

January 20, 2023

2130524 Ontario Inc.

c/o Mr. Mark Flowers
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SLR Project No.: 241.30132.00000

**RE: Response to Peer Review of Land Use Compatibility/Mitigation Study
51 Manstor Road, Toronto, ON**

SLR Consulting (Canada) Ltd. (SLR), was retained by 2130524 Ontario Inc. to conduct environmental air quality, noise, and vibration studies in support of an employment lands conversion of the property located at 51 Manstor Road in Toronto, Ontario ("the Project"). SLR originally prepared a report entitled "Compatibility and Mitigation Study, Air Quality, Dust, Odour and Noise, Toronto ON", dated July 2021, which was submitted to the City of Toronto in support of the employment lands conversion request.

INTRODUCTION

SLR received peer review comments on the above noted report. The peer review comments were prepared on behalf of the City of Toronto by Cambium Inc. ("Cambium"). A copy of the peer review comments is provided in **Attachment A**.

This letter is prepared in response to the Cambium peer review and is structured to follow the order in which Cambium provided their comments.

RESPONSE TO PEER REVIEW COMMENTS

Comment (C)1. As per the City's TOR potential land use compatibility impacts must be identified. While the Study appears to provide a comprehensive list of significant facilities with environmental approvals, please identify whether the following operations should be considered for compatibility:

- a. Waste Pro, 2295 Loreland Avenue*
- b. Humber Valley Group, 80 The West Mall*
- c. Acura Sherway, 2000 The Queensway (Cambium notes that Acura Sherway seems to be included in the noise assessment, but not within the text or air assessment).*

Response (R) 1. The Waste Pro Facility obtained an EASR (R-004-6113897756) on February 16, 2022, seven months after SLR's study was completed. SLR has reviewed the EASR confirmation which notes the site operates as a waste transportation system, and involves only the collection, handling, transportation and transfer of waste by waste transportation vehicle. The EASR confirms the waste

transportation system does not include any on-truck processing of waste. Waste types transported include domestic sources, commercial waste and non-hazardous solid industrial waste. Based on this information, the site would be considered a Class II facility. The facility is located greater than 300 m from the Project site and therefore does not require further assessment.

The Humber Valley Group appears to operate as a storage and vehicle maintenance yard. Based on aerial imagery, there appears to be outdoor storage of scrap metal. It is not expected that any processing occurs on the site. Limited information regarding their operations is available online and the site does not operate with an existing ECA or EASR. This site would be considered either a Class II or Class I facility. The Project site is located approximately 60 m from the Humber Valley Group. Further analysis of this facility may be required, but not at this stage in the application process. This assessment/application is for an employment lands conversion as part of the MCR process. SLR will strive to secure the above information in support of future applications, including ZBA and SPA.

The Acura Sherway facility was not included in the air quality assessment. A search of the MECP registry did not yield a permit or registration for this site. As suggested in Guideline D-6, automotive repair shops may be listed as a Class II facility partly due to the operation of a spray-paint booth. However, auto-repair shops of this size are now generally considered Class I facilities, as the MECP has a specific Environmental Activity and Sector Registry for this industry with specific operating conditions required which reduces emissions. Auto-repair shops are regulated under Ontario Regulation 347/12: Regulations under Part II.2 of the Ontario Environmental Protection Act – Automotive Refinishing. Therefore, the Acura Sherway facility is classified as a Class I light industry, with a Recommended Minimum Separation Distance of 20 m and a Potential Area of Influence of 70 m. The facility is located approximately 60 m from the Project site and is, therefore, within the Area of Influence.

The Project site is proposed to introduce new elevated receptors, however, based on a review of aerial imagery of the Acura Sherway facility, SLR is of the opinion that the operations have a low potential to generate fugitive emissions of dust and odour. Under standard operating procedures for paint booth operations, emissions are controlled through the use of filters, and most paints used at this time are water-based versus oil based. The water-based paints have a lower potential for the generation of fugitive odours.

The emission sources are observed to be low level and primarily located on or adjacent to the facility building. Due to the low height of the sources, potential emissions will be influenced by the presence of the existing building and associated “downwashing” generated through building “wake” effects. This typically results in potential emissions occurring at or near to the facility property boundary. Based on SLR experience with similar facilities, it is anticipated that the paint application rate at the Acura Sherway facility will fall within the lowest application rate category listed in O.Reg 347/12 and have no required Recommended Minimum Separation Distance between the paint booth exhaust stack and the nearest property boundary.

