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February 14, 2022

SENT BY EMAIL: Kerri.Voumvakis@toronto.ca, Jeffrey.Cantos@toronto.ca and phc@toronto.ca

Chair and Members of the Planning and Housing Committee  
City of Toronto  
100 Queen Street West  
Toronto, Ontario

Dear Chair and Members of the Planning and Housing Committee

**Re: Employment Land Conversion Request  
Inclusion of Additional Lands at 99 Ryding Avenue  
Related Employment Conversion Request Sites:**

We are the land use planners for Paletta International Corporation (Paletta), the owner of 109 Ryding Avenue. The Paletta lands, together with the Howard Ungerman lands to the immediate east at 99 Ryding Avenue are, currently occupied/tenanted by the Maple Leaf Foods, which will be vacating the properties in January 2024.

In July and August 2022, we, on behalf of Paletta, filed an Employment Area conversion request with the City for 109 Ryding Avenue. This property, together with other nearby sites along Ryding Avenue and St. Clair Avenue West make up this very small and remnant Employment Area, left over from when the 'Stockyards' to the east was converted for retail commercial purposes decades ago. Since then, OPA 144 was adopted for the St. Clair Avenue West corridor, which amendment further redesignated and converted Employment Area lands along St. Clair Avenue West to Mixed Use Areas. These prior Employment Area conversions are contiguous with properties on the north side of Ryding Avenue. This City initiative has further shrunk this already small Employment Area. OPA 144 remains under appeal and Paletta, among others are appellants to this OPA.

**Attachment 1** to this letter is a map prepared of the Ryding Avenue and St. Clair Avenue West area in question. This very small and remnant Employment Area is subject to many Employment Area conversion requests where the vast majority of owners do not have long term plans of continuing employment usage and where Mixed Use Areas has also been similarly requested. Our immediate neighbour to the east, at 99 Ryding Avenue has also sent to Planning and Housing Committee the attached letter, seeking the same thing as the Paletta property. It is clear from this that the vast majority of this area are seeking the same thing. The principal basis of this is that this area is no longer a viable Employment Area in the long term and therefore, will warrant due consideration of this Employment Area conversion request.

Paletta has been involved for years seeking this same outcome and the City has to date not given this area a fair consideration of the owners' requests.

This remnant area along Ryding Avenue and St. Clair Avenue West is small and is immediately adjacent to the Mixed Use Areas along St. Clair Avenue East. The small size of this Employment Area, its proximity to lands permitting sensitive uses, together with this area benefiting from enhanced rapid transit planned near the St. Clair Avenue West and Keele Street intersection bring rise to this request.

As such we disagree with City staff's preliminary and what appears to be cursory, review and recommendations to maintain the area for an Employment Area and respectfully request that staff be directed to continue examining this area for Mixed Use Areas and to meaningfully engage with the owners about their collective Employment Conversion requests.

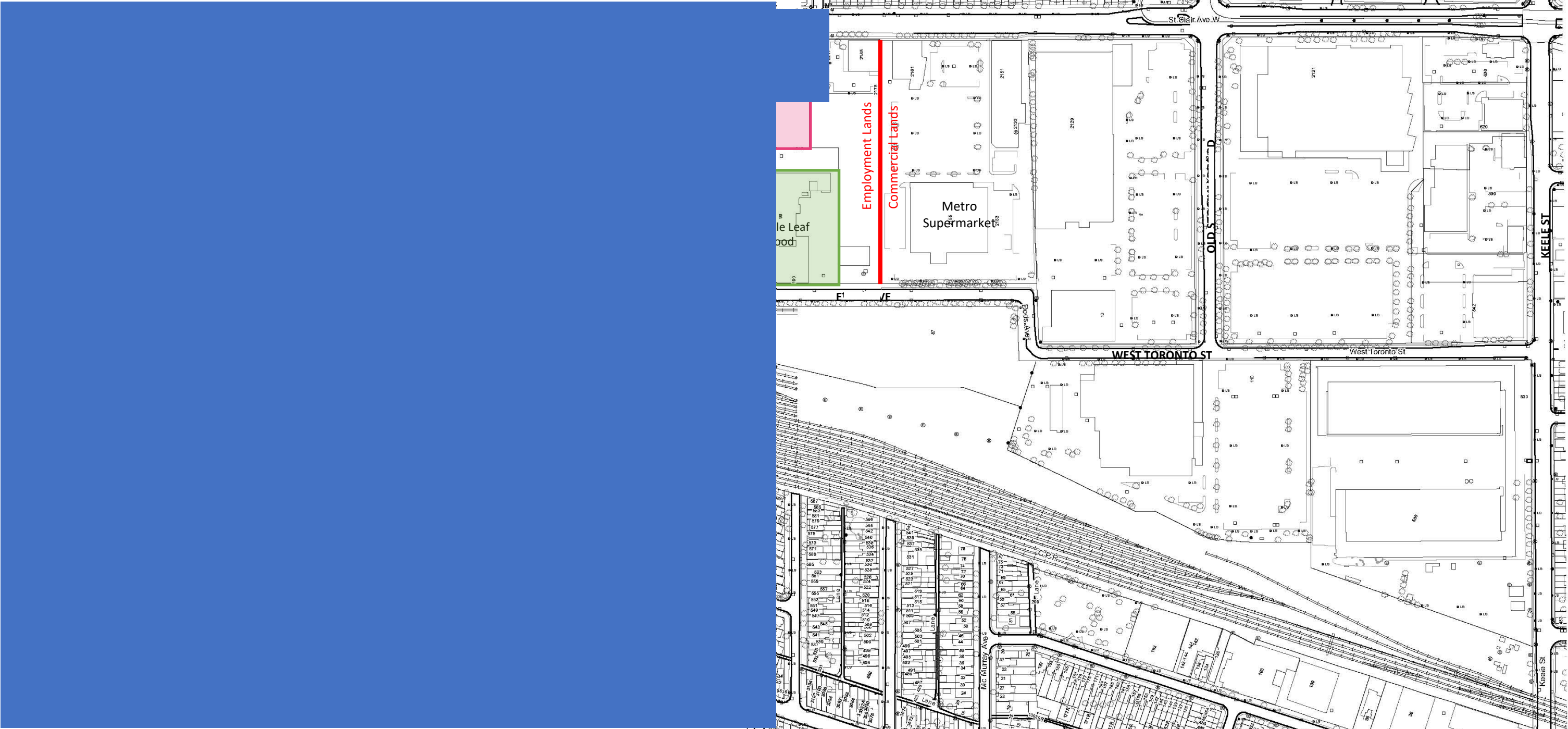
Please feel free to contact the undersigned should you have any questions or require anything further.

