

Note: The attachments mentioned in this document may be viewed by clicking on the links provided on the last page (p. 11). Links are also provided throughout the text where possible.

On behalf of Don Mills Friends, [www.donmillsfriends.org](http://www.donmillsfriends.org)

**RESPONSE TO THE APPEAL  
BY CF/REALTY HOLDING INC.**

Re: O.M.B. Case No. PL070673 O.M.B. File No.: O070090 & Z070070  
Appeal by CF/Realty Holding Inc. (“Cadillac Fairview”)  
Don Mills Centre Redevelopment – 939 Lawrence Avenue East, 49 The Donway West  
and 1090 Don Mills Road, City of Toronto

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**1. OFFICIAL PLAN AMENDMENT**

**The OMB must pass judgment on an appeal that seeks both very extensive and massive variances. The appeal under consideration does not reward the surrounding community, nor does it consider the far-reaching influence on other landowners in the area who wish to have their land viewed in similar circumstances. As a professional versed in community planning, I submit that it would be unwise granting such an appeal, which is contrary to best-practice urban planning principles.**

**Community integrity, liveability and stability are at stake unless we have parkland and a highly visible recreation centre installed in the core area. The OMB should be aware that there is an urgent need for parks in the core and surrounding area. To forego the parkland acquisition, besides working against Toronto’s Official Plan and the Central Don Mills Secondary Plan, would be contrary to best planning practice. This is also the last chance for Don Mills to obtain the needed park space for the core area in the next 100 years.**

**The appeal seeks to increase the FSI by 60% and increase the building heights by 600% and then ask for critical changes to the Zoning By-law in total disregard of the Official Plan, the Secondary Plan and Zoning. The OMB must consider that the appeal is not minor and reflects poorly**

on any intentions exposed by the province in its intensification guidelines. In essence, a decision supporting such a variance will affect not only the Don Mills area, but the entire city.

If the City and OMB were to open the door to such requests, it would open up Don Mills to such high intensification that not only would Don Mills lose its distinctive and heritage character; it would also become vulnerable to all the urban maladies associated with excessive intensification.

Here are the reasons:

### 1.1 Parkland Acquisition.

(1) The SW quadrant (Nbhd) of which the Centre is a part, has *no public park space of any kind nor any recreational facilities* other than a few trails for walking and the arena site. The Appendix, diagrams # 1 & 2, will clearly illustrate this point.

(2) Except for the NW quadrant, there are *no neighbourhood parks* in any of the adjacent quadrants (Nbhd). Again, diagrams # 1 & 2 in the Appendix will clearly illustrate this point. The former industrial land in the NW-quadrant, Bond Park, is overloaded with ball fields and tennis courts. Because of its regional use it can only be called a District Park. Most of the other so-called neighbourhood parks are actually parkettes. They are so small that they can only accommodate children's playgrounds and open storm water ditches. The remaining spaces are just trails wide enough to accommodate walkways and open storm water ditches. Macklin Hancock's innovation of the school / park complex, now an international planning principle, no longer exists in Don Mills.

If you see green spaces with children's play facilities, you can almost be sure they are part of the school facilities owned by the Toronto Board of Education. Diagrams # 1 and 2 in the Appendix show the school properties in light-brown colour.

(3) Residential intensification has already taken place. Over 2500 new dwelling units have been constructed adjacent to the core area since the early 70s without the allocation of additional neighbourhood park space. A population increase of between 5000 to 7500 persons has resulted. Regrettably the city did not secure needed park space up to an additional 2.5 ha (6.17 acres) @ .4 ha / 300 units. ( See Appendix: [Don Mills Building Inventory](#))

(4) Contrary to popular belief, and no matter what hired planners and the media may say, Don Mills has fallen well behind accepted community open-space standards. Once praised the world over as the community with interlinking neighbourhood and community parks, Don Mills in 2005 joined Toronto's inner city have-not-communities in terms of parkland and recreation facilities. The 1994 North York Parks and Recreation Master Plan indicated Don Mills as having 1.52 ha/ 1000 persons of public community park space. With the increase in population, it now has

less than 1.0 ha for 1000 persons. To provide examples of other communities, Markham has a standard of 3.0 ha and Mississauga 2.2 ha / 1000 persons. The standard of most “World Cities” is much higher. (See Appendix: [Comparative Park Standards, excerpt of North York Parks and Recreation Master Plan.](#))

(5) Wynford Heights, another Don Mills Nbhd, reliant on the Core area, with at least 5000 senior residents, has yet to find a park space. Where will the city get park space for this Don Mills Nbhd? Looking at the Don Valley Parkway and Eglinton Ave E. is not a sufficient substitute for recreation and exercise!

