

January 27, 2025

BY EMAIL: exc@toronto.ca

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Executive Committee:

Re: EX20.11 - ReNew Golden Mile Environmental Assessment: Final Report

We are counsel to Choice Properties REIT (“**Choice**”), the owner of the Golden Mile Shopping Centre generally situated on the north side of Eglinton Avenue East, between Victoria Park Avenue and Pharmacy Avenue and municipally known as 1880 to 1890 Eglinton Avenue East and 1523 Victoria Park Avenue and 1525 to 1545 Victoria Park Avenue (the “**Property**”).

Choice has been actively engaged in the Golden Mile Environmental Assessment (“**EA**”) process and has made written and oral submissions to staff and the Infrastructure and Environment Committee and attended meetings with staff to express its concerns with the Golden Mile EA. A copy of the following written submissions are attached:

- Letter to City staff, dated November 25, 2024 to City staff;
- Letter to the Infrastructure and Environment Committee, dated May 27, 2024 in response to the ReNew Golden Mile Environmental Assessment - Interim Report, dated May 13, 2024 (attached to November 25, 2024 letter); and
- Letter to City staff, dated April 6, 2023 (attached to November 25, 2024 letter).

Through the course of the Golden Mile EA process, Choice has been working closely with City staff to explore whether the preferred alignment and designs for Craigton Drive and Golden Mile Boulevard can be accommodated on the Property. As outlined in further detail below and in an effort to cooperate with the City, Choice is prepared to accommodate certain elements of the Golden Mile EA. However, in reviewing the ReNew Golden Mile Environmental Assessment: Final Report, dated January 24, 2025 (the “**Final Report**”), Choice remains very concerned with two specific EA elements, being the Craigton Drive widening and cornering rounding radii at street intersections.

Background

Existing Property

The Property is approximately 7.7 hectares in area and includes a range of retail stores and buildings, including a No Frills grocery store, Joe Fresh, Scotia Bank, Value Village, City of Toronto Golden Mile Employment and Social Services Centre, as well as a variety of smaller local tenants.

Site-Specific Approvals

Choice has been actively advancing development applications for the Property since 2016. Following an extensive process working with City staff and other stakeholders that culminated in a settlement, the Ontario Land Tribunal (the “**OLT**”) approved an Official Plan Amendment (“**OPA**”) and Zoning By-law Amendment (“**ZBA**”) on August 10, 2022 and a Draft Plan of Subdivision (“**DPOS**”) on November 17, 2022 to facilitate the comprehensive redevelopment of the Property as a mixed-use, transit-oriented neighbourhood.

The OPA and ZBA permit the development of the planned mixed-use community across seven defined development blocks on the Property and allow for a total development of approximately 3,597 dwelling units, community space and other non-residential uses, including a new food store.

The OPA includes policies to guide the development of the Property, including the general locations of the new street network, planned rights-of-way for the new streets and required public street widenings.

The ZBA builds upon the level of detail provided in the OPA and specifies, in detail, requirements regarding the arrangement, massing, built form, public realm and floor area allocations of the proposed buildings on each of the development blocks, including specific building locations relative to new streets and other buildings. These details were the product of extended discussions with City staff and were premised upon the overall master plan that underlies the approved OPA, ZBA and DPOS for the Property.

The DPOS creates six development blocks, a park block and a new public street network supporting development of the Property. The approved DPOS also establishes road alignments, rights-of-way, corner roundings, and street phasing, which includes Golden Mile Boulevard that was considered within the Golden Mile EA.

Since the OPA, ZBA and DPOS approvals over two years ago, Choice has been advancing its detailed engineering design for the required transportation and servicing infrastructure in accordance with the approved DPOS conditions so that construction of the first phase of development (Block F) can proceed as soon as possible.

Comments on the Final Report

The concerns previously raised by Choice have not been addressed by staff in the Final Report. There are elements of the preferred alignment and design that continue to conflict with Choice's OPA, ZBA and DPOS approvals.

It is important to highlight that Choice's approved OPA expressly recognizes that the exact location, alignment and design of public streets on the Property can be implemented through a DPOS in advance of the completion of any Municipal Class EA. That is precisely what has occurred and, consequently, the Golden Mile EA should have no impact on their existing approvals. However, based on our review of the Final Report, City staff are attempting to undo and revisit elements of Choice's site-specific OLT approvals despite being well aware of Choice's objection and concerns to same.

Craigton Drive Widenings

The Final Report recommends that Craigton Drive be widened from 20 metres to 23 metres and that the entire 3.0 metre widening be taken from Choice's Property on the south side of Craigton Drive. This is contrary to Choice's OPA, ZBA and DPOS approvals requiring a 1.5 metre widening only and contemplates that the remaining 1.5 metre widening would be taken from the lands on the north side of Craigton Drive.

The Final Report, in its recommendation for a 3.0 metre widening on the Choice Property, completely ignores Choice's OPA, ZBA and DPOS approvals. Choice has been consistently and abundantly clear that it will not agree to provide a greater road widening and, yet, the Final Report states that "[c]ity staff will work with the development proponents on the south side of the street to secure the additional lands using existing zoning by-law provisions where implementing zoning is in place and through the continued review of development applications." Choice's position on the widening of Craigton Drive has not changed and will not agree to provide any additional lands.

A 3.0 metre widening fully on the south side of Craigton Drive has significant impacts on the built form of Block G on the Property. It would result in a reduction of the required podium setback from Craigton Drive on Block G, or a shifting of the massing further south and therefore reducing the approved tower separation distance between towers G1 and G2.

