

May 30, 2022

**Re:** Planning and Housing Committee Meeting, May 31, 2022

PH34.4 (10:15 AM) City-Initiated Zoning By-law Amendments to Implement Ontario Line - Final Report (Ward 10, 13, 14, 15 - Statutory: Planning Act, RSO 1990)

c/o [phc@toronto.ca](mailto:phc@toronto.ca)

## Impact of Ontario Line on Toronto Heritage Resources

Chair and Committee Members

ACOToronto is a local branch of the Architectural Conservancy of Ontario, founded in Toronto in 1933 by Professor Eric Arthur and Anthony Adamson. Through a network of 17 branches across Ontario we educate and advocate for the conservation and re-use of structures, districts and landscapes of architectural, historic and cultural significance to inspire and benefit Ontarians.

Let us first say that we recognize the need for this transportation infrastructure, which will serve important communities such as Flemingdon Park and Thorncliffe Park who have struggled with bus service for generations, as well as new areas of high population concentration at Liberty Village.

We are writing to express a letter similar to the one we sent Metrolinx to outline our concerns regarding the impact of the selected Ontario Line Project on an extensive number of heritage sites along the length of the route, particularly along Queen Street, one of the City's most vibrant streets, important for the cultural life of the citizens as well as visitors. **The project makes its way through a concentration of Toronto's most significant heritage properties and heritage conservation districts, almost as if the route was chosen to inflict maximum damage.**

We conclude that the potential damage to Toronto's heritage posed by the Ontario Line warrants evaluating other route options and establishing a citizen's heritage round table to work with Metrolinx on alternative solutions to the pressing transportation needs. We strongly urge the Planning and Housing Committee to work with Metrolinx to establish such a committee.

In forming our opinion we have reviewed the following Metrolinx documents as background:

- Appendix B, Ontario Line Project, Draft Environmental Conditions Report-Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment, Prepared by Aecom Canada, September 2020

- Draft Heritage Detailed Design Report Contract RFS2019NAFCPO 214244 HDR Project 10206938 Ontario Line Technical Advisor Toronto, Ontario February 110 202 2 Meaghan Rivard, MA, CAHP , Senior Cultural Heritage Specialist
- Maps of the stations and land acquisitions available at <https://www.metrolinxengage.com/en/content/built-heritage-resources-cultural-heritage-landscapes-draft-environmental-impact-assessment>

We have also posed questions to the Public Consultation Meeting on March 1, 2022. We have written to Metrolinx to ask them to establish a Heritage Roundtable to minimize damage on heritage structures. To be effective examining alternate locations for portions of the route or stations need to be on the table.

The City of Toronto should not be fixing zoning issues along the line before the heritage impacts are fully understood.

As a volunteer organization, it is not possible to describe our concerns in full detail through the limited consultation process that has been available to us, nor in a short letter. We regret entering into comment on this project so late in the planning process, however we note that the background documents indicate comment on the impacts on heritage was sought by Metrolinx only from government bodies. No attempt was made to contact any established heritage NGO's, rather Metrolinx expected NGO's to reach out.

Our ability to understand the full impact of the project is hampered by the separation of the description of it between transit planning by Metrolinx and development planning along the line by Infrastructure Ontario.

The Ontario Line Environmental Assessment report evaluates to some extent the potential impacts on some 272 heritage properties along the route, summarized as:

*“The results of this impact assessment identified 272 known or potential heritage resources in the Study Area; direct impacts are anticipated on 35 properties, potential for indirect impacts are anticipated on 126 properties, and no direct or indirect impacts are anticipated on 126 properties. Noting that some properties have more than one type of direct impact, of the properties where direct impacts are anticipated there are:*

- **22 for which complete or partial demolition is anticipated**
- 5 properties where encroachment without impact to heritage attributes is anticipated
- 7 where the introduction of new elements is anticipated (5 where heritage attributes will be impacted and 2 where they will not)
- 1 where temporary relocation is anticipated
- 1 where excavation of a registered archaeological site is anticipated
- 1 property where the extent of direct impacts and mitigation measures are to be determined

**The Ontario Line will have irrevocable impacts on Toronto’s most significant heritage sites, including Fort York, Queen Street, East and West, Osgoode Hall, and the First Parliament Site. “Direct impacts are also anticipated for five Heritage Conservation Districts (HCDs): King-Spadina HCD, Queen Street West HCD, Riverdale HCD, St. Lawrence Neighbourhood HCD, and Garden District HCD”.**

The report describes impacts related to the demolitions required for stations, excavation and construction staging, and future vibration during train operation. We are concerned that we could find no commitment in the Draft Environmental Impact Assessment Report that Metrolinx will undertake condition surveys of all the relatively fragile heritage properties along the line as a baseline before construction begins so that it will be possible to identify damage caused by construction or operation activities and provide adequate compensation to property owners for damage or loss. We are also concerned that the stated objective to have development along the line repay the costs of the Ontario Line, as well as policies inviting high density projects within 800m of stations, will result in little more than token elements of Toronto’s most significant heritage resources surviving to tie the city to its past.

We are particularly concerned with the impact of construction of the station entrance building on the lawn of Osgoode Hall, requiring removal and reconstruction of the historic fence and the removal of mature trees from the west lawn to accommodate the station building and to create a construction staging area. **The intrusion into this historic cultural heritage landscape is egregious and absolutely unacceptable.**

Given the potential impacts on a wide range of important properties, we recommend that an alternate route be considered. We suggest that Richmond Street could offer similar transportation benefits within easy distance to connections to TTC stations. We also suggest that a forum be created for citizens to offer ongoing comment about the heritage issues as the project evolves.

Yours sincerely,



Catherine Nasmith  
OAA FRAIC CAHP  
Past-President, ACO Toronto



Diane Chin  
Chair, ACO Provincial

c.c.

Will Coukell, COO Architectural Conservancy Ontario, [will@acountario.ca](mailto:will@acountario.ca)