(6) 1.5 acres of Moccasin Trail Park, once used for camping and children’s play, have been lost to the community because of the construction of a storm water pond serving most of Cadillac Fairview’s site simultaneous with two other, smaller developer’s sites. (Appendix: [Moccasin Trail Park Storm Drainage Plan.](#)) This was the only park space in the south-east quadrant. The purpose is to divert rain water away from most of the Cadillac Fairview site as well as the other sites, such that they can be made more impervious and built up right to the edge of the property. The city agreed to the construction without consulting the whole community. Even though the city has a policy to detain storm water on site, it permitted the diversion. Best environmental practice would have considered utilizing the flat rooftops of the new buildings for storm water detention, ideal for such a purpose. Also perforated pavements, similar to that of the Canadian Tire store parking lot on Sheppard Ave E., could have been used. Storm water retention could also have occurred on site if the green space of the front yards and a number of our 25-year-old healthy trees had been retained. Now the setback spaces have become stores with walls of buildings set right on the street line as if to form a fortress. In addition to the removal of the park space, over 200 emerging and fully grown trees have also been eliminated from Moccasin Trail Park, in to make room for the dirty pond. It is a significant degradation of the natural environment.

River valleys are conservation lands/flood plains and are under the jurisdiction of the Toronto Region Conservation Authority, not the city. Mistakenly, some hired planners and media may still consider the river valley as NBHD park space, even though it is a regional facility and serves the whole city.

(7) The Macklin Hancock Parkette, listed in the P& R Master plan as 0.24 hectare, has less than 0.14 ha. Quietly and unofficially, the city has permitted a permanent private driveway entrance over the already small green space. Losing 1,000m<sup>2</sup> out of 2,400m<sup>2</sup>, especially in the central area, is another significant loss of park space. Now, there is only space for signs, a bench and paving. (Appendix: [Macklin Hancock Parkette](#))

(8) Some hired expert may cite the Leaside Spur railway lands as a Don Mills NBHD Park. This is unacceptable because these lands are part of the regional structure of multipurpose pathways, particularly bicycle ways, and can not be used as playfields. Our former councillor, Ms. J. Flint, and city parks director Mr. Frank Kershaw (well respected in professional circles), have stated that the railway strip can never be counted as Don Mills neighbourhood park space.

(9) In heritage terms, Edwards Gardens is considered “exclusive” Don Mills park space. Since the city made it a Botanical Garden, it has become a regional facility like a zoo belonging to the greater community. It is a park space where NBHD toddlers and preschool children once used to have space to play.

(10) The [Central Don Mills Secondary Plan](#) calls for “*a central commercial and community centre within the Donways at the south-west corner of Don Mills Road and Lawrence Avenue.*”

The core area once had a Recreation Centre - Curling rink, a landmark in its own right. There also were a bowling alley and a movie theatre. All of these were on private property. One by one, quietly and without fanfare, the facilities disappeared, only to be replaced with stores. In the absence of any recreation facilities, community actions drifted to the Mall, which had to serve as the “quasi community centre.” Then the Mall was torn down. The loss of these facilities and any loss of the required parkland and landscape space surrounding the buildings are an immense loss to the community and will only be accentuated by the erection of massive buildings. No compensation has been offered in terms of other recreation facilities or parkland.

(11) Attempts are underway to remove the last public facility - the arena - from the site and place it into somebody else’s backyard. From the correspondence received and articles in the local paper, we know that the Henry Farm Community Association does not want the Don Mills arena in the Don East Parklands, nor would it be in the proper place there. Do we throw the Secondary Plan out the window because Cadillac Fairview and Fram Builders do not want to adhere to it? The Don Mills Arena, located on public parkland, must remain and be expanded rather than handed over to any developer. The Secondary Plan, its policies and objectives, such as “*To strengthen the function of the Don Mills Centre as a community centre,*” are useless when they are not followed.

