



February 5, 2026

Steven Barber, Planner

City of Toronto
100 Queen St W
Toronto, ON M5H 2N2

Via email: steven.barber@toronto.ca

Dear Steven Barber:

**RE: Official Plan Amendment and Zoning By-law Amendment Applications
115 Saulters Street South, Toronto
City Files: 24150052 STE 14 OZ & 25151703 STE 14 OZ
MHBC File: 23276B**

MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC) are the planning consultants on behalf of Portlands Energy Centre L.P. (operating as Atura Power), a subsidiary of Ontario Power Generation Inc. (OPG), with respect to the Portlands Energy Centre (PEC) located at 470 Unwin Avenue in the City of Toronto. This letter is in response to the notice of public meeting received, planned for February 19, 2026, and a follow-up to our previous letter, dated February 24, 2025, regarding the applications for 115 Saulters Street South (the "Subject Lands"). The Subject Lands are located approximately 750 metres from PEC. We understand that the proposal includes the redevelopment of the Subject Lands with two residential towers, with heights of 51 and 47 storeys with 74,34 square metres of developed gross floor area, comprised of 68,288 square metres of residential and 6,123 square metres of retail and Productions, Interactive and Creative non-residential uses.

Atura Power is completing a review of the application materials and technical studies for the proposed development. The attached memorandum, prepared by Alliance Technical Group North, provides an assessment of the air quality impacts associated with the proposed development within the area of influence of PEC. To mitigate the potential air quality impact to the proposed development, Alliance's findings demonstrate that a maximum height of 64.5 metres meets the Ministry of Environment, Conservation and Parks (MECP) Point of Impingement (POI) limits. As prescribed in the Central Waterfront Secondary Plan, proponents are encouraged to consult with PEC on land use compatibility matters and therefore, Atura Power requests to be copied on any correspondence between the applicant and the City of Toronto regarding the Land Use Compatibility Study and peer review process. Atura Power will provide further comment as needed through these discussions.

We thank you for the opportunity to provide comments and request that any future updates regarding the Subject Lands, or any other applications within 2,000 metres of PEC be circulated to pecplanning@aturapower.com. If you have any questions, please do not hesitate to contact our office.

Yours truly,

MHBC



Melinda MacRory, M.Pl., MCIP, RPP
Partner



Kaitlin Webber, MA, RPP, MCIP
Intermediate Planner

cc. Tasti Seid, Plant Manager, Atura Power

DATE: April 24, 2025

TO: Stephen Smith
Atura Power
1415 Joshuas Creek Dr Unit 200, Oakville, ON L6H 7L9
Tel: 289-259-2377
Email: Stephen.smith@aturapower.com

From: Limin Sun, M. Eng.

Re: Air Quality Impact Assessment for 115 SAULTER ST S (Development Application No. 24150052STE14OZ), ATG Reference No. 92958-1-2

Atura Power retained Alliance Technical Group North (Alliance) to assess air quality impacts associated with the surrounding development application No. 24150052STE14OZ within the area of influence of the Portlands Energy Centre L.P. (the Facility or PEC) located at 470 Unwin Avenue, Toronto, Ontario.

For natural gas combustion equipment, the Ontario Ministry of Environment, Conservation and Parks (MECP) considers emissions of Nitrogen Oxides (NO_x) to be the significant air contaminant emitted, other contaminants can generally be treated as insignificant. Ontario Regulation 419/05 – Air Pollution, Local Air Quality contains air quality criteria for NO_x covering two time periods, a 1-hr and a 24-hr. Based on Alliance’s experience the air quality criteria for the 1-hr condition is limiting and providing facilities can comply with the 1-hr condition the 24-hr condition will also be met. To predict the maximum 1-hr average concentration of NO_x, the following conservative assumptions have been used in the regulatory AERMOD models:

- The most conservative (higher) NO_x emission rates were used, which are greater than the continuous monitoring results in 2024.
- Future elevated receptors were generated along the property line for the development every 10 m horizontally and every 3 m vertically up to the proposed maximum building height.
- The proposed podium and tower buildings were also added in the regulatory AERMOD models to simulate the building downwash effect.

