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December 9, 2009

Karen Pitre
Project Director
GO System Electrification Study
Metrolinx
20 Bay Street, Suite 600
Toronto, ON M5J 2W3

Dear Ms. Pitre,

RE: Response to November 13, 2009 Metrolinx' letter to Board of Health Chair Regarding Recommendations for the GO System Electrification Study

On November 16, 2009, the Toronto Board of Health discussed my report on Metrolinx' Georgetown South Service Expansion and Union-Pearson Rail Link, which included a recommendation in three parts to strengthen the GO System Electrification Study (Electrification Study). Thank you for your November 13, 2009 letter, addressed to Councillor John Filion, Chair of the Board of Health, that responded to my report.

At the meeting, the Board of Health requested that I respond to your November 13th letter to: *"...identify the extent to which the Medical Officer of Health's recommendations are addressed, including how noise impacts could be dealt with in the electrification study, and to make this response available to members of the Board of Health, community groups and deputants."* This letter responds to that request. I reference the Board of Health report and meeting recommendations available at <http://www.toronto.ca/legdocs/mmis/2009/hl/decisions/2009-11-16-hl26-dd.htm>.

Your letter references several details of the Request for Proposal (RFP) for Consultant's Assignment for an Electrification Study Evaluating Future Technologies (Proposal No. RFP-2009-CON-013). However, I feel that overall your letter and the RFP do not adequately respond to the concerns raised in my report. I note specific examples, and make an additional comment on the assessment of noise impacts that has not been previously expressed.



Framework to Integrate Evaluative Parameters

In its recommendation 2(a), the Board of Health urged Metrolinx to “*develop a risk analysis framework for integrating the various impacts associated with each train technology option that is explicit, and open to public review.*” Your letter references the wide-ranging risk analysis planned for the Electrification Study. As the RFP states, the citizens of the Greater Toronto and Hamilton Area “want future transportation infrastructure decisions to achieve an optimal balance of economic, social, environmental, operational, health and technological considerations.” The balance of factors being sought by Metrolinx is not yet clear and must be defined, as it will influence the results of the Electrification Study. It is understood that the consultant will propose specific methodologies for the Electrification Study, including an evaluative framework. I strongly recommend that Metrolinx and its Consultant: 1) begin the process of developing an evaluative framework as soon as possible; 2) involve stakeholders in its development (i.e., inform stakeholders of the options and invite their commentary; and, 3) report the results of the Electrification Study in a way that clearly discloses the inputs and framework used.

Health Impact Assessment (HIA)

In its recommendation 2(b), the Board of Health urged Metrolinx to broaden the assessment of health impacts associated with train technology options by adopting an approach that encompasses Health Impact Assessment (HIA) methods. Your letter suggests that the consultant will propose specific methodologies for the assessment of health impacts. My staff would be happy to meet with you and your consultant to discuss how HIA can be incorporated into the Electrification Study.

Low socioeconomic status is associated with poor health outcomes. The status of some communities along the Georgetown rail corridor is a cause for concern, as their existing health burden may lead them to be more severely impacted by diesel train exhaust than other communities of higher socioeconomic status. HIA is a tool that can be used in conjunction with other health assessment techniques, such as risk assessment, to help ensure that the distribution of health impacts and benefits is fully analyzed. Risk assessment alone is not well suited to examining those distributions. Resources from the National Collaborating Centre for Health Public Policy describing HIA can be found at <http://www.ncchpp.ca/627/Health+Impact+Assessment.htm>.

Compare Costs of Technology and Phasing Options

In recommendation 2(c), the Board of Health urged Metrolinx to compare “*the total cost of train expansion options between investing in electrification now, versus use of Tier 4 compliant diesel technology as an interim strategy, with electrification later.*” It is not clear from the RFP whether this is a scenario that will be considered. The Board’s concern is that phased, multi-year implementation of an electric or alternative technology could involve some interim investment in conventional diesel technology to meet service or other requirements prior to full implementation. To get a full picture of the investment required for phased, multi-year implementation scenarios, the capital costs of any interim measures that may be required should be quantified as part of the assessment of system costs. I look forward to seeing the results of such an analysis.

Noise

The impact of noise from both construction activities and expanded train operation on their health and daily lives is a significant concern to many Toronto residents. The RFP states that the Study must quantify the impact of each technology on human health, including assessments of noise. It’s not clear from the RFP whether both construction and operational noise will be considered. I urge

Metrolinx to include construction noise in the Study wherever significant construction differences exist among the technology options.

Metrolinx' planned Go System Electrification Study is an important initiative. This effort requires a significant commitment of resources, and it is vital that those resources are used well by conducting the best possible study. The best possible study will ask the right questions, will answer them in ways that support decision making, will have scientific credibility, will engage stakeholders, and will follow a fair and transparent process.

The Electrification Study's Terms of Reference were established by Metrolinx with the help of a Community Advisory Committee and the broader community. The contract to complete the work is now out for tender, and the Electrification Study will continue to evolve as the successful consultant contributes its own innovations. It is my hope that stakeholders will have significant opportunities to shape the detailed work plan.

Sincerely,

Original signed by Dr. David McKeown

David McKeown, MDCM, MHSc, FRCPC
Medical Officer of Health

cc: BOH Members

Councillor John Filion, Chair
Councillor Janet Davis, Vice-chair
Councillor Raymond Cho
Councillor Paula Fletcher
Councillor Chin Lee
Councillor Gord Perks
Trustee Soo Wong
Alejandra Bravo
Vaijyanthi Chari
Fiona Nelson
Lisa O'Brien
Valerie Sterling

Community groups

Clean Train Coalition
Mount Dennis Community
Association
Weston Community Coalition

Deputants

Suri Weinberg-Linsky
Elizabeth Littlejohn
Lin Grist
Scott Dobson
Catherine Kormendy
Karl Junkin
Rick Ciccarelli