

City-Initiated St. Clair Avenue Study – Between Old Weston Road and Blackthorn Avenue/Spring Grove Avenue – OMB Official Plan Amendment Appeal and Potential Zoning By-law Amendment – Supplementary Report #5

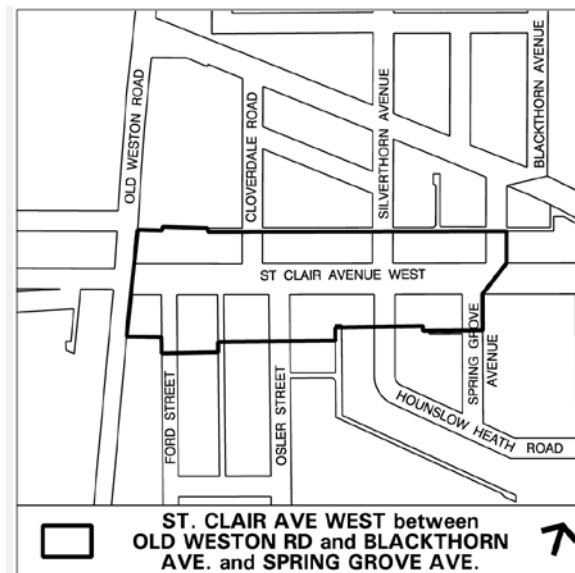
Date:	August 21, 2015
To:	Etobicoke York Community Council
From:	Director, Community Planning, Etobicoke York District
Wards:	Ward 17 - Davenport
Reference Number:	05 189781 WET 11 TM

SUMMARY

At its meeting of September 10, 2013, Etobicoke York Community Council deferred consideration of a Planning Report (Item EY26.6 – Supplementary Report #3) on the St. Clair Avenue Study between Old Weston Road and Blackthorn Avenue/Spring Grove Avenue and requested staff to hold a public consultation meeting on the proposed policy framework and regulatory approach set out in the Draft Modification to Official Plan Amendment No. 84.

A status report on the findings and outcome of the community consultation meeting was considered by the Etobicoke York Community Council at its meeting of January 15, 2014. The report also advised that Planning staff had retained the services of an environmental consulting firm to peer review the Draft Modification but had yet to assess the report findings.

An additional report (EY31.4 – Supplementary Report #4) on the findings of the peer review process and



recommended modifications to the proposed policy framework was prepared for the February 25, 2014 meeting of the Etobicoke York Community Council. The item was referred back to staff who were directed to obtain a further report from the environmental consulting firm and comment on a number of matters associated with mitigating odour impacts on other residential sites.

This report provides a summary of the additional work undertaken by Golder Associates Limited, the environmental consultant retained by the City, and recommends approval of the revised Draft Modification to Official Plan Amendment No. 84 (OPA 84) as outlined in the previous Supplementary Report #4.

RECOMMENDATIONS

The City Planning Division recommends that:

1. City Council adopt Recommendations 1 to 3 contained in the report (dated August 21, 2013) titled City-Initiated St. Clair Avenue Study- Between Old Weston Road and Blackthorn Avenue/Spring Grove Avenue - OMB Official Plan Amendment Appeal and Potential Zoning By-law Amendment - Supplementary Report #3 from the Director, Community Planning, Etobicoke York District, subject to replacing Attachment 1 in that report with Attachment 1: Revised Draft Modification to Official Plan Amendment No. 84, appended to this report dated August 21, 2015 and revising the recommendations accordingly so that the recommendations now read as follows:
 - " 1. City Council authorize the City Solicitor, City staff and any other necessary consultants to attend the Ontario Municipal Board to support a modification to Official Plan Amendment No. 84, for the lands along St. Clair Avenue West between Old Weston Road and Blackthorn Avenue/Spring Grove Avenue substantially in accordance with the Revised Draft Modification to Official Plan Amendment No. 84 attached as Attachment 1 to the report dated August 21, 2015, as a settlement to the appeal of OPA No. 84 for the western segment of the St. Clair Avenue Study.
 2. City Council direct City staff to schedule a public meeting and bring forward an amendment to Zoning By-law 1103-2009, for the lands along St. Clair Avenue West between Old Weston Road and Blackthorn Avenue/Spring Grove Avenue substantially in accordance with the proposed draft Zoning By-law Amendment attached as Attachment 2, subject to the City receiving an OMB decision approving the draft Modification to Official Plan Amendment No. 84 substantially in accordance with the draft Modification in Attachment 1.
 3. City Council authorize the City Solicitor to make such stylistic and technical changes to the draft Modification to Official Plan Amendment No. 84 and the proposed draft Zoning By-law Amendment as may be required."

Financial Impact

There are no financial implications resulting from the adoption of this report.

DECISION HISTORY

At its meeting of September 10, 2013 Etobicoke York Community Council considered a report dated August 21, 2013 titled City-Initiated St. Clair Avenue Study- Between Old Weston Road and Blackthorn Avenue/Spring Grove Avenue- OMB Official Plan Amendment Appeal and Potential Zoning By-law Amendment- Supplementary Report #3 (Item EY26.6). A copy of the report can be found at the following link:

<http://www.toronto.ca/legdocs/mmis/2013/ey/bgrd/backgroundfile-60847.pdf>

Community Council deferred consideration of the report to its meeting of November 19, 2013 and further requested the Director, Community Planning, Etobicoke York District to hold a public consultation meeting pertaining to the policy framework and regulatory approach of the proposed Draft Modification to Official Plan Amendment No. 84 and report back to the Etobicoke York Community Council with a revised Draft Modification prior to proceeding to the Ontario Municipal Board so that the policy framework and regulatory approach could reflect the community comments gathered at the public consultation meeting. The decision document can be found at the following link:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2013.EY26.6>

A public consultation meeting was held on October 16, 2013. At its meeting of October 17, 2013, Etobicoke York Community Council further directed staff to report no later than January 2014 on the outcome of the public consultation meeting and any modifications to the proposed policy framework and regulatory approach. The decision document can be found at the following link:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2013.EY28.41>

A status report on the findings and outcome of the community consultation meeting was considered by the Etobicoke York Community Council at its meeting of January 15, 2014. The report also advised that Planning staff had retained the services of an environmental consulting firm to peer review the Draft Modification but had yet to assess the report findings and potential impacts to the proposed policy framework. The Director, Community Planning, Etobicoke York District was directed to report to the Etobicoke York Community Council meeting on February 25, 2014 on the outcome of the peer review process and any modifications to the proposed policy framework and regulatory approach of the proposed Draft Modification to Official Plan Amendment No. 84. The report and decision document can be found at the following link:

<http://app.toronto.ca/tmmis/viewagendaitemhistory.do?item=2014.ey30.6>

On February 25, 2014, the Etobicoke York Community Council referred the report dated February 6, 2014 (Item EY31.4 – Supplementary Report #4) on the findings of the peer review process and recommended modifications to the proposed policy framework back to the Director, Community Planning, Etobicoke York District, and further:

1. Requested City Planning staff to obtain a further report from the independent Environmental Consulting firm retained by the City; with conclusions and recommendations, and to comment and advise on any further revisions to the proposed policy framework and regulatory approvals as set out in the proposed Draft Modifications to the Official Plan Amendment No. 84, as it relates to other residential sites, for example:
 - a. Odour and Air Quality Assessment for the recently built “Options for Homes” three apartment towers, on Keele Street, and adjacent to the NRT site immediately to the south, where all the apartment buildings are higher than 16 m.
 - b. Odour and Air Quality Assessment for the existing TCHC buildings at 61 Pelham Park Gardens and Symington Place at 1884 Davenport Road, immediately to the east of the NRT site, where both apartment buildings are higher than 16 m.
 - c. Any assessment, comments, or recommendations should include and not be limited to: nuisance odours measured in odour units ("OU") that can be detected and show where it originates; and any receptor (on-site) mitigation measures.
 - d. Any other examples in other parts of the City, like the Long Branch Area, where “H” provisions have not been implemented, and how it relates to the St. Clair Avenue Study.
 - e. Proposed "at-receptor mitigation" alternatives that can be included in any "H" provisions or Official Plan Amendment, that better share the burden of mitigation fairly between any potential applicants for new development and the existing polluter, including alternatives that place the onus entirely on the polluter.
2. Requested City Planning staff to ensure that the Environmental Consultant report also includes:
 - a. Any existing “regulatory standard” for odour levels or guidelines and how odour levels are identified or where it originates.
 - b. The regulatory standards or guidelines that are in place, where an average person would be able to perceive a difference between odour levels of building heights between 16 m. and 39 m. or how significantly different any "OU" are at higher heights compared to 16 m. height.
 - c. The reasonableness and practicability of the proposed Draft Modifications and “H” provisions from the community's perspective in terms of economic revitalization of the commercial strip that is in dire need.
3. Directed City Planning staff to consult with businesses and residents on any further reports.
4. Requested City Planning staff to give full consideration to the removal of the "H" provision as part of the report back to Etobicoke York Community Council.

The report and decision document can be found at the following link:

COMMENTS

In 2014, the City retained Golder Associates Limited (Golder), an environmental consulting firm with expertise in air quality and odour impact assessment and mitigation to undertake a peer review of the proposed policy framework and Draft Modification to Official Plan Amendment No. 84. The findings of the peer review process, including recommended revisions to the Draft Modification of OPA No. 84 were discussed in Supplementary Report #4 dated February 6, 2014 (Item EY31.4).

On February 25, 2014, Etobicoke York Community Council referred this report back to City Planning staff and directed that Golder be retained to:

- Provide commentary on the regulatory approach to odour assessment;
- Undertake an odour and air quality assessment of residential developments in the vicinity of the NRT facility having heights greater than 16 metres;
- Identify odour mitigation alternatives;
- Provide examples of developments where Holding ('H') provisions were not used to address potential land use conflicts related to odour and noise (i.e., the Long Branch Area scenario); and
- Review the reasonableness and practicality of the Holding ('H') provisions from the community's perspective.

