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DELIVERED BY EMAIL
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Executive Committee
City of Toronto
City Hall, 22nd Floor East
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Mayor Chow and Members of the Executive Committee:

**Re: Executive Committee Meeting 20 – January 28, 2025 – Item EX20.11
ReNew Golden Mile Environmental Assessment – Final Report
Comment Letter from Bell Canada - Impacts on 865 Pharmacy Avenue**

We are counsel to Bell Canada, the registered owner of 865 Pharmacy Avenue, Toronto (“**Subject Property**”). We write to provide comments regarding City staff’s recommendation to endorse the final preferred alignments and designs for the Golden Mile Reconfigured and New Major Streets Environmental Assessment (“**Golden Mile EA**”).

Bell has critical telecommunications infrastructure on the Subject Property in the areas affected by the final preferred alignments and designs of the Golden Mile EA. Bell respectfully asks the Committee and, ultimately, City Council, to direct City staff to discuss options to mitigate and, where possible, eliminate, any impacts and/or damages with Bell.

The Subject Property Contains Critical Telecommunications Infrastructure

The Subject Property is 2.36 hectares (5.83 acres) in size and consists of a five-storey central telecommunication toll and mobility switching building and a 152.7 metre (500 foot) high communications tower. A series of outdoor generators and underground telecommunications infrastructure also occupy the Subject Property.

The existing building, tower and underground infrastructure, including telecommunication cable ducts (together, the “**Bell Facility**”) are integral components of Bell’s communications network servicing the Golden Mile area and beyond. The Bell Facility supports critical network services for the 911 dispatch, toll connection to other telecommunications facilities, critical network system for the operations of the Toronto Stock Exchange, network services for major banks and businesses, and core transfer signal equipment Bell’s wireless networks.

The services provided by the Bell Facility cannot be interrupted as a result of the road network improvements contemplated by the Golden Mile EA. Early and regular communications between the City and Bell will reduce the risk of any such interruption and the potential damages to Bell as a result of the transportation network improvements considered in the Golden Mile EA.

The Golden Mile EA Preferred Alignments and Impacts to the Subject Property

The final preferred alignments and designs for the Golden Mile EA will potentially impact the Subject Property in two respects:

1. The preferred alignment for the new East-West Street: Golden Mile Boulevard; and,
2. The preferred alignment for the reconfiguration of Craigton Drive.

Golden Mile Boulevard

The alignment of the Golden Mile Boulevard appears to be entirely within the southern limit of the Subject Property. This proposed alignment will impact Bell's existing underground infrastructure and, potentially, the operation of the telecommunication facilities on the site.

While Bell takes no issue with the alignment of the Golden Mile Boulevard as it relates to lands outside of the Subject Property, Bell encourages the City to explore shifting the alignment of the right-of-way (and specifically, the roadway element and any underground infrastructure proposed to be located below grade along the right-of-way) as far south as possible. **If underground infrastructure that is currently located on the Subject Property must be relocated to accommodate the ultimate road alignment, Bell estimates the costs of such relocation to be in the millions of dollars with significant implications to the project's timeline and budget.**

Craigton Drive Reconfiguration

While the proposed reconfiguration of Craigton Drive appears to be largely outside the limits of the Subject Property, there may also be impacts to the critical underground infrastructure in the area and access to the site. These potential impacts also warrant further discussion between Bell and the City.

Request for Council Direction for City Staff to Consult with Bell Canada

Given the critical nature of the telecommunications infrastructure on and around the Subject Property to the Golden Mile area and beyond, the very real risk of impact to the Bell Facility or interruption in service (including emergency services) requires further consultation between City Staff and Bell.

To that end, and recognizing that early discussions prior to the detailed design work being finalized would be beneficial to both parties, **we respectfully request that the Executive Committee and, in turn, City Council, add the following Recommendation in any motion considered to endorse the recommendations of the General Manager, Transportation Services from the Staff Report:**

City Council directs the General Manager, Transportation Services (or their delegate) to consult with Bell Canada as part of the detailed design of the Golden Mile Boulevard and the Craigton Drive Realignment to minimize and/or eliminate, impacts to 865 Pharmacy Avenue and Bell's telecommunication infrastructure

arising from the preferred alignments and designs for the ReNew Golden Mile Environmental Assessment.

We ask that the City provide our client with copies of design drawings (in PDF and CAD format) regarding the preferred alignment of (1) the Golden Mile Boulevard and (2) the Craigton Drive reconfiguration so that potential conflicts and impacts can be minimized. We further welcome any opportunity to meet with the City to discuss the minimize impacts on the Subject Property, mitigate our client's damages and, critically, ensure the telecommunications infrastructure on the Subject Property is protected.

Kindly provide us with notice of any reports, decisions, and Committee and/or Council meetings regarding the Golden Mile EA and, specifically, the Golden Mile Boulevard and the Craigton Drive reconfiguration.

Yours truly,

BORDEN LADNER GERVAIS LLP



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IT/LE

cc. Client
Jacquelyn Hayward, Director, Planning, Design & Management, Transportation Services
Barbara Gray, General Manager, Transportation Services