

October 4, 2024

Attention: Melissa McKay
1 Rosetta Street Inc.
700 Lawrence Street West, Suite 375, West Office Tower
Toronto, ON M6A 3BV

SLR Project No.: 241.V20210.00002

Revision: 0

**RE: 1 Rosetta Street, Georgetown – Environmental Noise and Vibration Study
Peer Review Comment Response #2 – CN**

Introduction

SLR Consulting (Canada) Ltd. was retained by 1 Rosetta Street Inc. to conduct environmental noise and vibration study for the proposed residential at 1 Rosetta Street in Georgetown, Ontario.

The environmental noise and vibration study was initially documented in the following report:

- “1 Rosetta Street – Environmental Noise and Vibration Study – Georgetown, ON” dated April 25, 2022.

A peer review was completed by Jade Acoustics Inc. (“Jade”) on behalf of Canadian National Railways (“CN”), documented in the Jade memo entitled “Environmental Noise and Vibration Study Peer Review – Proposed Residential Development – Rosetta Street and River Road, Town of Georgetown” dated December 22, 2022.

In response to these comments, an updated environmental noise and vibration study was prepared in response to the above-noted peer review contained in the following document:

- “1 Rosetta Street – Updated Environmental Noise and Vibration Study – Georgetown, ON” dated May 26, 2023.

Subsequently, a second set of peer review comments has been received from Jade, in their memo entitled “Updated Environmental Noise and Vibration Study Peer Review – Proposed Residential Development – Rosetta Street and River Road, Town of Georgetown” dated April 3, 2024.

The purpose of this letter is to provide responses and supporting information to address the new comments. For clarity, the peer review comments are provided in italics in the following subsections, in the order they are provided in the letter by Jade review, with SLR responses immediately following the comments. Review comments are provided for reference in **Attachment A**. An Updated Environmental Noise and Vibration Study dated October 4, 2024 has also been prepared, and should be read in conjunction with this peer review response letter.

As Jade has indicated their agreement with conclusions regarding vibration, the vibration assessment is not discussed further in this response letter.

CN Peer Review Comments

Peer Review Comment #1

The following comments were provided within the first peer review and remain applicable after reviewing the Updated Environmental Noise and Vibration Study, dated May 26, 2023. It is acknowledged that the noise study indicates the MOE requirement for brick veneer or masonry equivalent construction as it relates to dwellings within 100 m of the railway line. The report does not mention that CN generally requires that the first row of dwellings be constructed of brick veneer or masonry equivalent, regardless of the predicted sound level. For completeness, it is requested that these requirements are included in the updated noise study.

This requirement is to apply to all south, east and west facing facades of the first row of buildings. As Enclosed Noise Buffers (ENB) are proposed, we would recommend that the brick veneer/masonry construction be applied to the inside walls of the ENBs. The exterior wall (outer wall) of the ENBs can be constructed of a wall assembly having a rating of STC 52 or greater, as recommended in the noise report. The exterior wall requirements as currently noted in the report are not sufficient and need to be addressed in the updated noise report. Tables 10 and 11 should be updated accordingly.

SLR Response: We note that CN is not a land use planning approval authority, and as such may request certain mitigation measures, but cannot require them.

A requirement for brick veneer or masonry equivalent regardless of predicted sound levels is not included in any guidance document currently and routinely used for land use planning in the Province of Ontario. It is not included in the Ministry of the Environment, Conservation and Parks (“MECP”) Publication NPC-300, nor in the Rail Association of Canada / Federation of Canadian Municipalities (“RAC/FCM”) *Guidelines for New Development in Proximity to Railway Operations*.

The MECP guidance in NPC-300 is already noted and applied in the assessment; therefore, it is not necessary to include the additional requested language in the Updated Environmental Noise and Vibration Study dated October 4, 2024.

Table 10, Table 11 and Table 12 of the Updated Environmental Noise and Vibration Study dated October 4, 2024 have been updated to reflect revised exterior wall constructions. The masonry equivalent construction will be applied to a combination of the exterior and interior walls of Buildings 01 and 02, and this is required to address Urban Design requirements for the proposed development that are unrelated to noise and vibration related impacts. As the non-glazing portions of the façade will include some form of masonry component (either as part of the inner or outer ENB), the applicable guidance and requirements of Publication NPC-300 are met. Acceptable indoor noise levels will be maintained.

Peer Review Comment #2

In Section 4.7, specific to Table 18 and for general completeness, the footnote should mention that the higher section of barrier, being 3.95 m high, was also included along with the 2.95 m high barrier (in terms of the applicable receptors).