Daylighting Triangles

The preferred alignment and design in the Final Report appear to have removed the daylighting triangles, which is supported by Choice as the daylighting triangles were inconsistent with the approved OPA, ZBA, and DPOS.

Corner Roundings

The Final Report continues to recommend corner roundings with a radii of 10 metres at all intersections, although it also states that “the City development review process should determine on a site-specific basis whether 10 metre corner rounding radius is required, or whether equivalent infrastructure can be accommodated in a smaller corner rounding.”

Choice’s approved DPOS has already established the required corner rounding radius of 6.0 metres at all intersections within its Property, with the exception of a radius of 5.0 metres at the intersection of Craigton Drive/Victoria Park Avenue. The suggestion in the Final Report that future development review processes will determine the required radius is not appropriate for the Choice Property given that all of its site-specific approvals already establish the required corner roundings. Choice will not agree to any change to the corner rounding radii set out in its approvals.

Sidewalk Easements

The Final Report illustrates a pedestrian clearway for Golden Mile Boulevard located within Choice’s development Block G and outside of the Golden Mile Boulevard right-of-way. This generally reflects recent discussions between Choice and City staff, as it would help accommodate the left turn lane. However, please note that any easement granted in favour of the City for the portion of the pedestrian clearway within Block G is subject to mutually satisfactory terms for the transfer of easement and Choice being permitted to construct an underground parking structure beneath the easement lands.

Intersection Controls

The Final Report recommends a new stop sign at the intersection of Golden Mile Boulevard and internal Street B on the Property. However, through the advancement of Choice’s detailed engineering design process, Choice has consistently proposed a traffic signal for this intersection, which has been accepted by engineering staff. Based on correspondence from staff, Choice has been advised that, notwithstanding the stop sign shown for such intersection in the Golden Mile EA, staff will be relying on Choice’s transportation impact assessment to advance the detailed design and a new traffic signal is not precluded.

Cycle Track

The preferred alignment and design in the Final Report shows a 2.1 metre wide cycle track on both the north and south sides of the entirety of Golden Mile Boulevard on the Choice Property. This is contrary to Choice’s OPA approval which does not include a dedicated cycling lane, but rather contemplates a dedicated multi-use path only along Street C and on a portion of Golden Mile Boulevard between Street C and Pharmacy Avenue. Notwithstanding this inconsistency, Choice has been working with City staff on the cross-section designs to see if the cycle tracks can be accommodated.

Conclusion and Request

The right-of-way, alignment and design of Golden Mile Boulevard and Craigton Drive, as reflected in Choice's OPA, ZBA and DPOS approvals, are fundamental to the development plan for the Property as supported by City Council in their agreement to settle the OPA, ZBA and DPOS appeals that were approved by the OLT. Any change to the right-of-way, alignment and/or design of Golden Mile Boulevard and Craigton Drive will conflict with the OPA, ZBA and DPOS approvals already in place and the terms of Choice's settlement with the City. Accordingly, it is imperative that the final alignments and design of the Golden Mile EA, as they relate to the Property, are consistent with the settlement reached between the City and Choice that resulted in the OPA, ZBA and DPOS approvals, except where explicitly agreed to otherwise by Choice.

We request that the Executive Committee either (1) refer the matter back to staff and direct staff to revise the preferred alignment and design to reflect the Craigton Drive widening and the corner rounding radii shown in Choice's OPA, ZBA and DPOS approvals; or (2) endorse the preferred alignment and designs subject to the necessary amendments to reflect the Craigton Drive widening and the corner rounding radii shown in Choice's OPA, ZBA and DPOS approvals.

In the absence of such revisions, the Golden Mile EA will impede Choice's ability to implement its approvals and cause unnecessary delay in the achievement of much needed housing and the delivery of infrastructure and community benefits in this growing area.

We ask to be provided with notice of any decision of City Council or Committees of City Council in relation to this matter. Thank you for your attention.

Yours truly,
AIRD & BERLIS LLP



Maggie Bassani

Cc: Client
Jag Sharma
Valesa Faria

November 25, 2024

BY EMAIL: goldenmile@toronto.ca

Dominic Cobran, Senior Coordinator, Public Consultation
Metro Hall
55 John Street, 19th Floor
Toronto ON, M5V 3C6

Dear Mr. Cobran:

Re: ReNew Golden Mile: Reconfigured & New Major Streets Environmental Assessment Study – Comments

As you may be aware, we are counsel to Choice Properties REIT (“**Choice**”), the owner of the Golden Mile Shopping Centre generally situated on the north side of Eglinton Avenue East, between Victoria Park Avenue and Pharmacy Avenue and municipally known as 1880 to 1890 Eglinton Avenue East and 1523 Victoria Park Avenue and 1525 to 1545 Victoria Park Avenue (the “**Property**”).

The Property is approximately 7.7 hectares in area and includes a range of retail stores and buildings, including a No Frills grocery store, Joe Fresh, Scotia Bank, Value Village, City of Toronto Golden Mile Employment and Social Services Centre, as well as a variety of smaller local tenants.

