

From: Angus Johnson, Greenspace Alliance

To: London City Council

Please add the letter below to the Agenda of the Oct.23 London City Council Meeting

I will attend this meeting in person and am requesting delegate status.

RE: Report of the Planning and Environment Committee:

RE:1982 Commissioners Road East (Z-9668), 2598-2624 Woodhull Road (Z-9673), 3810-3814 Colonel Talbot Road (Z-9671), 3637 Colonel Talbot Road (Z-9664)

Trading Cars for Trees

The issue of producing GHG emissions and global warming relate to the plans for these four developments, hence treating them as a group.

The Rainham emissions map¹ shows the correlation in London of vegetation and emissions. Simply, areas with vegetation can remove emissions. If pavement and infrastructure have replaced vegetation, emissions increase.

If completed, these projects will result in a substantial amount of vegetation being replaced by pavement and infrastructure. Within the projects, over 65 trees will be eliminated. (In one project, trees will be removed but no figure is provided.)

The Rainham map shows the amount of tailpipe emissions remaining after reduction by vegetation. Since nitrous dioxide and particulate matter are tailpipe

emissions, the sources of emissions are vehicles burning petroleum. After these four projects remove over 65 trees they will usher at least 643 cars into the community . A one-two emissions punch, increasing sources of emissions while eliminating a means to mitigate them.

As of this writing, there are currently 222 filed development plans, ² for London, with 23660 new households. Multiplying 23 660 by a .66 car dependency rate, X households of 2.4 people = potentially 37 477 more cars. That's a 14% increase of cars if the plans are realized. London's current car population is 273 000. So shrinking vegetation, will be processing at least 14 % more 'on the rise' tailpipe emissions. (And this is not quite halfway to the 47000 new households extorted by our premier.) This development group gives just a suggestion of the potential increase in GHG emissions facing London.

Before council gives final approval to these projects and assumes accountability for these emission increases, give consideration to a recent successful climate change lawsuit³ brought by Our Children's Trust, the Oregon-based law firm that represented 16 young Montanans. In the case the judge decided that children have a fundamental right to a 'clean and healthful environment which includes climate' and that the laws and policies of the state of Montana were in violation of that right.

Another youth-led Hawaii lawsuit, is set to open in June 2024. Young plaintiffs in this case will argue 'that the state's transportation system allows for high levels of greenhouse gas emissions, in violation of the young people's constitutional rights'. Accountability of government for increasing GHG emissions is clearly the focus of these legal actions. An emissions policy that replaces trees with parking lots seems like a invitation to litigation by young Londoners rightly concerned about the effect of emissions on the world they'll be living in.

I think the city has to face the real possibility that the litigants, could ask about London's net zero emissions strategy or whether that amounts to waving in another 70 or 80 thousand cars, bulldozing a lot of grass and trees and hoping for the best.

Recommendations

(1.) London could accelerate approval of housing plans with the least impact on vegetation and that generate the fewest cars and essentially delay the most odious plans.

(2.) Paved parking lots could be looked at as a rare opportunity to increase vegetation. Imagine high rise towers enclosed by mini-forests that replace at least half the pavement.

(3.) Attracting retirees and remote workers to the city could be explored. American cities⁴ offer a variety of incentives when courting non-commuting home buyers.

The Rainham Map and Non Residential Development

Commercial and industrial development can also have a large impact on vegetation. Mall parking lots and new industries can eliminate large areas of vegetation. But emissions produced could be on a larger scale because of greater use of diesel fuel than in residential transportation. The concern is not with a large numbers of new cars in town, but with diesel trucks here already and the probability of industrial development bringing more.

On the Rainham map, the highest emissions are in an orange area forming a large irregular patch concentrated in the southern half of Ward 4. It lies between a line running east to west slightly north of Central Ave. marking the northern edge of the C.P. Railyard and in the south to Hamilton Rd. and east to west between Highbury Ave. and Adelaide St. The other large portion of rail yard is owned by CN Rail. A small chunk of the area left of centre is beige and yellow, a small older residential area. Slightly east of this the rail areas are connected by a strip of orange.

The rail areas are separate sections 21 and 22 rails wide. Around this area is an eclectic mix of six auto repair shops, three car dealerships, Fed Ex, a custom cabinetry, a salvage yard, a window and door supplier, a pet groomer, a designer shop, a plumbing supplier and one truck repair shop. Overall, the area is an industrial/commercial residential mix. The Fed Ex business is probably the largest source of diesel truck traffic close by.

The burning of gasoline does not usually produce amounts of particulate matter while diesel burning directly produces large amounts, two in particular, black

carbon (soot) and fine particles under 2.5 microns. And while burning gasoline and diesel both produce nitrous oxides, diesel burning produces it in much larger amounts, eight to eleven times as much. It is estimated that diesel burning is responsible for 85% of all nitrous oxides from moving vehicles. In perspective, here, much of the particular fuel that produces a substantial amount of both these emissions is being burned by diesel powered locomotives in two railyards effectively sandwiching this area of the city.

Containing Emissions to London's Diesel Corridor

Extending from the rail areas of Ward 4 and through Ward 2 including the large industrial area in Ward 2 is an area where a concentration of diesel truck traffic and the emissions it produces contributes to higher emissions. Presently, that area and the outlets of Highbury Ave. and Veterans Memorial connecting the corridor to the 401 mark the areas where concentrations of diesel emissions are largely confined.

There are two problems with diesel emissions that trucks produce. First, the disproportionate quantity of emissions, second, the tendency of trucks to spread the emissions over wide areas. A "Near-Road Air Pollution Pilot Study"⁵ conducted by the Southern Ontario Centre for Atmospheric Aerosol Research at the University of Toronto, provided valuable information on the disproportional amount of emissions from diesel trucks. Six stations beside major roads in Vancouver and Toronto between 2015 and 2017 yielded these observations:

"Emissions from trucks represent the major source of key pollutants such as nitrogen oxides and black carbon. Data for these pollutants indicate that excessive exposure to diesel exhaust can occur near roads with a significant proportion of truck traffic....concentrations are higher on cold winter days suggesting that the emission control systems for diesel vehicles may not perform well at low temperatures....Emission factors for over 100,000 individual vehicle plumes also showed that a small portion of the trucks and cars were responsible for the majority of the emissions" The report concluded that "...policies and programs implemented to remove this small fraction of highest-emitting vehicles from populated areas could yield large benefits."

Four of the world's largest cities already are banning diesel vehicles. London, England 'fines' diesel trucks 100 £ a day. In 2021 our premier, put a testing plan in

place that was supposed to deal with the problem of diesel emissions in Ontario, but with limited results. For these emissions specifically, London should have a plan that begins with confining emissions to certain areas of the city and ultimately eliminates them.

And while programs to deal with diesel locomotive emissions potentially involve monitoring and working with just two companies, there are a daunting number of companies using diesel trucks within London. This would clearly be an area for research.

¹ See attached “ Rainham/Dalhousie Emissions Map of London by Ward”

²<https://london.ca/business-development/planning-development-applications/planning-applications?page=0>

³<https://www.scientificamerican.com/article/kids-sued-montana-over-climate-change-and-won/>

⁴ <https://www.indeed.com/career-advice/news/cities-offering-perks-remote-workers>

⁵<https://www.socaar.utoronto.ca/wp-content/uploads/2019/10/SOCAAR-Near-Road-Air-Pollution-Pilot-Study-Summary-Report-Fall-2019-web-Final.pdf>

Rainham/Dalhousie Emissions Map

Of London by Ward

