



July 4, 2023

The Chair and Members  
Planning and Housing Committee  
c/o Nancy Martins, Committee Administrator  
10<sup>th</sup> Floor, West Tower City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Re: **City of Toronto Official Plan Review**  
**Item 2023.PH5.3, "Our Plan Toronto: Recommendations on Seventy Employment Area Conversion Requests and Chapter 7 Site and Area Specific Policy Review - Final Report Conversion Request # 026 - 4711, 4723, 4733 and 4751 Steeles Avenue East, #060 - 681 Silver Star Boulevard, #075 - 29 Redlea Avenue, #085 - 3447 Kennedy Road As well as Conversion Requests just south of our operations within the Milliken Employment Area, specifically Conversion #008 - 3266, 3280, 3290, 3330 Midland Avenue and 50, 70 Silver Star Boulevard, #052 - 4016 and 4020 Finch Avenue #053 - 2901-2913 Kennedy Road, 21 Trojan Gate, 4040 Finch Avenue East, and 15-19 Milliken Boulevard, #057 - 4140 Finch Avenue East, #058 - 4186-4190 Finch Avenue East, #061 - 3360 Midland Avenue**

Dear Chair Bradford and Members of the Committee:

We are writing as the owners of D. Crupi & Sons Limited and D.C.M. Holdings Limited, and, on behalf of several property owners and/or business operators within the North Milliken Employment Area, namely K-Line Insulators Limited, All-Weld Company Limited, Trisan Construction, Metrocon Ready Mix Corp. and Costafam Holdings Inc. (AGF-C&T Inc). We are owners of operating industrial sites and/or businesses within the North Milliken Employment Area. The North Milliken Employment Area consists of the lands generally bounded by Steeles Avenue on the north, Midland Avenue on the East, the properties fronting onto McNicoll Avenue on the South and Kennedy Road on the West. The larger Milliken Employment Area is generally bounded by Midland Ave. on the east, Kennedy Road on the west, Finch Ave on the south and Steeles Ave on the north. We have serious concerns about the long list of conversion requests before you today in that are within Scarborough-Agincourt, in the Milliken Employment Area as noted above.

As business owners that provide employment to thousands of people plus thousands of jobs through subcontractors, suppliers and service companies that we utilize, we would like to express how crucial it is for the City of Toronto to make the protection of its employment areas a matter of utmost importance. This is especially important when it comes to Core Employment Areas that permit heavy industrial uses, of which there are not enough lands within the City where these uses are allowed. Many of these heavy industrial operations that have been providing essential goods and services for the maintenance and growth of municipalities, including the City of Toronto, for decades and generations are facing growing pressures that make it increasingly hard to operate. We are constantly being squeezed by the pressures of encroaching residential development and other sensitive uses, restrictive policies, by-law amendments, land expropriations, politics and more. We could not find land to operate on elsewhere within the City to do what we do even if we wanted to, nor should we have to.

We were very pleased to review Planning Staff's report and see the emphasis they placed on preserving the integrity of this employment area and that they have recommended strongly against the approval of the conversion requests that lie within the Milliken Employment Area in Scarborough Agincourt. We are tired of working so hard and investing so much into our businesses and into this City and being told our businesses are valued and important to the City, only to be dealing with proposals like this that always seem to get approved. In the past, we have seen conversion requests pushed through for approval, despite the acknowledgment by staff that our operations face considerable and concerning threats and conflicts when placed in close proximity to residential or other sensitive uses. There are several Class 2 & 3 industries operating in this employment area, 24 hours a day, 7 days a week and 365 days a year. These industries within the North Milliken Employment Area include operations like a large asphalt manufacturing plant and material processing facility, along with a 24-hour heavy equipment maintenance facility, two ready mix concrete plants, concrete material processing facility and salt depot. The employment area is also home to a large heavy metal fabrication facility that exports large ASME pressure vessels such as heat exchangers and reactors as well as other custom fabrications around the world, a major manufacturing facility of polymer insulators with a large global customer base mainly composed of electrical utilities, including local companies like Hydro One and Toronto Hydro, a major reinforcing steel manufacturing facility, and a large road construction company that does emergency services for the City of Toronto. Some of our businesses have to consider an area of influence in our ECA of 1000 metres and there is no way, if roles were reversed, that any of our businesses would gain approval to set up so close to any sensitive uses, like what is proposed for the properties noted above where conversion applications are currently being reviewed and inevitable upcoming applications within this employment area that will certainly come and that will be in even closer proximity if any of these conversion requests are approved.

