



March 21, 2018

via email

Toronto Preservation Board
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Attention: Lourdes Bettencourt, Secretariat

**Re: Inclusion on the City of Toronto's Heritage Register - College Street
Properties
Item PB32.3**

We are the solicitors for the Governing Council of the University of Toronto (the "University") the owners of 167 College Street in the City of Toronto. The University has reviewed the staff report regarding the inclusion of various College Street properties on the City of Toronto's Heritage Register, dated March 12, 2018, and has a number of concerns with respect to the inclusion of 167 College Street. In our view, it is premature and inappropriate to consider listing 167 College Street as there is insufficient evidence and analysis that it has any significant heritage value or interest. The listing information for 167 College Street provided in the staff report does not adequately address the criteria outlined in Ontario Heritage Act Regulation 9/06. While staff assert that the property meets Regulation 9/06, the information provided clearly does not meet or adequately consider the Regulation 9/06 criteria. It appears that the list of College Street properties is just a blanket list and not a review of heritage value and listing worthiness. As a result, we ask that 167 College Street not be listed on the City of Toronto's Heritage Register.

With over 80 listed or designated buildings on the St. George Campus alone, the University has a long and successful history of heritage conservation. However, insufficient information has been provided to support the inclusion of 167 College Street on Toronto's Heritage Register. In particular:

1. 167 College Street has been significantly altered over time and no longer contains the original roof, windows or window openings. In addition, there has been extensive interior renovations.



2. 167 College Street is used for institutional purposes, currently by the University and previously by the Salvation Army. The building has not been used for commercial purposes in many decades.
3. As a two story building, 167 College Street is out of context and is not historically, visually or physically linked to the surrounding block.

For the foregoing reasons, we ask that the Preservation Board refuse to adopt staff recommendations and not list 167 College Street as it not been sufficiently demonstrated that it has any cultural or heritage value or interest.

Yours truly,
Cassels Brock & Blackwell LLP

A handwritten signature in blue ink, appearing to read "Signe Leisk", is written over the typed name.

Signe Leisk