



November 18, 2013.

BY E-MAIL

etcc@toronto.ca

Chair and Members,
Etobicoke York Community Council,
Etobicoke Civic Centre,
399 The West Mall,
Main Floor,
Toronto, ON, M9C 2Y2

Attention: Ms. Rosemary Mackenzie, Secretary,
Etobicoke York Community Council

Dear Chair and Members,

Re: EY 29.2 - 3560, 3580 and 3600 Lake Shore Blvd. W. Official Plan Amendment. Zoning By-law Amendment and Draft Plan of Subdivision Applications – Final Report, November 1, 2013.

The South Etobicoke Industrial Employers' Association (SEIEA) represents a group of manufacturers who employ over 2000 employees in South Etobicoke. SEIEA advocates for the retention and growth of industrial employment in South Etobicoke. SEIEA's interest in these applications involves land use compatibility with the existing and future operations of industry adjacent to and near these lands.

SEIEA has reviewed the staff report dated November 1, 2013, and has the following comments. These comments are independent of those provided by the representatives of Chrysler and Wakefield regarding their respective sites and operations.

We recommend that Committee direct Planning and Economic Development Staff to consider the following, prior to final approval of these applications.

The report notes that the lands north of the railway are part of an Employment District identified on Map 2 – Urban Structure and are designated Employment Areas by Map 125 – Land Use Plan. This area continues to be designated as a Core Employment Area in the current Official Plan and Municipal Comprehensive Reviews for Employment Lands coming to a Public Meeting at Planning and Growth Management Committee on November 21, 2013. This large, contiguous area of employment lands extends up to Horner Avenue in the north and from

Kipling Avenue in the east to Browns Line in the west and is part of a much larger South Etobicoke Employment Area. The employment lands review concluded that this area was deemed necessary for the City's employment growth projections and economic diversity.

Employment Areas are a finite resource to be conserved and the new Official Plan policies encourage a more intensive use of land in Employment Areas for business and economic activities. Any sensitive use encroachment that would threaten the stability and growth of this area would be contrary to the proposed new employment lands policies.

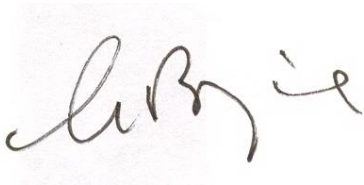
- The analysis on page 11 under the heading: Compatibility with Surrounding Industrial Uses and the MOE Guideline D-6; is rather limited and potentially misleading. In reference to the industrial lands north of the rail corridor, we question whether
 - “The most impactful use permitted by these zones fall within the Class II classification of Guideline D-6 which requires a 70 m separation distance between the industrial and sensitive uses.”
- These distance separations are recommended minimum setbacks. As noted in the Guideline, the potential zone of influence can be 300m or more for a Class II facility. The actual influence area for a particular facility is site-specific. “The potential influence areas, or where known, the actual influence areas should act as a ‘flag’ and no sensitive land use should be permitted within this range for all Classes of industrial land use without evidence to substantiate the absence of a problem.”
- Measurements are normally taken from the property line of the industrial land use to the property line of the proposed sensitive use. However the 70m distance separation from industrial facilities to the north, described on page 12, appears to be based on a measurement between the actual buildings or closest point where buildings could be located on their properties rather than the property lines themselves.
- It is noted that there are a number of vacancies in the Employment District (Arkon Road vicinity) to the north and the Guideline states (Section 4.4.5) in this case the potential influence area should be based on the hypothetical worse case scenario for which the zoned area is committed. The new zoning by-law would not preclude a number of the Class III facilities noted in the Appendix A Industrial Categorization Criteria of Procedure D-6-1 in the E zone for these lands.
- The applicant submitted noise and air quality studies to evaluate the feasibility of the proposal relative to the adjacent Wakefield operations. There is no mention of extending this analysis to the facilities within the Employment District north of the tracks.
- Page 10 of the report states a number of submissions have been made on behalf of local industrial landowners. The report should identify which industries other than Wakefield and Chrysler have been contacted by the City about this development and which industries' Certificates of Approval were reviewed by staff other than Wakefield and Chrysler.
- The proposed at-receptor mitigation only appears to apply to those blocks directly impacted by noise from Wakefield's operations. Warning clauses for noise and odour appear only to refer to the proximity of Wakefield and not the railway or other nearby employment lands and industries.

- Staff has recommended that the subject lands be designated under the new NPC-300 Guidelines as a Class 4 Area. Although the City has discussed this approach with MOE, Chrysler and Wakefield, this could affect other industries in the area. How will other industries be notified of this proposal? These matters should be addressed in the conditions of approval.

Further discussions with the MOE and the industries immediately north of the development are recommended to ensure that the distance separation below the recommended minimums in the MOE Guideline is appropriate.

SEIEA would like to be kept informed about the approval of the subject applications. Further, SEIEA's comments stated above are strictly without prejudice to any position that individual member companies might take in relation to the current application. SEIEA would be pleased to discuss any of these specific issues further with you and your staff at your convenience.

Yours very truly,

A handwritten signature in black ink, appearing to read "Al Brezina". The signature is written in a cursive style with a small flourish at the end.

The South Etobicoke Industrial Employers' Association (SEIEA)
Al Brezina, Executive Director

cc. S. Keir, Keir Corp