

Bayview Village Association Comments to Economic Community and Development Committee Meeting, January 11, 2024 on Proposed Toronto Noise Bylaw Changes

The Bayview Village Association is a volunteer, community-driven organization established in 1956 to promote the welfare of residents of the Bayview Village area which is now part of Toronto's Don Valley North ward. Membership is open to all residents of this area. The Association's activities include community meetings, cultural and social events and outreach. We also advocate for the interests of our community by engaging all stakeholders to address such issues as traffic, environmental concerns, neighbourhood safety and noise, the topic of this submission.

Noise is a public health issue. Toronto ambient urban noise levels already exceed recommended ambient noise limits to prevent health effects (see point 1).

Excessive noise is an issue in our community. Noise from powered property maintenance equipment is a daily occurrence. Infill construction is constant. Daily, our residents are exposed to noise from trucks and other construction vehicles, and from stone and wood cutting, hammering, and related small scale construction work. These activities also occur on evenings, weekends and holidays.

We support strong measures to reduce noise in Toronto. We are very disappointed that the proposed noise bylaw changes are insignificant in terms of reducing excessive noise in Toronto. Our comments on the Executive Director's report and the proposed changes are outlined below.

1. The ED report does not include a Health Impact section that details how the bylaw changes would 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.

The ED report should detail how the proposed noise bylaw changes will achieve urban noise levels that will prevent health effects of Torontonians.

* Toronto Public Health, 2017. *How Loud is Too Loud - Health Impacts of Environmental Noise in Toronto*.

2. Toronto's noise bylaw must mandate power equipment source sound emission limits.

We support broadening the power device definition to include more noisy equipment. Setting specific power equipment sound emission limits will definitely 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 Toronto implementing a City of Vancouver style by law that requires leaf blowers to 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. As a start, this could be done through the Federation of Canadian Municipalities, who could then reach out to its US counterpart."

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

Setting sound level limits at the noise source or source property line 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...." (Executive Director's report).

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

- Citizens do not know how to report noise complaints.
- If citizens do try to use the 311 reporting process, they find the process 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 temporary dedicated email account reporting option for leaf blower complaints alluded to in the ED report, only became available in August 2023. This reporting option was never widely communicated to Torontonians. Hence, 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 that all residents can use it and all noise complaints are recorded.

5. Adequate and timely monitoring and enforcement of the noise bylaw are essential to successfully control the deleterious effects of noise on the health of Torontonians.

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. Residents should be consulted during the development of public education initiatives regarding the noise by-law regulations and best practices to mitigate noise.