(12) Allowing more than 1,300 units would add, at the minimum, 2,600 persons, but possibly 4,000 persons to the area, of which at least 10 to 20 % will be children. Where will they play, and see or feel green grass? Even if the number of units is reduced by half, a park and green space surrounding residential buildings are still necessary. Is the expectation that all the new residents will be seniors? Or is the expectation that all the new residents will be single or childless families? On the contrary, new families moving into homes in this area have at least 2 and up to 4 children. Are they all expected to walk 3 kilometers to Bond Park in the northwest quadrant after they searched all other quadrants for play space only to find that all spaces are occupied?

(13) Does the developer expect people with a specific lifestyle to inhabit the residential area without any community space? Overland public school, the NBHD facility, is currently used for continuing education and community programs. It is also overcrowded and cannot bear the brunt of this massive increase unless it is rebuilt in an expanded form. Community programs provided by this school should actually be provided in a community centre, to minimize the overcrowding. The local secondary school, Don Mills Collegiate Institute, also struggles with 4-5 portable classrooms, which appear to be permanent fixtures.

(14) In approving Phase 1, Council stipulated a 2% park requirement—that is, 2,407.06 m<sup>2</sup> (2% of 120,353.m<sup>2</sup>). Why was this not provided for in Phase 1?

(15) The developer's information, available on the Internet, mentions public open spaces over 60,000 square feet. Why the reversal for Phase 2 and the request for opting out of the parkland acquisition?

(16) A letter sent to the Don Mills Residents Inc. and Victoria Village Ratepayers Assoc. by the Don Mills Civitan Club, Feb 5. 2003, reads, “*The Club has presented its plans to Cadillac Fairview and has received verbal commitment for an additional 50% in lands (over and above the 50,000 square feet the existing facility sits on) and almost \$ 4.5 million dollars in aid of construction cost.*” The letter towards the end states “*In our opinion this is a win-win for Don Mills and the Don Mills Civitan.*” ( A copy of the letter can be made available.) Sadly, this appears now to be a lose-lose situation for Don Mills and an unnecessary, uncalled for upheaval for the Henry Farm ratepayers if the Don East Parklands are used for buildings and parking lots.

(17) Phase 1 has already taken up too much space for the single commercial land use, almost 77.3% of the whole site, and despite the consolidation of the parking into one large coliseum for cars, it is “virtually” impossible in Phase 2 to gain a NBHD park. In addition, the developer is showing a “local park”( Schedule A -provided by Davies Howe Partners - concept plan) where the front yard space normally required for residential buildings as the “landscaped area” should be provided and confirmed by the attached detailed calculations.

(18) The location of the so-called “local park,” its odd configuration and small size, make it unsuitable as a NBHD park. There is only play space for 2- to 7-year-old children. For the rest of the residents who live on the opposite side access is cut off by the roadway. The “local park” should be included in the landscape space to cover the Zoning By-law, Residential section 15.8 General Requirements.

(19) Also shown on schedule A - concept plan, is a building labeled “Recreation Centre,” consisting of 1,526 m<sup>2</sup> on 1,999 m<sup>2</sup> of private land accessible only via a private road and attached to the 26-storey apartment tower. The Building is in an obscured location, its access indirect, without parking and nowhere near public mass transit. The building, despite its 2 floors, is terribly inadequate in its size and not integrated with the existing arena. Like the above “local park,” this space should also be added to cover the needed landscape space as the calculations will indicate.

(20) Labeling the private square on the various plans “public” is extremely misleading unless it is the intent to make the “square” publicly owned. *No privately owned “square,” “recreation centre” or “private roads” will ever replace the need for civic facilities owned by the public in the centre.* Don Mills has first-hand experience with how these facilities disappear.

*Don Mills desperately needs public parkland for a community centre that is located where residents and visitors can easily and consistently access it.*

*The only suitable location for this facility now is the parking lot in front of the arena, which has automobile, pedestrian and public transit access via Don Mills Road. Such a facility may be two storeys high, but it has to be adjacent to the existing arena and have possibilities of parking, above and underground. The current parking lot space, when dedicated as parkland, can accommodate the essential community centre, as well as 2 arenas, including parking, next to a much-needed health centre, as the attached sketch shows. Without using any imagination, this facility will be a bonus to the commercial venture in many ways.*