Site-Specific Approvals

Choice has been actively advancing development applications for the Property since 2016. Following an extensive process working with City staff and other stakeholders that culminated in a settlement, the Ontario Land Tribunal (the “**OLT**”) approved an Official Plan Amendment (“**OPA**”) and Zoning By-law Amendment (“**ZBA**”) on August 10, 2022 and a Draft Plan of Subdivision (“**DPOS**”) on November 17, 2022 to facilitate the comprehensive redevelopment of the Property as a mixed-use, transit-oriented neighbourhood. This settlement was highlighted by the City when they noted: “*The Golden Mile Secondary Plan advanced a vision for a new mixed-use community with a range of tall, mid-rise and some low-rise buildings to be constructed over the next 20+ years. There are 14 sites with active development applications within the Plan Area. City Council has approved or accepted settlement offers for 12 of the 14 sites,*” in the General Manager of Transportation Services’ ReNew Golden Mile Environmental Assessment: Interim Report, dated May 13, 2024 (the “**Staff Report**”).

The OPA and ZBA permit the development of the planned mixed-use community across seven defined development blocks on the Property and allow for a total development of approximately 3,597 dwelling units, community space and other non-residential uses, including a new food store.

The OPA includes policies to guide the development of the Property, including the general locations of the new street network, planned rights-of-way for the new streets and required public street widenings. In particular, Map 4 of the OPA illustrates the required cycling network on the Property.

The ZBA builds upon the level of detail provided in the OPA and specifies, in detail, requirements regarding the arrangement, massing, built form, public realm and floor area allocations of the proposed buildings on each of the development blocks, including specific building locations relative to new streets and other buildings. These details were the product of extended discussions with City staff and were premised upon the overall Master Plan arrangement that underlies the approved OPA, ZBA and DPOS for the Property.

The DPOS creates six development blocks, a park block and a new public street network supporting development of the Property. The approved DPOS also establishes road alignments, rights-of-way, corner roundings, and street phasing, which includes Golden Mile Boulevard which is being considered within the Golden Mile EA undertaken by the City.

Since the OPA, ZBA and DPOS approvals, Choice has been in the process of advancing its detailed engineering design for the required transportation and servicing infrastructure in accordance with the approved DPOS conditions.

Comments on the ReNew Golden Mile: Reconfigured & New Major Streets Environmental Assessment Study (the “Golden Mile EA”)

Choice has been closely following and participating in the Golden Mile EA process and, on April 6, 2023, made a written submission to City staff following a presentation to landowners (appended as Attachment 1). Choice made a further written and oral submission to the Infrastructure and Environment Committee on May 27, 2024 in response to the Staff Report (appended as Attachment 2).

Although Choice was pleased to see the EA proceed for the Golden Mile Secondary Plan area, they had a number of concerns with the recommended alignment and designs in the Staff Report which conflict with Choice’s OPA, ZBA and DPOS approvals. Since August 2024, Choice has been coordinating with the EA team directly regarding these impacts on the OPA, ZBA and DPOS approvals, and is hopeful that a resolution can be reached. However, this letter is being submitted further to Choice’s previous correspondence to formally note these concerns as part of the Golden Mile EA consultation process and to make additional submissions following our review of the latest staff presentation and updated plans provided at the second public meeting held on November 21, 2024.

It is important to highlight that Choice's approved OPA expressly recognizes that the exact location, alignment and design of public streets on the Property can be implemented through the Draft Plan of Subdivision process in advance of the completion of any Municipal Class EA. That is precisely what has occurred and, consequently, the Golden Mile EA should have no impact on their existing approvals.

Craigton Drive Widenings

The Staff Report included the preliminary recommendation that Craigton Drive be widened from 20 metres to 23 metres and that the entire 3.0 metre widening be taken from Choice's Property. This is contrary to Choice's approved OPA that only requires a 1.5 metre widening and contemplates that the remaining 1.5 metre widening would be taken from the lands on the north side of Craigton Drive. Similarly, Choice's approved DPOS shows a 1.5 metre widening. To avoid impacts to the approved design on Block G, implementing the 3.0 metre widening fully on the south side of Craigton Drive would require reducing the required podium setback from Craigton Drive on Block G, or shifting the built form further south and therefore reducing the approved tower separation distance between towers G1 and G2. The latest Golden Mile EA plans still show the full 3 metre widening located on Choice's Property, which is not acceptable.

Daylighting Triangles / Corner Roundings

The latest plans from the Golden Mile EA have now removed the daylighting triangles, which is supported by Choice as the daylighting triangles were inconsistent with the approved OPA, ZBA, and DPOS. However, the Golden Mile EA plans now illustrate corner roundings with a radii of R10.0 which do not reflect the corner rounding radii of R6.0 shown on Choice's approved DPOS (and R5.0 at the intersection of Craigton/Victoria Park). The R6.0 radii has been consistently shown in Choice's detailed design submissions to date in coordination with City staff. The curb radii shown in the approved DPOS ought to be reflected in the Golden Mile EA plans.

Sidewalk Easements

The latest plans from the Golden Mile EA illustrate a pedestrian clearway for Golden Mile Boulevard located within our development Block G and not within the Golden Mile Boulevard right-of-way. This generally reflects recent discussions between Choice and City staff, as it would help accommodate the left turn lane. However, please note that any easement granted in favour of the City for the portion of the pedestrian clearway within Block G is subject to mutually satisfactory terms. It is also imperative that Choice can still have an underground parking garage beneath the pedestrian clearway easement lands.