We are located within a designated Provincially Significant Employment Area within very close proximity to the properties with conversion requests in our employment area as listed above which are conversion requests before you today. We have brought our concerns forward to both the City and the province on multiple occasions about the importance of protecting this employment area. We have been down this road before with a previous regeneration area that cut into our employment area and brought along with it an application for 3 high rise residential towers that, quite frankly, do not belong. If they ever receive final approval for those towers, they will be incompatible with the current heavy industrial uses within our employment area. We warned staff then that if that development application was approved it would open the flood gates for more and here we are. We feel like we are fighting for our lives as businesses. We are told that we are being heard but then sensitive uses are still being allowed to encroach upon the North Milliken Employment Area, threatening the growth and the very viability of what is a longstanding successful area of employment.

Unfortunately, we are not alone. Our employment area is not unique and this is happening across the City. Throughout today's meeting in various forms it has been reported by City staff that employment areas need to be protected. Almost every single application for conversion of employment areas before you today, is reported by City staff to be within an employment area that has almost a 0% vacancy rate. There is clearly a demand and a need for these areas for businesses to operate. The bottom line is that there are not enough employment lands left in the City and they need to be protected. Once they are allowed to be converted, it is almost impossible to return them to commercial or industrial uses.

There is no doubt that our businesses will be adversely impacted by the introduction of any sensitive uses being allowed into the surrounding area as proposed. The potential adverse impacts will be of such significance as to seriously compromise our ability to maintain current operations and/or the ability to expand operations in the future in response to changing market conditions. Given the varying nature of our industrial operations which involve heavy truck traffic throughout all hours of the day and night, yard operations, inclusive of outside storage of goods and materials and the operation of heavy

equipment often 24 hours a day, which may result in noise, dust, odours and other fugitive emissions, we do not consider the proposal to introduce any form of residential development within the North Milliken Employment Area to be reasonable or appropriate from a land use planning or socio-economic perspective. Rather, the introduction of residential or sensitive uses will only serve to limit our business operations and further result in new restrictions which are not conducive to maintaining a healthy employment area for core industrial uses. We do not believe there are any reasonable or enforceable conditions or restrictions which may be imposed upon approval of a development application including sensitive uses on the proposed site or any of the other applications to be considered within or in close proximity to the North Milliken Employment area which would resolve our concerns and give reasonable reassurance that the stability of this employment area would not be threatened.

We have also expressed serious concern on many occasions in consultation with various City staff about introducing more pedestrian, bicycle and residential traffic into the North Milliken Employment Area. There is so much constant heavy truck traffic and pedestrians/cyclists in the area do not follow any rules of the road. We have already seen extremely dangerous situations unfold with cyclists not paying attention or residential traffic cutting off heavy trucks and pedestrians walking where they should not, especially in a heavy industrial area. We are terrified for all the heavy truck drivers, that despite doing everything they are supposed to do and taking all precautions, the more people you introduce into an area where they don't belong, the more risk the City is taking that a tragic event could happen. Safety has to be the top priority and bringing more people into the area from residential and sensitive land uses does not consider safety at all.

Based upon the policy directions for Employment Areas and the intent of the City of Toronto Official Plan to protect such areas from the introduction of sensitive and/or incompatible land uses, it is submitted that the City of Toronto should not give favourable consideration to the proposals for conversion within this employment area as referenced at the beginning of this letter, but rather, the lands in question should be maintained for employment in order to grow and expand the employment potential of the area and other adjacent properties rather than threaten the stability of the employment area by creating incompatible land use and "opening the flood gates" for further applications and approvals.

As major stakeholders with significant investments in the area, we have said it countless times before and will say it again – any residential uses in this close proximity to the North Milliken Employment area is unequivocally INCOMPATIBLE with the existing, well established core industrial uses in the area. The City's own experts in Planning and Economic Development are echoing the same concerns and sounding the same alarm. These are businesses that have been operating within the City of Toronto for anywhere from 40 to 100 years. The issue to be addressed should be the advancement of a sound planning framework which protects the integrity of and reinforces and strengthens the role of the North Milliken Employment Area as part of the economic base of the City of Toronto. The effect of introducing residential will be to impair the desirability of the area from the perspective of the introduction of new industrial uses and continuing capital investment throughout the area. We do not believe, that if the City starts down this road which will inevitably lead to further conversion applications in the area, that it has been demonstrated or proven that we will not be forced to limit our business operations. We do not believe that it has been shown that we will not lose the ability to adapt and grow in ways that may become necessary due to the changing of our industry or business requirements. We do not believe that it has been shown that we will not lose future growth opportunities and permitted future land uses on our existing properties. We do not believe that anyone from the City of Toronto can demonstrate that we will not eventually be forced to close our companies due to major incompatibility issues with new residents moving in once more residential and mixed use applications are put forward. We will not be able to coexist with residential uses or mitigate for resident complaints that are certain to come (and we should not have to). This would mean losing our investments in our businesses, in our properties, in the

area, and, in our employees and the thousands of jobs that are at risk by putting residential and sensitive uses in an area where it does not work given surrounding land uses.