The detailed technical analysis completed by Golder is appended to this report as Attachment 2. Below is a brief overview of the findings:

Regulatory Approach to Odour Assessment

Golder's report explains that the preferred approach to evaluate odour in Ontario is to use "whole odour", where odour strengths are expressed in odour units (OU). An odour strength of 1 OU is defined as the "odour threshold", or the concentration where 50% of trained odour panelists can detect an odour but may not be able to identify its origin or nature. While there are no regulatory standards for odour levels, odour units are used as a guideline to predict whether odour levels are likely to be detectable by the public. If concentrations are below 1 OU, it is unlikely that odours will be detected. Odour compliance is based upon odour complaints that could occur when concentrations exceed the odour threshold (1 OU).

Odour is regulated under the Environmental Protection Act (EPA) by the Ministry of the Environment and Climate Change (MOECC). Individual compounds or mixtures can cause odours. In Ontario, industrial facilities that have atmospheric emissions, including odour, are required to obtain an Environmental Compliance Approval (ECA) from the MOECC. To obtain such an approval, the industry has to demonstrate that they are capable of meeting the established regulatory criteria and guidelines at adjacent or nearby residential uses referred to as "receptors". These receptors would represent the current residential land use at the time the industry applied for the ECA.

In order to meet the odour guidelines, industries must demonstrate that predicted odour concentrations will not exceed the odour threshold (1 OU) more than 0.5% of the time in any one year (about 44 hours per year). Therefore, areas on the face of a residential building where members of the public may be exposed to odours (e.g., open balconies, outdoor amenity areas, open windows, etc.) and where odour concentrations are predicted to exceed the odour threshold of 1 OU more than 0.5% of the time, have an increased potential for odour complaints to occur.

Odour and Air Quality Assessments

In evaluating the potential impacts on the nearby Options for Homes (OFH) and Toronto Community Housing Corporation (TCHC) residential buildings with heights greater than 16 m, Golder used a dispersion model to predict odour strengths and the likelihood of exceeding odour thresholds on the exposed faces of the buildings at different heights above the ground. The modelling focused on the faces of the buildings closest to National Rubber Technologies (NRT), as this is where the highest odour concentrations are likely to occur. See Attachment 4 for the location of these properties.

Odour assessments on these existing residential buildings demonstrated that:

- a) 60 Heintzman Street - The exposed north face of the OFH building was predicted to have odours in excess of the odour threshold at all heights, with maximum concentrations increasing with height above ground. The frequency of exceeding the odour threshold of 1 OU more than 0.5% in any one year only occurs at heights greater than 16 metres. The predictions are based on the presence of operable windows (observations confirmed there were no balconies present on the north face). Assuming the agreed mitigation measures have been incorporated into the design of the building, there is a low likelihood for odour complaints.
- b) 61 Heintzman Street - The exposed north face of the OFH building is the closest residential structure to the NRT facility and was predicted to have odour concentration in excess of the odour threshold (1 OU) more than 0.5% of the time in any one year at all heights. The predictions are based on the presence of operable windows (observations confirmed there were no balconies present on the north face). Assuming the agreed mitigation measures have been incorporated into the design of the building there is a low likelihood for odour complaints.
- c) 61 Pelham Park Gardens - The exposed west face of the TCHC building has a potential for odours at all heights of the building. The frequency of exceeding the odour threshold more than 0.5% of the time in any one year only occurs at heights above 32 metres. The predictions are based on the presence of operable windows. There were no balconies observed on the exposed west face of the building and no unresolved complaints related to odours from this address.
- d) 1884 Davenport Road - Given its distance from the NRT facility and shorter building height, odour complaints would appear unlikely for the exposed west face of the TCHC building. Maximum odour strengths at this building just exceeded the odour

threshold (i.e. 1 OU) at the highest level of the building, but such predictions were extremely rare (0.06%) and therefore the potential for odour impacts is minimal.

Golder notes that NRT currently holds a valid Environmental Compliance Approval (ECA) from the MOECC demonstrating NRT's capability to meet the established regulatory criteria and guidelines at existing residential sites (at-receptors), despite the potential for odour impacts at these locations.

Odour Mitigation Alternatives

The Golder report identifies a number of odour mitigation alternatives to address odour impacts including "at-receptor" mitigation and "at-source" mitigation. It explains that "at-receptor" mitigation either reduces the likelihood of an odour complaint, or removes locations that may have been considered receptors (i.e. individual residential sites). "At-source" mitigation refers to measures implemented at the industrial facility to reduce or prevent impacts to a receptor (i.e. residential uses). The report also provides commentary on which parties should be responsible for the costs associated with implementing the identified mitigation measures.

The following chart illustrates mitigation measures that could be considered as well as their feasibility and associated impacts to both the industry and area residents.

	At-Receptor (Residential Site)	At-Source (Industrial site)
Potential Mitigation Measures	<ul style="list-style-type: none"> Restrict residential building heights below industry plumes (i.e. 16 m height limits). Modify impacted building by restricting balconies, outdoor amenity areas, operable windows and air intakes in areas that intersect with the plumes. 	<ul style="list-style-type: none"> Increasing stack heights proportional to development heights. Increasing plume height/rise by changing stack parameters so emissions disperse quickly. Reduce emissions through control technologies (e.g. wet scrubber, HEPA filters, thermal oxidation). A different technology may be required for each emission.
Impacts	<ul style="list-style-type: none"> Potential development limits through building height restrictions. Reduces the livability and quality of the residential living environment and the outdoor amenity areas for building occupants. 	<ul style="list-style-type: none"> Raising stacks heights results in significant capital costs associated with required infrastructure (e.g. concrete construction, heavy foundations, guide stack and superstructure, large footprint required on site) and may decrease plume rise. Increasing plume rise requires higher temperatures and air flows which increases operational costs. Tall stacks are not aesthetically pleasing and could negatively impact the character of an area. Control technologies require significant footprints, increased operating costs and may reduce plume heights that could impact buildings previously unaffected.

Long Branch Area Development

Golder reviewed residential redevelopment of former industrial sites in the Long Branch Area (3560, 3580, and 3600 Lake Shore Boulevard West). These developments involved land use compatibility issues associated with odour and noise impacts. The approvals did not require the implementation of a Holding “H” provision. Instead, an agreement was negotiated between the developer and the affected industry whereby the developer agreed to implement and fund a combination of at-source mitigation measures to the affected industry, and at-receptor restrictions and mitigation measures for the proposed development. Golder notes that such agreements appear to be feasible when there is one affected industry and one proposed development that benefit from the arrangement and where the agreement contributes to the support for the recommended approval of a planning application.

Key Report Findings

The Golder analysis concluded the following:

- a) Introducing residential developments above 16 m in height has the potential to increase the likelihood of odour complaints associated with the NRT facility and restrict their operations.
- b) Odour and Air assessment at existing tall residential buildings demonstrated that:
 - Potential for odour impacts on the OFH development has been mitigated through agreed to on-site measures.
 - Potential for odour impacts at the west face of 61 Pelham Park Gardens (TCHC) above 32m.
 - Little or no potential odour impacts at the west face of 1884 Davenport Road (TCHC).
- c) Odour mitigation may be considered:
 - At site of the residential property (i.e. at-receptor) by restricting building heights, balconies, outdoor amenity areas, operable windows and air intakes on areas of the building that intersect with industry plumes. This may limit development and/or reduce the livability and quality of the residential living environment and the outdoor amenity areas for building occupants.
 - At the industrial facility (i.e. at-source) by raising stacks heights and stack plumes and by reducing air/odour emissions through control technologies (e.g. wet scrubber, HEPA filters, thermal oxidation). This results in significant capital and operating costs to the industry which could result in impacts to previously unaffected buildings and may not be feasible.
- d) Burden of mitigation costs should be the responsibility of :
 - The developer where new residential buildings are proposed/constructed that differ from the existing built form and are inconsistent with the land use context at

- the time the industry obtained their approvals. Mitigation measures could include at-receptor and/or at-source mitigation or a combination of both.
- Both parties when an agreement is reached whereby a financial settlement between the developer and the industry is entered into on the agreed level of mitigation to implement and/or a financial consideration is given to the industry by the developer, in lieu of further mitigation. In situations where the developer provides a financial consideration to the industry, it is reasonable that the industry be responsible for any environmental compliance concerns (i.e. the required revised ECA) raised by the presence of the development.
 - The industry where a residential building exists at the time the industry (“emitter”) obtained their approvals and/or the industry modified their operations or is no longer able to maintain the performance of their mitigation measures. In this case, the industry would only need to implement at-source mitigation.
- e) The Long Branch redevelopment is an example where an agreement was reached between the developer and the industry to address and manage potential land use compatibility issues related to odour and noise impacts. The developer agreed to fund the required mitigation both on the development site (at-receptor) and the industrial site (at-source). The agreement was required by the City before development could proceed.
- f) Proposed development in the St. Clair Avenue West area will involve multiple developers. As such, the approach used for managing potential conflicts between development and existing industries that was successfully applied in Long Branch is not likely a practical alternative.
- g) The proposed Holding “H” provision is a mechanism that would require an agreement to mitigate potential odour impacts and is an appropriate mechanism to be used in the St. Clair Study area.
- h) The proposed draft modification of OPA 84, including recommendations made by Golder to use a Holding symbol "H" and set out criteria for the removal of the "H" in the Official Plan is the most practical alternative for managing potential conflicts between future residential development and the existing industry.
- i) Experience from the Long Branch example suggests that industries and developers can mediate potential conflicts without the need for a formal directive or City involvement where approval of proposed development is incumbent upon agreements being reached, as is the case with the proposed Draft Modifications to OPA 84.

Community Consultation

A community consultation meeting was held on May 27, 2015 to present Golder's findings to the community and provide an opportunity for public input on the Draft Modification to Official Plan Amendment No. 84 as a settlement to the Ontario Municipal Board appeal of OPA 84. Presentations were provided by Planning staff and a representative from Golder. The meeting was attended by area residents, businesses

owners and developers including their legal representatives with interest in local properties that could be impacted by the proposed settlement.

Numerous questions were asked of Martin Rawlings from Golder related to the regulatory approach to address odour impacts and potential mitigation alternatives. Concerns were raised relating to the timing and distribution of the meeting notices. Refer to Attachment 3.

Conclusion

Golder's analysis concluded that the proposed Revised Draft Modification to Official Plan Amendment No. 84 is the most reasonable approach to resolve current and future potential odour conflicts between existing industries and proposed residential development in the St. Clair Avenue West area.