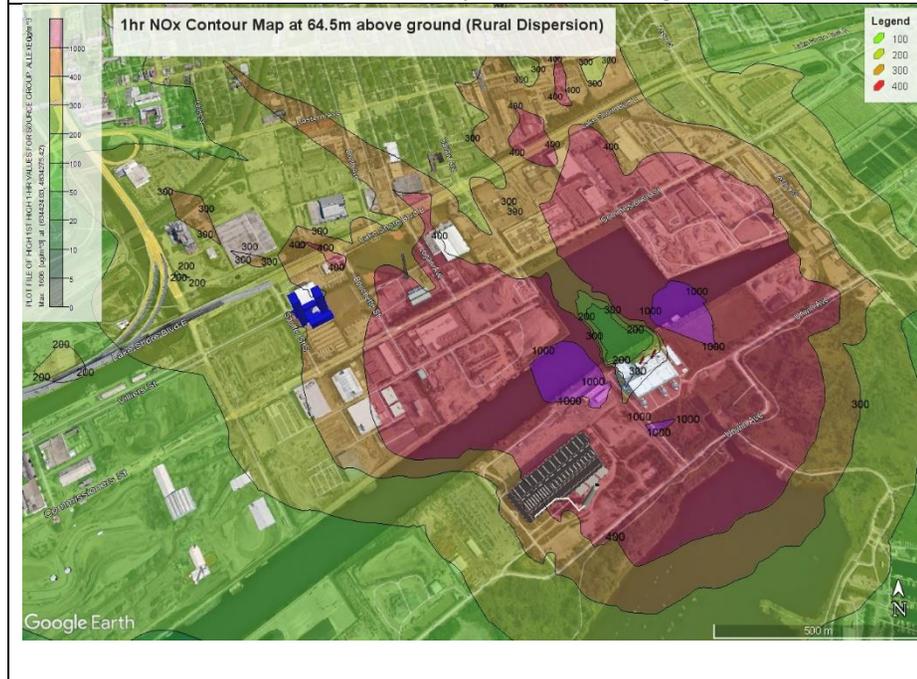
The unmitigated (no building height restrictions in place) models are developed to assess the worst-case scenarios for the development. To mitigate the potential air quality impact to the development, the proposed maximum building heights are reduced (mitigated) to meet the MECP POI Limits. Please note that the regulatory air dispersion modelling is conducted to predict the maximum air quality impact for the most conservative worst-case scenario, which is not the most accurate to reflect the day-to-day operations.

The air dispersion modelling results are presented using both the “rural” and “urban” dispersion coefficients in AERMOD. As evidenced by the contour plots and tables use of the urban dispersion coefficient provides better dispersion for the PEC exhaust stacks. Presently MECP advocates use of the rural dispersion factors in absence of completing a detailed land use characterization study. Guidance from US EPA on the applicable dispersion coefficient to use when urban areas abut large water bodies would appear to contradict MECP’s current position in this area. Alliance would expect significant resistance from MECP to apply the urban dispersion coefficient in the absence of significant supporting documentation.

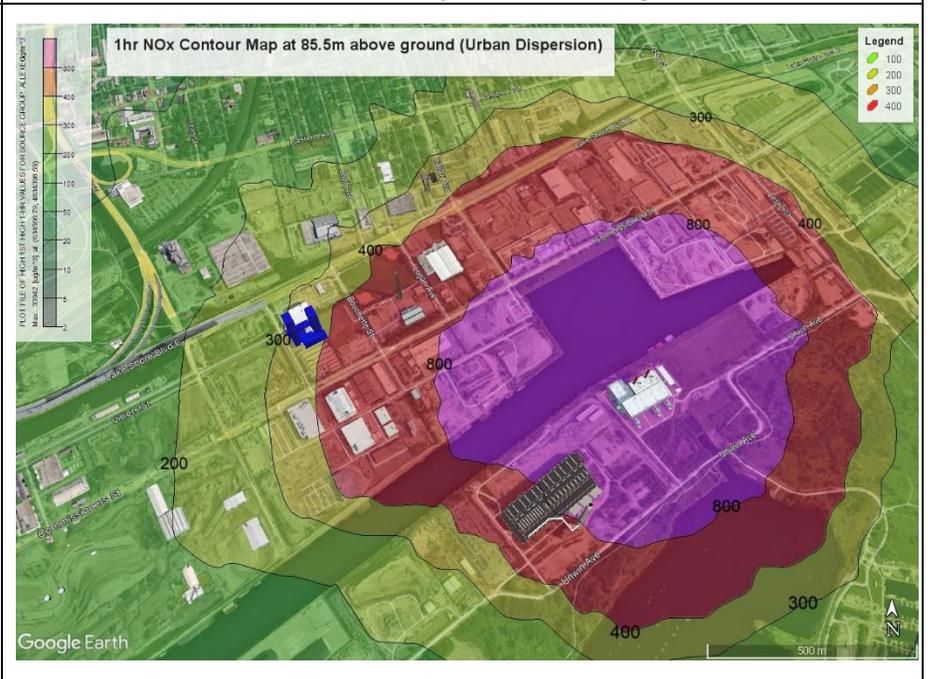
Table 1 Modelling Results for SDA #4 (Distance = 855m, 45F Residential Tower Buildings)

Rural Dispersion Option				Urban Dispersion Option			
Scenario	Maximum 1hr NOx Concentration ($\mu\text{g}/\text{m}^3$)	Maximum % of MECP POI Limit	Building Height (m)	Scenario	Maximum 1hr NOx Concentration ($\mu\text{g}/\text{m}^3$)	Maximum % of MECP POI Limit	Building Height (m)
Unmitigated	3,384	846%	139.5	Unmitigated	721	180%	139.5
Mitigated	313	78%	64.5	Mitigated	357	89%	88.5

1hr NOx Contour Map (64.5 m above ground)



1hr NOx Contour Map (88.5 m above ground)



Note:

1. Recent direction from the MECP requires Environmental Compliance Approval (ECA) applications to use the Rural dispersion coefficients in AERMOD assessments. Use of the Urban dispersion option require a complicated land use assessment, which would be further complicated by the presence of the adjacent Lake Ontario. Until such approval or agreement is reached with MECP an assessment of both Urban and Rural conditions should be completed.
2. The more conservative Rural dispersion coefficient was used in the previous and current ESDM report.
3. The Urban dispersion option is recommended in US EPA's 2019 AERMOD Implementation Guide for sources located in urban areas, in close proximity to water bodies.