Given the anticipated, low usage rate of the paint booth and the fact that O. Reg 347/12 does not require a Minimum Separation Distance between the paint booth stack and property line for this facility, air emissions from the paint booth operations are not anticipated at the proposed Project site development. The Acura Sherway facility was included in the noise assessment.

- C2. It is unclear whether the rail lines adjacent to the site constitute a rail yard. Aerial imagery appears to show disconnected rail cars parked in the area. If this is a rail yard area, then noise assessment should be conducted for the rail yard activities in addition to the rail line activity. Confirmation from the rail authority on the use on the area should be obtained.

- R2. SLR has reviewed the aerial imagery and also conducted several visits to the site. During the site visits, trains were not observed to be parked in the area. Based on SLR's experience evaluating rail yards, we believe the rail line adjacent to the Project site to be a shunt line and not a rail yard. Rail yards are typically much larger areas, to allow trains to disassemble and be built for transport. The area adjacent to the Project site is expected to be a shunt line, used for trains to temporarily park and possibly unload a single car for the adjacent industries. In addition, the Railway Association of Canada railway mapping site classifies the CP line here as a 'siding' line. Any noise impacts are expected to be infrequent, and cars would typically shut down rather than remain idling. Significant noise impacts are not anticipated and additional analysis is not recommended at this time. This use of trains adjacent to the site will be considered further and assessed, if required, as part of future planning applications.
- C3. As per the City's TOR, a history of any complaints received by the City and Ministry related to operations in the immediate area of the Site should be investigated.
- The Study would benefit from a discussion of any complaints receive by the Ministry or City, related to any of the operations that occur within the study area.
- R3. SLR agrees the complaint history is beneficial in reviewing compatibility between land uses. At this time SLR has not advanced a Freedom of Information (FOI) request given the project is early in development as part of the MCR process. An FOI request will be submitted at the time of completing future planning applications.
- C4. The Study would benefit from a description of the extent to which the applicant has exchanged relevant information with major facilities as per the City's TOR. This could include the written undertakings given to affected businesses that any information regarding their processes, emissions data and expansion plans not already part of the public record would be treated on a confidential basis.
- a. The noise assessment provided for stationary sources would benefit from confirmation or communication with those sources to confirm the modelled noise sources are accurate.
- R4. This assessment/application is for an employment lands conversion as part of the MCR process. Further assessment of the surrounding facilities may be required during future planning applications such as ZBA once building plans are further progressed. SLR will strive to secure the above information in support of future applications.
- C5. The City's TOR requires discussion on potential land use compatibility issues, considering propane storage and distribution facilities, if applicable. Please confirm if any facilities in near proximity to the Site operate as propane storage and/or distribution facilities and detail the expected impact of such a facility in relation to the by-law requirements.
- R5. SLR completed an online search for propane storage tanks and/or filling sites surrounding the Project site. No storage tanks or filling sites were identified within 500 m of the Project site.
- C6. As per the City's TOR, plans for future development in the vicinity of the Site is to be considered. The Study would benefit from discussion on whether significant development applications in the area

- have been reviewed. In reviewing the City databases, the Study may consider including a list of the surrounding plans for new or adapted uses in the area, and potential impacts of such uses.
- R6. SLR accepts this comment. This assessment/application is for an employment lands conversion as part of the MCR process. Therefore, a detailed review of future planning applications was not conducted. The Toronto Development Applications website shows an application under review (2021) for 1750 The Queensway, which includes three 27-storey residential buildings noted as Phase 1 of the project. This proposed use would introduce a high-rise sensitive use in the immediate area, approximately 150 m from the Project site.
- C7. The City's TOR requires discussion on the impact of a proposed conversion on the future intensification of the employment area. The Study would benefit from direct comment regarding the impact that the conversion request would have on intensification and expansion of the surrounding existing industry, and the potential for new employment uses to be established in the zoned Employment areas including any vacant lots.
- R7. An excerpt from the City of Toronto Zoning Bylaw 569-2013 Map is illustrated below as **Figure 1**.

