

Appendix A: Notice of Completion

Wet Weather Flow Management Master Plan

Notice of Study Completion

The City of Toronto has prepared a Master Plan for the management of its wet weather flow (i.e. stormwater and combined sewer overflow) following Phases 1 and 2 of the Municipal Class Environmental Assessment. The study covers the entire City and extends across six major watersheds but is limited to the watershed area contained within the City boundaries. These include the Rouge River, Highland Creek, Don River, Humber River, Mimico Creek, Etobicoke Creek watersheds and the lake-based watersheds draining directly to Lake Ontario.

The Master Plan is based on a new philosophy of considering stormwater as a resource and utilizing a hierarchical principle (i.e., applying source controls measures first, then conveyance controls measures followed by end-of-pipe control measures where necessary). It included a broad public consultation process with community representatives on the Steering Committee. The Master Plan strives to meet Provincial Water Quality Objective for the receiving waters.

While the Master Plan addresses the need and justification of projects at a broad level, more detailed studies for each individual project included in the Master Plan will be done at a later date following the Municipal Class Environmental Assessment. The types of projects included in the Master Plan are listed below.

By issuing this notice, the project file for this study is hereby placed on the public record for a 30-day period. The Master Plan is available for review at the following locations:

Local Library:

North: North York Central Library, 5120 Yonge St.
(416-395-5535)
South: Urban Affairs Library, Metro Hall, 55 John St.
(416-395-5577)
East: Cedarbrae Library, 545 Markham Rd.
(416-396-8850)
West: Richview Library, 1806 Islington Ave.
(416-394-5120)

Civic Centres:

East York Civic Centre, 850 Coxwell Ave. (416-392-3072)
Etobicoke Civic Centre, 399 The West Mall (416-394-8101)
North York Civic Centre, 5100 Yonge St. (416-395-0480)
Scarborough Civic Centre, 150 Borough Dr. (416-396-7288)
Toronto City Hall, 100 Queen St. (416-392-7033)
York Civic Centre, 2700 Eglinton Ave. W. (416-394-2523)

Website:

A summary of the reports will be available on the City website:
www.toronto.ca/wetweatherflow

Any issues or concerns you may have should be raised and resolved with the City of Toronto. Your written comments regarding the Master Plan must be received by August 11, 2003.

All comments should be submitted to:

William To
Works and Emergency Services Department
City of Toronto
Metro Hall
55 John Street, 19th Floor
Toronto, ON
M5V 3C6

Fax: 416-392-2974

E-Mail: works_consultation@toronto.ca

If you have any questions about this notice, please call:
416-397-7777 TTY: 416-357-0831

Schedule B Projects

- wet ponds
- infiltration systems
- Exfiltration/filtration systems (outside road allowances & to existing outlet)
- road sewer separation (outside road allowances & to existing outlet)
- in-line storage facilities

Status

- While the Master Plan addresses Phases 1 and 2 of the Class EA, additional investigations will be carried out for each project later.

Schedule C Projects

- wet ponds (with chemical or biological treatment or disinfection)
- constructed wetlands
- Exfiltration/filtration systems (to new outlet)
- road sewer separation (to new outlet)
- underground detention tanks / storage tunnels (storm or combined sewage)
- stormCSD treatment facilities

Status

- The Master Plan addresses Phases 1 and 2 of the Class EA. Phases 3 and 4 will be completed for each project at a later date.
- Phases three and four will be completed for each project at a later date.

Subject to the comments received as a result of this notice, the recommended Master Plan will be presented to City Council for approval.

This notice issued July 11, 2003



Appendix B: List of Participants in the Review

Citizen Members of the WWFMMP Steering Committee

Luciano Martin	Action to Restore a Clean Humber (ARCH)
Peter Hare	
John Hopkins	
Dalton Shipway	
Karey Shinn	Chair, Safe Sewage Committee
Lino Grima	Remedial Action Plan Public Advisory Committee
Karen Buck	Citizens for a Safe Environment
Jim Neff	Ashbridges Bay Treatment Plant Implementation and Compliance Monitoring Committee
Peg Lush	Safe Sewage Committee

Community Organizations and Individuals

Five Individual Members of the Public
Water Tek Inc.
Safe Sewage Committee
Dominion Colour Corporation
Council of Commodores
Don Watershed Regeneration Council
Etobicoke Creek Watershed Coalition
Humber Watershed Alliance
Friends of the Don East
Save the Rouge Valley System\Green Door Alliance
Black Creek Project
Humber Heritage Committee

Government Agencies

City of Toronto, Parks and Recreation
Toronto Region Conservation Authority
Ministry of the Environment
Environment Canada

Appendix C: Complete Set of Comments and Responses

Citizen Members of the WWFMMP Steering Committee

Respondent	Comment	City Response
<p>Luciano Martin, Action to Restore Clean Humber (ARCH)</p>	<p>1. Natural wetland/infiltration areas as receiving sites: existing naturally occurring features, the Plan only consider two sites. ARCH has several additional sites.</p>	<p>The consultants and City have, in evaluating the end-of-pipe facilities, estimated benefits based on green 'wet-pond' facilities or equivalent [which include infiltration facilities, constructed wetlands etc]. The 'or equivalent term' is the key term and is meant to illustrate that these type of technologies provide similar benefits irrespective of whether or not it is a wet pond, a constructed wetland, etc. At the next stage of site specific evaluation for green end of pipe facilities, the site specific project will consider several alternatives, including natural wetlands / infiltration areas, wherever possible.</p> <p>Further, City council on September 22 and 23, 2003, in approving the WWFMMP adopted a motion authorizing "That staff work with knowledgeable Humber Watershed groups to pursue the inclusion of some low cost projects that utilize effective natural processes for the 2003-2007 implementation period of the WWFMMP."</p> <p>It should be noted that depending on the classification, sensitivity and subsoil conditions of natural wetlands/infiltration areas, the discharge of additional sewage (including storm runoff) may be prohibited from entering any sensitive or Provincially Significant Wetlands to avoid negative impacts on existing wetland functions. Wetlands are protected through the protection of representative habitats, such as Areas of Natural and Scientific Interest (ANSI) program, protection and management of fish habitat, and management of significant wetlands in various Crown Lands management programs.</p>
<p>Luciano Martin, Action to Restore Clean Humber (ARCH)</p>	<p>2. Deflector arm: should be deleted from the Plan and use the money for upriver water improvement project. The deflector arm may degrade water quality west of the river mouth and jeopardize the Heritage River designation of Humber River.</p>	<p>While the Master Plan provides for control of City sewer outfalls which directly impact the beaches, these improvements are masked by the impacts of watersheds, which extend well beyond the City limits. The modelling analyses that was carried out during the evaluation of alternatives for achieving beach water quality objectives demonstrated that flows from the Humber River will continue to impact water quality along the Western Beaches and similarly, the flows from Etobicoke Creek will continue to impact Marie Curtis Park beaches, even with the implementation of the 100 year plan and implementation of additional controls in the 905 area with performances typical of the MOE SWMP Planning & Design Manual.</p> <p>It has been demonstrated that no matter what we do at source, conveyance and end-of-pipe, the degree of restoration of the hydrological cycle is insufficient to achieve beach water quality objectives. The concept of a "deflector arm/ fishing pier structure" was evaluated and the computer simulation results demonstrate that it, in conjunction with all upstream measure contained in the plan, can significantly improve water quality along the Western Beaches and Marie Curtis Park Beach West. In the Humber River watershed, the Master Plan gives high priority to projects with the largest impacts on improving water quality in the Humber River. This includes eliminating sources of dry weather pollution. The City will also be working with the Toronto and Region Conservation Authority and upstream communities to improve water quality from all sources to the Humber River.</p> <p>Achieving the Plan's beach water quality improvement objectives within the 25 year implementation plan can not be realized without these structures.</p> <p>This type of project is subject to review and analysis through the Class Environmental Assessment process which will address all concerns that have been raised and further evaluate the justification for this project. The GA will consider and assess options for the configuration of the structure and opportunities to integrate it with recreational uses and the ecological function of Humber Bay (e.g. fishing pier and park features above water and fish habitat features below water). However, through a motion by Works Committee on September 4, 2003, the City is committed to "delaying the Class Environmental Assessment process for the Humber River and Etobicoke Creek Deflector Arms and instead, requesting that the commissioner of Works and Emergency Services report back to the Works Committee by April 2004 on consultations with expert stakeholders and the community in these watersheds".</p>

Respondent	Comment	City Response
Luciano Martin, Action to Restore Clean Humber (ARCH)	3. Citizen and Non-Government organization (NGO) involvement: Plan does not recognize and fully involve the resources of the community, little attention to assessing the non-government capabilities, and identify projects that will benefit from NGO and Gov partnership.	<p>It is recognized that residents, Non-Governmental Organizations (NGO's) and businesses are valuable assets to support the implementation of the WWFMMMP. A Stormwater Pollution Prevention Public Education and Outreach Strategy, prepared as part of the Master Plan process, identified strengthening and enhancing community outreach efforts to residents and businesses as a key activity.</p> <p>To this end, funding in the amount of \$250,000 per year has been approved for community based projects which advance the wet weather flow management targets in the Master Plan. A City interdepartmental team will be formed including the TRCA to establish criteria and process for the selection of candidate projects for funding and a report to Works Committee will be prepared on an annual basis documenting the projects funded and financial leveraging provided by other corresponding parties for these projects. The funding is to be administered by TRCA as they have a watershed based mandate and already work with many of the community-based groups who wish to promote activities in support of the Master Plan.</p>
Luciano Martin, Action to Restore Clean Humber (ARCH)	4. Polluters pay principle: Strongly disagree with statement in Introduction "both the generators of pollution and the beneficiaries of a clean environment should contribute equally to the financing of WWF management initiatives".	The City's Finance Department is assessing various funding options including increasing water rates, levying property taxes, implementing user charges apportioned to the percent impervious area of an individual lot, development charges and grants/subsidies, etc., as potential sources of revenue to finance the Plan. Further, in accordance with the Master Plan, all future development in the City is expected to provide on-site stormwater management controls consistent with measures required for the long term Preferred Strategy.
Luciano Martin, Action to Restore Clean Humber (ARCH)	5. Dry weather measures: not adequately assessed and remedial measures are not fully evaluated.	Dry weather discharges were simulated in the computer models and the impacts of dry weather discharges were assessed in the analysis of the alternative strategies. Also, measures contained within the 25 year Implementation Plan consist of enhanced municipal operations and maintenance practices which include a dry weather discharge remediation program.
Luciano Martin, Action to Restore Clean Humber (ARCH)	6. Modelling shortcomings: models place undue reliance on typical parameter values. Should place greater emphasis on real, measured data. Should include negative values to be assigned when measure has adverse impacts.	<p>The modelling analysis was based on using typical parameter values in the model as an initial estimate, but was then followed by a rigorous model 'calibration and validation process' which involves adjusting the selected modelling parameters within ranges that were considered reasonable to achieve a reasonable level of agreement between model simulation values and the monitored field data. In fact, the model places greater reliance on real, measured data than the typical parameter values.</p> <p>The scoring system assigned to the evaluation criteria ranged from 0 to 10. Instead of assigning negative values where there was a negative impact or no positive contribution, negative criteria were included in the evaluation criteria such as impacts on: public health, user acceptance, terrestrial and aquatic systems, open spaces, etc. If a strategy resulted in no adverse impact on a particular negative criteria that criterion was assigned a score of 10. On the other hand, if there were adverse impacts that criteria was assigned a score of 0. In this way, adverse impacts were accounted for in the evaluation of alternative strategies.</p>
Luciano Martin, Action to Restore Clean Humber (ARCH)	7. Source controls, end-of-pipe hard infrastructure: recommend a relocation of funds in Estimated Cost Tables ES.2 and ES.3 from End of Pipe Facilities and Deflector Arm to Source Control, Stream Restoration, Dry Weather Remediation, education, natural processes sites, and environmental monitoring.	<p>The implementation of source controls, conveyance controls, stream restoration, public education, etc., has been given high priority in the 25 year implementation plan. Over \$400 million of funding has been allocated in the 25 year plan to achieve the target uptake rate for Source Controls and conveyance controls; to implement the enhanced Stormwater Pollution Prevention Public Education and Outreach Strategy; to complete Stream Restoration in 15 years; to implement an enhanced municipal operations and maintenance program for the elimination of pollutants at source and to eliminate dry weather discharges and for the undertake an environmental monitoring program.</p> <p>In the combined sewer service area, given the City's legislative requirements in achieving the Ontario Ministry of the Environment's prescribed levels of combined sewer overflow control, achieving the target uptake rate of 40% for downspout disconnection has been advanced as a first priority in the Plan implementation.</p> <p>However, even with the ambitious implementation levels of these measures in the long term (100 year) plan, the development of the Master Plan has demonstrated that to meet the objectives of the WWFMMMP, end of pipe facilities and the Deflector Arms are required.</p>

