

May 13, 2026

File No.: 575936-106

Sent Via E-mail: teycc@toronto.ca

Toronto and East York Community Council
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Dear Clerks and Members of Council:

**Re: Official Plan Amendment and Zoning By-law Amendment
1, 2A, and 4-16 Sumach Street and 90 Eastern Avenue
City File No.: 21 204556 STE 13 OZ
Toronto and East York Community Council Public Meeting – May 28, 2026**

We are retained by 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.

We are writing in response to the Notice of Public Meeting scheduled for May 28, 2026, to provide comments on behalf of Atura Power to the Official Plan Amendment and Zoning By-law Amendment applications (collectively the “**Applications**”) for 1, 2A, and 4-16 Sumach Street and 90 Eastern Avenue in the City of Toronto (the “**Subject Lands**”). The Applications are proposing to permit a 59-storey mixed-use building and a 55 storey residential building on the Subject Lands, comprising 1,276 residential dwelling units (the “**Proposed Development**”). We understand that a Site Plan Application (25 242829 STE 13 SA) is being processed concurrently to facilitate the Proposed Development.

PEC is a combined-cycle natural gas electrical generating station capable of outputting 600-megawatts to the electricity grid, and a critical asset that protects the City of Toronto from rolling brownouts or blackouts during times of the year with high demand. Today, PEC supplies enough power to serve nearly one-quarter of Toronto’s electricity needs and enables the city to continue to grow. PEC is a “major facility” as defined by the Provincial Planning Statement, 2024 (PPS), and therefore requires land use compatibility to be addressed in relation to sensitive land uses. Atura Power and OPG are each a “specified person” for the purposes of the *Planning Act*, R.S.O. 1990, c. P.13.

As a result, Atura Power has a direct interest in development applications within the influence area of the PEC, including the Proposed Development, which is located approximately 2,000 metres from the PEC. On April 15, 2026, our offices provided a letter to Ms. Katherine Bailey enclosing an Air Quality Impact Assessment prepared by Atura Power’s technical consultant, Alliance Technical Group North (“**Alliance**”), in response to the Proposed Development. A copy of this correspondence is attached as **Appendix “A”**. Alliance’s findings demonstrate that, to mitigate the potential air quality impacts to the Proposed

Development, a maximum height of 79.5 metres meets the Ministry of Environment, Conservation and Parks (MECP) Point of Impingement (POI) limits.

Section 4.1.2 of the D-6 Guidelines recognizes that the influence area of major facilities is site-specific. As demonstrated in Alliance's assessment, emissions from the PEC extend to and beyond the Proposed Development on the Subject Lands. On this basis, Atura Power maintains a legitimate planning interest and reserves the right to review, comment on, and participate in planning processes related to the Proposed Development, as necessary to protect its Environmental Compliance Approvals and other Ministry requirements.

Atura Power has also been actively participating in planning processes for other development applications within the Toronto Port Lands, Waterfront, South of Eastern Employment Area, and the West Don Lands. This participation includes extensive involvement in the Ookwemin Minising (formerly Villiers Island) Precinct Plan and associated planning instruments. To ensure that land use compatibility considerations are appropriately addressed, Atura Power has consistently requested the inclusion of a Holding (H) symbol in zoning by-laws, requiring the completion of additional technical studies to demonstrate that appropriate mitigation measures will be implemented prior to development. In keeping with this established approach, Atura Power requests that the following Holding (H) provision be included in the Zoning By-law Amendment for the Proposed Development:

(XX) An amending by-law to remove the ("H") symbol in whole or in part, and in respect of specific uses, shall be enacted by City Council or through delegated authority when the implementation of the following conditions at the owner's sole expense have been secured to the satisfaction of the Chief Planner and Executive Director, City Planning, and the Executive Director, Development Review, or their designate, through the execution and registration on title of an agreement, or agreements pursuant to Section 37, 51, and/or 53 of the Planning Act or Section 114 of the City of Toronto Act, 2006, as appropriate:

(xx) The owner shall provide a noise study, air quality study, and a detailed design plan in support of a Site Plan Control application for any sensitive land use which demonstrate that appropriate noise and/or air quality mitigation works will be implemented. The noise study and air quality study shall be submitted by the owner to the City of Toronto. The City of Toronto will undertake a peer review of such studies at the owner's expense. The owner shall be requested to provide a copy to all industrial and port operators, utilities or major facilities that have been identified within the noise and air quality study within the Port Lands. Such studies shall demonstrate:

(a) That the requirements of Ministry of Environment, Conservation and Parks regulation and guidelines, including NPC-300, Ontario Regulation 419/05, Ontario Ambient Air Quality Criteria (AAQC), and Canadian Ambient Air Quality Standards (CAAQS), have been satisfactorily addressed; and

(b) That the requirements of any agreements with the City and third parties respecting noise and air quality mitigation, have been satisfactorily addressed;

Atura Power respectfully submits that the inclusion of the requested Holding (H) provision is necessary to ensure that land use compatibility matters are appropriately addressed and that future sensitive land uses

will not result in adverse effects on the continued operation of the PEC or its Environmental Compliance Approvals. Atura Power looks forward to continuing to work with City staff and the applicant to address these matters through the planning process.