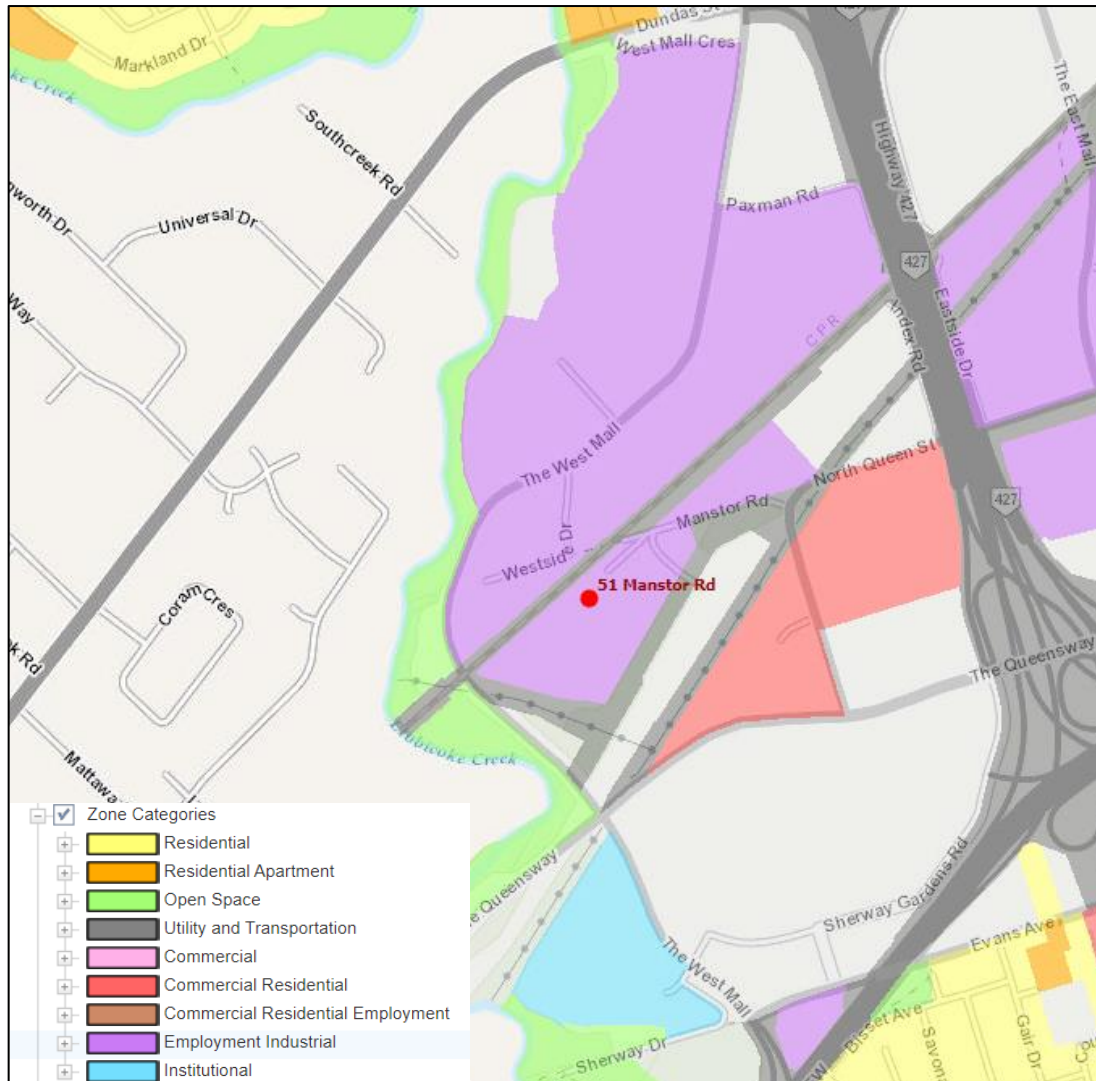


Figure 1-Excerpt from City of Toronto Zoning Bylaw Map

SLR completed a review of City of Toronto Zoning By-law No. 569-2013 applicable Chapter 60.20 Employment uses and have classified the uses in accordance with the MECP D-6 Guidelines. These uses would be permitted in the areas marked purple in **Figure 1**.