It is recommended that the Revised Draft Modification to Official Plan Amendment No. 84 attached as Attachment 1 to this report be adopted as a settlement to the appeal by National Rubber Technologies. The proposed framework provides a balanced approach that allows for development, while protecting existing industry and mitigating potential undue adverse impacts from incompatible land uses.

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ATTACHMENTS

Attachment 1: Revised Draft Modification to Official Plan Amendment No. 84
Attachment 2: Golder Associates Ltd., Memorandum, dated March 16, 2015
Attachment 3: Golder Associates Ltd., Technical Memorandum, dated June 1, 2015
Attachment 4: Aerial of Residential Sites (Odour and Air Quality Assessment)

Attachment 1: Revised Draft Modification to Official Plan Amendment No. 84

REVISED DRAFT MODIFICATION TO OFFICIAL PLAN AMENDMENT NO. 84

For certain lands abutting St. Clair Avenue West between Old Weston Road and Blackthorn Avenue and Spring Grove Avenue

Modification to Amendment No. 84 to the Official Plan of the City of Toronto as follows:

1. Chapter 7 of the City of Toronto Official Plan, entitled Site and Area Specific Policies, Policy No. 326 is amended by deleting and replacing the text of paragraph (f) with the following:

No changes will be made through rezoning, minor variance or consent or other public action that are out of keeping with the vision for St. Clair Avenue West and the purpose and intent of the "Area A" lands as described above.

2. Chapter 7, Site and Area Specific Policies, is amended by adding Site and Area Specific Policy No. 362 to certain lands abutting St. Clair Avenue West between Old Weston Road and Blackthorn Avenue and Spring Grove Avenue, as follows:

“362 Certain lands to the north and south of and fronting on St. Clair Avenue West between Old Weston Road and Blackthorn Avenue and Spring Grove Avenue as identified on Map A:

- (a) All development along St. Clair Avenue West between Old Weston Road and Bathurst Street shall conform to the overall vision for change as identified in the St. Clair Avenue Study. This vision encourages an intensified, transit-oriented urban environment which promotes a vibrant pedestrian realm and experience. This goal shall be achieved through the implementation of an area specific zoning by-law and Urban Design Guidelines.
- (b) Intensification of the residential use portion of a development on lands within the outlined area shown on Map A between Old Weston Road and Blackthorn Avenue and Spring Grove Avenue (the subject area) may be controlled via the use of a Holding "H" symbol and permitted following the fulfillment of criteria as set out herein to allow lifting of the Holding "H" symbol. Such criteria shall include the receipt by City Council of a report from the Chief Planner or designated Director of Community Planning respecting compliance with the required criteria including confirmation that any mitigation measures required for the Development Proposal will foster an appropriate living environment within the residential units and in a mixed use community coexisting with nearby employment uses.

- (c) City Council may enact a zoning by-law pursuant to Section 34 and 36 of the Planning Act, with a Holding "H" symbol in respect of the residential uses on lands within the area shown on Map A.

Definitions

- (d) For purposes of this Site and Area Specific Policy, the following terms have the following definitions:
 - (i) "Development Lands" means the lands for which an application to lift the Holding "H" symbol has been filed.
 - (ii) "Development Proponent" means the landowner or agent acting for the landowner who is the applicant for a Development Proposal and is seeking Council approval to lift the Holding "H" symbol on the Development Lands.
 - (iii) "Development Proposal" means the specific residential component of a development proposed by the Development Proponent for the Development Lands.
 - (iv) "Employment Lands" means the lands known municipally as 35 Cawthra Avenue.
 - (v) "Employment Land Use" means any industrial employment use including its facilities on the Employment Lands operating on the date that this By-law was enacted, and includes any full, partial or expanded form of such use.
 - (vi) "Employment Land User" means the employer engaged in an Employment Land Use on the Employment Lands.
 - (vii) "Engineering Feasibility Study" means an engineering study that is completed by a qualified consulting engineer, who has worked in consultation with and is acceptable to the Employment Land User, at the Development Proponent's expense, which includes in its terms of reference:
 - a. a review of the Odour and Air Quality Assessment report and the mitigation measures recommended in the reports; and

- b. an assessment of the technical feasibility and cost of implementing the off-site mitigation measures recommended by the Odour and Air Quality Assessment Report to mitigate adverse air quality impacts in relation to the Development Proposal.

- (viii) "Mitigation Certification" means a document completed by a qualified architect and/or qualified consulting engineer, that stamps and certifies that any required on-site mitigation measures on the Development Lands identified by the Air Quality and Odour Assessment and Air Quality and odour assessment peer review are expressly described and detailed in the Site Plan Submission drawings, Notice of Approval Conditions or Site Plan Agreement, as applicable.

- (ix) "Odour and Air Quality Assessment" is an odour and air quality study prepared by a qualified consulting engineer at the Development Proponent's expense that:
 - a. Includes a stack height and air pollution control optimization study to assess the adverse air quality impacts including odour impacts to Ontario Ministry of the Environment standards as applicable (e.g. the Summary of Standards and Guidelines to Support Ontario Regulation 419: Air Pollution - Local Air Quality February 2008 PIBS # 6569e and Jurisdictional Screening Level (JSL) List - A Screening Tool for Ontario Regulation 419: Air Pollution - Local Air Quality February 2008 PIBS # 6547e Version 1) from the Employment Land Use in relation to the Development Proposal at a requested height increase beyond what the existing zoning for the Development Lands permits.

 - b. Recommends, first and foremost as necessary, off-site mitigation measures on the Employment Lands and the Employment Land Use, such as stack height adjustments and the provision of other discharge control measures and/or if required any on-site advisory clauses and mitigation measures that will not (appreciably) lessen a reasonable living experience within the Development Proposal (i.e. on-site mitigation measures may include restricting outdoor amenity spaces or balconies, the location and size of operable windows or air intakes above a height of 16.5 m), to meet a standard of one odour unit (1 OU) using the Methodology for Modeling Assessments of Contaminants with 10 Minute Average Standards and

Guidelines under O. Reg. 419/05 included in Standards Development Branch Technical Bulletin April 2008, as amended or replaced from time to time.

- (x) "Odour and Air Quality Peer Review" means a third party peer review and report of the Odour and Air Quality Assessment, Engineering Feasibility Study, Written Mitigation Statement and NRT commentary. This is to be completed by a qualified consulting engineer at the expense of the Development Proponent for and under the direction of the City.
- (xi) "Written Mitigation Statement" means a statement prepared by a qualified consulting engineer outlining the intended height of the Development Proposal, the intended off-site mitigation measures to be installed and maintained on the Employment Lands and the Employment Land Use to address any potential adverse impact on the proposed residential uses, and the associated cost of implementing such mitigation, all based on the accepted Engineering Feasibility Study.

Criteria for Lifting of the Holding "H" Symbol

- (e) The Holding "H" symbol applicable to the MCR zoning under former City of Toronto By-law 438-86, as amended, for lands within the outlined area shown on Map A may be lifted by City Council, and such lands may be used for buildings where any residential use component exceeds the heights permitted prior to the lifting of the Holding "H" symbol, upon receipt by City Council of a report from the Chief Planner or designated Director of Community Planning that confirms that any mitigation measures required for the Development Proposal will foster an appropriate living environment in a mixed use community coexisting with nearby employment uses and will establish appropriate living conditions within the residential units and indicates compliance with all of the following mandatory requirements:
 - (i) The existence of an Employment Land Use at 35 Cawthra Avenue which is operational or has not ceased operations for a period of more than two years.
 - (ii) Submission of an Odour and Air Quality Assessment to the City, with a copy to the Employment Land User. The Development Proponent will confirm to the City that the Employment Land User has been provided with a copy of the Odour and Air Quality Assessment. The Employment Land User will have 45 days after receipt of the Odour and Air Quality Assessment to provide its comments to the City.

- (iii) The submission of an Engineering Feasibility Study to the satisfaction of the City, with a copy to the Employment Land User. The Development Proponent will confirm to the City that the Employment Land User has been provided with a copy of the Engineering Feasibility Study. The Employment Land User will have 45 days after receipt of the Engineering Feasibility Study to provide its comments to the City.
- (iv) The submission of a Written Mitigation Statement to the satisfaction of the City, with a copy to the Employment Land User. The Development Proponent will confirm to the City that the Employment Land User has been provided with a copy of the Written Mitigation Statement. The Employment Land User will have 45 days after receipt of the Written Mitigation Statement to provide its comments to the City.
- (v) Completion of an Odour and Air Quality Peer Review, which has as its conclusion that the peer reviewer concurs with the methodology, findings and recommendations regarding mitigation of the Odour and Air Quality Assessment, Engineering Feasibility Study, Written Mitigation Statement with due consideration given to any comments that the Employment Land User or its solicitor has provided regarding the items (e.g. ii, iii, iv) above.

Securing of Off-Site Mitigation Measures

- (vi) Off-site mitigation will be secured via written confirmation, to be received in a timely manner and shall not be unreasonably withheld, signed and stamped as applicable, to the satisfaction of the Director of Community Planning, Etobicoke York District, from:
 - a. the Development Proponent's consulting engineer and the Employment Land User's consulting engineer that the recommended off-site mitigation measures if any contained in the Engineering Feasibility Study, Written Mitigation Statement, Odour and Air Quality Assessment and Odour and Air Quality Peer Review to support the Development Proposal have been completed, are operational and have been demonstrated to mitigate air quality and odour impacts to acceptable Ministry of the Environment standards; and/or
 - b. the Employment Land User's solicitor that other

arrangements to achieve the recommendations, if any, contained in the Engineering Feasibility Study, Written Mitigation Statement, Odour and Air Quality Assessment and Odour and Air Quality Peer Review, including financial and implementation arrangements between the Employment Land User and the Development Proponent, have been made to ensure completion of the mitigation measures prior to residential occupancy.

