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July 4, 2023

The Chair and Members Planning and Housing Committee c/o Nancy Martins, Committee Administrator 10th 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 # 74 – 555 Rexdale Blvd.

Dear Chair Bradford and Members of the Committee:

We are writing as the owners of D. Crupi & Sons Limited and 1428729 Ontario Limited. We operate an asphalt manufacturing facility at 176 Bethridge Rd. in Etobicoke. This facility is approved to operate 24 hours a day, seven days a week which is often required for the substantial amount of road construction work we do for the City of Toronto and for other municipalities. We also have associated aggregate processing and recycling operations on this site. This property occupies approx. 10 acres.

We have been made aware of the proposal of Woodbine Entertainment for the site at 555 Rexdale Blvd. We are generally not as concerned with the consideration of residential intensification at the northwest end of the site which is over 1.5 km from our current operations. However, Woodbine Entertainment's proposal to develop further south towards the south-eastern boundary of the site is unacceptable and incompatible with our operations and many of the other heavy Class 2 & 3 industrial operations like ours operating in relatively close proximity to this proposed development.

Our company has been in the asphalt manufacturing, paving, road maintenance and aggregate production business since 1951 in the City of Toronto. We are a family owned business in its third generation and have been operating out of this employment area since 2005. We strategically acquired this property within this industrial area as our business needs grew and evolved. We are proud, Canadian business owners, who are good, responsible corporate citizens. We have invested and continue to invest a tremendous amount into establishing, growing and expanding our business here, into the area, into the City and in our employees. We chose this location because it was planned and zoned appropriately, as well as being buffered from sensitive residential areas by distance, lighter industry and commercial/retail uses which provided a measure of certainty we could operate and have the opportunity to grow in these areas. Now we are all feeling uncertainty and pressure – once the erosion of the employment area starts with one development application, the floodgates open for other developers to apply for conversion on their lands. This creates instability and the future viability of the area for industrial operations immediately becomes uncertain. Taking action now to protect the future of this employment area is critical to the survival and growth of the businesses like ours within it and to the desirability of these areas for businesses looking to establish and invest in their businesses here.







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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. Businesses like ours 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 to be converted to allow sensitive land uses further towards the southern and south-eastern border of 555 Rexdale Blvd. 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 as been reported by City staff that employment areas need to be protected. And that there are not enough employment lands left in the City. 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 could 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 such close proximity to Crupi's operations to be reasonable or appropriate from a land use planning or socioeconomic 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 our operations at 176 Bethridge Rd. which would resolve our concerns and give reasonable reassurance that the stability of this employment area would not be threatened.

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 at 555 Rexdale Blvd. 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.

We are asking that **the City Planners, Councillors and decision makers understand that this is about the survival of our businesses and the jobs of all of our employees for the long term.**

In closing, it has been stated to us, by many City and Planning Officials, as well as Economic Development, 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 us. We hear City of Toronto Planning & Economic Development staff saying we need to protect 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 HEAD OFFICE



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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 that we receive notice of all upcoming public meetings, inclusive of meetings of Council and meetings of Council where any applications, studies or approvals are being considered for 555 Rexdale Blvd. or the surrounding area involving residential or sensitive uses, as well as notice of any Council decisions with respect to these matters.

Sincerely yours,

Dominic Crupi Vice President



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