Table 1: D-6 Classification of City of Toronto Zoning By-law No. 569-2013 Chapter 60.20 Employment - Permitted Uses

| Land Use | Type of Operation | Industry Class | Area of Influence Distance (m) | Recommended Minimum Separation Distance (m) |
|-----------------|--|----------------|--------------------------------|---|
| Ambulance Depot | N/A | N/A | N/A | N/A |
| Animal Shelter | If completed with outdoor animal runs maybe considered as an industry. Expected to be self-contained minimal air/noise emissions | I | 70 | 20 |
| Artist Studio | Self-contained minimal air/noise emissions | I | 70 | 20 |

| Land Use | Type of Operation | Industry Class | Area of Influence Distance (m) | Recommended Minimum Separation Distance (m) |
|--|--|----------------|--------------------------------|---|
| Bindery | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Building Supply Yards | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Carpenter's Shop | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Cold Storage | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Contractor's Establishment | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Custom Workshop | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Dry Cleaning or Laundry Plant | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Financial Institution | N/A | N/A | N/A | N/A |
| Fire Hall | N/A | N/A | N/A | N/A |
| Industrial Sales and Service Use | N/A | N/A | N/A | N/A |
| Kennel | Self-contained minimal air/noise emissions | I | 70 | 20 |
| Laboratory | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| All Manufacturing Uses with prohibitions to facilities primarily classified as a Class III use | Classification depends on intensity. Given prohibitions listed, expected to be a Class I or Class II industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Office | N/A | N/A | N/A | N/A |
| Park | Typically a Sensitive Receptor | N/A | N/A | N/A |
| Performing Arts Studio | N/A | N/A | N/A | N/A |
| Pet Services | N/A | N/A | N/A | N/A |
| Police Station | N/A | N/A | N/A | N/A |
| Printing Establishment | Classification depends on intensity. Given surrounding land uses expected to be a Class I industry. MECP Permits required for emissions to atmosphere | I or II | 70 or 300 | 20 or 70 |
| Production Studio | Self-contained minimal air/noise emissions | I | 70 | 20 |
| Public Works Yard | MECP Permits required for emissions to atmosphere | II | 300 | 70 |

| Land Use | Type of Operation | Industry Class | Area of Influence Distance (m) | Recommended Minimum Separation Distance (m) |
|-------------------------------------|--|----------------|--------------------------------|---|
| Service Shop | Self-contained minimal air/noise emissions | I | 70 | 20 |
| Software Development and Processing | Self-contained minimal air/noise emissions | I | 70 | 20 |
| Warehouse | Self-contained minimal air/noise emissions | I | 70 | 20 |
| Wholesaling Use | Self-contained minimal air/noise emissions | I | 70 | 20 |

Some additional uses are also permitted under Chapter 60.20.20.20 (1), however these uses are permitted with constraints that would likely result in the potential D6 Industry classification as Class I.

The Table 1 employment uses generally have the following characteristics:

- Outputs: Sound, not typically audible off-property; low potential for fugitive emissions of dust or odour;
- Scale: limited outside storage;
- Process: Self-contained within buildings; and
- Operations/ Intensity: Infrequent movements of equipment and personnel.

The proposed Sherway Area Secondary Plan Land Use Plan is shown below in **Figure 2**. The site is proposed to be designated as Core Employment (currently under appeal at OLT), and the lands directly east and south are designated as Core Employment or General Employment. The majority of the lands within the Secondary Plan are designated as Mixed Use Areas including permission for residential, commercial and retail uses. The area west of the The West Mall and north of Sherway Drive is designated Institutional areas and occupied by a large health care facility.

