

January 9th, 2024

To : Economic and Community Development Committee (ECDC)

ecdc@toronto.ca

Re: Item - 2024.EC9.5

Dear Madam Chair and Honourable Committee Members,

We are writing on behalf of Gasbusters, an organization that is supported by 587 residents across the City of Toronto and 19 Residents' Associations.

Having read the proposed recommendations by MLS following their Noise Bylaw Review that has taken place over the past several months, we consider them to be nothing short of shameful in their negligent approach to addressing the growing hazards related to excessive noise within our city. We urge that you vote on January 11 to reject their report in its entirety, and send them "back to the drawing board" to generate meaningful recommendations that will lead to tangible results in making our city more liveable. We live in a world now in which data is readily accessible, and utilizable for proper decision-making- let's use it!

During the facilitated sessions which our Committee members attended, the vast majority of attendees indicated that noise levels in Toronto are worse than they were four years ago. Various sources were identified, notably Power Devices and Construction. Does that not clearly indicate that our citizens are concerned about the impacts of noise, and that they feel that regulatory action should follow? MLS has raised expectations through the consultation process- now make them deliver.

Our primary interest is in the regulation of Power Devices and the elimination of gas-powered leaf blowers and related garden equipment, but we know that the sources of excessive noise in our city are widespread, and we expect City Council to implement measures regarding noise mitigation at a standard that will make Toronto exemplary, rather than a laggard.

Our specific points are outlined below:

Proposed Toronto Noise Bylaw Changes

Noise is a public health issue and we do not believe that the MLS report treats it with sufficient urgency. Toronto ambient urban noise levels already exceed recommended ambient noise limits to prevent health effects.

1. The MLS report does not address the numerous negative impacts of noise on the health of Torontonians.

These health impacts include:

- cardiovascular disease,
- cognitive impairment in adults and children,
- sleep disturbance
- mental health impacts
- Potential adverse pulmonary effects, increased mortality from diabetes, and negative impact on behaviour in children.

Toronto ambient urban noise levels - 63 dBA (24-hour average) in 2017*, likely higher now - exceed recommended ambient noise limits to prevent the aforementioned health effects:

- 55 dBA (Leq 16 hours) average through the day and evening, and 40 dBA (Leq 8 hours) at night - World Health Organization.
- 55 dBA average during the day, 50 dBA average at night. Ontario Ministry of Environment and Climate Change.

* Toronto Medical Officer of Health, *Health Impacts of Environmental Noise*.

The ED report should detail how the proposed noise bylaw changes will achieve urban noise levels that will prevent health effects of Torontonians, and it should be based on qualified, published data under the signature of Toronto's Medical Officer of Health.

2. Power Device sound emission limits.

Setting specific power device sound emission limits will reduce noise and help mitigate the negative health impacts of ambient noise.

For example, in the case of leaf blowers, your consultant Valcoustics, reports that a standard exists for the sound measurement and labelling of this equipment (ANSI Standard ANSI/OPEI B175.2-2012).

We support implementation of a bylaw requiring leaf blowers meet "Category 1" of the aforementioned standard (≤ 65 dBA at an unspecified distance).

We also support Valcoustics suggestion that Toronto "...reach out to other Canadian or North American municipalities to act together setting sound limits and to require sound labelling in order to use a device in the municipality. This would create a stronger incentive for manufacturers to comply.

3. Toronto's noise bylaw should set time of use and sound level limits (decibels) for noise generating activities.

Setting sound level limits at the sound source or property line of the source allows enforcement without intrusion into complainant's residences or property.

We note that "The majority of residents agree with using sound level limits (decibels) to enforce the Noise Bylaw, with 70% agreeing that they should be used to measure how loud an event or object is, and 68% agreeing they should be measured from the location of the complainant." (Executive Director's report).

4. Toronto's noise complaint reporting process isn't working.

- Citizens do not know how to report noise complaints.
- The 311 reporting process is lengthy and not user-friendly.
- The system does not record many noise complaints – only those occurring outside permitted times. This means that complaints about noisy equipment used during the day are largely excluded from the data.
- The email reporting option alluded to in the ED report for leaf blowers only became available in mid-2023. This reporting option was never widely communicated to Torontonians. The complaints it received in no way reflect the level of public concern about leaf blower noise.

We fully support revising and simplifying the current noise complaint reporting process so everyone can use it and all noise complaints are recorded.

5. Enforcement of the noise bylaw is essential.

This means fines must be large enough to act as a real deterrent. Enforcement must be timely, and bylaws must be written to facilitate enforcement. For example, allowing remote noise monitoring and using the generated data to lay charges.

6. Consultation with Residents is essential to the development of public education initiatives that will be effective.

Thank you.

Gasbusters Organizing Committee
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GAS BUSTERS

Stopping leaf blowers from damaging our health and the environment

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About Gasbusters

Gasbusters is a growing group of Toronto residents and residents' associations that want an IMMEDIATE BAN on the use of gas-powered leaf blowers and related garden equipment in Toronto. Our membership includes over 500 individuals and 19 resident associations:

- Avoca Vale Residents' Association
- Bayview Village Association
- Bedford Park Residents Organization
- Church Wellesley Neighbourhood Association
- Deer Park Residents Group
- Eglinton Park Residents' Association
- FONTRA The Federation of North Toronto Residents' Associations
- Friends of Farquharson
- Grange Community Association
- Harbord Village Residents' Association
- High Park North Residents Association
- Lytton Park Residents' Organization
- North Rosedale Residents Association
- Rathnelly Area Residents Association
- Republic Residents Association
- South Armour Residents Association
- South Eglinton Davisville Residents Association
- West Willowdale Neighbourhood Association
- Wychwood Park Residents Association.