SLR Response: The requested clarification is no longer applicable, as an elevated section of barrier is not required. Only the 2.95 m barrier is required. Section 4.7, Table 18 of the Updated Environmental Noise and Vibration Study dated October 4, 2024 appropriately indicates that the 2.95 m high barrier has been considered.

Peer Review Comment #3

It is acknowledged that a mitigation summary table is included in the Appendix of the noise report (Table D1). Further to point 1., above, the ENB outer wall and ENB inner wall design requirements are to be clearly specified. It is also important to keep listed and included the exterior wall requirements for all dwellings with exterior walls and without ENBs.

SLR Response: The requested clarification has been provided in Appendix D of the Updated Environmental Noise and Vibration Study dated October 4, 2024. Requirements for ENB outer walls, ENB inner walls, and exterior walls without ENBs have been specified.

Peer Review Comment #4

As a separate note on the mitigation measures that need clarification within the report, the Updated Noise Report dated May 26, 2023, includes inconsistencies between Tables 10 and 11 relative to Appendix D (the mitigation summary tables). For example, the exterior wall requirements do not match. Also, within the text of the report, it is noted that the analysis was conducted with exterior walls set at STC 50, although the BPN work in the appendix uses STC 52 and Tables 10 and 11 report STC 52.

These inconsistencies within the text and tables unfortunately creates a situation where the final mitigation measures are unclear. However, as CN requires brick veneer/masonry equivalent wall construction, the report needs to be updated to reflect this requirement for the inner ENB walls and STC 52 for the exterior (outer) ENB walls. In the final noise report, consistency across all text and tables should be addressed, taking into account as well the points above regarding exterior wall requirements etc.

SLR Response: Consistent requirements have been provided across all text and tables in the Updated Environmental Noise and Vibration Study dated October 4, 2024. As noted in the SLR Response to Peer Review Comment #1, the masonry component of the ‘exterior wall’ in some locations will be included at the outer wall, and at other location at the inner wall. As the non-glazing portions of the façade will include some form of masonry component (either inner or outer ENB), the applicable guidance and requirements of MECP Publication NPC-300 are met.

Peer Review Comment #5

The report includes STC requirements for windows/exterior doors. However, in some cases, that are provided as “composite” values. As this is confusing, the report should outline the STC requirements for the outdoor ENB and the inner ENB windows/exterior doors.

SLR Response: The requested clarification has been provided in Table 10, Table 11, and Appendix D of the Updated Environmental Noise and Vibration Study dated October 4, 2024.



Peer Review Comment #6

The following comment was made previously and still applies to the updated noise report. Section 7.0 of the updated noise report includes a bullet list of conclusions for the development. The last bullet point of the Stationary Noise Source section and the last bullet in the Overall Assessment section comment on the hypothetical situation of the Metrolinx Georgetown Layover station no longer operating. Instead of commenting on mitigation measures that may change the text should indicate that should Metrolinx change its operation or cease operations at the Georgetown location before the proposed development is constructed, an updated noise and vibration report should be prepared. In addition, an updated noise report is to be circulated to CN for peer review as the mitigation measures may be altered and may impact the mitigation required to address CN operations.

SLR Response: Section 7.0 of the Updated Environmental Noise and Vibration Study dated October 4, 2024 has been revised to include additional language regarding a hypothetical scenario where the Metrolinx Georgetown Layer station is no longer operating. Section 7.0 now states that an updated environmental noise and vibration study should be prepared in such a scenario, and that mitigation measures may require review/additional analysis. It is, however, at the discretion of the land use planning authority (in this case, the Town of Halton Hills and Halton Region) whether the report is required to be circulated to CN for peer review.

Statement of Limitations

This report has been prepared by SLR Consulting (Canada) Ltd. (SLR) for 1 Rosetta Street Inc. (Client) in accordance with the scope of work and all other terms and conditions of the agreement between such parties. SLR acknowledges and agrees that the Client may provide this report to government agencies, interest holders, and/or Indigenous communities as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of SLR.

Any findings, conclusions, recommendations, or designs provided in this report are based on conditions and criteria that existed at the time work was completed and the assumptions and qualifications set forth herein.

This report may contain data or information provided by third party sources on which SLR is entitled to rely without verification and SLR does not warranty the accuracy of any such data or information.

Nothing in this report constitutes a legal opinion nor does SLR make any representation as to compliance with any laws, rules, regulations, or policies established by federal, provincial territorial, or local government bodies, other than as specifically set forth in this report. Revisions to legislative or regulatory standards referred to in this report may be expected over time and, as a result, modifications to the findings, conclusions, or recommendations may be necessary.



