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Need for Changes to Rail Corridor Proposals

The Mount Dennis Community Association (MDCA) wishes to express its strong concern about three aspects of Metrolinx' current proposals for work on the rail corridor through our area (where it runs close to many individual dwellings, a day care and two large apartment buildings):

(1) Need for Noise Reduction Barriers

We were startled to learn at a meeting in November that Metrolinx now plans to implement its work in the rail corridor WITHOUT installing any new noise barriers in the Mount Dennis area. This came as a major surprise because the 2009 report prepared for Metrolinx by J.E.Coulter & Associates recommended that such barriers be provided in all those areas which do not already have them.

The new stated reasons for not providing noise barriers throughout the corridor were:

- lower than originally-anticipated train speeds;¹
- revised forecasts suggesting fewer trains will use the new tracks; and
- the possibility that future construction of catenary supports (needed for electrification) may be impeded by noise walls.

The MDCA does not accept these arguments for eliminating the previously-recommended noise barriers in the Mount Dennis section of the rail corridor.² Approval has been given for the creation of three additional rail lines, thereby doubling the capacity of the corridor. Once that capacity increase has occurred, today's decisions about train speeds and today's forecasts about train volumes can be changed with relative ease.

With respect to catenary support poles: these could be built as part of the current work and integrated into the noise barrier system, assisting in the speedy process of electrification to which the government says it is committed. If this is not practical, it

¹ At least some residents believe they may be more bothered by slower trains, whose noise will be audible for longer periods.

² The fact that Metrolinx is proposing new noise barriers in some others parts of the corridor is exacerbating local concerns.

should still be possible to design the noise walls with small removable sections to accommodate future poles.

Even if there was not a consultant's report recommending noise barriers, there is a compelling case for providing them. Government of Ontario regulations set out specific requirements to be imposed by municipalities on anyone planning to build new housing adjacent to rail tracks. During the past twenty years, those regulations have forced ALL developers of new homes beside the three-track Mount Dennis rail corridor to build noise barriers which minimize the trains' disturbance of residents in new homes. Older houses beside the tracks do not enjoy the same protection. Yet now, the same Government which insists that new residences get noise protection is in process of turning the three-track rail corridor into a six-track corridor, thereby doubling its capacity and significantly increasing the potential noise exposure of existing homes, but refusing to provide those homes with noise barriers.

This seems to us a serious and unacceptable case of double standards. We suggest that if rail lines were not, in the normal course, outside Provincial jurisdiction, developers of new rail capacity would be subjected to the same standards as developers of new housing. In this case, where an agency of the Province is itself the rail developer, it must be held to such standards.³ As stated in one of the Ontario government's own publications: "By ensuring that environmental conflicts are identified and minimized at the earliest possible stage in a development proposal, the need for subsequent abatement controls is avoided. This early planning strategy facilitates cost effectiveness and maximizes the number of available planning or design options." Mount Dennis residents are asking that the government act in accordance with its own policies, and minimize future environmental conflicts by providing noise barriers NOW, when the new rail tracks are being installed.

(2) Need for Vibration-Reducing Ballast Mats

The 2009 report prepared for Metrolinx by J.E.Coulter & Associates also proposes use of ballast mats to reduce the amount of vibration transferred into the soil. It states: "The one area which is known to probably benefit from ballast mats and/or sleeper pads is the area around Mount Dennis" (because it is an area of "stiff" soils which readily transmit vibration).

Despite this, the latest Metrolinx proposals call for ballast mats at various OTHER locations within the corridor, but not in Mount Dennis. Again, the MDCA is mystified by this. Residents adjacent to the rail corridor are already troubled by existing levels of vibration, and believe that any new tracks should be provided with the benefits of ballast mats. We would also like to see ballast mats added under the existing tracks as part of any future reconstruction, as proposed in the J.E.Coulter report.

(3) Need to Preserve Trees and Shrubs

The rail corridor throughout Mount Dennis is richly endowed with trees and shrubs, all of which (we were told at the November meeting) Metrolinx intends to remove.

Most Mount Dennis residents feel very strongly about the need to preserve this vegetation. At present, the trees "naturalize" the rail corridor, reducing its visual impact. Although their effect in reducing noise is quite small, trees and shrubs put

³ Refer to Ontario Government publication LU-131 and its Annex for details of the requirements.

the noise source largely out-of-sight, which makes it less oppressive. There are other important benefits too. The leaves of rail-side trees and shrubs absorb some of the dust and diesel particulate matter emitted by passing trains, acting as natural air filters. They also accommodate significant quantities of birds and small mammals, which many in our community would hate to lose.

The Black Creek Conservation Project is one of several other local organizations which shares MDCA's concern about tree loss from the rail corridor. We are aware that Metrolinx has pledged to replant elsewhere as many trees as it removes from the corridor. This is commendable, but wherever existing trees and shrubs can be preserved within the rail corridor, they should be. And we believe that the greater width of the corridor through Mount Dennis makes it more feasible to retain trees here - and improve the corridor's aesthetics by planting new ones too - than it may be in some other sections.

It is also worth noting that the US Federal Highways Administration recommends that where noise barriers are used, landscaping (i.e. trees and shrubs) should be "provided near the barrier to avoid visual dominance".⁴

This letter has been delayed while we consulted with local residents, especially those immediately adjacent to the tracks. Our consultation has shown that the overwhelming majority share the above concerns: they want noise barriers adjacent to all residential properties (and the daycare); they want vibration mats; and they want to see trees and shrubs within the rail corridor retained, and enhanced wherever possible.

In an effort to ensure that such action is taken, and treated as a matter of high priority, we are e-mailing copies of this letter to elected representatives at all three levels of government as well as the Clean Train Coalition, the City's Medical Officer of Health, and various media.

Yours Truly

{ original signed by }

Simon Chamberlain, Secretary
Mount Dennis Community Association

⁴ http://www.fhwa.dot.gov/environment/noise/noise_barriers/design_construction/keepdown.cfm