Site Plan Requirements

- (vii) The fulfillment of the following Site Plan requirements for a Development Proposal for which an application has been made to lift the Holding "H" symbol:
- a. submission of a Site Plan Application for the Development Proposal accompanied by a Mitigation Certification, a copy of which shall be provided to the Employment Land User;
 - b. confirmation that the off-site mitigation required if any, under Subsection 2.(e)(vi) herein has been secured;
 - c. issuance of Notice of Approval Conditions which contains conditions requiring:
 - (i) that the Site Plan Agreement with respect to the Development Proposal will contain a provision requiring all mitigation measures to be listed on all plans and drawings for any Building Permit submission and that a Mitigation Certification be submitted as part of any application for a Building Permit; and
 - (ii) entering into a Site Plan Agreement, to which a Mitigation Certification is attached as a schedule, that requires any on-site mitigation measures to be implemented prior to the first occupancy of any residential unit on the Development Lands. The Development Proponent will provide a copy of said Site Plan Agreement to the Employment Land User when the agreement is executed.

Lifting Criteria for Holding "H" Symbol Not Required

- (f) Where the Employment Land Use has ceased operation and is not replaced by another operation of the same or similar use for a period of two years measured from the date of closure of the original operation, City Council may lift the Holding "H" symbol without regard for any unfulfilled Holding "H" symbol removal criteria noted herein.

No Minor Variance for Exceeding Height

- (g) No additional height for a development with residential uses beyond the applicable maximum residential height zoning permissions within the subject area shall be granted through a minor variance.

"Area A" Lands

- (h) Those lands identified on Map B as "Area A" generally contain only a single detached dwelling or a pair of attached semi-detached dwellings which, when cleared of structures, facilitate through mitigation by the introduction of open space and distance, mid-rise buildings with heights between 7 storeys (24 m) and 9 storeys (30 m) on lands designated *Mixed Use Areas* and identified on Map A.
- (i) The intent and purpose of "Area A" lands are to prevent the destabilization of lands designated *Neighbourhoods* and their character from encroachment by mixed use developments by:
 - (i) Securing a minimum standard of open space, distance and sky view from nearby lands designated *Neighbourhoods* and 7 to 9 storey (24 to 30 m) developments on the lands identified on Map A;
 - (ii) significantly minimizing shadow impacts of development on nearby lands designated *Neighbourhoods*;
 - (iii) providing a visible, soft-landscaped delineation between mixed use developments with frontage on St. Clair Avenue West and nearby lands designated *Neighbourhoods*;
 - (iv) creating rear lanes where servicing, loading, and vehicle access shall be located for all new developments with frontage on St. Clair Avenue West; and
 - (v) where sufficient lands exist, providing additional temporary commercial parking to service those lands identified in Map A.

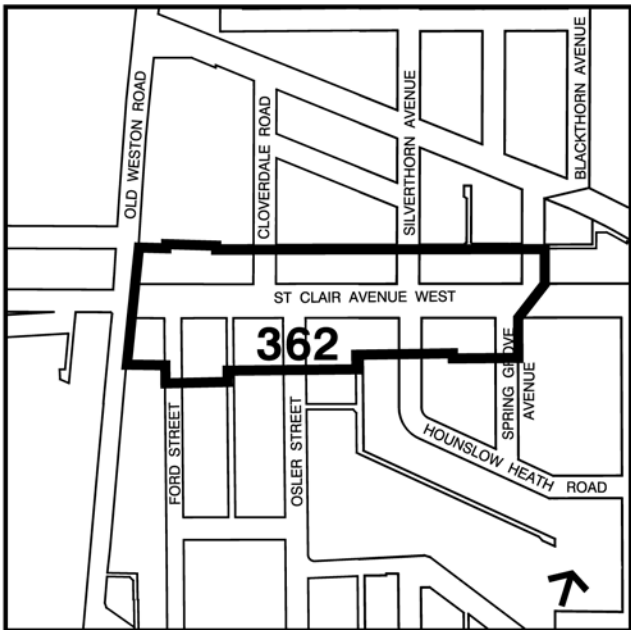
- (j) "Area A" lands shall only be used:
 - (i) to create new, or widen existing public lanes adjacent to lands with frontage along St. Clair Avenue West or create private driveways where appropriate;
 - (ii) to provide a soft-landscaped strip between those lands designated *Mixed Use Areas* fronting on St. Clair Avenue and nearby lands designated *Neighbourhoods*; and
 - (iii) to permit a commercial parking in association with those lands designated as a *Mixed Use Area* where additional lands provide for this use.

- (k) Lands located in "Area A" that have not been conveyed or leased to the City or its agencies:
 - (i) shall not be severed from ownership of the lands with frontage on St. Clair Avenue West designated as a *Mixed Use Area* and where such lands are developed as a condominium, the lands identified in Area A shall form part of the common elements of such condominium corporation; and
 - (ii) shall be maintained by the owner of the adjacent lands with frontage on St. Clair Avenue West.

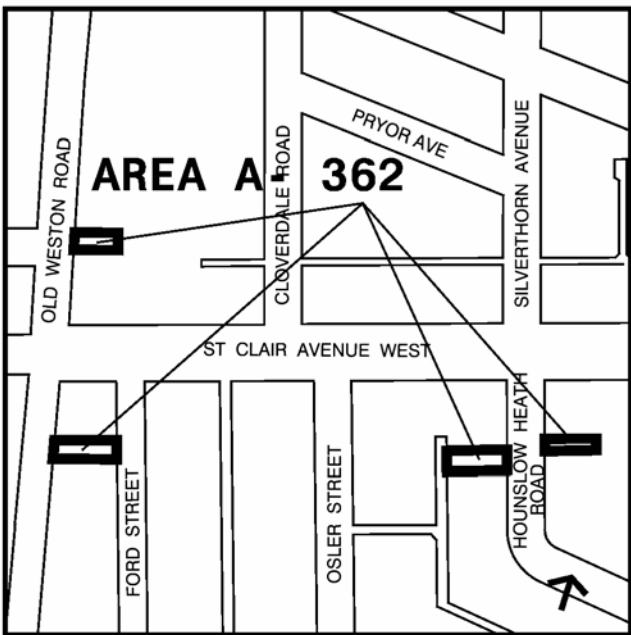
Vision for St. Clair Avenue

- (l) No changes will be made through rezoning, minor variance or consent or other public action that are out of keeping with the vision for St. Clair Avenue West and the purpose and intent of the "Area A" lands as described above.
3. Map 28, Site and Area Specific Policies, is amended by adding certain lands to the north and south of and fronting on St. Clair Avenue West between Old Weston Road and Blackthorn Avenue and Spring Grove Avenue, as shown on the map above as Site and Area Specific Policy No. 362.
 4. Map B to Site and Area Specific Policies No. 362 shall form part of this amendment."

MAP A



MAP B





ATTACHMENT 2

March 16, 2015

Project No. 13-1151-0278 (2000)

Lou Moretto
City of Toronto
Manager, Community Planning
Etobicoke York District
2 Civic Centre Court, 3rd Floor
Toronto, Ontario M9C 5A3

MEMORANDUM RE: ST. CLAIR AVENUE STUDY – ADDITIONAL SUPPORT AND CONSULTATION FROM SUPPLEMENTARY REPORT #4

Dear Mr. Moretto:

Please find enclosed Golder Associates Ltd. (Golder) memorandum in response to the requests outlined in the Etobicoke York Community Council Decision of February 24, 2014 found in Action Item EY31.4, regarding Supplementary Report #4 (05 189781 WET 11 TM).

1.0 INTRODUCTION

In the mid-2000s, City Council endorsed Avenue Studies to be undertaken along St. Clair Avenue West between Keele Street and Bathurst Street. St. Clair Avenue West is identified in the Toronto Official Plan as an *Avenue* where growth and intensification are to be accommodated and encouraged. In general, the objective of the Avenue Study was to set out a vision and implementation strategy to guide growth along St. Clair Avenue West while mitigating impacts on adjacent low rise *Neighbourhoods*, improving the street and pedestrian environment and identifying locations for new and/or improved public open spaces.

The Avenue Study area included lands currently designated *Employment Areas* and zoned to permit a variety of employment and industrial uses. The Avenue Study resulted in the adoption by City Council of Official Plan Amendment No. 84 and a Zoning By-law Amendment for properties designated in the Official Plan as *Mixed Use Areas* that front onto St Clair Avenue West. The amendments allow for, among other matters, mixed use residential and commercial buildings with building heights above the current zoning regulation of 16 metres to a maximum of 39 metres in certain locations.

National Rubber Technologies Corporation (NRT) appealed the policies of Official Plan Amendment No. 84 that provide for taller buildings in the area along the segment of St. Clair Avenue West from Old Weston Road to Spring Grove Avenue/Blackthorn Avenue. The original zoning for this area was left in place to address the issues that were identified as part of the appeal.



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The reason for NRT's appeal was their assertion that policies which would allow for taller residential buildings above 16 metres along the segment of St. Clair Avenue West from Old Weston Road to Spring Grove Avenue/Blackthorn Avenue may be impacted by emissions from the operations of their facility at 35 Cawthra Avenue, to the extent that complaints could be made by the new occupants of the taller buildings. The complaints could lead to orders by the Ministry of Environment and Climate Change (MOECC) to correct emissions to address the complaints. This could impede their operations, cause increased operational costs and affect competitiveness and operating feasibility.

In an effort to settle the appeal, working with NRT's representatives and its odour consultant (ORTECH), City Planning proposed a draft modification of OPA 84 to set out a site and area specific Official Plan policy for the segment of St. Clair Avenue West affected by the appeal. The draft site and area specific policy (SASP) proposes a policy framework and regulatory approach that would use an "H" holding symbol and set out criteria for the removal of the "H" holding symbol in the Official Plan to permit taller buildings with residential uses. The criteria for removing the "H" holding symbol would have to be satisfied before the "H" holding zoning symbol is lifted by a zoning by-law amendment to permit development to proceed up to the height prescribed in the Zoning By-law.

City Planning staff retained Golder to conduct a peer review of the proposed policy framework and regulatory approach with respect to its reasonableness and applicability. The suggestions from the peer review were incorporated into the current version of the Draft Modifications to Official Plan Amendment No. 84. These suggestions were summarized by City Planning in Supplementary Report #4 dated February 6, 2014 (Item EY31.4).