Respondent	Comment	City Response
Luciano Martin, Action to Restore Clean Humber (ARCH)	8. Turbidity as a water quality indicator: turbidity should be one of the indicator parameters for Humber River water quality.	We agree that turbidity is a water quality indicator. In evaluation of the strategies, Total Suspended Solids (TSS) was used as the key water quality parameter. TSS is a surrogate for turbidity and accordingly turbidity has been considered. In terms of future monitoring programs, both turbidity and suspended solids will be measured.
Luciano Martin, Action to Restore Clean Humber (ARCH)	9. Upstream contribution, watershed solutions: should clearly identify the roles and actions desired in the upstream municipalities. Urgent need for joint watershed oriented action.	<p>In developing the WWFMMP, the City of Toronto engaged "upper watershed" municipalities in two formal roundtable sessions to provide information on the Master Planning process and seek feedback and advice:</p> <ol style="list-style-type: none"> 1. "Our Shared Watersheds" (November 2000); and 2. "Our Shared Watersheds II: Continuing the Dialogue" (February 2002). <p>One of the strategies for co-operation and collaboration that emerged from the second roundtable was the creation of an Inter-regional Working Group. Both the City and the "upper watershed" municipal staff supported the establishment of an Inter-regional Working Group of stormwater management practitioners to: establish a common vision and goals for stormwater management at a regional/watershed level; promote and ensure collaboration and co-operation between the City of Toronto and upper watershed municipalities; share information and consider joint efforts such as pilot projects, modeling and spills response; develop by-laws to ensure water flowing out of one municipality is of a good quality when entering the next; and develop consistent messaging to communicate technical issues and best practices to the public and political decision-makers. The TRCA could assist with co-ordination and facilitation for the new group, which could also be linked to the Smart Growth Panel and the Remedial Action Plan.</p>
Luciano Martin, Action to Restore Clean Humber (ARCH)	10. Natural features preservation: retention and enhancement of natural heritage features should be a criterion for evaluating strategy alternatives.	At the master planning level, it may not be necessary to include heritage resources as part of the evaluation criteria for alternative strategies as most often the exact location of any proposed facilities are only approximate and remain flexible. However, this consideration will normally be included as part of screening criteria for the alternative solutions and design concepts for any proposed facilities under the Class Environmental Assessment process for individual projects that come forward to implement the master Plan. The effect of the strategies on natural features was considered in the evaluation criteria of the strategies (its title is 'terrestrial systems', the second component of the "Natural Environmental Criteria" - see for example Table 4.121 in the XCG report for Humber River watersheds)
Luciano Martin, Action to Restore Clean Humber (ARCH)	11. Implementation mechanism: the directing body should include knowledgeable community members with decision-making roles.	Certainly, there are plenty of opportunities for the knowledgeable communities to participate and assist the project by providing their knowledge for the specific watershed areas in the next phase (Phase 3) of the Class Environmental Assessment for individual projects that come forward to implement the Master Plan. The assistance of knowledgeable public members will also be sought through the Public Education and Outreach strategy, part of which the TRCA has agreed to assist the City.
Luciano Martin, Action to Restore Clean Humber (ARCH)	12. Pilot projects: pilot projects with big-bang-for-the-buck should be implemented ASAP (esp. low cost natural methods and partnership with government/NGO)	<p>The 25 Year Implementation Plan consists of a list of prioritised projects which is feasible and hence appropriate, given the target spending level for Plan implementation and the need to build up the City's capacity for implementing the various projects. Significant time will be needed in the first several years for the completion of the next phases of the Class Environmental Assessment process, preliminary design, detailed design and obtaining final agency approvals, etc. This list of prioritised projects will provide the greatest return on investment in terms of environmental improvement while addressing human health and safety and infrastructure protection concerns.</p> <p>(Also, For partnership with government/NGOs refer to #3)</p>

Respondent	Comment	City Response
Luciano Martin, Action to Restore Clean Humber (ARCH)	13. Humber River Technical Report, Stream Restoration: The Rowntree Creek Sub-Watershed is omitted from the analysis of tributaries and no remediation projects are listed in it. ARCH has identified several infrastructure and natural corridor sites in need of restoration along this stream.	The stream restoration work proposed in the Final reports of each of the technical Consultants needs additional detailed analysis prior to its implementation. The City has started a Geomorphic Systems Study for Highland Creek watershed in 2003, which will be used to prioritize areas for restoration and seek out additional stream areas of concern. Once the Highland Creek study is well advanced to sufficiently demonstrate that all factors for prioritizing projects are understood, it will create a template for carrying out similar studies on the other watersheds.
Luciano Martin, Action to Restore Clean Humber (ARCH)	14. Natural Wetland/Infiltration receiving areas should be recognized as a distinct category, to be implemented in the 5-10 year time frame of the Plan.	The City will consider such techniques as applicable end of pipe locations and is open to any locations that ARCH can suggest as a demonstration project. Natural wetlands per se generally have very limited ability to accept additional flow through them and remain effective. Constructed wetlands, sized to accommodate the flows and the desired level of treatment, are generally the selected technique from the category of 'wetlands'. In terms of natural wetlands such as the Humber River Marshes, the general thinking is to preclude additional stormwater flows from adjoining catchments from directly flowing into such wetland complexes.
Peter Hare	15. WWFMMP is a good step forward.	Thank you
Peter Hare	16. Like to see more natural systems wherever possible.	See Response #1
Peter Hare	17. Source control should have greater weight than end of pipe (e.g. deflector arm).	See Response #7
Peter Hare	18. Pilot projects should be implemented quickly, esp. lower cost method.	See Response #12
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	19. Circulate all SC written comments (in total) to other members.	Those who made request, copies will be circulated
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	20. Changes to the Final Report made after the final written comments should be sent to these six members	A summary of the major issues and responsibilities from the 30-day consultation period will be compiled and circulated.
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	21. Recommend the use of natural wetland/infiltration areas as receiving sites for Toronto's stormwater.	See Response #1
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	22. Delete deflector arms and use the money for upstream water quality improvement. Should use "islands of green and a built infrastructure" to cleanse the water at the mouth of Humber. Also support cleaner effluent from the Humber Treatment Plant.	See Response #2
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	23. Assess non-government capabilities within each watershed (Gov/NGO cooperation).	See Response #3
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	24. Generators of pollution should be required to fund the prevention of pollution at source. A cash-in-lieu policy is not acceptable. Waterbase planning as a first priority and requirement of land use.	See Response #4 In accordance with the Master Plan, all future development in the City is expected to provide on-site stormwater management controls consistent with measures required for the long term Preferred Strategy. However, it is recognized that site conditions for certain types of development may preclude the feasibility of achieving all of the WWFMMP requirements. Under these circumstances cash-in-lieu may be an option to the extent the applicant is not able to achieve the level of control consistent with the WWFMMP. Cash-in-lieu funding collected would be used to implement projects contained within the WWFMMP for the corresponding watershed/waterfront drainage basin in which they are collected.

Respondent	Comment	City Response
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	25. Where is the dry weather plan?	See Response #5
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	26. Measured data should be used in assessing the performance of wet/dry weather solutions implementation. Do we have the current measured data on water quality in each of the watersheds and at the Lake Ontario waterfront?	See Response #6
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	27. Funds should first be spent on source control. A review and reallocation of funds in all areas would be appropriate (esp. CSO area)	See Response #7
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	28. Joint watershed oriented action needed with upstream municipalities.	See Response #9
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	29. Suggest an implementing body for WWFMMP made up of watershed stakeholders and track progress. This implementing body for WWFMMP could review and recommend pilot projects to be implemented.	See Response #11
Karen Buck, Lino Grima, John Hopkins, Luciano Martin, Jim Neff, Karey Shinn	30. The low cost, at source, solution to storm overflows in the Don River (one of three Stormwater Pilot Studies done by City of Toronto) is one pilot that needs implementation.	<p>The Stormwater Pilot Studies have provided demonstration examples and experience in implementing these types of initiatives. One of these types of projects which attempted to implement downspout disconnection and similar technologies to reduce the water volumetric loadings to sewers in the Don River watersheds also monitored flows. As we understand the peer review of this project undertaken some time ago by SWAMP staff, the results did not demonstrate a significant reduction in measured volumes of flows. This type of response appears to be predictable, given a review of the project and will be considered as efforts are made in the WWFMMP to aggressively implement source controls.</p> <p>Council, on July 23, 2003, adopted revisions to the City's downspout disconnection program to meet target levels consistent with the WWFMMP. The program will target a particular geographic area each year in order to maximize program delivery efficiency and benefits. The program has been expanded to include an inspection/monitoring component to monitor the reduction in flow into the combined sewers and quantify reductions in overflows. Accordingly, each geographic area will act as it were a pilot project.</p> <p>See Response to #12</p>
John Hopkins	31. A recommended funding mechanism for WWFMMP over next 25 years has not been submitted.	Toronto City Council, September 22, 23, 24 and 25, 2003, approved a joint report from the Chief Financial Officer and the Commissioner of Works and Emergency Services recommending that the funding requirements for the implementation of the Wet Weather Flow Management Master Plan and the alternative funding mechanisms be reviewed annually through subsequent submissions of the Water and Wastewater Services Operating and Capital Budget and in conjunction with the annual water rate process.
John Hopkins	32. Costs should be adjusted (add 20%) to account for inflation and ensure funding for duration of project.	See Response #31
John Hopkins	33. Choose Strategy 5c over 5a - because 5a provides no further road sewer separation.	See Response #7 and #115
John Hopkins	34. City Staff should visit Milwaukee's Sewage Treatment Plant (it produces Milorganite and biosolids called Agrilife)	Thank you for the information. The City has been in contact with Milwaukee and their solicitors for some time and are fully aware of their product.
John Hopkins	35. Goal should be clean water in 25 years, not 100 years.	See Response #12

Respondent	Comment	City Response
John Hopkins	36. Any new installations should ensure that the storm and sanitary sewers are installed separately.	<p>At the master planning level, where the strategies are developed on a watershed basis, the assessment and evaluation of Strategy 5a (opportunistic road sewer separation) and Strategy 5b (complete road sewer separation) showed that the environmental benefits in the long term were the same. However, in the short term, Strategy 5a provides more environmental benefits than Strategy 5b with less social impacts and significantly lower cost. Based on these findings, complete road sewer separation contained in Strategy 5b cannot be justified on a technical or economic basis.</p> <p>Nevertheless, Strategy 5a was modified whereby at the next phase (Phase 3) of the Class Environmental Assessment Process for end-of-pipe facilities proposed for combined sewer service areas which abut separated sewer service areas, the option of separating the road drainage from the combined sewer service area and routing it to the abutting separated storm sewer and providing an equivalent level of treatment to this intercepted flow as would be provided by the original end-of-pipe facility proposed, be reviewed and assessed in more detail. In addition, Works Committee on September 4, 2003, expanded Strategy 5a to consider sewer separation during regular maintenance and repair work in the CSO area.</p>
John Hopkins	37. To manage and treat wet weather flows use "French drains" at the downspout disconnects from roofs of shopping malls or condominiums. Proper construction techniques should be used.	<p>The City agrees that this is an appropriate option depending on several considerations presented in the MOE Stormwater Management Planning and Design manual. In general, infiltration technologies can achieve water quality enhancement; however, stormwater containing high concentrations of suspended solids will tend to clog these controls. If the quality of stormwater is such that there may be a problem with clogging in the system, pre-treatment is required. A key consideration concerns long - term maintenance should they plug or otherwise lose their hydraulic capacity as these facilities will be operated and maintained by private landowners.</p>
John Hopkins	38. Questions regarding French Drains: Where should run-off be directed? What are the impurities in the stormwater? How should the suspended solids collected in the French-drain be managed?	<p>Runoff should be infiltrated into the ground where possible or be directed to a third pipe with any excess redirected to the storm sewer. The impurities in stormwater runoff have been documented in the technical reports and include in excess of 50 pollutants of concern. The dominant pollutants of concern in terms of a functioning french drain are suspended solids, trash, leaves, woody twigs, and oil and grease which should be trapped and filtered (pre-treated) before stormwater flows into a french drain. If solids accumulates in a french drain, it will periodically require maintenance in terms of reconstruction.</p>
John Hopkins	39. Some water from shopping mall parking lots should be allowed to enter the soil.	<p>In areas with suitable soils, stormwater from parking lots can be infiltrated provided it is pre-treated to remove oil and grease and suspended solids.</p>
John Hopkins	40. Coatsworth Cut is unhygienic. It should be cleaned up. Toxic sludge dredgeate should be treated.	<p>As a part of managing excessive sediment accumulation in Ashbridges Bay / CC, TRCA periodically dredges sediments. Contaminated sediment is disposed in the CDF [confined disposal facility] cells in the area of Tommy Thompson Park. Many of these sediments are so clean that TRCA is now looking for other locations to re-use the sediments, rather that expend useful space in the CDF.</p> <p>In addition, the City will implement projects to control present discharges from the 3 CSO pipes and the stormwater pipe that discharges to the head of Ashbridges Bay / CC. Alternatives identified in the Technical Consultant report for the WWFMMP, include underground storage and constructed wetlands. The TRCA, through their Aquatic Habitat Restoration Strategy, have identified underwater measures for Ashbridges Bay / CC which maybe undertaken jointly with the WWFMMP projects. At that time, additional sediment surveys will be undertaken and any additional sediment related projects will be identified to assist in the restoration of Ashbridges Bay / CC.</p> <p>The CSO's discharging into Ashbridges Bay/Coatsworth Cut are controlled in the 25 Year Implementation Plan to meet the requirements of Procedure F-5-5 within the first 15 years. Public feedback received indicated that the Bay is used extensively by canoeing clubs and other uses in which humans are in contact with the water. Achieving higher level of water quality improvements is possible if the storm sewer discharge is also controlled. This would require an additional storage/treatment system. The 25 Year Implementation Plan has been modified accordingly to include the control of stormwater discharges at Ashbridges Bay/Coatsworth Cut in the 2008-2012 time period at an estimated cost of \$12 million (November 26, 27 and 28, 2002 Toronto Council, Clause No. 23, Report No. 15 of Policy and Finance).</p>

