

January 19, 2021

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Sent by Email – gregg.lintern@toronto.ca

Proposed Redevelopment of 153-185 Eastern Avenue

I have received your letter dated January 16th, 2021. Following receipt of your letter, and in order to gather the necessary information to respond, Ministry of Municipal Affairs and Housing (MMAH) staff engaged with representatives of the Ministry of Government and Consumer Services, the Ministry of Heritage, Sport, Tourism and Culture Industries as well as Infrastructure Ontario. Infrastructure Ontario (IO) is the government agency that has lead responsibility for demolition activity related to this project and advises that the province has received all necessary permits and completed all legally required studies to proceed with the demolition of the structures at the site.

For your convenience and to expedite a response to your inquiry, MMAH staff have compiled responses in two sections below:

1. The Proposed Undertaking – New Market and Affordable Housing; and,
2. Completion of Heritage Impact Assessment.

1. The Proposed Undertaking – New Affordable and Market Housing

As you may know, leveraging surplus government properties is a commitment of More Homes, More Choice, the government's Housing Supply Action Plan.

On October 22, 2020, the Minister of Municipal Affairs and Housing made an order permitting the zoning for the proposed undertaking. This order, O. Reg. 595/20 under the *Planning Act*, is [publicly available on e-laws](#). The order enables the construction of three residential buildings, with heights and density expressly described therein, together with community space and other amenities. The future development will contain both affordable and market housing.

This undertaking advances the revitalization of West Don Lands/Central Waterfront and creates densification in a transitioning neighbourhood to support existing and planned transit routes. Soil and groundwater contamination impacts were identified that likely result from historical industrial operations at the property. Further, three of the four structures are slab-on-grade construction. Elevated concentrations of Polycyclic aromatic hydrocarbons (PAHs), petroleum hydrocarbons (PHCs), metals and inorganics were found in the soil across most of the property. Groundwater-sampling indicates there are exceedances in the groundwater for these contaminant groups. Environmental remediation to mitigate this contamination proposes the demolition of the four structures on the property to access and remediate the contaminated soil and ultimately accommodate the proposed housing development.

Following the removal of the four structures and remediation of contaminated soils adjacent to and beneath the four structures, elements of the structures best representing the industrial component of the former use and heritage value will be reintroduced to the site through replication and reconstruction. These will be complemented by an interpretation of the former industrial enclave through a heritage interpretation plan. This will provide an opportunity for the original heritage value to continue to be understood in the new construction and to partially retain the original architectural aesthetic, but with functioning code-compliant structures.

The City of Toronto will have an opportunity to consider a detailed plan for replication and reconstruction of heritage elements of the site once an application for site plan approval is submitted to the City for consideration.

2. Completion of Heritage Impact Assessment

In the fall of 2020, Infrastructure Ontario conducted a Heritage Impact Assessment (HIA). In addition, working from a 2004 Cultural Heritage Evaluation Report, the property was evaluated against the criteria of O. Reg. 9/06 and O. Reg 10/06 of the OHA to determine the level of significance. The evaluation determined that the property is not of significant provincial heritage.

The HIA considered possible alternatives to demolition and concluded that these were not feasible due in part to the contamination of the property, requiring full remediation. Potential adaptive reuse, and the application of requirements under the Building Code were also taken into account and it was determined that reuse of the structures was not viable based on several limitations and deficiencies identified during on-site review and assessment of built form to determine structure conditions, materials, permanent all-season suitability or adaptability.

A Cultural Heritage Documentation Report and Heritage Interpretation Plan have since been completed. With respect to the proposed demolition of the four structures, IO staff engaged with MHSTCI regarding the proposed undertaking following senior management discussions on the required heritage due diligence process and requirements specific to this undertaking. To that end, with the completion of the above-noted HIA, IO advises that it has fulfilled all heritage requirements as per the MHSTCI *Standards and Guidelines for the Conservation of Provincial Heritage Properties* (i.e. Cultural Heritage Evaluation, O. Regulation 9-06 and 10-06, Archaeological Assessment, and Heritage Impact Assessment).

Sincerely,

A handwritten signature in black ink, appearing to read 'JP' or similar initials, enclosed in a light blue circular stamp.

Joshua Paul
Assistant Deputy Minister, Housing Division
Ministry of Municipal Affairs and Housing

- cc. Paula Dill, Office of Provincial Land Development Facilitator
Adam Carr, Infrastructure Ontario
John Cimino, Infrastructure Ontario
Bruce Singbush, Assistant Deputy Minister, Ministry of Government and Consumer Services
Kevin Finnerty, Assistant Deputy Minister, Ministry of Heritage, Sport, Tourism and Culture Industries