Etobicoke Community Council at its meeting on February 25, 2014, requested City Planning staff to obtain a further report from Golder Associates, the consulting firm retained by the City: with conclusions and recommendations, and to comment and advise on any further revisions to the proposed policy framework and regulatory approvals as set out in the proposed Draft Modifications to the Official Plan Amendment No. 84, as it relates to other residential sites, for example:

- a) Odour and Air Quality Assessment for the recently built "Options for Homes" (OFH) three¹ apartment towers, off Keele Street, and adjacent to the National Rubber Technologies Corporation (NRT) site immediately to the north, where all the apartment buildings are higher than 16 m. (Section 2.0).
- b) Odour and Air Quality Assessment for the existing Toronto Community Housing Corporation (TCHC) buildings at 61 Pelham Park Gardens and Symington Place at 1884 Davenport Road, immediately to the east of the NRT site, where both apartment buildings are higher than 16 m. (Section 3.0).
- c) Any assessment, comments or recommendations should include and not be limited to: nuisance odours measured in odour units ("OU") that can be detected and show where it originates and any receptor (on-site) mitigation measures. (Section 4.0).
- d) Any other examples in other parts of the City, like the Long Branch Area, where "H" provisions have not been implemented and how it relates to the St. Clair Avenue Study. (Section 5.0).

¹ There are actually two apartment towers built for Options For Homes.

-
- e) Proposed “at-receptor mitigation” alternatives that can be included in any “H” provisions or Official Plan Amendment, that better share the burden of mitigation fairly between any potential applicants for new development and the existing polluter, including alternatives that place the onus entirely on the polluter. (Section 6.0).

To facilitate the review and provide context with respect to issues related to the proposed Draft Modifications to the Official Plan Amendment No. 84, the report will also include:

- a) Any existing “regulatory standard” for odour levels or guidelines and how odour levels are identified or where it originates. (Sections 2.0 and 3.0)
- b) The regulatory standards or guidelines that are in place, where an average person would be able to perceive a difference between odour levels of building heights between 16 m and 39 m or how significantly different any "OU" are at higher heights compared to 16 m height. (Sections 2.0 and 3.0)
- c) The reasonableness and practicability of the proposed Draft Modifications and “H” provisions from the community's perspective in terms of economic revitalization of the commercial strip that is in dire need. (Section 7.0)

2.0 ODOUR ASSESSMENT — OPTIONS FOR HOMES

2.1 Background

In Ontario, the preferred approach for evaluating odour is to use “whole odour”, where odour strengths are expressed in odour units (OU). An odour strength of 1 OU is defined as the “odour threshold”, or the concentration where 50% of trained odour panelists can detect an odour but may not be able to identify its origin or nature. While there are no regulatory standards for odour levels, odour units are used as a guideline to predict whether odour levels are likely to be detectable by the public. If concentrations are below 1 OU, it is unlikely that odours will be detected. In Ontario, odour compliance is based upon odour complaints that could occur when concentrations exceed the odour threshold (1 OU). Although 1 OU acts as a threshold, it is more likely that odours at levels of 3 to 5 OU would be recognized in the environment, and thus result in complaints (Proposed Revisions to Odour-based Ambient Air Quality Criteria and Development of an Odour Based Policy Framework, MOECC, March 2005).

The MOECC is required to respond when they receive odour complaints from the public, and those industries identified as the source of the odours are issued a control order and are required to mitigate odour emissions to a point where impacts will not occur. Once the industrial emitter has implemented mitigation measures, they will use modelling to demonstrate that future odour concentrations will meet the 1 OU threshold in accordance with accepted MOECC practices.

The basis for the concerns raised by NRT can be illustrated in the following figure. The figure illustrates how a plume being emitted from a facility can be transported and dispersed in an environment where it can pass over low-rise residential buildings but impact taller residential buildings. This increased likelihood of impact, and corresponding increase in odour strength, is more likely to result in complaints that could trigger MOECC investigations and actions.

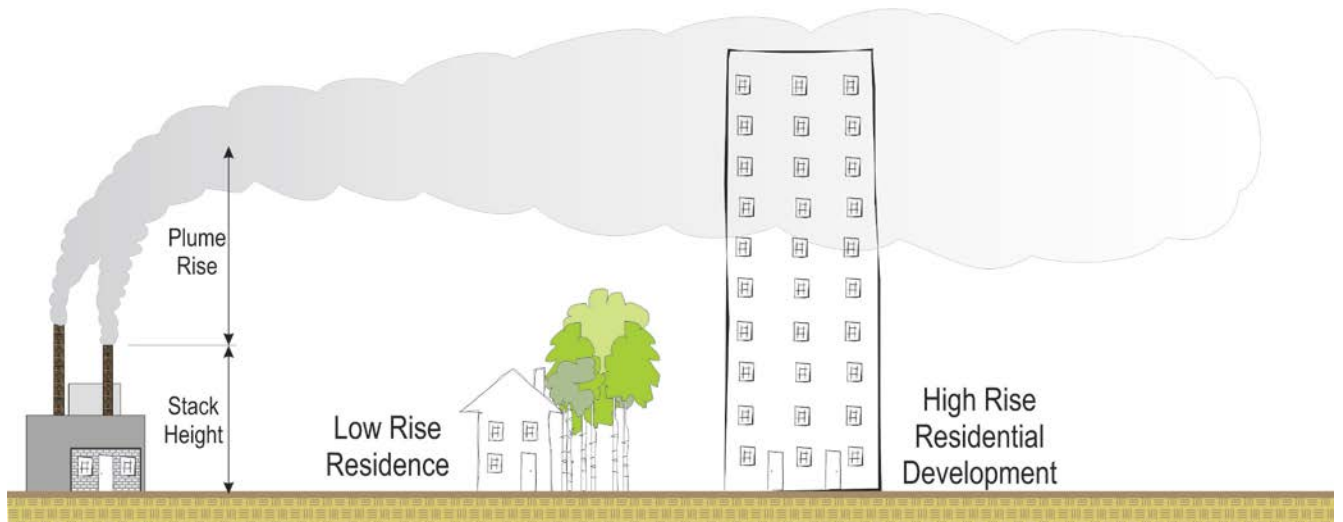


Figure 1: Illustrative Cartoon of Plume Dispersion and Building Height

In Ontario, industrial facilities that have atmospheric emissions (including odour) are required to obtain an Environmental Compliance Approval (ECA) from MOECC. Currently, NRT holds a valid Environmental Compliance Approval (ECA) or equivalent at the time of their application. To obtain such an approval, the industry has to demonstrate that they are capable of meeting the established regulatory criteria and guidelines at adjacent or nearby receptors. These receptors would represent the current land use at the time the industry applied for the ECA. With the exception of odour, enforcement of atmospheric emissions is based upon demonstrating compliance with established standards and is rarely driven by complaints.

2.2 Approach

In evaluating the potential impacts on the recently built Options for Homes (OFH) development on the east side of Keele Street, a dispersion model was used to predict odour strengths and the likelihood of exceeding odour thresholds at different heights on the towers above the ground. The modelling focused on the faces of the buildings closest to NRT, as that is where the highest odour concentrations are likely. The results shown in the following sections highlight how concentrations and likelihoods of exceeding the 1 OU odour threshold vary with height above the ground along the faces of the buildings.

Physical release characteristics and odour emissions from the NRT facility were provided by NRT's consultants (ORTECH) and represent the data provided by NRT to the MOECC regarding facility operations. Emissions of odour from NRT are from stacks ranging in heights from approximately 5 to 22 metres above the ground. The height of the plume from each of these stacks varies depending on release conditions. Based on air dispersion principles, any resulting plumes will tend to travel well above the ground and have impacts that occur at greater heights than the existing residential buildings (less than 16 metres) in the area.

In Ontario, it is necessary for industries to demonstrate that predicted odour concentrations will not exceed the odour threshold (1 OU) more than 0.5% of the time in any one year (about 44 hours per year) in order to show the capability of meeting the odour guidelines. Therefore, areas on the face of the building where members of the public may be exposed to odours (e.g., open balconies), where odour concentrations are predicted to exceed the odour threshold of 1 OU more than 0.5% of the time, have an increased potential for odour complaints to occur.

Based on discussions during a meeting between City staff, Golder and representatives of NRT, it was noted by NRT that an agreement had been reached between NRT and the developer of the OFH towers that a number of mitigation measures be included in the design of the buildings to avoid the potential for odour issues. Given this, there is every reason to believe—assuming the agreed mitigation measures were incorporated into the design of the towers—the approved operations at NRT will remain in compliance. As the City was not party to this agreement, specific details related to what mitigation measures were to be incorporated in the design of the buildings is unknown. However, from observations of the OFH towers, it appears that there are no balconies on the north face of the buildings (i.e., the face of the building closest to NRT), but it was not possible to determine whether windows on the north face were operable or air intakes were situated on the top of the building facing north. It also appeared from site reconnaissance and available images of the towers that there are balconies near the northern limits of the west face of the building. The odour predictions presented in the following section represent values at the face of the building closest to NRT (north face) and do not take into account whether or not at-receptor mitigation measures were implemented.

2.3 Results

Options for Homes have recently built two residential towers, located at 60 and 61 Heintzman Street off Keele Street and immediately south of the NRT facility (61 Heintzman is the building closest to NRT). Dwelling units on the faces of the OFH towers closest to NRT do not have balconies, but it was not possible to determine whether the windows were operable or not. The remaining units in the two towers appear to have outdoor balconies and functional windows. The two towers share a rooftop terrace on the fourth floor of 60 Heintzman Street with an outdoor BBQ area. The following table presents the number of stories at each apartment tower and the approximate height.

Table 1: Description of Options for Homes two apartment towers located at 60 and 61 Heintzman Street.

	Number of Stories	Height [metres]
60 Heintzman Street	23	93
61 Heintzman Street	16	67

The odour predictions for the exposed north face of 60 Heintzman Street shows that the maximum predicted odour concentrations could exceed the odour threshold (1 OU) at all levels on the building, and that the likelihood that concentrations of odours in excess of the odour threshold are greater than 0.5% in any one year at building heights above 16 metres. For context, the Draft Zoning By-law Amendment that would implement the Draft Modification to Official Plan Amendment No. 84 is proposing to increase the maximum permitted building height along St. Clair Avenue West in the area that is the subject of the appeal to Official Plan Amendment No. 84 from a height of 16 metres (as permitted by current zoning) to between 24 and 39 metres. The predictions represent the conditions likely to exist should there be balconies or operable windows present. Observations of the OFH towers suggest there are no balconies present on the exposed north face of the building but it was not possible to determine if there were operable windows. The maximum odour concentrations occur at a height of approximately 64 metres above the ground (see Figure 2). The pattern of frequencies matches the pattern for maximum concentrations shown in Figure 2.