Intersection Controls

The latest Golden Mile EA plans show a new stop sign at the intersection of Golden Mile Boulevard and internal Street B on the Property. However, through the advancement of Choice's detailed engineering design process, Choice has consistently proposed a traffic signal for this

intersection, which has been accepted by engineering staff. Based on correspondence from staff, Choice has been advised that, notwithstanding the stop sign shown for such intersection in the Golden Mile EA, staff will be relying on Choice's transportation impact assessment to advance the detailed design and a new traffic signal is not precluded.

Conclusion and Request

The right-of-way, alignment and design of Golden Mile Boulevard and Craigton, as reflected in Choice's OPA, ZBA and DPOS approvals, are fundamental to the development plan for the Property as supported by City Council in their agreement to settle the OPA, ZBA and DPOS appeals that were approved by the OLT. Any change to the right-of-way, alignment and/or design of Golden Mile Boulevard and Craigton Drive will conflict with the OPA, ZBA and DPOS approvals already in place and the terms of Choice's settlement with the City. Accordingly, it is imperative that the final alignments and design of the Golden Mile EA, as they relate to the Property, are consistent with the settlement reached between the City and Choice that resulted in the OPA, ZBA and DPOS approvals, except where explicitly agreed to otherwise by Choice.

Any inconsistencies, including those noted above, will necessitate returning to the OLT to revise the approved OPA, ZBA and DPOS instruments. In this instance, the OLT will be advised that the terms of the settlement reached with the City and reflected in the approved OPA, ZBA and DPOS have been changed due to the Golden Mile EA process a mere two years after the City attended at the OLT in support of the settlements. It will also be incumbent upon the City to explain to the OLT why the Golden Mile EA Process is being undertaken without coordination with the property owners with approved developments in the area. Revising these materials will have a significant impact on the achievable transit-oriented density on the Property, the available public spaces, and the delivery of necessary infrastructure in this important and growing area. Moreover, the City's approach to the processing of our client's approvals in light of the Golden Mile EA is even more troubling given that Choice's approved OPA provides that "the exact location alignment and design of public streets will be refined through a Draft Plan of Subdivision for the Site which will be informed by **any completed** Municipal Class Environmental Assessment" (*emphasis added*). At the time of the approval of our client's Draft Plan of Subdivision, there was no completed Municipal Class Environmental Assessment and that continues to be the case today, yet the City is applying the draft Municipal Class Environmental Assessment to the Phase 1 subdivision detailed design process as they work towards the start of construction.

At the time of filing this correspondence, we were not in a position to confirm whether any of our client's concerns have been addressed as the final version of the Golden Mile EA has not been endorsed by City Council. In the event that our client's concerns have not been addressed, and in order to avoid unnecessarily returning to the OLT to revisit Choice's approved settlement, we request that City staff address the matters noted herein to reflect Choice's OPA, ZBA and DPOS approvals and detailed design submissions as they relate to the Property.

November 25, 2024

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Our client continues to welcome meetings with City staff to discuss and share any information and materials that their consulting team has developed to date and will be preparing as part of our ongoing design efforts to address our client's concerns.

Yours truly,

AIRD & BERLIS LLP

A handwritten signature in dark ink, appearing to read "Sidonia J. Tomasella". The signature is fluid and cursive, with a small dot at the end.

Sidonia J. Tomasella

SJT/NM

cc: Client

April 6, 2023

Dominic Cobran

Senior Coordinator, Public Consultation Unit
Policy, Planning, Finance and Administration Division
City of Toronto
19th Floor, Metro Hall
55 John Street
Toronto, Ontario M5V 1J2

Re: ReNew Golden Mile EA – Developer Meeting Presentation Comments

Dear Dominic,

Thank-you for circulating the presentation materials presented to the Golden Mile Area Developers at the December 13, 2022 meeting.

This letter is provided by CP REIT Ontario Properties Limited (Choice Properties REIT), in response to the materials presented, and as background information for the City's consideration as part of the ReNew Golden Mile Environmental Assessment.

As you are aware, Choice Properties REIT (also referred to herein as "Choice") is the owner of the Golden Mile Shopping Centre generally situated on the north side of Eglinton Avenue East, between Victoria Park Avenue and Pharmacy Avenue. The property is approximately 7.7 hectares in area and includes a range of retail stores and buildings, including a No Frills grocery store, Joe Fresh, Scotia Bank, Value Village, City of Toronto Golden Mile Employment and Social Services Centre, as well as a variety of smaller local tenants. The municipal addresses of the Choice lands are 1880 to 1890 Eglinton Avenue East and 1523 Victoria Park Avenue and 1525 to 1545 Victoria Park Avenue.

The following is provided as input into the ReNew Golden Mile Environmental Assessment process:

- A summary overview of the comprehensive redevelopment applications and related planning approvals processes that Choice has been advancing with the City for the property since initial Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications were made to the City dating back to 2016;

- An outline of approvals secured through a settlement of Ontario Land Tribunal (OLT) appeals, with Final Orders approving the Official Plan Amendment and site-specific Zoning By-law Amendment issued on August 12, 2022, and the Final Order approving the Draft Plan of Sub-Division issued on November 17, 2022;
- Commentary on the presentation materials presented by the City at the December 13, 2022 meeting;
- Discussion on the work undertaken on behalf of the Golden Mile Landowner Group (“GMLOG”), of which Choice is a part, with respect to the coordination of an alignment for Golden Mile Boulevard across all landholdings on the north side of Eglinton Avenue East;
- Commentary regarding on-going site-specific development and infrastructure planning related processes that Choice is advancing for the proposed development in parallel to the Renew Golden Mile EA; and
- A statement regarding Choice’s willingness to engage with the City to best enable the conduct of the EA as it related to Golden Mile Boulevard in a timely and satisfactory manner.