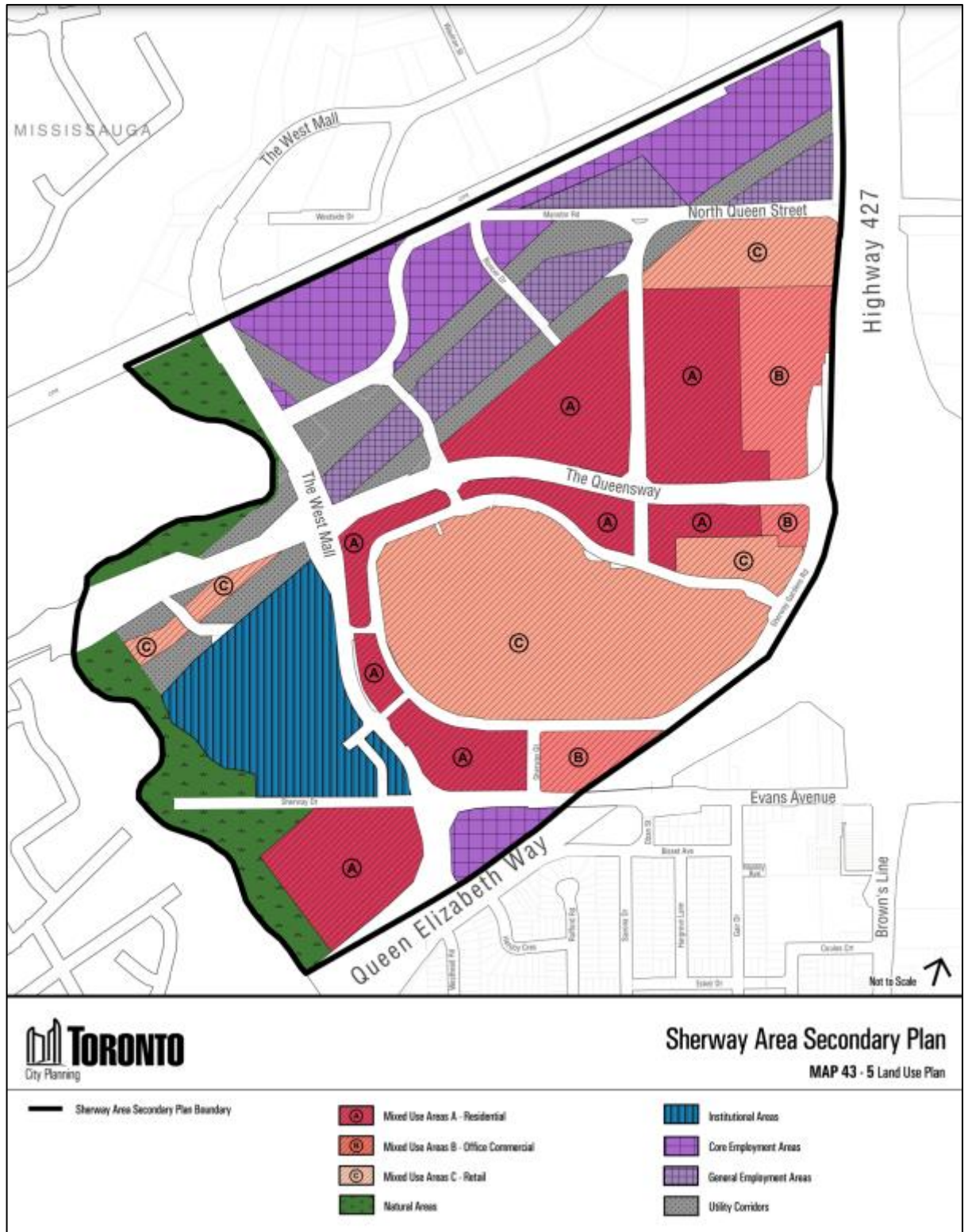


Figure 2: Sherway Area Secondary Plan Land Use Plan

Based on the above employment characteristics, existing surrounding sensitive land uses, size, and nature of the possible employment land uses, and the Sherway Area Secondary Plan, the majority

of the possible uses are considered Class I Light Industries under MECP Guideline D-6, with a 70 m Area of Influence and a Recommended Minimum Separation Distance of 20 m. Depending on the intensity of the employment uses, Class II Medium Industries may also occur. Under MECP Guideline D-6, Class II industries have a 300 m Area of Influence and a Recommended Minimum Separation Distance of 70 m.

This assessment/request is for an employment lands conversion as part of the MCR process. Further assessment of the surrounding facilities may be required during future planning applications, such as ZBA, once building plans are further progressed. If changes to the land ownership or operations do occur within the surrounding lands, the assessment will be updated during future planning applications.

- C8. The City of Toronto's report titled *Reducing Health Risk from Traffic-Related Air Pollution (TRAP) in Toronto* (October 2017) notes that there is a potential for health risks from TRAP within 500 metres of highways with an average daily traffic volume of 100,000 vehicles or more, within 150 metres of highways with daily traffic volumes of 50,000 vehicles or more, and within 100 metres of arterial roads with an average daily traffic volume of 15,000 vehicles or more.
- a. Cambium notes that based on Table 16 of the Study, a number of the roadways listed, including Highway 427 and the Gardiner/QEW, fall within the above noted scenarios. The Study provides some high-level best practices to address TRAP concerns, which Cambium generally agrees with. Based on the proximity to the major highways, however, a detailed assessment should be completed to specifically address TRAP and the required mitigation. If a detailed study cannot be justified at this stage of the application process it should be marked for future stages of planning.

