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BY E-MAIL
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May 14, 2013
File No: 121770.1003

City of Toronto City Clerk's Office
Toronto City Hall
100 Queen Street West
10th Floor, West Tower
Toronto, ON M5H 2N2

Attention: Ms. Frances Pritchard, Manager
Planning and Growth Management Committee

Dear Madam:

**Re: Official Plan/Municipal Comprehensive Reviews:
Preliminary Assessments of Additional Conversion Requests
Planning and Growth Committee May 16, 2013 Item PG24.5
Client: National Rubber Technologies Corp.
Property: 35 Cawthra Avenue, Toronto**

We are the solicitors for National Rubber Technologies Corp. ("NRT") who own and operate the existing rubber recycling and manufacturing facility at 35 Cawthra Avenue (the "Property"), south east of the intersection of Keele Street and St. Clair Avenue West. NRT and its predecessor companies have operated in this area since 1927.

NRT's facility recycles and reuses rubber and fibre for the manufacture of automotive and industrial rubber components. NRT annually recycles approximately 10 % of the province's used tires. NRT is an integrated manufacturer that both designs and manufactures rubber parts. Tires are collected and ground at NRT's related Commissioners Street operation and then trucked to the Facility. The process begins with scrap tires and finishes with product that is ready to ship to automotive assembly plants or industrial customers.

We are writing this letter in support of the Planning Department's Preliminary Assessment and Policy Direction with respect to the following properties in proximity to its Property which are discussed in the April 23, 2013 staff report on various Employment lands conversion requests:

- 6 Lloyd Avenue;
- 290 Old Weston Road;
- 611-623 Keele Street; and

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- 404 Old Weston Road.

Reasons for Support

NRT **supports** the planner's determinations in the preliminary assessments that the properties noted above should be retained for employment uses and not converted to permit residential uses. **NRT is particularly concerned with the potentially destabilising effect of the encroachment of new residential uses into the existing Employment Area, which would threaten the ongoing viability of its heavy industrial use and potentially put more than 150 well-paid unionized employees out of work.**

NRT continues to invest extensive time and resources to modernize its facility and expand its product line. NRT has been very involved in monitoring land use proposals in the vicinity of its Property. NRT has also actively participated in a number of major Ontario Municipal Board hearings for nearby development proposals and proposed Official Plan amendments for St. Clair Avenue West, both east and west of Keele Street.

NRT has had the importance of its on-going viability recognized in Ontario Municipal Board proceedings and supported by City staff. One of the Ontario Municipal Board proceedings was a 41 day hearing respecting an earlier proposed residential development at 6 Lloyd Avenue which was ultimately denied by the Board in its October 21, 2008 Decision. The Board's Decision gave NRT confidence that it should continue to invest in the modernization of its plant at 35 Cawthra Avenue.

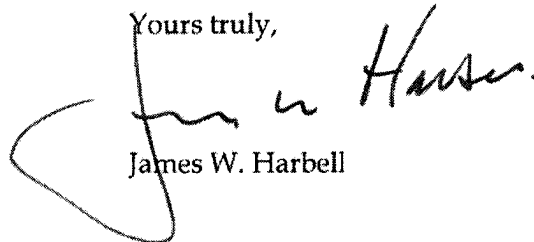
The Request

We strongly urge that the Committee **support** the planner's preliminary assessment determinations that is appropriate to retain the properties noted below for employment purposes:

- 6 Lloyd Avenue;
- 290 Old Weston Road;
- 611-623 Keele Street; and
- 404 Old Weston Road.

If you have any questions or require clarification with respect to NRT's concerns, please contact the undersigned. Thank you for your attention to this matter.

Yours truly,



James W. Harbell

/vs

cc:

Christian Giles, Policy & Research, City Planning Department