1.0 Development Approvals and Entitlements

Choice is a long-time landowner in the Golden Mile area and has been actively advancing development applications for the properties at 1880 to 1890 Eglinton Avenue East, 1523 Victoria Park Avenue and 1525 to 1545 Victoria Park Avenue (also referred to herein as the “Site” or “the lands”) since 2016.

An Official Plan Amendment application for the Site was originally made to the City of Toronto in December 2016, seeking approval for a comprehensive, transit-orientated, mixed-use and master planned development on the lands. Zoning By-law Amendment and Draft Plan of Subdivision applications were made to the City in October 2020. These applications were subsequently appealed to the Ontario Land Tribunal (OLT).

Choice has been actively engaged with City staff since the filing of the development applications for the Site, as part of the City’s Golden Mile Secondary Plan and Transportation Master Planning processes and the resolution of the appeals of the site-specific applications.

It is noteworthy that the development plans evolved considerably through the extended process working with City staff. The development plans were revised to respond to the policies in the Golden Mile Secondary Plan, to facilitate the settlement of the site-specific appeals.

1.1 Approvals

The above-noted planning entitlement processes led to City Council adopted settlements of Choice's appeals of its OPA, ZBA and DPOS applications.

On April 1, 2021, Choice submitted a settlement offer to resolve the OPA appeal, which was accepted by City Council at its April 7-8, 2021 meeting. On July 12, 2021, Choice submitted a settlement offer to resolve the ZBA and DPOS appeals, which was accepted by City Council at its July 14-16, 2021 meeting. The ZBA for the property outlines specific development permissions on the property and, notably, the location of buildings and built form across the property. The Draft Plan of Subdivision defines the organization of new streets and a new park to be dedicated to the City to facilitate the mixed-use development on the property.

The OPA (SASP 583) and ZBA permit the development of the planned mixed-use community across seven defined development blocks on the Site and allows for a total development of 300,097 m² of gross floor area, including just over 270,000 m² of residential floor space. The balance of the permitted GFA is allocated to non-residential uses, including a new food store.

The OPA includes policies to guide the development of the Site, including the general locations of the new street network, planned right-of-ways for the new streets and required public street widenings. In particular, Policy C.2 provides that *"the exact alignment and design of the public streets will be refined through a DPOS for the site which will be informed by any completed Municipal Class Environmental Assessment"*.

The ZBA builds upon the level of detail provided in OPA and specifies, in detail, requirements regarding the arrangement, massing, built form, public realm and floor area allocations of the proposed buildings on each of the development blocks, including specific building locations relative to new streets and other buildings. These details were the product of an extended discussions with City staff and were premised upon the overall Master Plan arrangement that underlies the approved OPA, ZBA and DPOS for the property.

The approved DPOS provides further detail and clarity with respect to the block and public street arrangements on the Site. The DPOS creates six development blocks, a park block and a new public street network supporting development of the site. Most importantly, the approved DPOS defines road alignments, right-of-ways, corner roundings, basic street

phasing and the location of the park within the Site. The DPOS includes Golden Mile Boulevard (Street A1 and Street A2 on the DPOS) that is being considered within the ReNew Golden Mile Environmental Assessment now being undertaken by the City. The intention of Policy C.2 of the site-specific OPA is to recognize that the alignment and design of the public streets can be established through a DPOS in advance of the completion of the EA process, which is what occurred for the Choice property.

The alignment of Golden Mile Boulevard across the Site, between Victoria Park Avenue and Pharmacy Avenue, responds to, and aligns with the provisions of the GMSP and the Golden Mile TMP in terms of the provided right-of-ways, connectivity and, subject to design details within the identified right-of-way being further advanced, key cross-sectional provisions of those documents.

The right-of-way and alignment of Golden Mile Boulevard (and the other streets) reflected in the DPOS are fundamental to the Master Plan block arrangement that forms the basis of the OPA and ZBA approvals supported by City Council and approved by the OLT. Any change to the right-of-way or alignment of Golden Mile Boulevard on the Site will adversely impact the OPA, ZBA and DPOS approvals already in place.

1.2 Approved Development Plans

The development approvals for the Site include 6 development blocks to accommodate approximately 3,600 residential units and a range of retail and commercial uses, including a new food store. Along with the food store, the community benefits proposed for the Site are extensive and include affordable housing, 30,000 ft² of community space and parkland.

Copies of the architectural site plans that accompanied the approved ZBA are provided in **Attachment A** of this letter for reference purposes. A copy of the approved DPOS is provided in **Attachment B** for reference purposes.

2.0 Proposed Golden Mile Boulevard Alignment (Golden Mile Landowner Group)

2.1 The Landowner Group

Choice is a member of the Golden Mile Landowner Group (GMLOG) which is a collaboration amongst a number of landowners across the Golden Mile area who have active and ongoing development applications in various stages.

Together, this group represents the owners of the majority of the property holdings within the Golden Mile Secondary Plan area. In the area north of Eglinton Avenue East, all seven of the landowners with the largest land holdings between Victoria Park Avenue and Birchmount Road, being Choice, Starlight, SmartCentres, Madison, Cosmetica, Riocan and Dream, are members of the GMLOG (with the exception of Bell, with its lands just east of Pharmacy Avenue).