Please ensure that a copy of this letter is provided to City Council in advance of its consideration of the Applications. Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,

Dentons Canada LLP



Alan Han
Land Use Planner

Attachments: Appendix A – Letter to Katherine Bailey, April 15, 2026

Copy: Client
Katherine Bailey, Senior Planner, Community Planning (Katherine.Bailey@toronto.ca)

April 15, 2026

File No.: 575936-106

Sent Via E-mail: Katherine.Bailey@toronto.ca

Katherine Bailey, Planner
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Dear Ms. Bailey:

**Re: Official Plan Amendment, Zoning By-law Amendment, and Site Plan Control Applications
1, 2-16 Sumach Street and 90 Eastern Avenue
City File Nos.: 21 204556 STE 13 OZ & 25 242829 STE 13 SA**

Dentons Canada LLP (“**Dentons**”) is retained by 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 Official Plan Amendment, Zoning By-law Amendment, and Site Plan Control applications (collectively the “**Applications**”) for 1, 2-16 Sumach Street and 90 Eastern Avenue in the City of Toronto (the “**Subject Lands**”). The Subject Lands are located approximately 2,000 metres from the PEC. We understand that the proposal includes the redevelopment of the Subject Lands with two mixed-use buildings of 59 and 55 storeys, comprising 1,276 residential dwelling units.

PEC is a combined-cycle natural gas electrical generating station capable of outputting 550-megawatts to the electricity grid, and a critical asset that protects the City of Toronto from rolling brownouts or blackouts during times of the year with high demand. Today, PEC supplies enough power to serve nearly one-quarter of Toronto’s electricity needs and enables the city to continue to grow. PEC is a “major facility” as defined by the Provincial Planning Statement, 2024 (PPS), and therefore requires land use compatibility to be addressed in relation to sensitive land uses. Atura Power and OPG are each a “specified person” for the purposes of the *Planning Act*, R.S.O. 1990, c. P.13.

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 (Alliance), provides an assessment of the air quality impacts associated with the proposed development within the area of influence of the PEC. To mitigate the potential air quality impact to the proposed development, Alliance’s findings demonstrate that a maximum height of 79.5 metres meets the Ministry of Environment, Conservation and Parks (MECP) Point of Impingement (POI) limits.

Atura Power requests to be copied on any correspondence between the applicant and the City of Toronto regarding land use compatibility, the air quality study, and the associated 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 the PEC be circulated to pecplanning@aturapower.com. If you have any questions, please do not hesitate to contact our office.

Yours truly,

Dentons Canada LLP



Alan Han
Land Use Planner

Attachment: Alliance Technical Group North Memorandum, April 14, 2026

Copy: Client

DATE: April 14, 2026

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 1, 2A & 4-16 Sumach St and 90 Eastern Ave Development Application**
ATG Reference No. 93018-7-1

Atura Power retained Alliance Technical Group North (Alliance) to assess air quality impacts associated with the surrounding development application within the area of influence of the Portlands Energy Centre L.P. (the Facility or PEC) located at 1, 2A & 4-16 Sumach St and 90 Eastern Ave, Toronto, Ontario.

Prior Involvement Disclosure

Alliance Technical Group North (formerly ORTECH Consulting Inc.) previously completed an air quality evaluation in 2021 for a former developer of the Sumach Street property. That assessment was limited to traffic-related air quality impacts and did not evaluate emissions from industrial or stationary sources. The prior work was completed under a separate retainer and is unrelated in scope to the current Air Quality Impact Assessment, which addresses industrial emissions associated with Atura Power's Portlands Energy Centre. Alliance does not consider this prior involvement to represent a conflict of interest.

For natural gas combustion equipment, the Ontario Ministry of Environment, Conservation and Parks (MECP) considers emissions of Nitrogen Oxides (NOx) to be the significant air contaminant emitted, other contaminants can generally be treated as insignificant. This position is based on that compliance with the NOx criteria generally equates to complying with the remaining contaminants associated with natural gas combustion. Ontario Regulation 419/05 – Air Pollution, Local Air Quality contains air quality criteria for NOx 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 that 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 NOx, the following conservative assumptions have been used in the regulatory AERMOD models:

- The most conservative (higher) NOx 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 may not reflect the day-to-day operations at PEC.

