

May 20, 2025

Toronto City Council
c/o City Clerk
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

BY EMAIL: clerk@toronto.ca

Dear Mayor Chow and Members of Toronto City Council:

Re: PH21.1 - Official Plan Amendments to Align with Provincial Legislative and Policy Changes Related to Employment Areas

On behalf of:

- **Shell Canada Products (3978 Keele Street)**
 - **Imperial Oil (1150 Finch Avenue West)**
 - **Suncor Energy Products Partnership (1138 Finch Avenue West)**
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Aird & Berlis LLP is legal counsel for Shell Canada ("**Shell**"), Imperial Oil ("**Imperial**") and Suncor Energy Products Partnership ("**Suncor**") (collectively, "**clients**") with respect to certain land use planning matters affecting the three large fuel storage and distribution terminals located in the north east quadrant of Keele Street and Finch Avenue West (the "**Fuel Terminals**").

The Fuel Terminals are separately owned and operated by our clients.

The Fuel Terminals have operated in their current locations since the mid-1950s. The Fuel Terminals are located within the DUKE Heights BIA and our clients are therefore BIA members.

Combined, the Fuel Terminals ship approximately 750 tanker trucks of fuel per day and operate 24 hours/day, 7 days/week, 365 days/year. Ninety-five percent (95%) of the liquid transportation fuel used in the Greater Toronto Area is transported from the Fuel Terminals.

The Fuel Terminals are situated on lands zoned Employment Heavy Industrial (EH) pursuant to the City of Toronto's Zoning By-law 569-2013 and are designated *Core Employment Areas* on Map 16 of the City's Official Plan.

The Fuel Terminals play a critical role in supplying fuel to Toronto area residents and businesses and are integral to the local, provincial and national economies. The Fuel Terminals must therefore be protected from the encroachment of incompatible uses which could pose public safety and operational concerns.

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The purpose of this correspondence is to express our clients' support for OPA 804 as it applies to the DUKE Heights BIA. Given the heavy industrial nature of our clients' operations and reliance on a stable operating environment for the movement of critical fuels, our clients support amendments to the Official Plan which would narrow the types of employment uses that are permitted in the vicinity of the Fuel Terminals.

Yours truly,
AIRD & BERLIS LLP



Laura Dean
Partner

LD

c. Clients

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