It is notable that 6 of these properties encompass the lands through which Golden Mile Boulevard will run (except for Bell) and are, for the most part, characterized today by large format retail and commercial development with large parking lots and circulation routings. Each of these properties are the subject of development applications (similar to the Choice property) that have either received (principally, OPA and ZBA) approvals before the OLT, or are significantly advanced in terms of the settlement arrangements with the City of Toronto, that establish the form of development and arrangement of the supporting street networks.

The development plans, and associated development approval instruments, for each of these proposals are premised upon an established arrangement and alignment for the various elements of the street network established within the GMSP and supporting TMP. This includes an alignment for Golden Mile Boulevard within each site plan that responds to the specific development and phasing circumstances of each landholding, as well as providing coordinated routing across the Golden Mile area as it extends through and between each property.

2.2 Golden Mile Boulevard: Coordinated Functional Plan

Given the importance of Golden Mile Boulevard, the LOG have worked collaboratively with respect to the coordination of each development application on the north side of Eglinton Avenue East to establish a consistent, connected and comprehensive plan for Golden Mile Boulevard. A preliminary functional plan has been prepared for Golden Mile Boulevard by BA Group on behalf of the LOG in this regard. This plan has been previously provided to the City. A reduced scale plan is provided in **Attachment C** and can be forwarded in digital form to the ReNew Golden Mile consultant team if that would assist the City's process.

This comprehensive plan for Golden Mile Boulevard is consistent with the policy directives of the GMSP (and various OPA's / SASP's that have been approved by the OLT), the key elements of the TMP and good engineering practice in terms of alignment, proposed right-of-ways, lane and other facility provisions. This plan also addresses technical matters with respect to intersection geometry, potential turn-lane needs at interfaces with the main north-south streets across Golden Mile and detailing in a number of key areas across Golden Mile.

The plan establishes the key street alignment and right-of-way arrangements for Golden Mile Boulevard recognizing that the more specific design details within the right-of-way will be the subject of future DPOS and engineering submissions, as well as the Phase 3/4 ReNew Golden Mile Environmental Assessment.

The established alignment underlies each of the development plans advanced as part of the planning approval processes for the lands on the north side of Eglinton Avenue East. These plans are the basis for the various OPA and ZBA settlements accepted by City Council and approved by the OLT for these lands.

It is the GMLOG's opinion that the alignment established for Golden Mile Boulevard and reflected within each of the development plans for the lands north of Eglinton Avenue East, provides a solid and appropriate design basis for adoption, particularly from an alignment and right-of-way perspective, as part of the ReNew Golden Mile Environmental Assessment. This would enable the alignment of Golden Mile Boulevard to be advanced in a responsive manner that is consistent with the development approvals and settlements for the lands north of Eglinton Avenue East, which have been accepted by the City Council and approved by the OLT, while remaining consistent with the GMSP and SASP policy context and the directions established within the TMP (Phase 1/2 Environmental Assessment).

As contemplated within the various site-specific approvals and GMSP, each property would advance the design details and construction of Golden Mile Boulevard on a phased and incremental basis through site-specific DPOS applications and engineering submissions, based upon the provisions and design specifications of the current Phase 3/ Environmental Assessment.

2.3 Golden Mile Boulevard within the Choice Property

With respect to the Choice property, the alignment and right-of-way options for Golden Mile Boulevard that were presented by the ReNew Golden Mile EA team, are generally consistent with that reflected in the approved ZBA and DPOS and the underlying directions of the GMSP and TMP.

It is recognized that the design and cross-sectional details of the Golden Mile Boulevard right-of-way is required to be advanced beyond that reflected in the approved DPOS and Master Plan materials. As noted previously, Choice is actively developing the design of the Phase 1 street system (including portions of Golden Mile Boulevard), including street cross-sections, intersection controls, lane configurations and public realm / landscape provisions, as part of an engineering submission process to satisfy DPOS conditions and to enable construction of the westerly segment of Golden Mile Boulevard (Street A1 on the DPOS) and other municipal streets to support the first phase of development on the Site.

We look forward to collaborating with City staff working as part of the ReNew Golden Mile Environmental Assessment team and within each of the technical areas to advance this work in a timely manner.

3.0 Comments on Presentation Materials

We have reviewed the presentation materials provided by staff at the December 13, 2022 information session and offer the following comments from Choice's perspective:

3.1 Study Area & Background

- As important background, the presentation should make reference and clearly recognize the existing development applications, development approval status and site-specific approvals. These approvals reflect City Council direction guiding development across Golden Mile.
- The background section of the upcoming public meeting presentation should reflect the approved development context across the GMSP, including the Choice property. The OLT has approved, with City Council support, a number of development approvals (including OPA, ZBA and DPOS approvals) that should be reflected in the background context for the ReNew Golden Mile Environmental Assessment. Given that the Environmental Assessment is being undertaken to establish new/modified streets that support the redevelopment vision of the GMSP, the development approvals should form part of the evaluation context for the Environmental Assessment. It is important to include such information to provide a full and accurate reflection of the Golden Mile context and to limit the risk of misleading the public about the context of the ReNew Golden Mile EA.
- The presentation should recognize and present the specific deployment and disposition of proposed development blocks, proposed buildings, parkland and other aspects of approved planning instruments, particularly those that may be impacted by public street alignment and design options being considered within the ReNew Golden Mile Environmental Assessment. Any potential impacts should form part of the evaluations undertaken as part of the assessment.
- The presentation should recognize the OLT approval of the DPOS for the Choice lands and its compatibility with the GMSP policies and TMP recommended configuration for Golden Mile Boulevard.

