



ST. MARYS CEMENT INC. (CANADA)

St. Marys Cement Inc. (Canada)
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November 20, 2013

EMAILED

Councillor Peter Milcryn and Members of the
Planning & Growth Management Committee,
10th Floor West, City Hall,
100 Queen Street West,
Toronto, Ontario,
M5H 2N2.

Attention: Ms. Nancy Martins

Dear Councillor Milcryn and Members of
The Planning and Growth Management Committee,

Re: PG28.2 - Official Plan/Municipal Comprehensive Review

Canada Building Materials Co. (CBM) a division of St. Marys Cement Inc. (Canada) is generally in agreement with the recommendations contained in the staff report dated November 5, 2013. CBM compliments staff on creating an Official Plan Amendment that provides a much clearer policy framework and direction regarding the future of employment lands in Toronto.

CBM has been manufacturing ready-mix concrete in the City of Toronto and the GTA for 80 years. We operate 5 plants in the City of Toronto, Scarborough, Etobicoke, Leaside, Weston and Portlands. CBM has approximately 240 employees in Toronto and supplies 850,000 cubic meters of concrete to various projects, which include the City of Toronto.

Since 2009 CBM has expanded in the City in two locations, Portlands (Commissioners St.) and Etobicoke (New Toronto St.) locations. Our Portlands plant, replaced a plant that had been situated behind the former Molson's plant for forty year. After years of talks with staff, a site was chosen at Leslie St. and Commissioners St. Our Etobicoke, on New Toronto St., plant approved after a struggle with staff over zoning, and in the end an OMB decision to allowed the construction of our plant.

There are some key points to remember for ready-mix concrete, and other manufacturing in the City. There is a lack of industrial lands due to conversions from industrial to residential, and the encroachment of residential with inappropriate separation distances.

1. Ready-mix concrete has a shelf life, that shelf life is from the time concrete is batched into the truck, to until it is discharge at the project site. The shelf life 90 minutes (1.5 hours). So, proximity to projects is key in a growing City centre.
2. There is a need to good planning practices to allow for industrial busineeses and to separate industrial uses, from sensitive uses, such as residential and restrauants.
3. The MOE requires industrial uses to have a Certificate of Approval (C of A). The most common being a Certicate of Approval – Air, which considers all emissions on the site, taking into account their proximity to sensitive uses and emissions at the property line. A Certicate of Approval – Air, can also require a company to do a noise study, and if a sensitive use is within a 500 meter radius of the property lines. C of A's typically have conditions in place as apart of the approval to mitifgate dust and noise, however the best mitigation is proper separation, at the planning level.

The City of Toronto needs businesses like CBM to supply concrete in a timely manner for the City's sustainability and future growth. As the City grows, so does traffic volumes, resulting in a need to have our product, ready-mix concrete close to market. Appropriately zoned industrial lands will let this happen.

We appreciate that the City recognizes the lack of employment lands and the fact that is has been slow diminished by conversion. The protection and establishment of the City of Toronto's employment lands is essential to toronto's growth and is key l attracting new business and preserving existing business which provide good employment opportunities.

Yours sincerely,

T.E. Austin MacMurdo,
St. Marys Cement Inc.
Corporate Lands Manger, Cement & Ready-Mix