

City Planning

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Joshua Paul
Assistant Deputy Minister, Housing Division
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Dear Assistant Deputy Minister Paul:

I am writing to you regarding the Temporary Street Occupation Permit (Permit No. 88028401)(the "Permit") issued by the City of Toronto, Transportation Services to QM Environmental for 153 Eastern Ave at Rolling Mills Rd to St. Lawrence St. We have become aware that the Permit is in relation to the potential demolition of buildings on the site and we are seeking confirmation that this locally significant provincial heritage property has been subject to all appropriate conservation measures and requirements.

We understand that the property comprising 153-185 Eastern Avenue is under MGCS title, managed by Infrastructure Ontario as their agency. On the City's Heritage Register since 2004, this property was evaluated for its cultural heritage value in 2006 by Unterman McPhail Associates, at the time under the Ontario Realty Corporation (ORC) Heritage Management Process.

In the 2006 Unterman McPhail evaluation, the buildings at 153-185 Eastern Avenue were determined to hold local significance but not provincial significance. When the Standards and Guidelines for Conservation of Provincial Heritage Properties (2010) came into effect, ORC/IO legacy evaluations were 'grandfathered' and not subject to re-evaluation. As such, 153-185 Eastern Avenue has been determined by the Province to be a provincial heritage property meeting Ontario Regulation 9/06 criteria under the Standards and Guidelines for Conservation of Provincial Heritage Properties (2010). This determination conforms to the City of Toronto's inclusion of this property on its Heritage Register (<https://www.toronto.ca/legdocs/2004/agendas/committees/ts/ts040914/it017.pdf>).

Because 153-185 Eastern Avenue is a provincial heritage property, under the Standards and Guidelines for Conservation of Provincial Heritage Properties (2010), *Section C. Protection C.1* a Strategic Conservation Plan is required to be prepared to provide guidance on conserving, maintaining, using and disposing of the property. In addition *Section F. Disposal* applies in these circumstances, *F.4: All other alternatives having been considered, consider removal or demolition as a last resort, subject to heritage impact assessment and public engagement. Use best efforts to mitigate loss of cultural heritage value.*

In advance of the demolition of structures, please confirm that the Province has undertaken a Heritage Impact Assessment on the demolition, including public engagement on this alternative, that a Strategic Conservation Plan was prepared by Infrastructure Ontario and that the disposal conforms to guidance provided in the Strategic Conservation Plan.

Given the inclusion of the property at 153-185 Eastern Avenue on the City's Heritage Register, its status as a provincial heritage property, and public interest expressed to date, the City of Toronto is of the view that conservation of the property's heritage attributes in the context of the site's redevelopment should be fully considered prior to any demolition taking place, and we respectfully ask the Minister of Infrastructure to demonstrate how these heritage buildings on this property are being protected through their disposal.

Sincerely,



Gregg Lintern, MCIP, RPP
Chief Planner and Executive Director
City Planning Division

Cc: Paula Dill, Provincial Land and Development Facilitator
Chris Giannekos, Deputy Minister, Ministry of Infrastructure
Mayor Tory, City of Toronto
Councillor Wong Tam, Ward 13 – Toronto Centre
Chris Murray, City Manager, City of Toronto
Tracey Cook, Deputy City Manager, City Toronto
Brian Haley, Director, Planning and Tribunal Law, Legal Services
David Sit, Manager, Community Planning
Mary MacDonald, Senior Manager, Heritage Planning