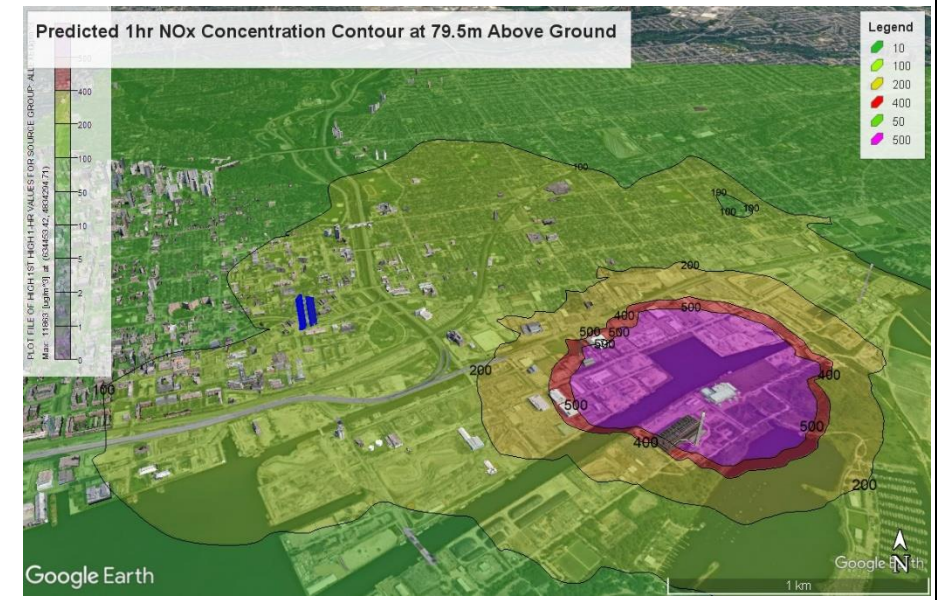
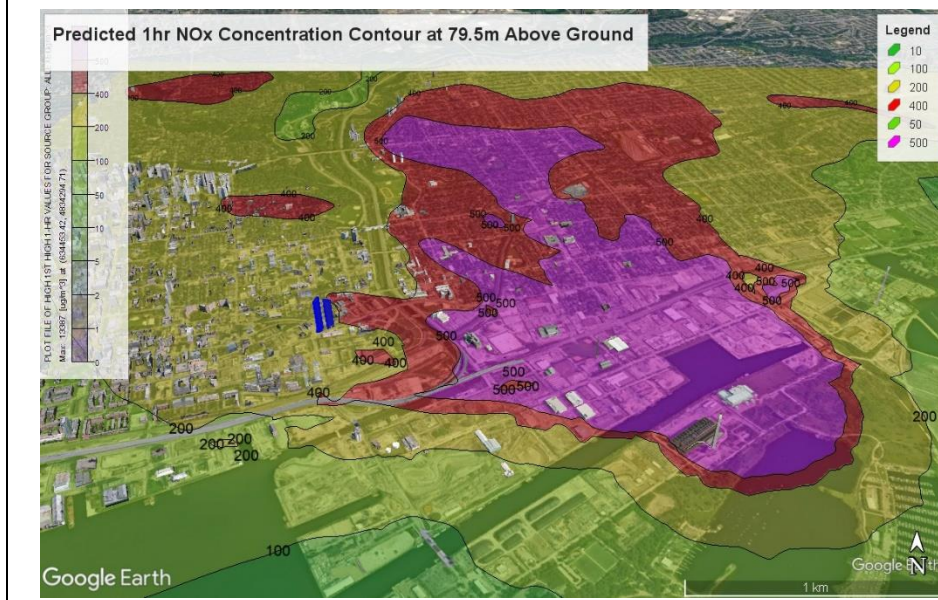
The air dispersion modelling results are presented using both the “rural” and “urban” dispersion coefficients in AERMOD. As evidenced by the contour plots and tables use of the urban dispersion coefficient provides better dispersion for the PEC exhaust stacks. Presently MECP advocates use of the rural 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 1, 2A & 4-16 Sumach St and 90 Eastern Ave (Distance = 2040 m, Max Design Building Height=201.75)

Rural Dispersion Option				Urban Dispersion Option			
Scenario	Maximum 1hr NOx Concentration ($\mu\text{g}/\text{m}^3$)	Maximum % of MECP POI Limit	Building Height (Max Receptor Height) (m)	Scenario	Maximum 1hr NOx Concentration ($\mu\text{g}/\text{m}^3$)	Maximum % of MECP POI Limit	Building Height (Max Receptor Height) (m)
Unmitigated	1,478	369%	202.5	Unmitigated	206	51%	202.5
Mitigated	354	89%	79.5	Mitigated	206	51%	202.5

1hr NOx Contour Map at 79.5 m above ground

1hr NOx Contour Map at 79.5 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.