Each of our industrial neighbours have experienced the problems associated with the encroachment of residential development and sensitive uses upon our businesses and the pressures which are brought to bear upon our day to day operations. Many of us have had to go to inordinate expense and business limiting measures to manage impacts due to compatibility related issues under the current regulatory framework. In some instances, notwithstanding the long term established commercial industrial function of the area, the end result has been a need to abandon our previous properties due to the inability to satisfy or comply with proposed mitigation measures and/or due to the extraordinary financial hardship associated with the implementation of such measures.

It is important to note that we previously fought a conversion application for 3447 Kennedy Road during the last Municipal Comprehensive Review. At that time, the application was withdrawn by the applicant after City staff stated that it would be completely inappropriate to consider converting this property to allow for sensitive land uses, given that it is within a heavy industrial area and within extreme close proximity to many heavy industrial operations that operate 24 hours a day and 7 days a week. Sensitive land uses on this property were stated to be incompatible with existing land uses and yet, here we are again having to fight the same application for conversion. Nothing has changed since the last Municipal Comprehensive review – if anything, the employment area has become busier since then, experienced extreme growth and introduced even more heavy industrial operations. What was absolutely inappropriate and incompatible for conversion then, is even more incompatible and inappropriate now as are the other properties with conversion applications in this area.

We understand that a fundamental element of the City of Toronto's Official Plan is to provide for residential development. However, due to the limited land available in the City, much of the future demand for housing will, of necessity, have to be met through the construction of mid to high rise structures. It is respectfully submitted that the need to go vertical does not mean it is appropriate to develop high rise residential structures anywhere and everywhere as that only leads to uncertainty and speculation by the development industry and potential destabilization of very stable employment areas like this one. A need now exists to examine the opportunities to encourage and attract compatible and complimentary forms of land use in this area, that contribute to the growth of the economy and the creation of long term jobs.

As a group of land and business owners we ask that the City of Toronto not risk and gamble with our business investments, our investments into the area and with our employees' jobs. ***It is incumbent upon the City Planners, Councillors and decision makers to understand that this is about the survival of our businesses and the jobs of all of our employees for the long term.*** This should be about a holistic view for the area which is consistent with the intent of the Provincial Growth Plan the Provincial Policy Statement and the overall policy framework for Employment lands. Allowing residential uses within the north-westerly part of the North Milliken Employment Area will, simply stated, erode and undermine the integrity of the employment area function and which will result in the implementation of a policy direction which forges the beginning of the end of the employment area lands south of Steeles Avenue.

In closing, it has been stated to us, by many City and Planning Officials, as well as Economic Development, that no one wants to see us leave the area. We have heard that our businesses are important to the City, and that you hear our concerns, and, that you are focussed on protecting our business interests and the jobs of those people employed by our companies. We hear City of Toronto Planning & Economic Development staff saying we need to protect these lands for employment and that introducing mixed uses or sensitive uses is not compatible or appropriate. Now is the time for City Planners and Politicians to clearly state that any conversion request or development proposal to

introduce a significant residential component of development within an established employment area is inappropriate and to take a stand to protect the employment areas of the City before it is too late.

Should you consider it appropriate, we would be pleased to discuss the issues and concerns outlined in this submission. Please ensure all stakeholders listed below receive notice of all upcoming public meetings, inclusive of meetings of Committees of Council and meetings of Council where any applications, studies or approvals are being considered for the North Milliken Employment Area or surrounding area involving residential or sensitive uses, as well as notice of any Council decisions with respect to these matters.

Sincerely yours,



Maria Crupi-Nisperos, on behalf of

Dominic Crupi  
Vice President  
D. Crupi & Sons Limited



Tony Carreira, P.Eng.  
President  
K-Line Insulators Limited



Scott Dunsmoor, P.Eng.  
President  
All-Weld Company Limited



Daniel Allegranza  
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Peter Costa  
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