Yours very truly,  
**GOLDBERG GROUP**

A handwritten signature in blue ink, appearing to read 'M. Goldberg', is written over a faint, circular official stamp.

Michael S. Goldberg, MCIP, RPP  
Principal

Cc: Mr. Paul Paletta, Paletta International Corporation  
Councillor Frances Nunziata  
City Planning



# LEGEND



**PALETTA SITE**  
 109 Ryding Avenue  
 (Conversion Request No. 121)



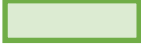
116R, 126 – 142 Ryding Avenue (Conversion Request No. 059)



2237 – 2283 St. Clair Avenue West (Conversion Request No. 116)



2221-2231 St. Clair Avenue West (Conversion Request No. 117)



99 Ryding Avenue (additional land to be included)

# SUBJECT SITE & SURROUNDING EMPLOYMENT CONVERSION LANDS



**GOLDBERG  
GROUP**

HOWARD UNGERMAN

BARRISTER & SOLICITOR

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TORONTO, CANADA  
M4Y 1C8

Tel: (416) 924-4111  
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February 14, 2022

Chair and Members of the Planning and Housing Committee  
City of Toronto  
100 Queen Street West  
Toronto, Ontario,  
M5H 2N2

Dear Chair and Members of the Planning and Housing Committee

**Re:    Employment Land Conversion Request  
      Inclusion of Additional Lands at 99 Ryding Avenue  
      Related Employment Conversion Request Sites**

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I am the solicitor for the owners of the property with the municipal address of 99 Ryding Avenue. The Paletta International Corporation lands and my lands together are currently occupied/tenanted by the Maple Leaf Foods, which will be vacating the properties in January 2024.

I am aware of the Employment Conversion Request by Paletta International Corporation (Paletta) located at 109 Ryding Avenue and have read all the materials submitted with the Paletta request in August 2021. I am also aware of the other Employment Conversion Requests in the Ryding Avenue and St. Clair Avenue West immediate area. I am supportive of Paletta's conclusions and recommendations which are, or should also, be applicable to my property at 99 Ryding Avenue.

My clients would like to include their property at 99 Ryding Avenue as part of the Employment Land Conversion Request.

I attach a map prepared of the Ryding Avenue and St. Clair Avenue West area in question. This is a very small remnant Employment Area where the vast majority of owners do not have long term plans of continuing employment and have similarly requested the City to convert their land from Employment Area to Mixed Use Areas. With my clients' land being included in this

request, it is clear that the vast majority of this area want the same thing. This area is not a viable Employment Area in the long term and therefore, will not be undermined in the long-term by its conversion.

There is a long standing request to the City to consider these lands as Mixed Use Areas and the City has to date not given this area a fair consideration of the owners' requests.

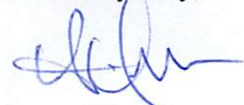
The Ryding Avenue and St. Clair Avenue West area is adjacent to the commercial use of the lands that were formerly the 'Stockyards'. These lands were converted many years ago from employment to commercial use. We understand they too are now Mixed Use Areas.

This remnant area along Ryding Avenue and St. Clair Avenue West is small and within proximity to the Mixed Use Areas along St. Clair Avenue East benefiting from enhanced rapid transit planned near the St. Clair and Keele Street intersection.

As such we disagree with City staff's preliminary recommendations to maintain the area for an Employment Area and respectfully request that staff be directed to continue examining this area for Mixed Use Areas and to engage with the owners about their collective Employment Conversion requests.

Please feel free to contact the undersigned should you have any questions or require anything further.

Yours very truly,



Howard Ungerman

c.c Mr. Paul Paletta, Paletta International Corporation  
Councillor Frances Nunziata  
City Planning