Respondent	Comment	City Response
John Hopkins	41. Question: Will there be sufficient treatment capacity at North Toronto Treatment Plant for the new housing starts in the Burke Brook and West Don River area?	<p>Section 8.4 of Chapter 8 in the final report for Study Area 1 (Combined Sewer Service Area) recommends that NTTP wastewater flows be diverted to the Ashbridges Bay Treatment Plant and maintain the NTTP for treatment of combined sewer overflow and/or stormwater.</p> <p>A review of the site treatment capacity and future options for the NTTP were assessed in 1997 by CH2M HILL as part of the Main Treatment Plant Environmental Assessment (EA) for the former Municipality of Metropolitan Toronto. The alternatives that were reviewed consisted of: Upgrade the NTTP to meet Provincial Water Quality Objectives; Expand the NTTP to treat additional wastewater flows; Divert wastewater flows to the Ashbridges Bay Treatment Plant and decommission the NTTP or maintain the NTTP for future use in combined sewer overflow or stormwater management.</p> <p>The preferred alternative identified in the Main Treatment Plant EA is that the NTTP wastewater flows be diverted to the Ashbridges Bay Treatment Plant for treatment with mitigation of any Lower Don River environmental impacts. This will free up the NTTP site for stormwater or CSO treatment should this be found to be desirable in future analysis. The Main Treatment Plant EA findings and recommendations are considered to be valid for the WWFMMP requirements, but will require a detailed assessment of the NTTP decommissioning of the impacts on the Lower Don River fish habitat. The use of the NTTP site for treatment of stormwater/CSO is also compatible with the WWFMMP in providing a treatment site for the stored CSO volume identified in the 25-year implementation plan in the Lower Don River (Cadorna/NTTP) storage facility and also possibly for the Lower Don River storage facility.</p>
John Hopkins	42. Control algae growth by using new technology available from: Secural Environmental Products Wendy Banting, President 138 River Mede Road, Unit #4 Vaughan L4K 3M8 Phone: 905-763-7428	Thank you for the information. The City will contact the supplier for information on their product.
John Hopkins	43. A laboratory should be dedicated to biosolids and daily operations of the sewage treatment plant.	The City laboratories and staffing are subject to periodic review. The City has been in the process of upgrading lab equipment and retraining staff and will continue to improve QA/QC procedures. Lab staff are especially active in improving QA/QC procedures and in developing new analytical methods to audit the City's WWTPs. The current lab complement is sufficient for the present workload.
John Hopkins	44. Request: Get accountants to provide their best estimate of costs.	<p>A breakdown of how the cost for each of the control measure was estimated and the terms used in the cost calculations for the preferred strategy are documented in Section 4.4.2, Chapter 4 of the WWFMMP Final Report for the combined sewer service area (Study Area 1).</p> <p>See Response #31</p>
John Hopkins	45. Remove, as much as possible Humber River slimes, before they reach Lake Ontario. Use of deflector arms to tidy up slimes not needed now.	<p>It is infeasible to remove slimes from the water. The slimes are a result of filamentous algae which grow due to the eutrophic character of the river. If and when the nutrient load particularly from upstream is reduced and after implementation of the City's long term preferred strategy, this phenomena of slimes will be substantially improved.</p> <p>See Response #2</p>
John Hopkins	46. Dams and weirs that currently accumulate slimes should be pumped. Collected slime can be used as cover to control biosolids odour.	See Response #45
John Hopkins	47. Contact GL&V Dorr Oliver/EIMCO in Orillia and bring a pilot plant into operation to prove the feasibility and cost of operation.	Thank you for the information. The City will contact the supplier for information on their product.
John Hopkins	48. Reduce the urgency of the pilot plant work on the deflector arms as they could be redundant to the overall project	See Response #2

Respondent	Comment	City Response
Dalton Shipway	49. Recommend that the following statement be given prominence in the Executive Summary and that it be placed "up top" in any communications to the public or elected officials: "A key feature of this plan is that it is flexible and designed to respond to changing budgets and new control/ treatment technologies." - page ES-8	Your recommendation is noted and will be incorporated into the Stormwater Pollution Prevention Public Education and Outreach Strategy, prepared as part of the Master Plan process. Flexibility has been emphasized as a key feature of the WWFMMP from the beginning and is the main reason for developing the monitoring plan and for reviewing and updating the WWFMMP every five years.
Dalton Shipway	50. People of Toronto want to swim in their rivers and streams again, as supported by objective 5 of the WWFMMP. While it is a goal of the WWFMMP to achieve the prevention of stormwater pollution, many study references clearly state that there will be no change in swimability - recreational opportunities. Recommendation: Urge politicians to demand action on Swimmable Rivers, to Beach Quality Standards, and that they tell the experts to come forward with steps one, and steps two to begin the realization of this very popular goal for the citizens of Toronto. Moreover, that these steps be released for public consumption and released to print media that serve the Wards of municipal government.	The City appreciates the stated goal and its urgency to various members of the public. This goal continues to be the long term target for the master plan, as articulated, and can be achieved by implementation of the long term preferred strategy. Achieving this target within the first 25 year Implementation Period of the Master Plan would require approximately \$ 7,986 million for the separated area and \$2,265 million for the study area 1 (CSO service area) [based on costs of the preferred strategy] in additional spending. This would increase the cost of the 25 year plan by a factor of \$10 Billion.
Karey Shinn	51. The Final Draft Plan for the CSO area fails to remove sanitary sewage from outfalls discharging to the rivers and waterfront. PWQO's not met.	In the WWFMMP the preferred strategy was developed to strive to meet PWQO's and to meet the requirements of Procedure F-5-5 for combined sewer overflows. The WWFMMP preferred strategy achieves PWQO's for most of the water quality parameters and achieves significantly improvements for other water quality parameters. The preferred strategy in the combined sewer area also meets all the requirements of Procedure F-5-5 for combined sewer overflows and accordingly removes sanitary sewage from outfalls discharging to the rivers and waterfront.
Karey Shinn	52. The current plan does not achieve PWQO's in Lake Ontario, as required for our drinking water source. The MOE may require entities to meet the objectives of source water protection.	The WWFMMP achieves PWQO's along the waterfront for most of the water quality parameters and achieves significantly improvements for other water quality parameters. The plan improves the quality of WWF discharges into Lake Ontario.
Karey Shinn	53. In Appendix 1-3 for the CSO Area it is reported that a Pollution Prevention Control Plan is required by the Province as part of the Procedure F-5-5 for combined and partially separated sewer systems. The current Final Draft Report on Area #1 and The Waterfront, although most of the criteria are met, fails to meet all the requirements. This failure could result in significant adverse restrictions being placed on future additional development in the City.	See Response #51 and #52 The WWFMMP is a Pollution Prevention Control Plan as it addresses and contains a strategy, on a watershed basis, to control all discharges (dry weather, stormwater and CSO) into the rivers and waterfront. The effluent from the Waste Water Treatment Plants, which includes plant bypasses, are controlled through the Certificate of Approval for the plant.
Karey Shinn	54. The final reports do not recognize the significance of the dry weather problem. Beach posting will continue until dry weather problems are resolved.	See Response #5
Karey Shinn	55. The Wet Weather Plan for the City would be improved if the CSO area was considered differently from the other newer separated areas. In certain areas, the city's sewers are old and will have to be replaced over the life of the WWFMMP. They should be replaced with separated sewers. Strategy 5a in the CSO area creates CSO effluent forever into the waterfront from facilities like the Western Beaches Tunnel, and perpetuates bypassing at sewage treatment plants.	See Response # 115

Respondent	Comment	City Response
Karey Shinn	56. Strategy 5a for the CSO area and Waterfront is making far too many assumptions without actual data to support modeling outcomes. Modeling data must be verified by comparing with actual water conditions. Data should be accurate and verified before billions of dollars are spent.	See Response #6
Karey Shinn	57. The 'Biggest Bang for the Buck' concept must not represent quick fixed not that do not achieve the required water quality over the long term. Spend money in a diversity of areas, such as tree planting and landscaping, and not just construction work.	See Response #7, #12
Karey Shinn	58. The Policy document is not complete. It needs permitting process for property storm water management plans. It needs by-laws to enhance water quality objectives and reduce storm water flows. The policy should prevent the deflector arm option for the Humber rives because it will not improve water quality.	See Response #2, #153, #175 and #176
Karey Shinn	59. The financing and management of expenditures for the WWFMMP needs clarification. Also, the information sources that were used to cost the WWFMMP options need to be provided to the Steering Committee.	See Response #31 and #44
Karey Shinn	60. The City does needs a sewer rehabilitation plan and sewer replacement program to coincide with the Wet Weather Plan, over the 25 or the 100 year planning period.	The City currently has a sewer rehabilitation plan and sewer replacement program. The performance of sewers are assessed through inspection, monitoring and modelling on an on-going basis. Renewal strategies in the form of replacement, rehabilitation and enhancement are undertaken through life-cycle assessment, prioritization and co-ordination with other city projects (e.g. Transportation Program) and have been integrated into the WWFMMP.
Karey Shinn	61. Rights given to cable and telecommunications companies to lay systems in the sewers need to be evaluated.	In providing these rights the capacity and/or function of the sewer systems are considered.
Karey Shinn	62. The effectiveness of downspout disconnection has been underestimated in the CSO area. The most important bundle is partial sewer separation with mandatory downspout disconnection, and storm water treatment where pollution loadings warrant treatment and/or disinfection. After this is done wet weather conditions can be re-evaluated and modeled.	See Response #7, #115, #119 and #131
Karey Shinn	63. Criteria for pilot projects and priority projects should be established.	See response #3 and #12 The 25 year plan contains a list of prioritized projects based on criteria documented in Chapter 8 of the Watershed Final Reports.
Karey Shinn	64. In section 4 of the CSO Area Report strategies and uptake are discussed. The Implementation components are identified, however there are gaps such as: implementation responsibility; business case; business case models for the commercial/industrial sector.	The City is responsible for implementation of the plan. Implementation of source controls on private property is the responsibility of the property owner with assistance from the city through the Public Education and Outreach Strategy (PEO) prepared as part of the Master Plan process. One of the key components described in the PEO strategy is to "enhance partnerships with business, community and environmental organizations." A specific recommendation under this strategy is to develop "a more detailed partnership strategy - outlining potential roles for PEO partners -...based on consultations with potential partners."
Karey Shinn	65. Contaminant loadings - Copper. ABSTP biosolids cannot tolerate more copper.	An evaluation of the volume and quality of solids will be a factor in determining type and location and role of wet weather flow treatment facilities. The commitment that the City has made is that such solids will not compromise the integrity of the biosolids project.

