



Quinto M. Annibale*
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December 9, 2024

City of Toronto
City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Attention: John Elvidge
City Clerk

Dear Mr. Elvidge,

**RE: December 17, 2024 Meeting of Toronto City Council
Item 2024.IE18.1 – Infrastructure and Environment Committee
Proposed Unwin Avenue Bailey Bridge Replacement Strategy Study
Submission on behalf of Studios of America**

I am the solicitor for Studios of America Corporation, the owner of 440 Unwin Avenue, the location of the decommissioned Hearn Generating Station (the 'Site'). The Site is located west of the Unwin Avenue Bailey Bridge and is approximately 30 acres in size.

We understand that the City is commencing a replacement study for the Unwin Avenue Bailey Bridge. In particular, we understand that the City is exploring potential design options as part of the interim bridge replacement strategy until the Phases 3 and 4 of the Municipal Class Environmental Assessment process for the realigned Unwin Avenue has been completed. It is also our understanding that the City is proposing that the design options consider the proposed alignment as included in the 2017 Port Lands and South of Eastern Transportation and Servicing Master Plan.

The 2017 Port Lands and South of Eastern Transportation and Servicing Master Plan suggested a potential re-alignment of Unwin Avenue but indicated that the specific alignment in the vicinity of the Hearn and Portlands Energy Centre was to be confirmed through Phase 3 of the Municipal Class Environmental Assessment Process. Likewise, policy 2.1.3(d) of the Port Lands Area Specific Policy of the Central Waterfront Secondary Plan notes that the final alignment in this area is to be determined through the completion of Phases 3 and 4 of the Municipal Class Environmental Assessment process. Phase 3 of the Municipal Class Environmental Assessment process in respect



of this portion of Unwin Avenue has not yet commenced and it is not known at this time when it will proceed.

Meanwhile, since that time (over 7 years ago), there has been significant changes in the Port Lands, including preliminary block planning for the 440 Unwin Avenue site. We are contemplating a more central alignment of Unwin Avenue to ensure that the adaptive reuse of the Hean Generating Station appropriately responds to the realigned public street. It is our intention to advocate for this alignment at the appropriate time as part of the Municipal Class Environmental Assessment process.

In light of the fact that the alignment of Unwin Avenue is not yet confirmed, we request that Studios of America Corporation be appropriately consulted to ensure that this replacement study also protects for alternative ROW alignments of Unwin Avenue. This will ensure that the replacement study is working with the latest information and that ultimately that the recommendations coming out of the study can be implemented. This will also ensure that the replacement study does not undermine Phase 3 of the Municipal Class Environmental Assessment Process by predetermining the alignment of Unwin Ave.

We appreciate your consideration of this request and we look forward to being consulted and participating in the City's Unwin Avenue Bailey Bridge Replacement Study.

Yours truly,

LOOPSTRA NIXON LLP

Per: Quinto M. Annibale

QMA/rg