- More generally, the presentation should recognize decisions by City Council made in the context of the GMSP as they relate to the Golden Mile street network. For example, City Council removed the realignment of Sinnott Road and Thermos Road as part of its approval of the GMSP and, yet the Environmental Assessment still advances options for this particular element.

3.2 Transportation Master Plan

- Reference and clarity should be made to the recommended street network that was approved as part of OPA 499 (GMSP) by City Council which provides the policy framework of the street network and guides development in the Golden Mile area. The TMP recommended street network map on slide 13 is not consistent with that adopted as part of the GMSP particularly as it relates to *“improvement 5 – the reconfiguration of Thermos Road to meet the existing signalized Sinnott Road”*.

3.3 Street Alignment & Cross-Section Alternatives

- The use of the notation “consistent with City Policies” is considered to be too general, potentially misleading and should be clarified as to which policies are relevant in each instance, and which policies a particular option is consistent with or not. There should be a specific review of the GMSP policies and existing site-specific OPA, ZBA and DPOS approvals as part of this policy context.
- While not within the immediate area of the Choice property, it was our understanding that the approved GMSP removed, by specific Council direction, consideration of the realignment of Thermos Road to meet Sinnott Road. This raises questions in response to the statements made referencing “consistent with City policies” which indicate, for example, retention of the current, offset arrangement of Thermos Road and Sinnott Road across Eglinton Avenue East. There should be an explanation as to why options are being considered as part of the ReNew Golden Mile Environmental Assessment for elements that have already been determined by Council. At a minimum, an option reflecting retention of the current offset condition should be reflected in the assessment and would, logically, be the only option that is consistent with City policy (as per GMSP)
- There should be a recognition of the coordination efforts made by the Golden Mile Landowner Group (GMLOG) with respect to the development of a consolidated alignment for Golden Mile Boulevard between Victoria Park Road and Birchmount Road, that aligns with the directives of the GMSP, the recommendations of the TMP and, importantly, the street alignment reflected in the site-specific development approvals and ongoing development applications.

3.4 Draft Detailed Evaluation Framework

- Choice looks forward to reviewing the details of how the socio-economic evaluation criteria will be advanced with particular regard to the impacts, if any, to existing development applications/approvals, including how any alternatives under consideration will be assessed in the context of detailed and approved development plans.

4.0 Continuing Development Related Application and Design Processes

The development of the Choice site is planned to occur on a phased basis, as contemplated within the approved OPA, ZBA and DPOS.

The first phase of development is proposed to be advanced in the south-western portion of the site (Block F). A site plan application was made to the City of Toronto for the first phase of development in February 2022 and remains in process with the City.

This first phase of development is to be supported by the first phases of the new street network and infrastructure elements identified within the DPOS. These include the westerly sections of Golden Mile Boulevard (Street A1 and Street B).

Choice has retained a consulting team to advance and prepare the first engineering submission packages to be filed with the City in connection with the transportation and servicing infrastructure required to support Phase 1 of the development. From a street design perspective, this process will advance and detail the cross-sectional, intersection arrangement, bicycle facilities and landscape features of the street network, including Golden Mile Boulevard, based on the alignments established by the approved DPOS. This process will also initiate the clearance of the various DPOS conditions that need to be satisfied in order to construct the new street network.

It is Choice's intention to submit the first engineering submission to the City in March 2023 in parallel with the ongoing work being undertaken by the City as part of the Renew Golden Mile Environmental Assessment. Choice's intention is to work collaboratively with the City in advancing the design of Golden Mile Boulevard and to confirm the required cross-section and design details in a timely manner as input into the engineering submission process.

In the interim, Choice will continue to advance the SPA application for Block F. An SPA resubmission is anticipated to be made to the City in Q2 2023.

5.0 Engagement

Choice looks forward to working collaboratively with the City to advance our upcoming DPOS and SPA approval processes in parallel with the ReNew Golden Mile Environmental Assessment. We particularly look forward to working closely on the development of design arrangements for Golden Mile Boulevard within the Choice property as alternatives are developed within the Environmental Assessment process.