Closure

An Updated Environmental Noise and Vibration Study report dated October 4, 2024 has been prepared to support this peer review response letter, and should be read in conjunction with the above noted responses.

Please contact the undersigned if you have any questions.

Regards,

SLR Consulting (Canada) Ltd.



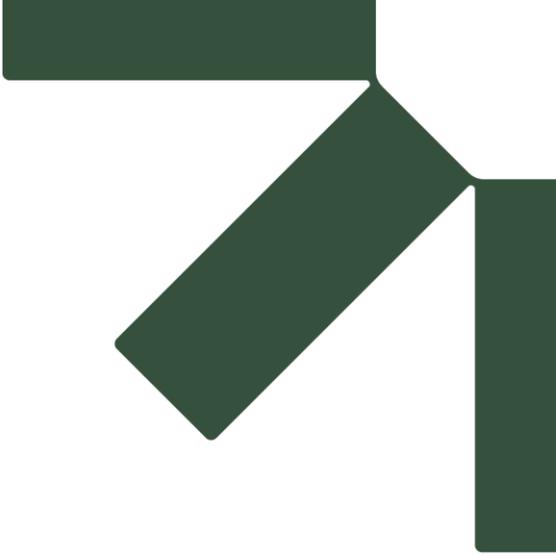
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Attachments

Attachment A – Peer Review Comments





Attachment A – Peer Review Comments

Peer Review Comment Response #2 – CN

1 Rosetta Street, Georgetown

1 Rosetta Street Inc.

SLR Project No.: 241.V20210.00002

October 4, 2024

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Acoustics Engineers Unit 19 Fax: (905) 660-4110
Inc. Concord, Ontario
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April 3, 2024

CN
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1600 Boulevard Rene-Levesque West
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H3H 1P9

Attention: Ashkan Matlabi

VIA E-MAIL
proximity@cn.ca



Re: Updated Environmental Noise and Vibration Study
Peer Review
Proposed Residential Development
Rosetta Street and River Road
Town of Georgetown
Our File: 22-145

As requested, Jade Acoustics Inc. prepared a peer review letter (dated December 21, 2022) regarding the *Environmental Noise and Vibration Study* dated April 25, 2022, prepared by SLR Consulting (Canada) Ltd., on behalf of 1 Rosetta Street Inc. An *Updated Environmental Noise and Vibration Study*, dated May 26, 2023, has been prepared by SLR to address various approval agency comments, including the peer review comments in the December 21, 2022 peer review letter prepared by Jade Acoustics Inc. on behalf of CN. No responses are included directly in the Updated noise report; however, as noted it is indicated that the comments have been addressed. We have reviewed the *Updated Environmental Noise and Vibration Study* and our findings are documented below.

The proposed development is located just west of the intersection of Rosetta Street and River Road in the Town of Georgetown. The CN Halton Subdivision (principal main line) is located south of the proposed residential development with the intervening uses of River Road and the Metrolinx Georgetown Layover Station immediately south of River Road.

The proposed development consists of three (3) mid-rise residential buildings. The highest building is up to 12-storeys high.

As before and following what was advised by CN at the time of the December 21, 2022 peer review, this peer review focuses only on the CN right-of-way through tracks and associated through trains. CN does not own the Metrolinx Georgetown Layover station and will be not commenting on the stationary noise source analysis completed within the report unless it affects the potential mitigation to meet the guidelines with respect to the CN operations.



We have reviewed the noise and vibration report with respect to noise/vibration issues related to rail traffic and CN. Other sources of noise/vibration have not been evaluated as part of this peer review. The CN, the Federation of Canadian Municipalities (FCM) and Railway Association of Canada (RAC) "Guidelines for New Development in Proximity to Railway Operations" (RAC/FCM guidelines) and the Ministry of the Environment, Conservation and Parks (MOE) guidelines have been used in this review. Only sources associated with CN operations have been reviewed. No original analyses have been conducted.

This peer review consists of a review of the approach, source information, and analysis methods used, as well as the required/recommended acoustic mitigation measures determined by the acoustical consultant that prepared the noise and vibration reports. We have only provided comments where the mitigation measures may be altered.

We find that the report has generally been prepared in accordance with the CN guidelines and requirements. However, there are various comments and points of clarification that need to be addressed, particularly with respect to the summary of the proposed mitigation as the information included in the noise report is not concise and will affect the preparation of the CN Agreement.