Respondent	Comment	City Response
Karey Shinn	66. The CSO area modeling is thought to be unreliable. Program crashes and limitations were reported. Recommendation: Additional data coupled with actual measuring and monitoring of flows into storm and CSO sewers as well as their discharges to trunk sewers and interceptor sewers need to be collected. Not all storm water outfalls require treatment. The contribution of animal derived e-coli needs to be assessed.	See Response #6
Karey Shinn	67. An energy audit needs to be done on the plans for Area 1 and under 5a.	An energy audit was not performed in developing of the preferred strategy. However, the analysis and evaluation of strategies 5a and 5b/5c showed that the storage, pumping and treatment requirements are similar between the two strategies. The proposed source control measures and measures to eliminate basement flooding in the preferred strategy will be the same for both strategies and thus their impact of reducing wet weather flows to the ABTP will be the same. Although combined flow to the ABTP under strategy 5b (sewer separation) would be less than under strategy 5a, there is an offsetting increase in flow to the stormwater EOP treatment facilities as well as the number of EOP facilities required. It is, therefore, envisioned that the energy requirements would also be similar for the two strategies. The impact of reduced flows on energy consumption and plant operating cost will be addressed through future work, especially through plant specific Master Plans.
Karey Shinn	68. No Implementation and compliance monitoring structure was recommended for on-going implementation of the plan.	Implementation and monitoring of the Plan is the responsibility of the City's Works & Emergency Services, Water & Wastewater Services. See Response #11
Karey Shinn	69. To date the public interest, for alternatives to strategy 5a, has not been addressed.	See Response #114 and # 115
Karey Shinn	70. Requirements outlined in the Mediator's Report of the ABSTP E. A. have not been clearly documented or are absent. (See pages 48-52 of the Mediator's Report)	All the requirements in Resolution 3 of the Mediator's Report of the ABSTP E. A. have been adhered to. See Response #151 and 152
Karey Shinn	71. In the CSO Area and the Waterfront, the City needs to speed up the Downspout disconnection. The CSO Area and the Waterfront are not yet complete plans.	See Response #115, #119 and #131
Karey Shinn	72. West Nile: Management of mosquito breeding areas should not use prevention methods that violate the sewer use by-law, or harm the bacteria that are necessary for the sewage treatment process.	The sewer use bylaw regulates discharges to the stormsewer system from private point sources. Provincial guidelines and City Council approval of a City of Toronto Public Health initiative has required addition of a chemical, methoprene, to City catchbasins to reduce the risk of breeding areas for mosquito species which act as vectors for WNV. A monitoring study is currently underway to ascertain whether the rate of dissolution of the methoprene leads to adverse impacts to aquatic biota. A provincial water quality objective for methoprene is currently in development, against which it will be possible to compare measured effluent concentrations from catch-basins.
Karey Shinn	73. I agree that naturally occurring features, infiltration sites and ponds, are not fully realized in the current Plan.	See Response #1
Karey Shinn	74. The Study Document for the Humber River Watershed in not acceptable so long as these \$40 million "Deflector Arms" are a part of it.	See Response #2
Karey Shinn	75. In overlooking the role of NGOs, the City is also overlooking funding opportunities that are realized through some money granting bodies when a Municipality partners with public groups.	See Response #3
Karey Shinn	76. The Financial objectives have not been thought out or debated. For example, how will the private sector contribute?	See Response #4

Respondent	Comment	City Response
Karey Shinn	77. Dry weather measures have been mostly sidelined. If there was an implementation strategy it would have to first achieve dry weather conditions that meet F-5-5, open beaches, and meet PWQO at the waterfront or in rivers.	See Response #5
Karey Shinn	78. Real time metered outfalls and contaminator analysis would be more valuable and provide more relevant results when the City has to demonstrate what improvements may or may not have been achieved.	See Response #6 and #140
Karey Shinn	79. Too much money is directed at End-Of-Pipe measures.	See Response #7
Karey Shinn	80. We need a solution to prevent weeping tile drainage from going into the sanitary system.	It is very difficult to disconnect foundation drains for existing development, especially where the foundation drain and internal plumbing are joined under the foundation. For new development the Sewer Use By-law does achieve this requirement.
Karey Shinn	81. Has there been a list produced of which documents area being submitted to the Province for posting on the Environmental Bill of Rights Registry. What constitutes 'The Plan'?	The list of documents that make up the WWFMMP is available on the Web. The WWFMMP is not required to be posted on EBR since this is only a Master Plan and not a specific project (as recommended by MOE)
Karey Shinn	82. Will the total package include 'The Blue Book'?	The "Blue Book" is included in the total package.
Karey Shinn	83. Has the Policy document been completed with the criteria for source controls and management plans at various types of lot levels. What proposed By-laws would be necessary to implement any parts of the Wet Weather Flow Plan? Without knowing what the complete Plan being submitted to the Province includes, it is not possible to know the context of the Wet Weather Plan and if the Implementation might ever be possible.	See Response #153, #175 and #176
Karey Shinn	84. Is there anywhere that states how funding will be raised or allocated?	See Response #4
Karey Shinn	85. When will a decision be made to allocate responsibility for the implementation/monitoring of the Plan? Will it be the TRCA? City of Toronto? The Parks Department?	Implementation and monitoring of the Plan is the responsibility of the City's Works & Emergency Services, Water & Wastewater Services. See Response #11
Karey Shinn	86. How does the new 'Blue Flag Program' fit into the waterfront water quality and monitoring program for the Wet Weather Plan?	The Blue Flag Program which is being established for all of the City's swimming beaches will incorporate and implement a list of best practices for managing the day to day operation of the swimming beaches. One of the program requirements includes a public education and communication program about the use of garbage containers and the need for diligent "stoop and scoop" practices for pet droppings in the vicinity of swimming beaches. These good housekeeping measures all support the broader initiative of reducing surface runoff pollutants thus improving near shore water quality.
Karey Shinn	87. What criteria will be applied to select which projects can be pilots or that will be "priorities"?	See Response #3 and #12
Karey Shinn	88. The Plan will fail this area into compliance with PWQOs in many part of the watershed even in 100 years. It is imperative to try new types of facilities and practices to mitigate problems at or as near to the source as possible. This has been TRCA approach and needs more City funding and implementation of their already laid out plan.	See Response #3

Respondent	Comment	City Response
Karey Shinn	89. Referring to "Basin Management Plan for the Rouge River" TRCA 1990. Two main recommendations need to be pursued as part of this area's Source Control program: Study to identify opportunities in existing development and/or retrofitting existing storm water facilities Work to protect erosion in level I and II channels, and new guidelines for more effective control and detention facilities should be prepared	In concert with the Town of Markham, the TRCA has previously conducted a limited number of studies and has initiated a larger set of studies "to identify opportunities in existing development and/or retrofitting existing storm water facilities". These efforts are also developing a strategy for rehabilitating Level 1 and level 2 channels, through the application of Natural Channel Design principles. New guidelines "for more effective control and detention facilities" have been prepared and are contained in the MOE Stormwater Management Planning and Design Manual, released in 2003. These guidelines will be assessed in these source control efforts within Markham, and also in City of Toronto projects.
Karey Shinn	90. More of the same types of facilities as the past are not going to improve the erosion problems in parts of the Rouge. New types of facilities are required and Low-Impact Development (LID) Design Strategies need to be employed in built up area.	The source control strategies contained in the City of Toronto's WWFMMP employ the same techniques as "LID Design Strategies in built up areas". The City will work with TRCA to improve these strategies for not only the Rouge, but also other watersheds.
Karey Shinn	91. Recommendation: ensure that implementation of the Plan in the Rouge River area is going to generate a new type of facility design and retrofitting program to address the erosion and peak flow problems together. Project that increase base flows while also decrease peak storm flows would be preferable.	Not one type of project will address all the problems. The key is the strategy presented for the long term which attempts to infiltrate as much rainwater as possible at source, along the conveyance route and at the end - of - pipe in order to decrease peak storm runoff rates. Appendix G of the Waterfront Response Summary [April 2003] outlines additional information summaries that will be undertaken to assist with further quantifying the benefits of WWFMMP to the individual Plants and which will be used as additional baseline information for the future Plant Master Plans.
Karey Shinn	92. Recommendation: In areas with erosion problems, high water table, and/or sewer/stormwater surging; Low Impact Development should be a condition of a new Development or Infill/Intensification approval (not Cash-in-Lieu). Low Impact Dev. and retrofitting would be a new candidate use for suitable quality Compost produced by the City.	The WWFMMP requires all new development meet the requirements of the preferred (long term) strategy, i.e., meet the targets of the WWFMMP. Although not specifically stated, because of this requirement all new development, according to the WWFMMP, can be considered Low Impact Development. Cash-in-lieu is not dependant on the type of development. All new development is required to achieve the targets of the WWFMMP. Cash-in-lieu is only a mechanism available if for some justifiable reason a new development, Low Impact or not, cannot achieved the targets totally with on site controls.
Karey Shinn	93. Recommendation: That City generate a manual for the ongoing retrofitting and installation of Rain Gardens, Roof Gardens and Landscaping requiring no tap water source watering (indigenous gardening). Gardening programs will accelerate Source Controls (i.e. downspout disconnections and rain barrels) as well as waste reduction (e.g. composting). Introduce awards for developers, commercial/institutional properties (roof garden sites), to create an inventory of sites to demonstrate Rain Gardens	These issues will be addressed through the Public Education and Outreach (PE&O) Strategy. The PE&O strategy provides for the development of "how to" manuals or instructions, creating incentives to home owners as well as developing partnerships with business, community and environmental organizations to enhance the implementation of source controls which include rain gardens, roof gardens, landscaping, etc. See Response #3
Karey Shinn	94. Recommendation: Identify projects that can move forward. Put together a list of TRCA projects and EAs that have already been completed and paid for.	See Response #3 and #12 The 25 year plan contains a list of prioritized projects based on criteria documented in Chapter 8 of the Watershed Final Report.
Karey Shinn	95. Recommendation: That Hydro lands and other undeveloped land be allocated for future storm water management in high water table, flooding, or sloped areas where required but not enough parks or open space for stormwater facility (E.g. Terraview Willowfield Storm Water facility, declared surplus 138 acres of Hydro corridor land in Scar in 1996)	The WWFMMP has allocated Hydro lands and other undeveloped public lands for future storm water management. However, to secure properties for stormwater facilities, more detailed studies are required. The WWFMMP identified opportunities for stormwater facilities at a scoping level. In the next stage of implementing individual projects, in accordance with the Class EA process, site specific details for a given facility will have to be reviewed in detail to determine if the proposed site is suitable, if another type of facility is required or if the proposed facility must be relocated to another site. Confirmation of sites and the type and final size of the facility is necessary before the City can proceed with securing properties.

Respondent	Comment	City Response
Karey Shinn	96. Recommendation: The Area 5 Report (page 2-54) that "There are no known foundation tile connections to the sanitary sewers within the sewershed." It is due to Scarborough By-Laws required weeping tiles or foundation drains be connected to the storm sewers in separated sewer area. It is important that this be the standard for future development and retrofitting where possible in the new City of Toronto.	For new development, the Sewer Use By-law does not allow foundation drains connected to sanitary or storm sewers.
Karey Shinn	97. Recommendation: Monitoring of water table and ground water levels in areas prone to flooding and sewer back-up need to be undertaken, as recommended in the 'State of the Watershed' Report: Highland Creek, Aug 1999, TRCA.	The York, Peel, Durham, Toronto Groundwater Consortium is presently developing a well water/ground water monitoring program for the purpose of monitoring ground water quantity and quality to meet requirements of the Provincial Groundwater Monitoring Network.
Karey Shinn	98. Recommendation: West Nile Virus is a problem mostly during drought years. It will be important to identify dry weather strategies to prevent West Nile, and not concentrate on the elimination of storm water ponds. Storm water pond should be design to create flow that disturb stagnant water, drain properly, or even be stored under Golf Courses (where possible use for irrigation).	While recent information from the Prairies and other locations has suggested the hypothesis that the incidence of WNV is accumulated as a problem during years of drought, the hypothesis awaits additional evidence. There are a variety of other factors that affect human risk, including the build - up of resistance after a few years of exposure, and the changes in major wildlife reservoirs such as jays and crows, as the virus is spread across North America. In terms of stormwater management facilities such as ponds and wetlands, the available evidence indicates that when properly designed, they do not pose an excessive risk as areas of habitat for the mosquito species which carry the WNV. The factors include [i] open water where wind-driven water motions preclude the quiescent conditions typical of catchbasins, which are habitats favoured by these mosquito species, [ii] inflows from storm-sewers which occur on average once every four days which upsets the mosquito hatching time of 10 days of quiescent conditions, and [iii] a much more balance food web in which such species as birds and fish consume mosquito larvae.
Karey Shinn	99. The big recommendation here is that monitoring and complete compliance with all the sections of the F-5-5 Procedure be set out in Pollution Prevention and Control Plan and carried out as the step one of this and all other areas in the Plan. This in no way prohibits Source Controls and Conveyance projects that can be applied City Wide only that site conditions will required that all projects be tailored to site specific conditions and apply to all new development and any retrofitting and infill development projects immediately.	Procedure F-5-5 pertains only to combined and/or partially separated sewers systems. The Master Plan requires that all new development and redevelopment comply with the requirements of the long-term preferred strategy.
Karey Shinn	100. Special efforts should be made to do Public Ed and Consultation in the Highland and Rouge Watersheds, as there has been an apparent lack of public membership in the WWFMMP Steering Committee and some residents feel isolated from the program. Because Rouge River is very impacted by the 905 area, the implementation of any Wet Weather Plans/Projects should be co-ordinated through Non-Gov Watershed wide groups such as Save the Rouge and Regional Councils and the TRCA.	See Response #3, #9, #114 and #159
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	101. Existing program could be enhanced to provide more water quality improvements within existing budget (e.g. partial sewer separation/sewer rehab. program, water conservation, Sewer-Use By-Law, downspout disconnection)	The Master Plan evaluated existing City programs such as sewer rehabilitation, water conservation, public education, etc., and recommended enhancements where feasible.