Yours sincerely,

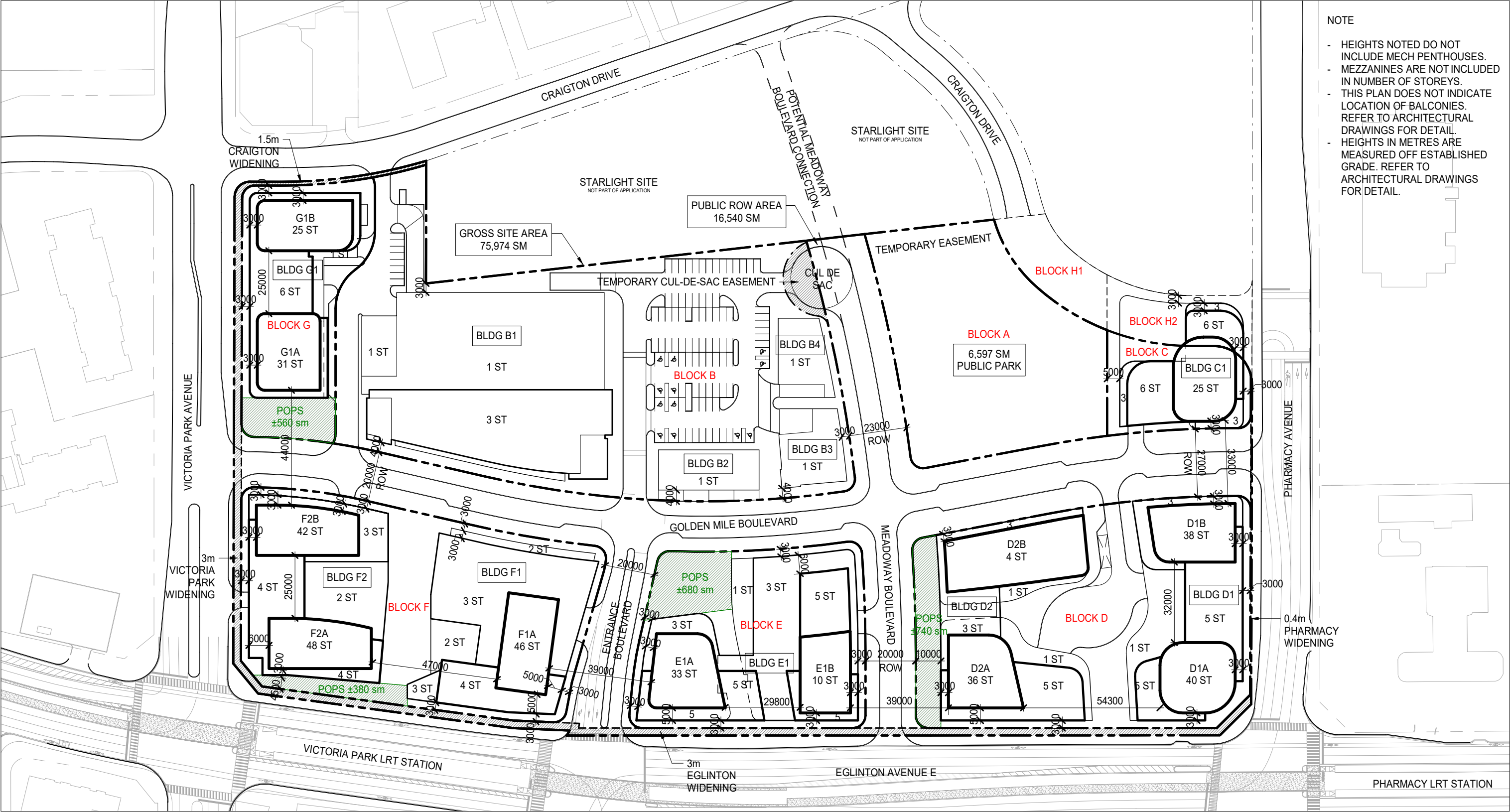
A handwritten signature in black ink, appearing to read "W. Omarkhail".

Wessal Omarkhail

Senior Manager, Development & Planning

C 416-917-5978

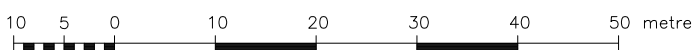
E wessal.omarkhail@choicereit.ca



WITHOUT PREJUDICE

DRAFT PLAN OF SUBDIVISION
PART OF LOT 35
CONCESSION D
(GEOGRAPHIC TOWNSHIP OF SCARBOROUGH, COUNTY OF YORK)
AND
BLOCK C AND D
REGISTERED PLAN 4362
AND
BLOCK A
REGISTERED PLAN 4722
CITY OF TORONTO

SCALE 1 : 750



SPEIGHT, VAN NOSTRAND & GIBSON LIMITED
ONTARIO LAND SURVEYORS
2020

THE REPRODUCTION, ALTERATION OR USE OF THIS PLAN, IN WHOLE OR IN PART, WITHOUT THE EXPRESS PERMISSION OF SPEIGHT, VAN NOSTRAND & GIBSON LIMITED IS STRICTLY PROHIBITED.

Notes:

1. Stylistic revisions to be made to this Draft Plan of Subdivision; and
2. Draft Plan of Subdivision to be revised to split Block 2 (Block B) into two separate blocks.

NOTES:

SUBJECT PROPERTY
ALL DIMENSIONS ARE IN METERS
ALL AREA MEASUREMENTS ARE COMPUTER GENERATED.
ALL ELEVATIONS REFER TO GEODETIC DATUM
ALL CORNER ROUNDING ARE 6.0 METER RADIUS

ADDITIONAL INFORMATION
REQUIRED UNDER SECTION 51(17)
OF THE PLANNING ACT

- C. THIS IS REPRESENTS THE APPLICANT'S ENTIRE HOLDING OF UNDEVELOPED LAND IN THE VICINITY.
H. PIPED WATER TO BE PROVIDED.
I. CLAY LOAM SOIL.
K. SANITARY & STORM SEWERS TO BE PROVIDED.

METRIC

DISTANCES SHOWN ON THIS PLAN ARE IN METRES
AND CAN BE CONVERTED TO FEET BY DIVIDING BY 0.3048.

SURVEYOR'S CERTIFICATE

I CERTIFY THAT: THE BOUNDARIES OF THE LAND TO BE SUBDIVIDED AND THEIR RELATIONSHIP TO THE ADJACENT LANDS ARE CORRECTLY SHOWN

DATE :
D. A. WILTON
ONTARIO LAND SURVEYOR



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DRAWN :	FILE NAME : A2000133.DWG
CHECKED :	PLOT SCALE : MET. 1=0.75
JOB No. : 200-0133	PLOTTED :
REF. No. :	UPDATED :

