipality.
- The subject property is appropriate for employment conversion in order to support the intensification targets and complete community function of the VMC Subway Station MTSA, provide a more appropriate transition from the approved and planned high-density residential uses to the south of Portage Parkway, support the function of the VMC as the City's Urban Growth Centre, encourage increased transit ridership and support current and future investment in higher order transit, and support Jane Street as an intensification corridor.
- It is inappropriate to treat a Major Collector, such as Portage Parkway which serves as a major artery for pedestrian and vehicular traffic, as a separation between the starkly different high-rise residential development to the south and the low-rise employment development to the north.
- Conversion of the subject property and the Portage Lands to allow more diverse land uses and considerations of these lands as a transition area in terms of height and density would create incentive for their redevelopment in order to support the creation of a more complete and liveable community and animated streetscape.

We are interested in continuing to work with the Region of York and the City of Vaughan as part of the Phase

2 assessment process and throughout the remaining MCR process to ensure the respective Official Plans are updated to incorporate a progressive and forward-thinking planning vision based on analysis of the relevant emerging land use planning and development issues.

We will continue to monitor the MCR process and kindly request to be notified of any future reports and/or meetings regarding the Regional Municipal Comprehensive Review. We also request to be notified of any discussion or decision pertaining to this request, and we hope to be able to engage with the Region of York and City of Vaughan further on this matter.

Thank you for the opportunity to provide these comments. We reserve the right to provide further comments as the MCR process progresses. Please contact the undersigned at extension 245 should you have any questions regarding this submission.

Yours Truly,



John Zipay MSc., U.R.P., RPP

c. Client

Hon. Steve Clark, Minister of Municipal Affairs and Housing  
Paul Bottomley, York Region, Manager of Policy, Research and Forecasting  
Sandra Malcic, York Region, Director of Long-Range Planning  
Hon. Mayor Bevilacqua, City of Vaughan  
Councillor Yeung Racco, Ward 4, City of Vaughan  
Jason Schmidt-Shoukri, Deputy City Manager, Planning and Growth Management  
Bill Kiru, City of Vaughan, Director of Policy Planning & Environmental Sustainability  
Christina Bruce, City of Vaughan, Director of Vaughan Metropolitan Centre Program  
Don Given, Malone Given Parsons on behalf of the Portage Landowners

- Att. 1. Employment Conversion Request Letter, prepared by Weston Consulting, dated March 18, 2019  
2. Air Photograph with Portage Lands, prepared by Weston Consulting, dated November 22, 2019