Respondent	Comment	City Response
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	102. Do not support continuing to use combined sewers (over 100 years old). Needs to build new and at least partially separated sewers, and improved capacity sanitary sewers that preserves capacity at our sewage plants. Separating stormwater from sanitary sewage builds in the option of specific end of pipe treatment for outdoor toxics that source controls cannot stop over time and degrades our sanitary treatment processes.	See Response # 36 and # 115
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	103. Safe Sewage Committee do not find that the WWFMMP is adequate to accomplish what it must to be effective at meeting Provincial Water Quality Objectives	See Response #51 & #52
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	104. Until a Pollution Prevention Plan, meeting the requirements of M.O.E. F-5-5 is produced, the 'Final Plan' fails to meet the F-5.5 procedure. Appendix G of Waterfront Response Summary, April 2003, is a listing of the sewer system and Treatment Plant operations that have not been generated in the context of the WWFMMP, and was not considered to be covered in the scope of the Plan to date.	See Response #51 and #53
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	105. The Plan is out of compliance with the Mediation Agreement for ABTP EA in several areas. For example, Strategy 5c (plan to complete partially separated sewer system in CSO area and intensive source control) is compliant with Mediation Agreement but abandonment by staff without debate.	See Response #115 and # 151
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	106. No amendments to the Sewer-Use By-Law have been proposed to implement and enforce compliance with the Plan. The fixation of e-coli and beaches has not provided a plan that will also control other serious toxics in stormwater (e.g. metals and persistent toxics). Sending harmful outdoor contaminants (e.g. fertilizers and herbicides, insecticides) will be detrimental to the City's biosolid program. Stormwater is high in Copper and we are near our allowable limits for (biosolid) land application.	See Response #122 and #123
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	107. The Plan fails to recognize the magnitude of illegal cross-connections and other Dry Weather discharges and their impacts on CSO quality. For example, August 2002 didn't rain but some beaches were posted 29 of 31 days.	See Response #5
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	108. The current Plan is missing too much actual data and monitoring to either form a baseline for future proposed monitoring, or to satisfy the requirements of phase II of any subsequent EAs in the CSO areas.	See Response #6

Respondent	Comment	City Response
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	109. CSO area sewer separation and partial sewer separation are not given equal alt status to tanks and tunnel system (expensive and unproven) Rehabilitation of the sewer system has not been explored in the context of cost/benefit analysis and resulting water quality. The public believe that it is possible to come much closer, if not achieve PWQO throughout the CSO area within 25 years. This current Plan is inadequate to do the same.	See Response #36, #51, #52 and 115
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	110. The 'Policy' Document was absent from the volumes to be reviewed. Not developed enough to direct the implementation (i.e. no enforceable criteria, proposed by-laws, commitment to work with 905 government, building redevelopment approval process). Different watershed may require different types of Policy.	See Response #153, #175 and #176
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	111. Financing of the Plan, who implements what parts of the Plan, and what specific sources were used for cost estimates are not stated. Concerned Toronto is overcharged compared to other municipalities in ON.	Implementation and monitoring of the Plan is the responsibility of the City's Works & Emergency Services, Water & Wastewater Services. See Response #3,#4, #11, #64 and #68
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	112. Although there is a recognized need to prioritize and pilot new technologies for various applications and business case scenarios, no criteria has been established to get priorities organized for specific purposes or results. The public want this Plan to achieve the best results possible - at the end of the process we expect to meet PWQOs and so far the Plan will not deliver that in 100 years, in most part of the City.	See Response #3, #12 and #63
Karey Shinn, Chair The Safe Sewage Committee (On behalf of the Safe Sewage Committee: Karey Shinn, Peg Lush, David Done)	113. To date the Public Consultation has not engaged the general public. Members of the Public such as the Safe Sewage Committee have been summarized or marginalized to the point of irrelevance.	See Response # 114 and #115
Lino Grima	114. It is regrettable that WES chose to make this important initiative available to the public during the depth of summer (vacation time) The level of participation was not high and many attended more than one meeting e.g. steering committee members. This hardly qualifies the project "as if the project were to undergo a full EA" as required by the Mediation Agreement developed during the Ashbridges Bay STP full EA (p.2). The WWFMMP was a Class EA in substance and in form, with the proponent firmly in control and able to disregard any opposing views from the citizen members of the steering committee. In a full EA there would be independent panel members who would control the process, let all to have their say and then write an independent report. Most of the public input was from the estimated 12,000 hours spent by the citizen members over 3.5 years. On one memorable Friday (nov.1, 2002) some citizen members spent 7 hours in 2 meetings.	The City thanks and acknowledges the substantial time commitment made by the members of the Steering Committee to the WWFMMP during the whole study process. See Response #151 and #152 The City has used a combination of public consultation methods and devoted significant resources to the public consultation efforts to fulfill the requirements of the Master Planning process under the environmental Assessment legislation of the Province of Ontario. While a lot of effort was put forward by the public members of the SC, extensive effort and opportunities for the broader public to participate was provided through multiple avenues - workshops, public meetings, focus groups, e-consultation, formal review period, etc. These opportunities were promoted through various means including direct invitations to the extensive project mailing list, personal contact with community groups and leaders, and newspaper ads. The Public Consultation Summary Report documents the details of the various consultation activities, level of participation and results, which varied according to study area and phase of the planning process. The consultation program was very extensive and would meet if not exceed the consultation one would expect with a "full EA" as required by the Mediation Agreement.

Respondent	Comment	City Response
Lino Grima	115. The summary report of the public consultation program mentions in passing strategies 5a and 5b. The public at the Bahai Centre (Oct 28/2002) were practically unanimous in wanting overflows eliminated and wanted more information on plan 5c.	<p>It should be noted that Strategy 5a, 5b and 5c were discussed at great length at the steering committee. Strategy 5c which was developed by 11 of the public members of the steering was assessed by the consultants and concluded that technically there was no difference between strategy 5c and Strategy 5b where both strategies consists of complete the road sewer separation and aggressive source control. The minutes of the Steering Committee of November 1, 2002, show that Lino Grima acknowledged that Strategy 5b and Strategy 5c were identical except that source controls would be implemented at an accelerated rate. Strategies 5a and 5b were presented, by the consultants, and discussed at the public workshop on October 28, 2002. Strategy (5c) was also tabled by a public member of the Steering Committee.</p> <p>Concerns have been raised by the public that the preferred strategy (Strategy 5a) for the combined sewer service area does not include sewer separation (i.e. construction of new storm sewers to intercept road drainage) and that given the importance of source controls, their implementation should be accelerated, in particular roof downspout disconnection, in helping to achieve the objectives of the Plan and reducing the size of end of pipe facilities, especially in the combined sewer service area.</p> <p>The assessment and evaluation of Strategy 5a (opportunistic road sewer separation) and Strategy 5b (complete road sewer separation) showed that the environmental benefits in the long term were the same. However, in the short term, Strategy 5a provides more environmental benefits than Strategy 5b with less social impacts and significantly lower cost. Based on these findings, complete road sewer separation contained in Strategy 5b cannot be justified on a technical or economic basis.</p> <p>Based on this feedback from the public Strategy 5a has been modified such that in the next phase (Phase 3) of the Class Environmental Assessment Process, for each end-of-pipe facility proposed, the option of separating the road drainage from the combined sewer service area and routing it to the abutting separated storm sewer and providing an equivalent level of treatment to this intercepted flow as would be provided by the original end-of-pipe facility proposed will be reviewed and assessed in more detail. Consistent with the Class Environmental Assessment process, this analysis will require further review and input from the public, in particular the local community. Also, the time to achieve target of 40% downspout disconnection within the combined sewer service area has been accelerated from 25 years to the first 10 years of the Plan implementation.</p>
Lino Grima	116. Staff have agreed to consider fully storm sewer separation and aggressive source controls (which are elements of plan 5b and 5c) for combined sewer areas "which abut separated sewer areas". This is a welcome first step and recognizes the logic and good sense of this strategy which is a better option in Area 1.	See Response # 115
Lino Grima	117. The deflecting arm received negative comments by all present (also at the Bahai Centre meeting and the steering committee meetings). This is control at end-of-pipe of the worst kind.	See Response #2
Lino Grima	118. The alternative to have virtually 100% downspout disconnection and 100% road sewer separation in Area 1 was not included in this draft. This partial separation of wet weather flow from sanitary flow was proposed as a modification to plan 5b and came to be known as plan 5c. This alternative was not included in this draft, and therefore the EA process is not complete in this respect. 75% Of Area 1 already has road sewers which are re-connected to the combined sewers because of inadequate down spout disconnection.	<p>Some existing road storm sewers are re-connected to the combined sewer overflow pipe as it is the only practical outlet available, they are not re-connected because of inadequate downspout disconnection.</p> <p>See Response # 115</p>

Respondent	Comment	City Response
Lino Grima	119. Our recommendation for 100% downspout disconnection may have to be the subject of a legal reference with respect to the federal Bill of Rights and Freedoms. However recent municipal initiatives in Winnipeg regarding mosquito control and the recent initiatives for “wet” garbage in Ontario and pesticides in Toronto suggest that such a by-law would withstand legal challenges.	<p>The benefits of source control measures were recognized from the outset of the Plan development process, irrespective of the type of sewer system servicing the area: separated or combined. The voluntary level of downspout disconnection proposed for the residential sector is 40% over the next 25 years. This represents a significant increase over present conditions wherein only an estimated 10% to 15% of homes across the City have their downspouts disconnected. An enhanced level of 75% participation is proposed in areas of the City undergoing intensification. The expected participation rate has therefore been a key decision point. This rate of uptake, particularly in the downtown core, is considered extremely ambitious and perhaps unrealistic given that roof downspout disconnection is not possible on all properties. For example, where the flow from a disconnected downspout can only be routed onto a driveway or other hard surface which drains towards the street, the disconnection provides no benefit because the flow is intercepted by roadside catchbasins and routed directly into the City’s sewer system.</p> <p>The rate of uptake and the corresponding improvements in sewer flow reductions from the source control program will be monitored and the success of these programs in achieving the Plan’s targets will be reviewed and reported to this Committee on an annual basis as part of a proposed annual update report.</p>
Lino Grima	120. Road sewer separation and downspout disconnection should cost less than the preferred option (5a)	<p>Strategy 5b and Strategy 5c are technically the same strategy as both strategies consists of complete the road sewer separation and aggressive source control. Table 7.1.3 of the CSO (Study Area 1) Report in comparing the cost between strategy 5a and strategy 5b shows that strategy 5b costs \$640 million more than strategy 5a.</p> <p>See Response #67</p>
Lino Grima	121. Controls at source in all areas need to be strengthened and more alternatives should be considered (e.g. soak-away pits, porous pavement and swales for ICI buildings with large lots such as churches, schools and shopping plazas)	<p>There are also over 60 other source control measures proposed in the Plan. These measures are specific to property types and a specific level of participation has been proposed for each. For example the following participation rates have been proposed within the single family residential sector: rain barrels - 15%; pervious driveways 15%; minor lot regarding 5%; stormwater soak-away pits 5%; foundation drain disconnection - 3%, and stormwater gardens - 1%. See table 4.2 for the list of source controls and per cent uptake proposed in the Plan per land use.</p> <p>See Response #7</p>
Lino Grima	122. The WWFMMP does not indicate how the City will treat contents of combined sewage storage tunnels/tanks. Will there be central or distributed treatment facilities? Without this information, how was the costing of plan 5a arrived at?	<p>The WWFMMP proposes four distributed treatment facilities to treat the contents of combined sewage storage tunnels/tanks. An EA will be necessary for these facilities at which time one or more of the facilities could be eliminated with the stored flow being directed to one of the other facilities. The cost for Strategy 5a includes the cost of the four proposed wet weather flow treatment facilities.</p>
Lino Grima	123. There is no mention of the implications of the increased load of biosolids/sludge from the combined sewage storage tunnels to the sewage treatment plant. These biosolids will take up capacity at STPs that is sorely needed to accommodate the increase of 1 million population as envisaged in the City Municipal Master Plan.	<p>See Response #65</p>

Respondent	Comment	City Response
Lino Grima	<p>124. There is a glaring omission of plan 5c suggested by the citizen members of the committee that would keep wet weather flow from the sanitary/combined flow except for foundation drains and illegal connections.</p> <p>Plan 5b in the current draft includes storage for combined sewage overflows, which is incompatible with the characterization of plan 5c (i.e. road sewer separation and separation of all flows from roofs).</p> <p>Plan 5c would also respect a principle adopted unanimously by the steering committee, including all agency reps and staff viz. that WWF be managed where it falls on our homes and streets. This principle of the Steering Committee is conspicuous by its absence in the report.</p>	See Response #115
Lino Grima	<p>125. Lack of performance data for end-of-pipe facilities, even when such data is available for the Eastern Beaches Detention tanks. Published data demonstrates that over a ten year period, the Eastern Beaches detention tanks have not performed according to design specifications. The Eastern beaches have been closed 20-25% of the time as opposed to the 5% of the time as required by F-5-5 (This data is reproduced in a TRCA/WRT report on the RAP, dated 2001).</p>	<p>A performance report on the Eastern Beaches detention tanks is being prepared by SWAMP. An evaluation of the additional factors which contribute to the continued elevated frequency of beach closures at the Eastern Beaches is underway. The data during the past decade actually show a more complex trend, than inferred by the question. There is a significant variation in the long term trend starting from a posting rate of about 40 - 60 % in the late 1980's and declining to much lower degree of postings of about 10 % in the late 1990's but then followed by a rate of posting of about 20 % in the first part of the 2000 decade. One factor reported to Works Committee in May 2002 was the discovery of the break in the underwater pipe from the McLean Tank, which has been subsequently repaired in 2002; its effect will be established by monitoring over the next three years. One additional factor being evaluated, as a result of the waterfront modelling undertaken in the WWFMMP is to provide additional remediation of the stormwater pumped off-shore from the McLean Tank as the modelling analysis suggests that the off-shore discharge impinges on beach water quality.</p>
Lino Grima	<p>126. On one hand, City Staff "recommend that road sewer separation be reviewed and assessed in more detail". On the other hand they still recommend strategy 5a which specifically excludes any more road sewer separation (pp. 18-19).</p>	See response #115
Lino Grima	<p>127. It should be noted that the road sewer separation and aggressive source control plan (5c) was developed by 11 of the 12 members of the steering committee and should be evaluated in full. A presentation on plan 5c was allowed on nov. 1, 2002 but the Staff report to the Works Committee had already been printed and bound.</p>	See response #115
Lino Grima	<p>128. The modification of the plan for Ashbridges Bay/Coatsworth Cut is confusing. On one hand several million \$ will be spent on improving storm water with e-coli in the thousands but a planned combined sewer storage facility (with e-coli measuring in the millions) will overflow about one in four or five days in the summer (20 -25%)</p>	<p>Three combined sewer overflows and one storm sewer currently discharge into the Ashbridges Bay area. The 25 Year Implement Plan proposed to remediate the discharge of the combined sewer overflows in compliance with the Ontario Ministry of the Environment requirements. However, the Plan did not attempt to achieve body contact recreational criteria within this time frame, because no beaches have been designated within this embayment.</p> <p>Public feedback indicated that the Bay is used extensively by canoeing clubs and other uses in which humans are in contact with the water. Concerns were raised by the public that the 25 Year Implementation Plan would not improve water quality in the Ashbridges Bay/Coatsworth Cut to the same degree as area beaches. However, achieving this higher level of water quality improvements is not possible without also controlling the storm sewer discharges. This would require an additional storage/treatment system.</p> <p>The 25 Year Implementation Plan has been modified accordingly to include a stormwater treatment facility at Ashbridges Bay/Coatsworth Cut in the 2008-2012 time period at an estimated cost of \$12 million in an attempt to achieve body contact recreational criteria.</p>