- R8. SLR is familiar with the TRAP document noted above and potential risks with the above noted average daily traffic volumes. At this time, there is no guidance related to addressing TRAP within potential exposure zones.

The QEW and Gardiner Expressway are located greater than 500 metres from the Project site. The West Mall, located approximately 30 metres from the Project site has an AADT of 16,382 north of The Queensway and 24,732 south of the Queensway, as noted in the SLR report. The Queensway, which is approximately 150m from the site has an AADT of 32,131. North Queen Street (approximately 380 m from the Project site) has an AADT of 12,707 and the North Queen Street Extension has an AADT of 17,842.

SLR has experience with responding to City requests for detailed quantitative TRAP studies. To date, the City has only requested quantitative detailed TRAP studies to be completed for developments located within 100 m of major highways with average traffic volumes of 100,000 vehicles or more per day. Therefore, a detailed TRAP assessment is not warranted for the Project site.

The potential exists for TRAP emissions from the surrounding arterial roadways. Therefore, it is recommended that the following Warning Clause and receptor based physical mitigation measures be included in the architectural design of the Project site structures.

Air Quality, Odour, Dust Emissions-Warning Clause

"Purchasers/tenants are advised that due to the proximity of adjacent transportation corridors and industries, dust and odours from these facilities may at times be perceptible."

Receptor-Based Physical Mitigation Measures

Ventilation System Design

Air Intake Locations (Entire Building)

General building fresh-air intakes should be on facades facing away from potential transportation emission sources, or behind a significant intervening building or structure.

Mandatory Carbon/ Dust Filters (Entire Building)

All air intakes for building mechanical systems, make-up air units, HVAC units, central air conditioning units and heat recovery units shall include carbon and/or dust filters. The filtration system is to be designed to supply the space with 100% odour filtered air drawn from outside the building envelope.

Positive Pressurization (All Occupied Areas of the Building)

The building mechanical systems, make-up air units, HVAC units, central air conditioning units and heat recovery units shall be designed to maintain positive pressurization under normal weather conditions of all occupied areas, in accordance with current ASHRAE recommendations.

- C9. Stationary noise predictions were completed however the following industries were not included with any noise sources:
- a. 41 Westside Drive Classic Towing and Storage – it was noted in the report that noise sources were observed.
 - b. 80 West Drive – this site appears to potentially have noise sources on site.
 - c. 111 The West Mall – Wilson Truck Lines – it was noted this site includes reefer trucks and truck traffic however it was not assessed as a noise source.
- R9. SLR recognizes that the above industries/facilities were not included in the preliminary screening stationary noise model. Significant noise impacts are not anticipated and additional analysis is not recommended at this time. Stationary noise impacts from these industries/facilities can be addressed in further detail at a later stage (i.e. ZBA or SPA when building design has been completed).
- C10. Within Section 7.2.3 of the Study, it is indicated that additional vibration measurements should be conducted when the concept design is completed. Cambium would agree and add that this additional work should also be completed in full compliance with FCM/RAC guidance for vibration measurements. This recommendation was not reflected in Section 7.3 Summary of Vibration Conclusions and Recommendations.
- R10. SLR accepts this comment. This assessment/request is for an employment lands conversion as part of the MCR process. Further assessment of the surrounding facilities may be required during future planning applications such as ZBA once building plans are further progressed. Future vibration assessments should consider the FCM/RAC Guidelines.

CONCLUSIONS

Based on the SLR response to the peer review comments, and the additional information provided, SLR acknowledges that additional compatibility studies may be required as part of future ZBA and SPA applications. The proposed Project site design and location of potential sensitive receptors will provide the additional detail requested by Cambium in the above noted comments. However, for the purposes of the employment lands conversion request under the MCR, the information provided to date should be considered adequate to allow for the land use conversion to be advanced.

Should you have any questions on the above, please do not hesitate to contact us.

Yours sincerely,
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STATEMENT OF LIMITATIONS

This report has been prepared and the work referred to in this report has been undertaken by SLR Consulting (Canada) Ltd. (SLR) for 2130524 Ontario Inc., hereafter referred to as the "Client". It is intended for the sole and exclusive use of the Client and by the City of Toronto in their role as a land use planning approval authority. The report has been prepared in accordance with the Scope of Work and agreement between SLR and the Client. Other than by the Client and as set out herein, copying or distribution of this report or use of or reliance on the information contained herein, in whole or in part, is not permitted unless payment for the work has been made in full and express written permission has been obtained from SLR.

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