Our comments are summarized below.

Noise Report

1. The following comments were provided within the first peer review and remain applicable after reviewing the Updated Environmental Noise and Vibration Study, dated May 26, 2023. It is acknowledged that the noise study indicates the MOE requirement for brick veneer or masonry equivalent construction as it relates to dwellings within 100 m of the railway line. The report does not mention that CN generally requires that the first row of dwellings be constructed of brick veneer or masonry equivalent construction regardless of the predicted sound level. For completeness, it is requested that these requirements are included in the updated noise study.

This requirement is to apply to all south, east and west facing façades of the first row of buildings. As Enclosed Noise Buffers (ENB) are proposed, we would recommend that the brick veneer/masonry construction be applied to the inside wall of the ENBs. The exterior wall (outer wall) of the ENBs can be constructed of a wall assembly having a rating of STC 52 or greater, as recommended in the noise report. The exterior wall requirements as currently noted in the report are not sufficient and need to be addressed in the updated noise report. Tables 10 and 11 should be updated accordingly.



2. In Section 4.7, specific to Table 18 and for general completeness, the footnote should mention that the higher section of barrier, being 3.95 m high, was also included along with the 2.95 m high barrier (in terms of the applicable receptors).
3. It is acknowledged that a mitigation summary table is included in the Appendix of the noise report (Table D1). Further to point 1., above, the ENB outer wall and ENB inner wall design requirements are to be clearly specified. It is also important to keep listed and included the exterior wall requirements for all dwellings with exterior walls without ENBs.
4. As a separate note on the mitigation measures that need clarification within the report, the Updated Noise Report dated May 26, 2023, includes inconsistencies between Tables 10 and 11 relative to Appendix D (the mitigation summary tables). For example, the exterior wall requirements do not match. Also, within the text of the report it is noted that the analysis was conducted with exterior walls set as STC 50, although the BPN work in the appendix uses STC 52 and Tables 10 and 11 report STC 52.

These inconsistencies within the text and tables unfortunately creates a situation where the final mitigation measures are unclear. However, as CN requires brick veneer/masonry equivalent exterior wall construction, the report needs to be updated to reflect this requirement for the inner ENB walls and STC 52 for the exterior (outer) ENB walls. In the final noise report, consistency across all text and tables should be addressed, taking into account as well the points above regarding exterior wall requirements etc.

5. The report includes STC requirements for the windows/exterior doors. However, in some cases they are provided as “composite” values. As this is confusing, the report should outline the STC requirements for the outdoor ENB and the inner ENB windows/exterior doors.
6. The following comment was made previously and still applies to the updated noise report. Section 7.0 of the updated noise report includes a bullet list of conclusions for the development. The last bullet point in the Stationary Noise Source section and the last bullet in the Overall Assessment section comment on the hypothetical situation of the Metrolinx Georgetown Layover station no longer operating. Instead of commenting on mitigation measures that may change the text should indicate that should Metrolinx change its operation or cease operations at the Georgetown location before the proposed development is constructed, an updated noise and vibration report should be prepared. In addition, an updated noise report is to be circulated to CN for peer review as the mitigation measures may be altered and may impact the mitigation required to address CN operations.

Vibration

The vibration work completed within the Updated noise report considers various “raw data” vibration measurements at the subject site as well as calculation work by SLR to predict vibration levels at the proposed buildings. Jade Acoustics Inc. reviewed the raw data measurements in determining the appropriateness of the conclusion by SLR that no vibration mitigation measures are required for the subject site.

In consideration of the massive building structure that is proposed for the subject site, it is a reasonable conclusion to indicate no vibration mitigation measures are required for the development.

Conclusions/Recommendations

We find that the noise and vibration report has generally been prepared with the appropriate guidelines considered. We do not anticipate that any of the comments in this peer review will alter the feasibility of the development; however, the report does not provide clear and concise mitigation measures in a format that can be easily used in the preparation of the CN Agreement.

Therefore, the peer review comments should be addressed in an updated noise report. A subsequent CN peer review is to be completed when the updated noise report is available.

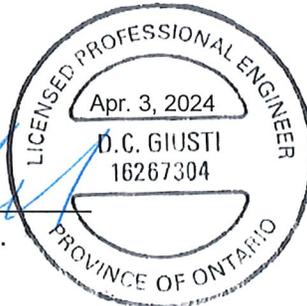
Yours truly,

JADE ACOUSTICS INC.

Per: 
Aaron Keey, P.Eng.



Per: 
Dalila C. Giusti, P.Eng.



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