Respondent	Comment	City Response
Lino Grima	129. One of the “3-5 most important objectives identified by participants” in the public consultation process was “eliminate discharges of sanitary sewage”. And yet strategy 5a ensures that untreated sanitary sewage discharges in our river and on our waterfront forever. Clearly strategy 5a does not satisfy the declared priorities of the public who spoke up.	See response #115
Lino Grima	130. The reference to soil conditions regarding further road sewer separation is only partly relevant (i.e. with regard to infiltration into the ground through perforated pipes). However, the road sewers need not be perforated and could convey the storm flow to a storm water end-of-pipe facility.	Strategy 5a provides for opportunistic sewer separation. See response #115
Lino Grima	131. Time line for strategy 5b (and 5c) is not fairly or correctly presented. Road sewers in Area 1 were built in about 20-25 years in the 1970s, 1980s and very early 1990s. Therefore the remaining 25% of the road separation could be completed in 8-10 years. In this respect road sewer separation and down spout disconnection has a shorter timeline than the recommended plan 5a	<p>The Master Plan and its 25 Year Implementation Schedule is feasible and hence appropriate, given the target spending level for Plan implementation and the need to build up the City’s capacity for implementing the various projects. In addition, the 25 Year Implementation Schedule has included projects which provided the greatest return on investment in terms of environmental improvement while addressing human health and safety and infrastructure protection concerns.</p> <p>The implementation of source controls, conveyance controls, stream restoration, public education, etc., has been given high priority in the 25 year implementation plan. Over \$400 million of funding has been allocated in the 25 year plan to achieve the target uptake rate for Source Controls and conveyance controls; to implement the enhanced Stormwater Pollution Prevention Public Education and Outreach Strategy, to complete Stream Restoration will be completed in 15 years, to implement and enhanced municipal operations and maintenance program to eliminate pollutants at source and to eliminate dry weather discharges and to undertake an environmental monitoring program.</p> <p>In the combined sewer service area, given the City’s legislative requirements in achieving the Ontario Ministry of the Environment’s prescribed levels of combined sewer overflow control, achieving the target uptake rate of 40% for downspout disconnection has been advanced as a first priority in the Plan implementation.</p> <p>The 25% of the combined sewer area that does not have road storm sewers basically represents the areas that are the most difficult to achieve sewer separation due to existing utilities, space constraints, business interruptions, approvals, etc. Therefore, to undertake sewer separation in these areas will be much more time consuming and expensive than the sewer separation undertaken in the 1970s and 1980s.</p>
Lino Grima	132. The most expensive component of the Plan (\$458 million or about 45% of the total) is the construction of storage tanks for combined sewers, which will overflow by design and even more so in reality. Any savings in this line item by choosing other options would make sense not only in terms of environmental health quality but also in the pocket book of the taxpayer.	See response #115
Lino Grima	133. To what extent is 1991 a representative year? Should there be some sensitivity analysis of the modelling? This was promised repeatedly during the meetings of the SC.	Based on the rainfall analysis on 20 years of rainfall data (1976 - 1997) performed by XCG consulting Ltd. and documented in the Appendix C.2 of Humber River Watershed Report, 1991 was determined to be a representative rainfall year. See response #6

Respondent	Comment	City Response
Lino Grima	134. The Western Beaches Storage Tanks lack performance data. We need more performance data before the City commits to very expensive, possibly ineffective and unsustainable control options similar to the Western Beaches Tanks. How will detention tanks and tunnels cope with increases in population and development in their catchment areas? Source and conveyance controls may take longer to build but they are more sustainable.	The City will be gathering performance data on the WBT during the coming years, as a part of C of A requirements, and considering any additional improvements that can be made to this facility as a part of the Environmental Assessment process for achieving beach water quality objectives for the Western Beaches, including the proposed spit / deflector arm / fishing pier at the mouth of the Humber River. In terms of the potential effects of additional population and development on flows to CSO storage facilities it should be noted that the CSO drainage area is already fully developed and that any increase in population will result only in re-development. Any new or re-development will be required, as part of the Wet Weather Flow Management Policy, to implement source controls and conveyance controls consistent with the preferred strategy of the WWFMMP. The anticipated effect of increased populations will, therefore, be a decrease in flows reaching EOP facilities thus increasing the performance of existing storage facilities such as the Western Beaches Tunnel.
Lino Grima	135. The Plan needs significant improvements especially with respect to source controls in all Areas and partial or road sewer separation in Area 1. I strongly believe that we need to build a consensus and a constituency to support this significant initiative. There is a solid basis for such a consensus if the maximum source controls possible are adopted in all Areas and the exclusion of rain water from the sanitary drain is given maximum possible application in Area 1.	See Response #115 and # 121
Karen Buck	136. Combined sewer overflows are the direct result of stormwater in the combined sewers in this sewershed service area. Overflows at the ABTP diminish the level of treatment (of received flows) from secondary/tertiary treatment to primary treatment and, in some cases, no treatment (the result of direct by-passing of flows at the seawall gates). The problem is combined sewers. The solution is sewer separation which in this submission means partial sewer separation involving the construction of separate stormwater conveyance through dedicated STORM ROAD SEWERS.	See Response #7 and # 115
Karen Buck	137. All partially separated sewer areas (70% should be subject to incremental and mandatory downspout disconnect programs until virtually 100% of the downspouts are disconnected.	See Response #119
Karen Buck	138. The remaining 30% of the combined sewer area (the areas where partial separation was not completed) should be subject to a road sewer installation program (partial separation) so that virtually 100% of the combined sewer area is partially separated.	See Response #115
Karen Buck	139. Partial separation of the combined sewers (30%) and mandatory downspout disconnection (virtually 100%) should occur within the first 15 years of the first 25-years implementation period.	See Response #131
Karen Buck	140. Real monitoring of overflows before and after partial sewer separation/downspout disconnection programme implementation.	See Response #6 Environmental monitoring and reporting are integral parts of the WWFMMP process. The Monitoring Plan, developed as part of the WWFMMP and documented in Chapter 8 of the watershed reports, includes environmental monitoring in order to assess the effectiveness of the proposed control measures and to define how progress is being made towards meeting the WWF targets. The WWFMMP will be reviewed and updated on a periodic basis to reflect changes in approaches to deal with stormwater and to incorporate findings from the monitoring program.

Respondent	Comment	City Response
Karen Buck	141. The final plan and its implementation must include benefit to cost analysis of each implemented programme and in the combined sewer area a cost avoidance benefit analysis associated with reduced flows and reduced treatment costs at the relevant receiving treatment plants. Only after targeted benchmarking, implementation of targeted programmes and targeted long term monitoring will the City of Toronto be able to establish their own benefit to cost analysis.	The evaluation of the strategies involved an assessment of benefits from various points of view and an assessment of costs. Generally, the benefit -cost curves showed a roughly linear relationship, which means that the more money that is spent, the more benefits that are achieved. An assessment of targeted programs such as solely source controls including their costs and their benefits was undertaken and used to establish the strategies. The conclusions from these analyses is that all possible efforts and all the programs in the WWFMMP are needed to achieve the goals, objectives and environmental improvement targets of the WWFMMP. See Response #67
Karen Buck	142. The Plan, in particular, in Study Area 1 will show improvements in stream restoration and in the elimination of basement flooding but improvements to water quality and the restoration of the hydrologic cycle remain highly questionable.	The 25 Year Implementation Plan focuses on stream restoration, minimization of basement flooding, reduction of inflows to the sanitary and combined sewer system through aggressive source controls and conveyance systems, improvement in stream water quality through treating CSO volumes prior to their discharge, achieving beach water quality objectives at designated waterfront beaches, improvement in the water quality of rivers and embayments such as Ashbridges Bay used by boaters, and additional management of the hydrological cycle. Since model evaluations of such study areas as the Highland Creek watershed indicate that there is a maximum degree of restoration of the hydrological cycle that can be attained, stream restoration is an essential technique for improving stream health.
Karen Buck	143. In Study Area 1 the preferred programme implementation has restricted downspout disconnection to a percentage of 40% rather than pursuing virtual 100% disconnection. The timeframe for downspout disconnection is 25 years (should instead be 15 years).	See Response #115 and 131
Karen Buck	144. The preferred programme in Area 1 rejected the completion of the partial separation of the combined sewershed by eliminating any construction of road sewers.	See Response #115
Karen Buck	145. End-of-pipe solutions are scheduled for implementation before any benchmarking and monitoring of the source control solutions. Toronto tank and tunnel solutions have not yet proven successful at meeting Ontario's F-5-5 regulation for combined sewer overflows.	The benefits achieved with source controls were determined with the calibrated computer models and the EOP facilities were sized accordingly to meet procedure F-5-5. Implementation of source controls as well as the environmental monitoring plan is to begin in year one. The implementation of EOP underground storage facilities will not occur in the first five year time frame, although the environmental assessment for such facilities may commence. If the environmental monitoring results from the first five years indicate that the effects of the implementation of source controls are different from what the computer models predicted the EOP facilities can be revised accordingly.
Karen Buck	146. The Plan did not identify end-of-pipe tank and tunnel treatment solutions or associated costs.	See Response #122
Karen Buck	147. The Plan, through modelling, does not achieve Provincial Water Quality Objectives for all of the parameters included in the Plan even in a 100-year timeframe.	See Response #51
Karen Buck	148. The Plan uses deflector arms to direct polluted water further out in Lake Ontario so that the nearshore will not be impacted.	See Response #2
Karen Buck	149. The Plan and its preferred implementation programme does not meet the objectives and targets that were endorsed by the Steering Committee.	See Response #51

Respondent	Comment	City Response
Karen Buck	150. The Plan is relying heavily on modelled results. Real monitoring results in the pipe (not receiving water) should be a requirement of the Plan and its implementation program. It remains questionable if modelling results are at a confidence level that would preclude the necessity for extensive monitoring	See Response #6
Karen Buck	151. Meeting the requirements of the Mediator's Report: A special meeting was held by the Implementation, Compliance and Monitoring Committee (ICMC) of the Mediator's Report so that Works and Emergency Services (WES) Staff could present the compliance of the Plan with the Mediator's Report (now considered as part of the ABTP EA submission).	<p>City staff presented information about the WWFMMP and its relationship to the WWTP's, particularly the Ashbridges Bay Treatment Plant to the ICMC. As well deputations and comments were provided by most members of the ICMC. The notes from this meeting have been tabled as a part of the written record of the ICMC whose responsibility focuses on the ABTP.</p> <p>Many of these statements were disputed by participants at the ICMC meeting, as evidenced by the written record from that meeting; several of the points made at the ICMC meeting form a significant basis for this comment.</p> <p>Some of the questions posed by the I C M C members require additional detail / quantification of the benefits to the treatment plants, which were beyond the scope of the WWFMMP consultants. As such, resolution of such points will be a part of the scope of work for Plant specific evaluations such as Master Plans.</p> <p>The WWFMMP had adhered to all the provisions of the Mediators Report. Key ways that the WWFMMP has addressed these aspects are illustrated as per the following.</p>
Karen Buck	152. It is unclear how the specific objectives of 3.2.2, 3.2.3, 3.2.4, 3.2.5 and 3.2.7 of the Mediator's Report are met by the Plan. The Plan does not ensure in Study Area 1 that there will be no increases in stormwater flows to the ABTP and it does not specifically address reductions of stormwater flows to the ABTP.	The WWFMMP has not compromised the approved treatment capacity of the ABTP. In addition, by implementing the proposed Source Controls, conveyance controls and Basement flooding controls (Infiltration Controls) stormwater flow rates to the ABTP will be reduced. Stormwater runoff will be treated through the proposed EOP facilities. Also, four distributed wet weather treatment facilities are proposed for the treatment of stored CSOs.
Karen Buck	153. The City of Toronto Stormwater Management Policy is not included in the final Plan documents. It is unclear how 3.3 of the Mediator's Report has been satisfied.	<p>See Response #175 and #176</p> <p>A Wet Weather Flow Management (WWFM) Policy for the City of Toronto has been prepared in conjunction with the WWFMMP. The draft WWFM Policy was reviewed with the Rouge Park Alliance as well as with the environmental regulatory and approval agencies and the WWFMMP Steering Committee and the final Wet Weather Flow Management Policy (August 2003) has been endorsed by City of Toronto Council on September 22, 23, 24 and 25, 2003.</p> <p>Administration of the WWFM Policy is the responsibility of the Commissioner of Works and Emergency Services. Implementation of the Policy will be supported by detailed Technical Guidelines and associated By-law(s). The Guidelines and By-law(s), once adopted by Council provide the administrative and legislative authority to ensure compliance of the policy. Following Council's approval of the Policy, the Guidelines and associated By-law(s) are being developed and will be recommended to City Council for approval in 2004.</p>
Karen Buck	154. End-of-the-pipe tank and tunnel coupled with 40% downspout disconnection and no comprehensive consideration of even partial separation of the combined sewers, has failed to maximize groundwater recharge and other beneficial uses of stormwater. In 3.5.6, the use of economic instruments to reduce the quantity of stormwater entering the system is not part of the final Plan.	See Response #4 and #115
Karen Buck	155. Regarding 3.6 the Plan does not give detailed reasons for the rejection of partial sewer separation, except cost, which in the end was deemed inconsequential over the 100-year timeframe.	See Response #115