*(View the attached potential Community Centre & Arena layout.)*

## **1.2. Increase in Density**

**The decision sequence logical for best practice in urban planning requires resolving the issues of the Zoning bylaw prior to making a decision on Density. The reasons are as follows:**

**(1.) The developer had all the opportunity in the world to integrate residential units into his commercial venture, which makes up over 77.3 % of the site. Mixed uses should have been the feature of the commercial redevelopment and should not be inserted into the small portion of the residential site as an afterthought so as if to say there has not been any other choice.**

**(2) Given that the decision about the parkland acquisition has not been made and to say simply that the level of density should be 1.6 FSI, is like giving medicine to the patient without considering the dosage. By overbuilding the commercial section in Phase 1, the developer has already reached the permitted density. Determination of density must adhere to the established rule that parkland be subtracted from the commercial and residential and excluded from the area of the density calculation.**

**(3) As the project stands now, the transportation infrastructure cannot handle any additional traffic. See section 2 of the Secondary Plan. Objectives 2.1 (d), “to limit the amount of commercial development to a level that can be accommodated by the transportation infrastructure.” To our knowledge, no comprehensive review of the transportation issue as per section 4.2 Density, paragraph 3, has been undertaken.**

**(4) Given that the developer has requested a change of most items in the Zoning By-law, which will massively affect the density, a decision on the FSI should also be postponed until all items have been resolved. If a decision on the density is made prematurely, there is no reason to continue to discuss any details because the “goodies” have already been given away. The developer will automatically know that the Zoning By-law will be changed to his wishes.**

**(5) If a decision on the density is made prematurely, then the taxpayer will be paying twice, not only for the comprehensive traffic study, but also for all the improvements and changes necessary on the ground. For example: The Donway West, like the other sectors of the ring road, divided by a central, highly desirable boulevard planted with**

trees, has one single lane each way. It is too narrow for the onslaught of traffic and will need more space. The highly desirable centre boulevard is at risk, because widening of the road right of way has been eliminated by building up to the street line without setbacks. The opportunity to create a bicycle path network, also stated in the Secondary Plan, has already been ignored and eliminated in Phase 1 along the Donway West, Lawrence Ave E. and Don Mills Road, even though the developer alluded to bicycle connections in his extensive brief.

(6) To up the density for the express increase in residential building heights / units is like “stealing from Peter to give to Paul.” Here is another example of poor urban planning practice and rejection of well-conceived and well-known city plans.

(7) Along the Donway ring and Don Mills Road are mostly multi-residential and rental buildings. All other land owners surrounding the site will consider themselves short-changed if they wish to redevelop under the values the developer seeks and are rejected due to excessive capacity allocated to a single developer.

(8) The Official Plan may show the Don Mills Core as an intensification site. It also indicates that it is a stable community and that it should remain so. The Secondary Plan does not substantiate the massive exemptions the developer is seeking.

(9) While developers seek advantages and bylaw changes based on greed and high profit motivation, urban planning for this site must consider a broader context. The addition of a residential component (Phase 2) to this redevelopment of any size is a bonus and intensification on top of its commercial factors (Phase 1) and must be judged as a very discretionary element subject to wise reflection.

### 1.3 Increase in Building Heights

Building heights are always a contentious issue in a growing and vibrant modern city. City plans evolve to reflect the neighbourhood context. Tripling the allowed heights breaks the neighbourhood context in what many consider is an absurd manner and without valid reasons.

(1) Building Heights were discussed at considerable length when the Secondary Plan was revised in 1994. It specifically determined the elevations above sea level as shown in the Central Secondary Plan. West of a north-south line, at the rear of the arena, the building heights are 6 floors, while east of the line building heights should be 8 floors. Furthermore the Secondary Plan states: *despite this limit “no building or structure will exceed 8 Storeys.”* One of several reasons (for this provision, I recall) was not to disrupt the flight path of birds by excessive building heights. Residents at that time were highly upset when 75 The Donway was built beyond the stipulated height.

(2) Permitting 26-storey apartment buildings will obviously repudiate the Secondary Plan, which states as its goal” *to manage change in a manner that retains and enhances the existing character of the area.”* Given the permitted GFA (See [Statistics summary](#)) of 86,925.0m<sup>2</sup> and a footprint of 12,365.85m<sup>2</sup>, the average floor per building only

**requires 7 floors.** Assuming the developers proposed GFA of 152,100.0m<sup>2</sup> and his 15,536.0m<sup>2</sup> footprint, then only an average of 10 floors per building would be needed. The urban structure of Don Mills is low-rise and must remain so within valid reason.