The odour predictions for 61 Heintzman Street shows that maximum odour concentrations would exceed the odour threshold (1 OU) more than 0.5% of the time, in any given year, at all heights. These predictions assume there are balconies and/or operable windows present; however, observations suggest that there are no balconies present on the exposed north face (the face closest to NRT). It was not possible to determine if there were operable windows present on the north face. Similar to 60 Heintzman Street, the maximum odour concentration are approximately 64 metres above the ground (see Figure 3) and the odour strengths increased with increasing height on the building up to approximately 64 metres. The pattern of frequencies differs from the pattern of maximum concentrations; with maximum frequencies exceeding 1 OU occur at a height of 32 metres.

























60 Heintzman St.					
93	2.08			0.73%	31
88	2.12			0.97%	29
80	2.23			1.46%	26
72	2.18			1.82%	24
64	2.54			1.95%	21
56	2.19			1.68%	18
48	1.75			1.31%	16
40	1.56			1.21%	13
32	1.58			1.10%	10
24	1.38			0.64%	8
16	1.13			0.14%	5
0	1.08			0.11%	1
Height [m]	Maximum Odour		Frequency >1 OU		Height [St]

Figure 2: Predicted Odour Concentrations and Frequencies Exceeding 1 OU for 60 Heintzman Street (Options for Homes).

61 Heintzman St.			
67	2.60		
64	2.65		
56	2.43		
48	2.27		
40	2.14		
32	1.68		
24	1.40		
16	1.20		
0	1.27		
Height [m]	Maximum Odour		Frequency >1 OU

Figure 3: Predicted Odour Concentrations and Frequencies Exceeding 1 OU for 61 Heintzman Street (Options for Homes).

2.4 Summary

Based on dispersion modelling results, there is a potential for odour impacts, in the form of tenant complaints, for all buildings examined, with the following general observations:

- The exposed north face of the OFH building at 60 Heintzman Street was predicted to have odours in excess of the odour threshold at all heights on the building, with maximum concentrations increasing with height above ground. The frequency of exceeding the odour threshold of 1 OU more than 0.5% in any one year only occurs at heights greater than 16 metres. The predictions are based on there being operable windows present (observations confirmed there were no balconies present on the north face).
- The exposed north face of the OFH building at 61 Heintzman Street is the closest residential structure to the NRT facility and was predicted to have odour concentration in excess of the odour threshold (1 OU) more than 0.5% of the time in any one year at all heights. The predictions are based on there being operable windows present (observations confirmed there were no balconies present on the north face).
- NRT currently holds a valid ECA.

3.0 ODOUR ASSESSMENT — TORONTO COMMUNITY HOUSING CORPORATION

3.1 Background and Approach

In evaluating the potential impacts on the Toronto Community Housing Corporation (TCHC) buildings at 61 Pelham Park Gardens (the closest building to NRT) and 1884 Davenport Road, a similar dispersion modelling approach was used. The model was configured to predict odour strengths and the likelihood of exceeding odour thresholds on the exposed faces of the buildings at different heights above the ground. The results shown in the following sections highlight how concentrations and likelihoods of exceeding the 1 OU odour threshold vary with heights above the ground along the faces of the buildings closest to NRT.

Based on observations of the TCHC buildings, the two residential towers appear to have functional balconies and windows. However, the balconies are not located on the face of the building closest to NRT. The modelling presented in the following section represents values predicted at the closest (westerly) face of the building and does not take into account that balconies do not appear to be present on this face.

3.2 Results

There are two TCHC apartment towers in the vicinity of NRT, located at 61 Pelham Park Gardens and 1884 Davenport Road. The two apartment towers appear to have functional balconies and windows. The following table presents the number of storeys at each apartment tower and the approximate height.

Table 2: Description of TCHC two apartment towers located at 61 Pelham Park Gardens and 1884 Davenport Road.

	Number of Stories	Height [metres]
61 Pelham Park Gardens	16 + Ground Floor	58
1884 Davenport Road	8 + Ground Floor	38

The odour predictions for the exposed west face of 61 Pelham Park Gardens (the face closest to NRT) show there is a potential to exceed the odour threshold (1 OU) at all heights. Generally, odour strength increased with height above the ground, with maximum odour concentrations occurring at 64 metres above the ground (see Figure 4), which is the same as what was modelled for 60 and 61 Heintzman Street. The frequencies of exceeding 1 OU more than 0.5% of the time in any one year occurred at heights above 32 metres.

The odour predictions for the exposed west face of 1884 Davenport Road (the face closest to NRT) show that maximum predicted odour concentrations were less than the odour threshold (1 OU) at all but the highest level (see Figure 5). Odour predictions in excess of 1 OU were infrequent at all heights on the 1884 Davenport Road building, being predicted to occur less than 0.5% of the time in any one year.

61 Pelham Park Gardens					
67	2.81			3.22%	22
64	2.95			3.20%	21
56	2.74			3.17%	18
48	2.10			2.77%	16
40	1.93			2.31%	13
32	1.53			1.75%	10
24	1.22			0.47%	8
16	1.06			0.07%	5
0	1.00			0.02%	1
Height [m]	Maximum Odour		Frequency >1 OU		Height [St]

Figure 4: Predicted Odour Concentrations and Frequencies Exceeding 1 OU for 61 Pelham Park Gardens – Toronto Community Housing Corporation.

1884 Davenport Road					
40	1.04			0.06%	38
32	0.91			0.00%	32
24	0.72			0.00%	24
16	0.60			0.00%	16
0	0.49			0.00%	4
Height [m]	Maximum Odour		Frequency >1 OU		Height [St]

Figure 5: Predicted Odour Concentrations and Frequencies Exceeding 1 OU for 1884 Davenport Road – Toronto Community Housing Corporation

3.3 Summary

Although the dispersion modelling results suggest there is a potential for odour impacts, in the form of tenant complaints, it is our understanding that there are no currently unresolved complaints received from residents at these two addresses. The following general observations can be made with respect to the modelling:

- The exposed west face of the TCHC building at 61 Pelham Park Gardens has a potential for odours (i.e., >1 OU) at all heights of the building. The frequency of exceeding the odour threshold more than 0.5% of the time in any one year only occur at heights above 32 metres. The predictions are based on there being operable windows present. There were no balconies observed on the exposed west face of the building.
- Given its distance from the NRT facility and shorter building height, odour complaints would appear unlikely for the exposed west face of the TCHC building at 1884 Davenport Road. Maximum odour strengths at this building just exceeded the odour threshold (i.e., 1 OU) at the highest level of the building, but such predictions were extremely rare (0.06%).
- NRT currently holds a valid ECA.

4.0 MITIGATION FOR EXISTING ACTIVITIES AT NRT

Based on the available information and surrounding land use, the majority of receptors in the immediate vicinity of NRT are sufficiently short (i.e., low rise residential buildings) such that plumes from the facility would not result in subsequent odour complaints. This observation is supported by the presence of the current ECAs confirming that the operations at NRT were predicted to be able to operate in compliance with relevant air emission regulations. Further, NRT has recently (2013) been successful in obtaining an updated ECA for their facility, suggesting there were no unresolved atmospheric emission issues when the ECA was granted. The one existing land use that may be incompatible with NRT is the recently constructed OFH towers.

Based on discussions during a meeting between City staff, Golder and representatives of NRT, it was noted by NRT that an agreement had been reached between NRT and the developer of the OFH towers with respect to at-receptor mitigation measures such that the presence of the towers would not impact the currently approved (ECA) operations at NRT. Given this, there is every reason to believe that—assuming the agreed mitigation measures were incorporated into the design of the towers—no additional mitigation measures are required either at NRT or OFH to ensure compliance. It is our understanding that the at-receptor mitigation measures implemented by the developer of OFH include the following on the faces exposed to NRT plumes:

- no balconies;
- windows that are not operable; and
- no unfiltered air intakes.

Although the results presented in Section 2.0 suggest that predicted odour values on the north face of the OFH towers have the potential to exceed the odour threshold more than 0.5% of the time per year, these results are predicated upon the assumption that there were receptors on the exposed north face of the buildings. If suitable at-receptor mitigation measures have been implemented (e.g., no balconies, no operable windows), there is a low likelihood for odour complaints from this development.

5.0 LONG BRANCH AREA

The example provided regarding the Long Branch development deals specifically with the staff report on an Official Plan Amendment application and a Zoning By-law Amendment application associated with 3560, 3580, and 3600 Lake Shore Boulevard West. The proposed amendments deal with a redevelopment of a brownfield industrial site to a mixed-use community comprised of townhouses, mid-rise buildings and single storey commercial buildings. The interior of the site would consist of 3 and 4 storey townhouses and stack townhouse blocks. In essence, we have a single development adjacent the following land uses:

- warehouses to the north, across the Metrolinx Lake Shore West Rail Corridor;
- residential homes to the east;
- residential homes to the south;
- Wakefield Canada Inc. (Wakefield) warehouse and manufacturing facility immediately to the west; and
- Chrysler Canada Etobicoke Casting Plant (Chrysler ECP) to the northwest, across the Metrolinx Lake Shore West Rail Corridor.

The proposed development does not appear to have any land-use conflicts with the warehouse facilities to the north, residential homes to the east or residential homes to the south.

Potential land-use conflicts were identified with respect to Wakefield, and the proposed developer has agreed to at-receptor mitigation measures set out in the acoustic plan prepared by Valcoustics Canada Limited related to Wakefield. The owners have agreed that noise and odour warning clauses related to Wakefield would appear in sale or lease agreements (perpetually there).

