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Reply:

September 16, 2009

The Honourable John Gerretsen
Minister of the Environment
135 St. Clair Avenue West, 12th Floor
Toronto, Ontario
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Dear Minister Gerretsen:

Re: Response to Information Clarification Submitted by Metrolinx in relation to Proposed Diesel Expansion of Georgetown South GO Service and Union-Pearson Rail Link

I am writing to submit additional comments to my letter of August 19, 2009, in which I commented on the proposed diesel expansion of the Georgetown South GO Service and the Union-Pearson Rail Link as submitted to you in the Environmental Project Report (EPR) prepared by Metrolinx.

In view of new technical information provided to you by Metrolinx in their “Information Clarification” statement of September 14, 2009, I trust you will take account of several comments that I am submitting for your consideration.

The new information submitted by Metrolinx has bearing on three main technical matters, as follows:

- Unacceptable leukemia risks are no longer predicted for any receptor locations. Metrolinx has submitted a revised hazard assessment for the chemical 1,3-butadiene that applies a more recent and appropriate standard for determining the cancer unit risk value. In the revised calculation, the maximum predicted leukemia risk for 1,3-butadiene is now below the Ministry of the Environment threshold of one in one million. Based on this result, I agree with the projection that there is no increased leukemia risk associated with the proposed project.
- As outlined in the EPR, local air concentrations of several contaminants are predicted to increase due to the proposed project and some contaminant concentrations are predicted to exceed health-based air quality benchmarks. Based on the additional technical information and clarifications of modelling calculations submitted by Metrolinx, I agree that these predicted increases do not underestimate the likely outcomes.



- As outlined in the EPR, acute health risks caused by exposure to several contaminants are predicted to increase due to the proposed project. Based on the additional technical information submitted by Metrolinx, I agree that these predicted increases do not underestimate the likely outcomes.

Notwithstanding the above, I remain concerned about the air quality impacts and increased health risks predicted for the immediately adjacent communities as a result of the proposed diesel expansion.

In the “Information Clarification” Metrolinx has described potential air quality and health impact mitigation measures, including improvements to locomotive stock. While these mitigation measures would reduce emissions, it is not clear what level of reduction will be achieved in local ambient air concentrations of the respiratory irritants for which increased risk is predicted.

In its additional information Metrolinx also indicates that it is exploring alternatives to diesel train technology, including electrification. In my view, electrification is the option that most clearly addresses the air quality and health impacts predicted from the proposed project for populations adjacent to the line by ensuring that any emissions (due to electrical power generation) are regional in nature. Whether other measures proposed as part of a comprehensive mitigation strategy could reduce the predicted air quality and health impacts to an acceptable level remains to be demonstrated.

Thank you for your consideration of these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McKeown". The signature is fluid and cursive, with a large loop at the end of the last name.

Dr. David McKeown
Medical Officer of Health

copy: Robert Prichard, President and CEO, Metrolinx