(3) The Secondary Plan objective (g) further states, “*to preserve the scale, height and built form relationships originally provided for in the development concept of Don Mills.*” The low-rise character of the community is an essential feature and should remain as such.

(4) The developers own shadow study, available on the Internet, shows that all the existing surrounding apartment buildings will be in the shadows of the 26-storey buildings at critical times in the fall and spring. This is a destabilizing factor to the community.

(5) The developer **had all the opportunity** to integrate residential units into his commercial venture, which makes up over 77.3 % of the site and should therefore not ask for a variance of the Secondary Plan. Mixed uses included in Phase 1 would have alleviated the call for higher buildings.

(6) The developer **chose to develop Phase 1 as one single land use,** namely commercial, and has opted for the horizontal separation of mixed uses. It **follows that there should be a separation of commercial and residential, along with a separate calculation for the residential area.**

(7) Any building height above the given 6 and 8 storeys of the apartment residential should also be determined on the basis of the current permissible coverage and landscaping requirements in the Zoning By-law. Hence a decision on the building heights should be postponed until all items in the Zoning By-law have been resolved.

(8) 26-floor-high buildings, parallel to each other at close range, in conjunction with the 14-storey 75 The Donway West, would create wind conditions that would at certain times be detrimental to pedestrians and vehicles on the adjacent roads and buildings. In this day and age, the builder should take into consideration all aspects of the city’s program that parallels the “Leeds” program. We also note that no wind tunnel studies have been undertaken.

## **2. AMENDMENTS TO ZONING BY-LAW NO 7625**

The developer is seeking in this appeal changes that dramatically alter the planned character of the Don Mills core area without considering community planning on a **broader** scale, thus destabilizing the whole area. Evidence shown in the appendix, “Summary, Detailed Project Statistics Review,” suggests that the developer has not even attempted to follow the Zoning By-law or the spirit thereof.

(2.1) The General Provisions, Item 15.8 of the multiple residential zoning, relate the gross floor area of a building to the landscaped area. According to the By-law, each 82

m2 of floor space should have 18 m2 of landscape space for the necessary green space. The requested building coverage of 50 - 54 % would create an extreme shortage of green space surrounding the buildings. In fact, if the developers proposed GFA were to be applied, then there would be a shortage of over 3.0 ha of green space.

(2.2) The coverage (Building Footprint) reflects directly the extent of the landscaped space. The coverage of 35 % as per Zoning By-law, multiple residential Zone RM 6 - 20.A.2.2, usually creates a landscape cover of 50 – 55 %, depending on the space needed for the “hard” landscape, which itself should not be above 15%. It would be a total reversal of the By-law. Contrary to the By-law, the developer’s statistics combine the “hard” and “soft” landscape, whereas separate calculations are needed for good reason. To combine the “hard and soft” landscape in my opinion is a cheap ploy to make it appear that there is more green space than there actually is. “Hard” landscape such as ramps, driveways and major paved areas must be calculated separately as per Zoning By-law.

(2.3) All re-developments adjacent to the core area abide by the Zoning By-law and provide the required landscape surrounding the buildings. “Brydencourt,” the recent multi-residential redevelopment just north of Lawrence Ave E., shows a landscape cover greater than 50%. Proof can be found in the attached APPENDIX: HOUSING STATISTICS # 2. The residential development for Phase 2 should not get any special treatment. There are no reasonable grounds to go beyond the 8-floor maximum in order to accommodate the desired number of units.

(2.4) The request for a GFA of 430 % increase reflects greed (see above) and does not represent need or fair planning practice. The Zoning for RM 6 – 20-A 2.5 requires that the “gross floor area of a building shall not exceed one hundred and fifty (150%) per cent.” Maintaining the lot coverage and given height limits will amply provide for residential units as foreseen in the Secondary Plan.

(2.5) The comparative calculations, see APPENDIX: DETAILED PROJECT STATISTICS REVIEW, clearly show the differences between the requested amendments and the By-law.

