

April 25, 2014

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RE: HL30.1 Path to Healthier Air: Toronto Air Pollution Burden of Illness Update

We provide this correspondence in support of the above noted staff report, but note that we feel additional attention is needed to address the key finding of the report, the need for a renewed focus on reducing emissions from traffic.

The report assesses the changes in the air pollution burden over the past decade and states that air pollution is currently estimated to give rise to 1,300 premature deaths and 3,550 hospitalizations each year in the City, down from 1,700 premature deaths (23%) and 6,000 hospitalizations (41%). The report finds that of all the contributors to health impacts from air pollution, traffic has the greatest impact, and contributes to about 280 premature deaths and 1,090 hospitalizations or about 20% of all premature deaths, and 30% of all hospitalizations due to air pollution. When only pollutants within Toronto's boundaries are considered, the proportion of premature deaths and hospitalizations attributable to traffic are 42% and 55% respectively.

In addition, the report states that air pollution in Toronto from traffic sources may contribute to 800 episodes of acute bronchitis among children, 42,900 asthma symptom days, 43,500 days where respiratory symptoms such as chest discomfort, wheeze, or sore throat would be reported, and 128,000 days when people would stay in bed or otherwise cut back on normal activities as a result of air pollution.

The report states that to reduce emissions from the key transportation sector means "tackling issues such as vehicle dependence (mode shift), the impacts of highways and truck traffic, and vehicle performance". Under Mode Shift the report mentions the City's and provincial efforts to encourage less polluting forms of transportation (such as "Complete Streets" and "The Big Move") but omits reference to the challenge to a reduction strategy posed by developments such as large format retail "power centres" that encourage, or (due to their item quantity/warehouse nature), necessitate use of personal vehicles (and also large truck traffic). Due to their customer drawing power over a large area, and offering cheap gas, they encourage massive traffic flows and congestion, with associated emissions¹.

¹ Based on figures submitted by the applicant, the proposed Costco retail warehouse plus gas station on Overlea Boulevard in Thorncliffe Park would result in an additional 2,246,400 vehicle trips per year (generating an unknown amount of emissions). See letter attached from John Elliott, Executive Director, Flemingdon Health Centre to Steve Forrester, Planner, North York District [42-46 Overlea Boulevard: Zoning By-law Amendment Application – Need for Air Quality Studies and Health Impact Assessment](#), March 27, 2014.



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Currently there is no mandated consideration of the health impacts of these developments in provincial policy or city's official plan or zoning by-laws. While there are "tests" in the City of Toronto Official Plan relating to transportation capacity and economic health of existing shopping centres related to proposed large scale stand-alone retail stores and power centres in Employment Areas², there is no such requirement for tests related to air quality and health impact.

It is recommended:

- that City Council request the Chief Planner and Executive Director, City Planning Division, in collaboration with the Medical Officer of Health to examine and report back to the Board of Health in January 2015 on the feasibility of either applying tests in the Official Plan related to air quality emissions and health impacts (similar to existing tests relates to transportation capacity and economic health of existing shopping centres) related to proposed large scale stand-alone retail stores and power centres in Employment Areas, or requiring a health impact assessment related to such developments.

Respectfully submitted



John Elliott
Executive Director
Flemingdon Health Centre

c.c. Dr. David McKeown, Medical Officer of Health
Jennifer Keesmaat, Chief Planner and Executive Director, City Planning Division

² Section 4.6.3 of Toronto's Official Plan states "Large scale, stand-alone retail stores and "power centres" are not permitted in *Employment Areas* in the *Central Waterfront* and are only permitted in other *Employment Areas* fronting onto major streets as shown on Map 3, that also form the boundary of the *Employment Areas* through the enactment of a zoning by-law. Where permitted, new large scale, stand-alone retail stores and 'power centres' will ensure that:

- a) sufficient transportation capacity is available to accommodate the extra traffic generated by the development, resulting in an acceptable level of traffic on adjacent and nearby streets; and
- b) the functioning of other economic activities within the *Employment Areas* and the economic health of nearby shopping districts are not adversely affected."