Respondent	Comment	City Response
Karen Buck	156. The Plan does not give detailed reasons for the inclusion of major end-of-pipe solutions and the abandonment of virtual 100% downspout disconnection coupled with road sewer construction (in the remaining incomplete areas of the sewershed) other than to opt for voluntary 40% downspout disconnection as a “likely achievable target” and an early compliance with Ontario regulation F-5-5.	See Response #7, #115, #119 and #121
Karen Buck	157. Regarding 3.7, the appropriate role for the NTP was not determined in the Plan.	See Response #41
Karen Buck	158. Regarding 3.10, the Steering Committee did not have a stakeholder from the Rouge or Highland watershed.	Stakeholder from the Rouge and Highland watersheds were invited to sit on the steering committee. Although they declined to sit on the steering committee they did request to be, and were, kept involved in the development of the WWFMMP through the public consultation process.
Karen Buck	159. Regarding 3.11, the Steering Committee did not have consensus on the Study Area 1 solution.	Although many public members of the steering committee did not concur with the recommended solution for Study Area 1, consideration was given to various alternatives and a recommendation was made based on technical, environmental, economic and social factors.
Karen Buck	160. Regarding 3.2.8 and 3.13, the Plan does recognize the need for water quality improvement in Coatsworth Cut (Ashbridges Bay) and in the 25-year implementation plan allotted a budget amount for eliminating the storm sewer in that area, however, the combined sewer overflows have not been addressed by the Plan. The Plan does not meet the requirements of the Mediator’s Report.	See Response #128
Karen Buck	161. It is questionable that end-of-pipe tanks and tunnel solutions in Study Area 1 is the major part of the 25-year implementation programme since “Losses to the sanitary system from roof downspouts and foundation drains are considered as a black box, resulting in these values not being explicitly quantified. Hence, additional efforts are needed to quantify the effects of the Plan on the wastewater treatment plants (WWTP).”	See Response #151 to 157

Respondent	Comment	City Response
Karen Buck	162. The July meeting of the ICMC was scheduled to hear how the Plan met the requirements of the Mediator's Report. The Staff presentation did not address this issue.	See Response #151 to 160
Karen Buck	163. There are reports of the final Plan for review that include a whole new set of small studies that were never presented to the Steering Committee. This is not satisfactory consultation. A special meeting of the Steering Committee should have been called to address these additional reports before soliciting comments from the Steering Committee and the public.	The "small study" documents being referred to that were submitted with the final WWFMMP consists of the Overview and Implementation Plan and the Waterfront Response Report and Appendices. These documents merely summarize the five Study Area studies and documents the Waterfront analysis. The material contained in these documents was presented to the steering committee throughout the WWFMMP process.
Karen Buck	164. Consultation with the public was adequate however the Plan, in Study Area 1, does not reflect the results of the consultation with the public and the Steering Committee public members.	See Response #115
Karen Buck	165. Further comments, being solicited on the final Plan, are important to the process and the development of the Plan since some of the final reports indicate a departure or gaps in the information from the initial Plan process. The Plan should remain an iterative process because of its timeframe.	See Response #114 and #163
Karen Buck	166. STEWARDSHIP and EDUCATION: should involve watershed and subwatershed groups whose interest and work is already directed at the improvement of water quality in the Toronto area and adjoining 905 areas.	See Response #3 and #9
Jim Neff	167. Public input was manipulated and ignored. Politicians, bureaucrats, and the public must be on equal footing to achieve best solution. Senior City Staff must communicate more effectively with Public	See Response # 114
Jim Neff	168. New Technologies (e.g. Micro-organism tech. to reduce sludge) have not been pursued.	A long list of technologies and management practices applicable to Wet Weather Flow has been compiled in the Blue Book. Most of these are proven practices and as such the City has confidence in implementing them. Several are actually documented in the MOE Stormwater Management Planning and Design Manual, and as such can be thought of as standard practices. Others are quite innovative or are proven in some areas of biotechnology, but their application to the field of Wet Weather Flow Management is largely untested. Their potential application, and the potential of other New Technologies, will be considered by the City in site-specific applications as the City implements the WWFMMP.
Jim Neff	169. Need for road sewer separation was ignored	See Response # 115
Jim Neff	170. Road Sewer discharge must be independently controlled (in a separate facility) to meet Great Lakes Water Quality Agreement, the City bylaw for ICI discharges and F-5-5	Road sewers' are stormwater pipes located below streets and arterial roads and which receive stormwater runoff through catch-basins. Road storm sewer discharges will be controlled by conveyance systems or end-of-pipe facilities following the Preferred Strategy and the 25 Year Implementation Plan. The City bylaw for ICI discharges for example is designed to control inputs to the road- sewer system from ICI sources. Where sewer separation is implemented in the CSO service area, the City will require separate EOP facilities to control discharges from the "storm-sewer system" to receiving waters.

Respondent	Comment	City Response
Jim Neff	171. Phytoremediation is the best proven resolution for Toxic Metal reduction. Why has it been ignored or dismissed?	Phytoremediation is a recently developed new, innovative technology which has a place in management of heavy metals in discharges. One significant area of application are in mine tailing discharges where the water is acidic, where the heavy metals are electro-reactive and in a reduced oxidation state in the discharge and in the 10's of mg/L. In wet weather flow, the concentrations are much more dilute and generally in an oxidized state. The City will continue to evaluate alternative technologies as they are identified and proven for applications compatible to wet weather flow.
Jim Neff	172. Environmental Audit must be set up (e.g. Migratory Birds Convention Act bans destruction of endangered bird habitat)	The Natural Heritage study has identified the various habitats within the City of Toronto. This information has been considered by the consultants in their evaluation criteria for wet weather flow strategies.
Peg Lush Safe Sewage Committee	173. Inadequate consideration was given to alternatives	See Response #115 and #168
Peg Lush Safe Sewage Committee	174. Disdain for extensive expertise and long-term dedication of public	See Response #3 and #114
Peg Lush Safe Sewage Committee	175. Policy was not adequately formulated	See Response #153 The WWF Policy, by its very nature, is a high level document which has evolved after extensive consultation with the public and the various stakeholder groups, including the Provincial Ministry of the Environment. It is acknowledged that some parties advocated additional detail for the policy document, which is not appropriate. When compared to available examples such as the Water Management - Policies; Guidelines, Provincial Water Quality Objectives of the Ministry of Environment and Energy (July 1994), the City's Policy document is more detailed. When compared to the Scarborough Drainage Policy which has considerable detail, it was determined the Scarborough model was too detailed, as it includes both Policy statements, and detailed design guidelines
Peg Lush Safe Sewage Committee	176. No specific guidelines were given	See Response #153 It is the intent of the City to develop specific guidelines to support the Policy over the next year, which will be largely technical in nature. In the interim, specific guidelines that have technical specifications in them from the former municipalities continue in force. In addition, Provincial Guidelines, such as the MOE Stormwater Management Planning and Design manual of practice is in force and provides the parent document / guideline to the City's guidance.
Peg Lush Safe Sewage Committee	177. No final vote on plan by steering committee was held+++	A Plan is not selected base on a vote of the steering committee. The development of the WWFMMP followed the requirements Master Planning set out in the Class Environmental Assessment document. The purpose of the steering committee was to guide and assist in the development of the plan. The final plan was determine after consideration and evaluation of various alternatives based on extensive broader public input provided through workshops, public meetings, focus groups, e-consultation, formal review period, etc. as well as technical, environmental, economic and social factors.

Community Organizations and Individuals

Names/Affiliations	Public Comments	Staff Responses
Individual Member of the Public	178. Why is the northern half of Toronto excluded from the plan? There are many simple and often inexpensive ways to reduce wet weather flow. Most of these wasted opportunities involve "applying source control measures". Some involve primary "conveyance controls". I have submitted suggestions to the applicable departments, authorities, boards, bureaucrats, and politicians. Almost nothing has been accepted."	The WWFMMP included all of the City of Toronto. See Response #7 and #9
Individual Member of the Public	179. Why are the "paving over of green space" by-laws and city policies not enforced on private and public property?	Pervious driveways and paving on road allowances will be addressed through the WWFM Policy and its associated Guidelines and By-laws. See Response #153, #175 and #176
Individual Member of the Public	180. Why is the paving of city owned green space on road allowances and boulevards adjacent to private property not kept to a minimum?	See Response #179
Individual Member of the Public	181. Parking permit: don't see anywhere in report about front yard parking. More car on the lawn means more run off to storm sewer. City is making it cheap to widening drive way	Front yard parking will be addressed through the WWFM Policy and its associated Guidelines and By-laws. See Response # 153, #175 and #176
Individual Member of the Public	182. Toronto has too much concrete for the water flow. Rather than ripping up the concrete, why not drill holes for the water to flow into. I'm sure that somewhere under all that concrete is the earth. You could even drill them in as a logo/pattern	The WWFMMP was developed based on hierarchical approach of Source Control measures, Conveyance Controls measures and EOP control measures. Source controls and Conveyance controls essentially increases the pervious area through out the city. The WWFMMP does infiltrate as much water as possible. Simply drilling holes in existing concrete should not be done as it will compromise its structural integrity
Individual Member of the Public	183. I'd like to add bridges to the plan which would replace culverts under major roads. This would improve busy street crossing access for creekside trail users and wildlife. Examples near me include the crossing of Taylor/Massey Creek at Eglinton and Rosemount, Highland Creek crossing Lawrence west of Midland and Brimley at Knob Hill Park (north of Eglinton). I realize that this is an expensive proposition so the bridges could be built slowly as these roads are periodically reconstructed.	See Response #13
Individual Member of the Public	184. I saw nothing in the plan about continuous trail systems (e.g. how to get through the privately owned golf courses which block access on the Don and Highland Creek). The city should purchase these golf courses and renaturalize them.	See Response #215, #216 and #217

Names/Affiliations	Public Comments	Staff Responses
Individual Member of the Public	185. As a lay person I found the volume of documents to be overwhelming. It would be easier if you had a series of maps annotated with proposed projects. Most of us don't need to know all of the background and study details. We care more about the proposed changes. The timing of mid-summer for review is also not great for most people and will probably reduce public input.	See Response #114
Individual Member of the Public	186. Want to find out if/how staff identifies culverts that drains to the Don River	See Response #13 and 217
Water Tek Inc.	187. I am also looking for information to ascertain whether the City plans to recycle an/or make use of wet weather flow for 'grey water' (home) use.	The WWFMMP encourages the reuse of stormwater for lawn and garden irrigation on individual lots as well as in parks. Recycling stormwater for "grey water" use is an innovative concept. The Waterfront Revitalization Water Quality Improvements Strategy Study to be undertaken as part of the Waterfront Planning will assess the feasibility of "grey water" use
Safe Sewage Committee	188. If scenario 5a or 5b are chosen the stormwater solids will be collected in detention tanks and tunnels and the sedimentary sludge after decantation would be sent to the ABTP, Highland Creek or Humber Plants for treatment. These solids would not be biosolids with a significant NPK and would hence dilute the agronomic biosolids in a detrimental way in conflict with principle 10 of bioethical optimization in the guiding principles (Resolution 1) of the Mediator's Report. Bioethical optimization looks to maximize beneficial uses in the processes of the ABTP plant, and hence watered down sludge would be counter to this standard since we want to maximize the beneficial use of the sludges for agronomic land application. Sending CSO and stormwater solids to the plant (with their constituent pesticides, petroleum by-products and diluted non-biosolids stormwater solid) counter Principle of the Mediator's Report says the integrity of the ABTP for treating sanitary sewage should be maintained. Additional stormwater flows would possibly result in more secondary bypasses through the seawall gates of the ABTP (since we do not have the new outfall as promised in the ABTP EA) RAP goal for ABTP EA (Natural Environmental Table 4 of guiding principles) call for the 'virtual elimination of untreated overflows from combined sewers'. WWFMMP would not eliminate CSO but trap them for treatment. Such trapping facilities are capable of overflows during significant weather events (e.g. Beaches detention tanks) Proposal 5c which calls for eventual complete sewer separation would be more productive and in line with the Mediator's Report. 5c would eliminate CSO and separate stormwaters for separate treatment at new facilities. Even if this infrastructural development took a century to achieve it would be of significant lasting benefit from a public health perspective. Environmental considerations must overrule financial concerns when it comes to public health and recreation. Scenario 5c should be broken out in the WWFMMP report since it is the only scenario to endorse complete sewer separation as propounded by Professor Grima, and represents the community minority viewpoint for the Councillors' perusal.	Procedure F-5-5 requires 90% of all runoff to be controlled and allows only 2 overflow per rain season. See Response #51, #115, #122, #123, #151 and #152
Individual Member of the Public	189. When will rotten sewer gas smell be removed from Keel-Bloor and Keel-Glenlake residential area? It has been present for 20 years. City Hall says it is being worked on every year. What is happening?	Sewer odour, although not a WWF issue, is an operation/maintenance issue for sanitary sewers usually occurring during hot dry weather and is continually being addressed.