*The values of all the existing residences, homes and apartments, and therefore the character of Don Mills as a “Garden City,” rely very heavily on the green spaces that surround its buildings. The criteria for these spaces are embedded in the Zoning By-law. Any exemption will be a dramatic variance that will detrimentally affect the community’s stability.*

People acquiring residences in any Phase 2 residential building should be able to expect as pleasant and healthy living environment as adjacent residential buildings. And those in adjacent existing buildings should have the same environmental privileges as the newcomers. Further, due to the absence of any green space in Phase 1, along The Donway W, Lawrence Ave E and eventually Don Mills Road, there should be no amendments to the Zoning By-law for section 15.8 General provision , nor Lot coverage of 35% (item2.2) or the building height s(item 20- A2.5) as specified.

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### 3. RECOMMENDATIONS

#### (3.1) Parkland acquisition.

- That the park requirements contained in the Official Plan be upheld and that the developer provide community park space based on the alternate policy of 0.4 ha for each 300 units.
- Assume (\*)  $\pm 900 \text{ units} / 300 = 3 \times 0.4 = 1.2 \text{ ha. or } = 12,000.00 \text{ m}^2$
- That the 2% of parkland stipulated in phase 1 on the lands utilized for commercial be added
 

$=$	<u>2,407.06 m<sup>2</sup></u>
• Total	<u>= 14,407.06 m<sup>2</sup></u>
- That the parkland to be dedicated be added to the current Don Mills arena lands on which a Community Centre and Twin Arena can be built.
- That the area to be dedicated consists of the parking lot area (approx. 6,500.00 m<sup>2</sup>.) and portions of streets surrounding the enlarged Arena site. The streets being O'Neil lane, street F and the street at the south side of the Metro store ( approx. 4,500.00 m<sup>2</sup>.)
- That the remaining lands to be dedicated, be translated into cash in lieu and made available to a building fund for the community centre and twin arena.

Note(\*) This is the number of permitted units based on the Zoning By-law. Should the number of units increase so should the park space. See the summary of the Detailed Project Statistics Review.

#### (3.2) Increase in density.

- That any increase in density over and above the permitted Zoning By-law be directly related to parkland acquisition and be cash in lieu applied to building of the community centre and twin arena.
- That any increase in density be carefully co-related to the adjacent urban structure and Central Secondary Plan height limits. That an exception to the Secondary Plan building heights only be made in parcel 3, buildings E & F provided that the additional units translate into cash in lieu and that the community centre can be started within 6 months from the date of the Phase 2 approval by the city.

#### (3.3) Increase in building heights.

- That any increase in the building heights be limited to the stipulated 8-floor maximum, as per Secondary Plan, except in the area of parcel 3, buildings E &F, where the height could be increased to 14 floors, provided that the additional height translates into cash in lieu and if the community centre can be started within 6 months from the date of the approval.

#### (3.4) Zoning By-law amendments.

- That the general provisions for multi-family dwelling zones, Section 15.8, be upheld and calculated properly, such that adequate landscape space is available for all new residential buildings.
- That Section 20-A of the RM6 zone 20-A.1 (b)(iv)(B) be upheld to 35% for all residential buildings.
- That Section 20-A of the RM6 zone 20-A.1 (a) be upheld.

This brief has been prepared to bring to the forefront the precedent-setting community alterations hidden in this appeal, affecting not only the Don Mills area, but other areas in the city as well. It is hoped that the City and OMB in their decision will give the same consideration to the findings of the community as to the developer and the appeal by CF/Realty Holdings Inc. and will not reward a short-term fashionable gain for a long-time community loss in terms of community park space and recreation facilities.

Should the appeal be granted as proposed, then I suggest that the Province of Ontario declare all Official Plans, Secondary Plans, and Zoning By-laws null and void.



Karl Frank, BLA OALA CSLA emeritus  
March 2009

- Attachments :
1. [City of Toronto Parks and Recreation Facilities Map.](#)
  2. [Don Mills Parks and Recreation facilities Map.](#)
  3. [Don Mills Housing Inventory.](#)
  4. [Macklin Hancock Parkette Plan.](#)
  5. [Moccasin Trail, Storm water drainage plan.](#)
  6. [Comparative Park Standards.](#)
  7. [Potential Community Centre & Arena layout](#)
  8. [Proposed Civitan Arena Elevation.](#)
  9. [Summary of Detailed Project Statistics review.](#)
  10. [Parcels 1-3, Detailed Project Statistics review . Page 1-6](#)