Although the lands north of the rail corridor are zoned for employment uses (Zoning By-law 569-2013; under appeal to the Ontario Municipal Board), there were no restrictions agreed to by the developer with respect to these land uses. Most of the employment lands are used for warehousing or light manufacturing, with the exception of the Chrysler ECP facility. Although Chrysler self identifies the ECP facility as a Class II (page 12 staff report), they are listed in the National Pollutant Release Inventory (NPRI) as being a non-ferrous die-casting foundry, which would appear to fall under Class III of the MOECC Guideline D-6 (metal manufacturing). As a Class III facility, a separation distance of 300 m would be required. There are portions of the proposed development that would be closer than 300 m from the Chrysler ECP facility, and the nature of the facility may result in potential conflicts with respect to atmospheric emissions, including odour.

In the example provided by City staff, there does appear to have been a successful negotiation between the developer of the subject property and the adjacent industrial facility (Wakefield) that included arrangements to implement a combination of at-source mitigation measures at Wakefield, and at-receptor restrictions and mitigation measures on the proposed development. Such agreements appear to be feasible when you have one affected industry and a proposed development. What appears to have been missing in the Long Branch example are potential conflicts associated with the Chrysler ECP facility, that on the surface would appear to potentially fall under a Class III classification of Guideline D-6. However, it is possible that comparable agreements can be reached between the proposed developer and Chrysler that may include some of the commitments already made with respect to Wakefield.

6.0 PROPOSED MITIGATION ALTERNATIVES

There are a number of proposed mitigation alternatives that can be considered both at-receptor (i.e., proposed building or development) and at-source (i.e., industry), or a combination of at-receptor and at-source mitigation measures that fairly share the burden of the mitigation between both the industry and the proposed developers.

6.1 At-Receptor

At-receptor mitigation either reduces the likelihood of there being an odour complaint, or removes locations that may have been considered receptors. In situations like those near St. Clair Avenue West, the most effective at-receptor mitigation would be to restrict building heights below the levels of the plumes (stack height plus plume rise in Figure 1) from the subject industry. As explained in Section 1.1, plumes emitted from stacks at a facility can readily disperse and pass over low rise residential buildings. In contrast, buildings that are tall enough to intersect with plumes tend to result in impacts, which can lead to complaints. If the building heights are below the plume, no additional mitigation measures are required at-receptor or at-source.

If the building height intersects the plume, the next option for at-receptor mitigation is to modify the exposed faces of the buildings to minimize the potential for odour complaints and eliminate receptors. It is important to note that exposed faces can include the face closest to the industry, the roof, and even the faces of the building adjacent to the closest face. The types of modifications would include no balconies, no open air amenity areas, no operable windows and no air intakes in areas that intersect with the plumes.

At-receptor mitigation may limit development by potentially restricting building heights and impacting the livability and quality of both the residential living environment in a sealed building and the outdoor amenity areas for building occupants.

6.2 At-Source

At-source mitigation refers to measures implemented at the industry to reduce or prevent impacts to a receptor.

These measures could include increasing stack heights. If the stack heights are increased, the plume height is also increased and may no longer intersect with the receptors. While this may seem like a simple solution, there can be a significant capital cost to increasing the stack height beyond 25 m (e.g., concrete construction, heavy foundations, guide stack and superstructure, large footprint required on site). The increase in the stack height has to be proportional to the increase in the building heights (e.g., increasing allowable heights from 16 m to 39 m requires an increase of 23 m in the height of all the stacks to keep the current level of impacts). In addition to the capital costs associated with increasing the stack height, taller stacks may also affect operating costs. Increasing the stack height will result in additional heat loss as the emissions travel up the stack, offsetting some of the gains from increasing the stack height. As a result, additional heat may need to be added at a cost to the facility. In addition, taller stacks present greater resistance that would require increased fan power to overcome. These increased fans require power to operate, which represents another cost to the facility. Finally, the aesthetics and appearance of the industrial facility, and surrounding area, will be impacted by the presence of a large stack. This may not be desirable for owners or tenants of existing industrial or residential buildings.

The plume height could theoretically be increased without increasing the stack height by changing the stack parameters. Dispersion of emissions from a stack could be improved if the emissions were at a higher temperature or faster exit velocity. As with the increased stack height, this option will likely result in much higher operating costs due to the requirement for larger fans and/or heaters to be added to the stack. It should be noted that these mitigation options are very limited with respect to the gains they will achieve.

Finally, the atmospheric emissions may be removed at the source through the addition of a control technology (e.g., wet scrubber, HEPA filter, thermal oxidation). However, different control technologies may be required for each atmospheric emission. Such control technologies may require significant footprints, as well as operating costs. These technologies can also affect the discharge characteristics of a stack (e.g., lower temperature, lower exit velocity) that have the effect of reducing the plume height, causing increased impacts on buildings that were otherwise unaffected.

6.3 Burden for Mitigation

In the case of buildings that were present at the time the industry (“emitter”) obtained their approvals, it is reasonable that the industry be responsible for addressing mitigation measures. In the event the industry modifies their operations or is no longer able to maintain the performance of their mitigation measures, then the industry should be responsible for addressing the mitigation measures.

In contrast, it seems fair that a proposed developer should bear the brunt of the cost of mitigation in those cases where buildings are constructed that differ from the existing built form and are inconsistent with the land use context at the time the industry obtained their approvals. The mitigation in these cases can be a combination of at-receptor mitigation and/or at-source mitigation, where the developer bears the brunt of the cost.

There are also situations where both parties can get together and reach an agreement regarding the level of mitigation implemented. In such an agreement, it is reasonable that the cost or burden may be shared by both parties. In addition, it is reasonable that a financial settlement between the developer and the industry can be reached, where an agreed level of mitigation is implemented, and/or a financial consideration be given to the industry, in lieu of further mitigation. In situations where the developer provides a financial consideration to the industry, it is reasonable that the industry be responsible for any environmental compliance concerns raised by the presence of the development.

7.0 REVIEW OF PROPOSED “H” PROVISIONS

City staff retained Golder to conduct a peer-review of the proposed use a “H” holding provision with respect to the proposed policy framework and regulatory approach set out in the Draft Modification of Official Plan Amendment No.84. Golder found the proposed modification to be reasonable and practical to all parties (i.e., the City of Toronto, NRT and potential developers). Recommendations included the clarification that NRT will be responsible for ensuring compliance with regulatory compliance should any process changes be made once a development has been constructed. It was also recommended that in order to lift the “H” holding provision, the Odour and Air Quality Study should be completed prior to the Engineering Feasibility Study to allow for an objective analysis of mitigation options or a combination of measures. Planning staff concurred with these recommendations and revised the Draft Modification to the Official Plan Amendment No. 84 accordingly. Finally, it was noted by Golder that a neutral third party air quality specialist should be designated to resolve any potential impasse between the industry and potential developers. While planning staff do concur that this would be beneficial, it was not included in the revisions as mediation could be undertaken without the need for a formal directive or City involvement. The Golder Peer Review Report can be found as Attachment 2 to the February 6, 2014 Planning report titled City-Initiated St. Clair Avenue Study- Between Old Weston Road and Blackthorn Avenue/Spring Grove Avenue-OMB Official Plan Amendment Appeal and Potential Zoning By-law Amendment-Supplementary Report #4 (File No. 05 189781 WET 11 TM).

Although the City provided the Long Branch development application as an example where agreements between developers and industry can be reached without the need for an “H” holding provision, this example is different from the St. Clair Avenue West situation in a number of ways. In the example of the development application associated with 3560, 3580, and 3600 Lake Shore Boulevard West, you have a situation with one proposed developer and one (or possibly two) affected industry(ies). Agreement on at-source/at-receptor mitigation measures were reached between the two parties, with the agreement contributing to the support for the recommended approval of the planning application. The situation along St. Clair Avenue West involves a single industry (NRT) and a number of potential development sites that could be attractive to developers. Without the “H” holding provision, the burden is placed on NRT to identify, and try to force an agreement regarding mitigation on any proposed residential development that may affect their industry. Should the developer chose to ignore NRT, NRT is then forced to appeal the proposed development to the Ontario Municipal Board. From that appeal, it is possible that an agreement could be reached between NRT and a proposed developer that would involve both at-source (i.e., NRT) and at-receptor mitigation measures. However, there is a significant financial burden placed on NRT to first identify, and then force (i.e., legal actions) an agreement with the proposed developer. This financial burden would not appear to be jointly shared in the absence of the proposed “H” holding provision.

There are numerous examples showing that the approach seen at the Long Branch Area would not be successful in the St. Clair Avenue West area. There have been a number of appeals associated with proposed multi-storey residential developments in the vicinity of NRT (e.g., 6 Lloyd Avenue) despite there being zoning to protect NRT as an employment land use. In the case of the most recent proposed multi-storey residential development (OFH), it appears NRT was forced to take legal action regarding the zoning of a multi-storey residential development immediately to their south that would have likely resulted in odour concerns and potentially placed undue burden on demonstrating air compliance in the future. The agreed outcome to this legal action appears to have been at-receptor mitigation agreed to by the developer that would have prevented balconies and windows that open anywhere on the faces of the development exposed to emissions from NRT.

The presence of the “H” holding provision does not prevent revitalization up to a reasonable building height (16 m). The “H” holding provision facilitates the potential for building heights to go beyond 16 m to permit for future development following appropriate study, peer review, identification of mitigation requirements and opportunity for the implementation of recommended mitigation measures. The use of the “H” holding provision and zoning approach also facilitates the two parties (developer and industry) to come to an agreement on a combination of mitigation measures (e.g., at-receptor, at-source), or other financial considerations in lieu of mitigation.

The City Planning proposed policy and regulatory approach to establish a site and area specific Official Plan policy that will provide for the use of an “H” holding symbol and the criteria that must be satisfied to permit the lifting of the “H” Holding symbol by way of a zoning by-law amendment is a reasonable and practical approach to balancing the Official Plan’s objective to provide for growth and development with residential uses along St. Clair Avenue West while also protecting existing industry.

