

June 28, 2022

VIA EMAIL scc@toronto.ca

Julie Amoroso, Administrator
Scarborough Community Council
Toronto City Hall
100 Queen Street West
Toronto ON M5H 2N2

Dear Ms. Amoroso

**RE: 25 Borough Drive, Scarborough (the "Subject Site")
Official Plan Amendment and Zoning By-law Amendment
SC33.3**

I am writing this on behalf of Atlantic Packaging Products Ltd. ("Atlantic"). We operate several facilities that neighbour the Subject Site; but our biggest concerns relate to our New Forest Paper Mill located at 333 Progress Avenue. It is situated just west of 25 Borough Drive across Brimley Road (160 metres away). We have provided aerial imagery below that shows the physical relationship between 25 Borough Drive and our closest facility (marked with a red "X" and outlined in green).

At 333 Progress Avenue we operate a Class II manufacturing facility (as that term is used in the D-6 Guideline, "Compatibility between Industrial Facilities and a Sensitive Land Use"). The facility operates 7 days a week, 24 hours a day with considerable shipping and receiving taking place. The facility opened in 2006 and is a long term, established industry employing many local residents. Atlantic has proudly been leading the way in environmental responsibility. We are fully committed to sustainable innovation and always work towards improving our sustainability index.



The purpose of this letter is to express our concerns with respect to the proposed residential development. Specifically, we ask that the members of the Community Council consider the issue of "nearness" in terms of potential noise and vibration impacts, and perceived odour and air quality impacts.

As noted above, the Atlantic facility is classified as a Class II industrial land use under the D-6 Guidelines. Class II industrial uses have a potential influence area of 300 metres. The Atlantic facility has potential to cause offsite air quality, odour and noise impacts within these separation distances. The Subject Site is located entirely within the potential influence area, associated with the Atlantic facility.

LAND USE COMPATIBILITY and REQUIREMENT TO SECURE MITIGATION MEASURES

As noted above, the Subject Site falls within the potential influence area of the Atlantic facility. Introducing sensitive land uses within the potential influence area will trigger a need for considerable mitigation required to ensure compatibility between existing industry and the introduction of new sensitive land uses. The more sensitive land uses encroach on industrial operations, the amount of mitigation needed and potential for complaints increases.

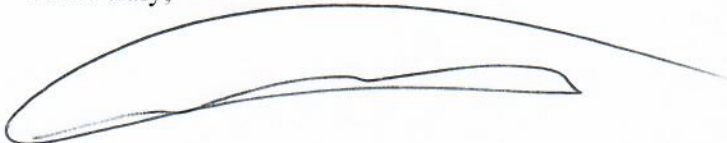
Atlantic supports the recommendation that City Council designate the Subject Site as a Class 4 Area under relevant provincial noise guidelines administered by the Ministry of Environment, Conservation and Parks. The Class 4 Area designation will allow existing industrial facilities in the vicinity of the Subject Site to rely on the associated sound level limits in applications for required provincial approvals, including operating certificates.

With respect to other impacts, we remain concerned and are not satisfied with how the Subject Site will address odour and air quality issues. In order to protect existing industrial operations and the future residents, extensive mitigation measures are required. Our consultant, GHD, has identified a number of potential mitigation measures that could be implemented, including important considerations around the location and filtering of air intakes, limitations on balconies and operable windows, inclusion of air conditioning, location of amenity areas, and the provision of appropriate warning clauses.

While we do not object to the general concept of development on this site, it is premature to approve this sensitive land use prior to having fully secured all mitigation measures necessary to protect existing industry (as would be consistent with the policies in the City's Official Plan, the PPS and the Growth Plan).

Please be advised that Atlantic welcomes further discussion with City staff and the applicant. We thank you for the opportunity to comment on this and request notification of any future meetings or decisions relating to the Subject Site's review.

Yours truly,



Glenn Taylor
Executive Vice President – Mills
Atlantic Packaging Products Ltd