8.0 CONCLUSIONS AND RECOMMENDATIONS

Based upon the results presented in the memorandum and the review of experience where conflicts between industry and developments elsewhere in the city have been resolved, the following has been concluded:

- The development of tall buildings in the vicinity of NRT has the potential to restrict their operations, especially when the buildings are taller than 16 metres in height.
- Proposed development in the St. Clair Avenue West area will involve multiple developers, many of whom are not yet known. Therefore, the approach used for managing potential conflicts between development and existing industries that was successfully applied in the Long Branch area is not likely a practical alternative.
- The proposed draft modification of OPA 84, including recommendations made by Golder, to use an “H” holding symbol and set out criteria for the removal of the “H” holding symbol in the Official Plan is the most practical alternative for managing potential conflicts between future development and the existing industry.
- Experience from the Long Branch area does suggest that industries and proposed developers are able to mediate potential conflicts without the need for a formal directive or City involvement where approval of proposed development is incumbent upon agreements being reached, as is the case with the proposed draft modifications to OPA 84.

Based upon the above conclusions, it is recommended that the proposed draft modifications to OPA 84 are the most reasonable approach for resolving current and future potential conflicts between existing industries and proposed residential development in the St. Clair Avenue West area. It provides a balanced approach that allows for development, while protecting existing industry.

Limitations

As indicated in the report, this peer review was based on the material provided by the City of Toronto, including the odour assessment report, staff report and architectural drawings. In addition, Golder has relied on the odour emissions data provided by NRT's odour consultant (ORTECH). Golder has prepared this report in a manner consistent with that level of care and skill ordinarily exercised by members of the engineering and science professions currently practicing under similar conditions in the jurisdiction in which the services are provided, subject to the time limits and physical constraints applicable to this report. No other warranty, expressed or implied is made.

Physical sampling of atmospheric emissions was not completed as part of the scope of work.

This report was prepared for the exclusive use of the City of Toronto. Persons other than the City of Toronto using this report or observations, or conclusions stated within, may do so at their own discretion.

Closure

This memorandum provides the results related to the predicted odour strengths on the OFH buildings at 60 and 61 Heintzman Street as well as the TCHC buildings at 61 Pelham Park Gardens and 1884 Davenport Road. Should you have any questions or concerns, kindly contact the undersigned at 416-271-9380 or aciccone@golder.com.

GOLDER ASSOCIATES LTD.

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Air Quality Specialist

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KL/JLK/ADC/ng/mp

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DATE June 1, 2015

PROJECT No. 13-1151-0278 (3000)

TO Lou Moretto
City of Toronto, Community Planning

CC Luisa Galli
City of Toronto, Community Planning

FROM Martin Rawlings

EMAIL Martin_Rawlings@golder.com

**FOLLOW-UP INFORMATION TO THE PUBLIC CONSULTATION MEETING ON MAY 25, 2015
REGARDING: ST. CLAIR AVENUE STUDY — PROPOSED SETTLEMENT OF AN APPEAL TO THE
ONTARIO MUNICIPAL BOARD OF OFFICIAL PLAN AMENDMENT NO. 84**

During the public consultation meeting held on the evening of May 27, 2015, there were a number of valuable questions asked by stakeholders regarding the March 16 report prepared by Golder and the presentation I made based on the findings summarized in the report. You will recall that one area of questions and answers was with respect to the predictions of potential odour impacts on the Toronto Community Housing Corporation building at 61 Pelham Park Gardens. A key participant in the discussions was Mr. Don Panos, who is a local business owner and the Chair of the St. Clair Gardens Business Improvement Association. Mr. Panos asked a number of questions about the predictions, their representativeness and the acceptability of the predictions. He felt strongly enough about the discussion on Wednesday night that Mr. Panos personally went to 61 Pelham Park Gardens on May 28, and contacted me by telephone to share his observations. Specifically, Mr. Panos observed that the stacks at NRT were clearly visible from the north face of 61 Pelham Park Gardens, a face of the buildings with balconies, and that the odour results in the report and the presentation may under represent the potential odour impacts. In response to the concerns raised by Mr. Panos, I agreed to look at the predicted potential odour impacts on the north face of 61 Pelham Park Gardens, compare those to the predictions for the west face, and present the finding in this memorandum.

In the March 16, 2015 Golder report, the dispersion modelling results of potential odour impacts on 61 Pelham Park Gardens were presented as Figure 4, and the text indicated the values represented the predictions for the closest, west face of the building. On reviewing the actual dispersion modelling files with the staff member that completed the modelling, it became clear that the original modelling had included receptors on both the west face of the building (the closest face to NRT) and the north face of the building (the closest face with balconies). The results also confirmed that the predictions of potential odour impacts were highest on the west face of the building; therefore, the text in the report was correct as the results presented in the March 16 report corresponded to the predictions for the west face. To help clarify this I have included three figures showing predicted potential odour impacts for 61 Pelham Park Gardens. The first figure (Figure 1) is the same as the presented in the March 16 report, and represents the maximum odour concentrations and frequencies above 1 OU for the building (this figure includes predictions for both the west and north face). Figures 2 and 3 present the predicted maximum odour concentrations and frequencies above 1 OU for the west and north faces of the building respectively.



These figures confirm the following:

- Odour impacts are unlikely below heights of 24 metres on this building. Although the maximum odour intensities are above 1 OU, the frequency of occurrence is less than the 0.5% per year, as identified in the Ontario odour modelling guideline².
- There is the potential for odour impacts at higher levels on the building, with maximum odour intensities above 1 OU, and frequencies above 1 OU more than 0.5% per year.
- Potential odour impacts occur for both the west and north face of the building.

61 Pelham Park Gardens					
67	2.81			3.22%	22
64	2.95			3.20%	21
56	2.74			3.17%	18
48	2.10			2.77%	16
40	1.93			2.31%	13
32	1.53			1.75%	10
24	1.22			0.47%	8
16	1.06			0.07%	5
0	1.00			0.02%	1
Height [m]	Maximum Odour		Frequency >1 OU		Height [St]

Figure 6: Predicted Maximum Odour Concentrations and Frequencies above 1 OU for TCHC building at 61 Pelham Park Gardens (Figure 4 in Golder report)

61 Pelham Park Gardens West Face					
67	2.81			3.22%	22
64	2.95			3.20%	21
56	2.74			3.17%	18
48	2.10			2.77%	16
40	1.93			2.31%	13
32	1.53			1.75%	10
24	1.22			0.47%	8
16	1.06			0.07%	5
0	1.00			0.02%	1
Height [m]	Maximum Odour		Frequency >1 OU		Height [St]

Figure 7: Predicted Odour Concentrations and Frequencies above 1 OU for the West Face of TCHC building at 61 Pelham Park Gardens

² Technical Bulletin: Methodology for Modelling Assessments of Contaminants with 10-Minute Average Standards and Guidelines Under O. Reg. 419/05. Prepared by the Standards Development Branch of the Ontario Ministry of Environment. April 2008.

61 Pelham Park Gardens North Face					
67	2.68			3.22%	22
64	2.67			3.13%	21
56	2.53			2.85%	18
48	1.95			2.53%	16
40	1.78			1.95%	13
32	1.46			1.21%	10
24	1.14			0.22%	8
16	1.02			0.02%	5
0	1.00			0.00%	1
Height [m]	Maximum Odour			Frequency >1 OU	Height [St]

Figure 8: Predicted Odour Concentrations and Frequencies above 1 OU for the North Face of TCHC building at 61 Pelham Park Gardens

Although I indicated that there was a potential for odour impacts on the building, I also indicated that there appeared to be few, if any, historic odour complaints from this building. During the community consultation session I suggested that this may be partially due to the absence of balconies on the west face of the building. However, this reasoning would not apply to the north face of the building. Another reason for the lack of odour impacts (i.e., odour complaints) from this address could relate to the modelling information used by Golder to predict potential odour impacts. I confirmed during the consultation meeting that the modelling was completed using the emissions and stack information from the dispersion modelling files used by NRT to support their recent (2013) Environmental Compliance Approval. These emissions would represent the maximum releases allowed from the facility, with typical emissions, and thus potential odour impact, being lower much of the time.

During the community consultation session of May 27, and during our conversation on May 28, Mr. Panos expressed concern regarding what he felt was an unacceptable situation with NRT being allowed to impact the residents of 61 Pelham Park Gardens, and not being forced by the Ministry to fix the situation. In addition, Mr. Panos suggested that the building at 61 Pelham Park Gardens was there before the industry. Although I tried to clarify these points with Mr. Panos, I feel it is of value to make the following observations with regards to potential impacts of NRT on 61 Pelham Park Gardens:

- A quick search on the internet allowed me to determine that 61 Pelham Park Gardens was constructed 1968, making it about 57 years old. In contrast I was able to determine that National Rubber, and its predecessors, were founded in Toronto in about 1926 by the Gross family and have operated at the address of 35 Cawthra Avenue since its founding, about 89 years. Thus NRT, and its predecessors, were operating in the area long before 61 Pelham Park Gardens was built.
- As stated in my presentation, there are no established regulatory standards for odours in Ontario that a facility must meet. The regulatory odour obligation for industries is to avoid causing an adverse effect as defined under the Environmental Protection Act. The enforcement process the Ministry of Environment and Climate Change uses to avoid adverse effects related to odour starts with odour complaints that the Ministry are required to investigate. Should the investigation confirm that an industry is causing an adverse

effect, the Ministry will require the industry to mitigate the impacts at the facility. We heard on Wednesday evening from Councillor Palacio (Ward 17) about the former National Rubber facility on Symington Avenue where odour complaints were made to the Ministry, investigations by the Ministry confirmed that an adverse effect was occurring, and the facility was forced to try and mitigate the impacts. In the case of the Symington facility, it appears that the cost to mitigate was such that National Rubber was forced to close the facility and consolidate their operations at the facility on 35 Cawthra Avenue.

- In my presentation I also talked about the current approach in Ontario for trying to avoid odour impacts, specifically the guideline that considers both the intensity and frequency of odours above 1 OU. This guideline, which was released in 2008, provides industry with a means for demonstrating that odour impacts are unlikely to occur when submitting applications for Environmental Compliance approvals. In the case of 61 Pelham Park Gardens and NRT, the Ministry has an operating record of odour complaints and potential impacts associated from this address. The information I was able to identify suggests that there have been few, if any, odour complaints from this address in recent years related to the NRT operations.

I trust the above information will help to address this issue that some of the participants at the community consultation meeting on May 27 may have felt was still outstanding.

Martin Rawlings, B.A.Sc., P.Eng. (AB)
Air Quality and EA Specialist

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Attachment 4: Aerial of Residential Sites (Odour and Air Quality Assessments)