Names/Affiliations	Public Comments	Staff Responses
Dominion Colour Corporation	190. Is it possible that any aspect(s) of the Plan may require expenditures by private industry?	The WWFMMP was developed based on hierarchical approach of Source Control measures, Conveyance Controls measures and EOP control measures. Source controls are essentially measures implemented on individual lot. In the WWFMMP, source controls on private property will be paid for by the property owner. See Response #4
Council of Commodores	191. In Bluffers Park, Coatsworth Cut, Toronto Islands and the mooring basin south of Coronation Park, there has been extreme growth of aquatic weeds that has caused personal injury and property damage issues for the boaters. Concerned that only the "city beaches" are designated in the Master Plan to meet contact objectives. With regard to the Etobicoke Creek arm or berm, concerned about any deterioration of the water to the east, specifically the re-routing of any water of poor quality into the adjacent basin at Colonel Sam Smith Park. Concerned that the berms and the extension of Ashbridges outfalls will move the polluted waters from the beaches to the offshore waters. Want to review plan to give unimpeded water access to canoeists through Ontario Place from the sheltered waters that run east from the Humber River, because rough water could be dangerous	See Response #2 and #128 The WWFMMP does not recommend extending any outfall at Ashbridges Bay
Don Watershed Regeneration Council (DWRC)	192. Policy framework for Toronto to work with the 905 Area on stormwater measures as needed. Source Control: shopping malls, churches, schools, universities, industrial parks have large areas of open space and/or paved parking areas which could be redesigned and redeveloped to accommodate storm water controls. City and landowners should share the costs of installing stormwater technologies. Partnerships would achieve more source control and monitor opportunities for new or untried technologies. Educational messages connecting storm water runoff and pollution of rivers should be concentrated in the first 10-12 years End of Pipe Controls: On Large sites the DWRC recommends stormwater facilities on tableland, either in open wetlands/ponds or sand filters under open space areas. Storage Tanks should only be used as the last resort. CSO Area Sewer Separation: The DWRC supports installation and "dead-ending" road sewers if there is a reasonable expectation that receiving infrastructure may be in place in the future. Innovative Technologies: Form partnerships with the private sector, government agencies and environmental groups to implement and monitor new technology. - Undertake Pilot Projects*** Upstream Municipalities: The plan fails to understand the inter-dependence of drainage areas in watersheds in both the "905" and in the City. Airborne Contaminants: Public education is needed to link water quality and air quality. West Nile Virus: Storm water detention ponds may be problematic because of standing water. They must be monitored closely to avoid mosquito breeding. Feds and the Province: Must contribute funds for the project to work	See Response #3, #4, #7, #9, #12, #72, #115 and #217 The WWFMMP was developed based on hierarchical approach of Source Control measures, Conveyance Controls measures and EOP control measures. In establishing EOP facilities above ground facilities ("Green EOP") on the tableland were considered first before facilities in the valleys or below ground storage tanks were considered.

Names/Affiliations	Public Comments	Staff Responses
Etobicoke - Mimico Creek Watershed Coalition	<p>193. Priority should be given to work UPSTREAM (most degraded in city) instead of at the creek mouths and waterfront. Three projects with HIGH PRIORITY: Remove fish barriers in lower Mimico Creek Stream restoration -see "Greening Our Watersheds" Remove concrete channel of creek under QEW</p> <p>Berm at mouth of Etobicoke Creek should be Re-evaluated - consider ALL other options</p>	See Response #2, #9, #12 and #13
Etobicoke - Mimico Creek Watershed Coalition	194. Five percent of budget should be spent on public education and outreach	The WWFMMP has allocated \$30 million over the next 25 years for public education and outreach.
Etobicoke - Mimico Creek Watershed Coalition	195. The proposed source control program should include requirements for PRIVATE roads in addition to public roads	The WWFMMP source control as well as conveyance control programs apply to all land uses, including private and public
Etobicoke - Mimico Creek Watershed Coalition	196. Construct Pond at Bonar Creek near mouth of Mimico Creek (Pilot Project)	The Environmental Assessment for Bonar Creek Pond is scheduled to commence in 2003
Humber Watershed Alliance	197. Funding should be focused UPSTREAM to reduce pollution	See Response #7
Humber Watershed Alliance	198. Strongly oppose deflector arm that is proposed at mouth of the Humber	See Response #2
Humber Watershed Alliance	199. Maximize use of source prevention and natural processes to improve quality of storm water runoff before it enters Humber	See Response #1
Humber Watershed Alliance	200. Policy Framework needed for TRCA to work with Municipal, Provincial, and Federal Governments.	See Response #3 and #9
Friends of the Don East (FODE)	201. Framework of WWFMMP should address: wet weather flow, water quality, natural heritage protection, greenspace acquisition & management, bylaw enforcement	See Response# 10, #51, #52, #116, #175, #176 and #220
Friends of the Don East (FODE)	202. Need Budget Allocations for: Channel Form Naturalization, Fish Barriers, Riparian Restoration, and Pond Construction must be ENSHRINED in the implementation plan, as engineering projects usually get preference	The 25 year Implementation Plan has allocated separate budgets for Stream Restoration (Channel Naturalization, Fish Barrier removal and Riparian Restoration) and EOP facilities.
Friends of the Don East (FODE)	203. City must install or upgrade trails and bridges in Taylor Massey Creek etc. in conjunction with WWF construction. This will ensure cost efficiency for natural heritage infrastructure	See Response #13 and #184
Friends of the Don East (FODE)	204. Increased City Staff is needed to manage WWFMMP - inter-departmental management	City Council, in adopting the WWFMMP approved additional staff resources for the implementation of the Plan.
Friends of the Don East (FODE)	205. More money needed for Public Education and Outreach	The WWFMMP has allocated \$30 million over the next 25 years for public education and outreach.
Friends of the Don East (FODE)	206. Community Participation in Source Control is needed. FODE wishes to work in development and implementation of PEO (public education).	See Response #3
Friends of the Don East (FODE)	207. "Channel form Naturalization" and "Riparian Vegetation Restoration" MUST be given working definitions	See Response #13 and #184

Names/Affiliations	Public Comments	Staff Responses
Friends of the Don East (FODE)	208. SAFEGUARD Budget, to commit to riparian vegetation, fish barriers, and channel form naturalization	See Response #202
Save the Rouge Valley System Green Door Alliance	209. Install a training certification course for construction, landscape, and engineering personnel wishing to work on Toronto projects - called a "Watercourse Certificate"	This sounds like an interesting idea. It is worthwhile considering this as a voluntary option
Save the Rouge Valley System Green Door Alliance	210. Install sewer courses on residential streets for peak flow	All residential streets in new developments are designed to carry peak flows.
Save the Rouge Valley System Green Door Alliance	211. Present Awards for Communities who control water flow	Noted and to be considered in the implementation of the PE&O Program. See Response #3
Save the Rouge Valley System Green Door Alliance	212. Provide water control training to all planning and development staff - prepare water flow predictions for all new project applications	The new WWFM Policy requires new development to provided Stormwater Management Plans consistent with the WWFMMP
Save the Rouge Valley System Green Door Alliance	213. Hold applicants liable for breaches of water control plans	As we develop the WWF Guidelines we need to assess how we can enforce stormwater management recommendations
Save the Rouge Valley System Green Door Alliance	214. Clarify impact of directing storm water from streets into wetlands	See Response #1
Save the Rouge Valley System Green Door Alliance	215. Need recognition of Rouge Park	While there is not a reference to 'recognition of Rouge Park' the WWFMMP does address how we should preserve, restore and enhance stormwater quality in the Rouge River watershed, hence adhering to the goals, objectives and planning principles of the <u>Rouge Park Management Plan</u> . The Future WWF Guidelines will also assist with the process of protecting
Black Creek Project	216. Supports the 12 points raised by ARCH (See comment #1-14)	See Response #1-14
Humber Heritage Committee	217. Disagree with the idea of the Humber spit and support upstream treatment to improve water quality. Spending of money, time or resources that does not in any way benefit the Remedial Action Plan for the Great Lakes in terms of water quality improvement is, in our estimation, deleterious and counter productive. Neither is it within the spirit or intent of the WWFMMP	See Response #2

Government Agencies

Names/Affiliations	Agency Comments	Staff Responses
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	218. Facilities identified in the studies are based on retrofitting the city's stormwater system and that additional facilities will be required to address growth. This should be made more apparent in the report.	Identified facilities are based on opportunities afforded in both existing areas and in areas of intensification. Additional opportunities may be identified during redevelopment. There may be further opportunities or requirements to provide additional facilities when considering development applications. During that process additional facilities may be further defined in the Management and Technical Guidelines.
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	219. One of the most important areas of concern with Parks and Recreation Division was the need for clear indication of end-of-pipe (EOP) facilities. Necessary for identifying and assessing which parks and greenspaces may be impacted by proposed facilities. With respect to the clarity of the document to the public and interested groups. The current documents do not provide adequate mapping or other details that would allow us to pursue this in sufficient detail, hence it has not been possible to identify concerns with proposed locations. I would, therefore, ask again that this information be provided so that we may review this with other staff in EDCT. Of the documents received for each watershed, Study Area 5 provides the best overall indication of the nature and location of proposed EOP facilities. i.e., Table 8.3.5, read in conjunction with Figure 8.3.3 (although the text in Chapter 8.3.4 and Figure 8.3.3 for Study Area 5 refers to oil/grit separators, the table does not include them as such). The other documents should conform to this, or an overview table/map should be provided for all of the study areas. A digital map which compiles the various watersheds and the proposed facilities would also help Proposed EOP facilities should be explicitly and consistently identified. Provide a detailed list of proposed facilities, broken down by study area. This will help estimate parkland implications.	The City will as a minimum have latitudes and longitudes or UTM's to identify each potential EOP facility and is attempting to ensure a uniformity standard for reporting. This information will be available in GIS files for providing more detailed maps. Some of these concerns have been addressed to varying degrees by the different consultant groups, but the City concurs that there is still a need to improve the consistency of presentation. This point was sent to all consultants who have been requested to provide map(s) to show locations of all stream restoration work, roof connection and cluster flooding areas, conveyance opportunities and EOP facilities (including reference IDs for all EOP facilities and stream restoration work) along with tables listing of each section of stream restoration work and EOP facility (with IDs, anticipated EA Schedule, location details, land ownership, design criteria and preliminary sizing, and estimated construction costs, etc. Also, the consultants are to submit a CD containing all GIS files as well as all computer model input and output files.
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	220. The documents do not consistently identify the criteria used to identify opportunities for EOP facilities in the identification of alternative (Section 6.1.3). Area 1 appears to have public land as a basic criteria, while others (Areas 4 and 5, anyway) do not.	The WWFMMP identified opportunities for end-of-pipe facilities at a scoping level. The screening criteria used by the different consultant groups were similar, but some consultants have used more detailed data than others to confirm potential sites. This variation in level of detail is currently part of the final reports and will remain so until the final reports are accepted by the City. This level of detail will affect to some degree how the city moves forward with specific projects; due to the wishes of MOE and EC to consider clusters of EOP sites to complete the requirements of the EA study process, it is anticipated that several facilities from the same watershed will be considered in one EA. The next stage of implementing individual projects will be the undertaking of the Class EA for each proposed EOP facility. In accordance with the Class EA process site specific details and criteria such as topography, existing utilities, competing land use, local acceptance, etc., for siting a given end-of-pipe facility will have to be reviewed in detail to determine if the proposed site is suitable, if another type of end-of-pipe facility is required or if the proposed facility must be relocated to another site. Confirmation of sites and the type and final size of the end-of-pipe facility is necessary before the City can proceed with securing properties for the proposed EOP facilities.
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	221. The criteria focus on existing uses and not potential future uses or development. Given Toronto's limited supply of parks and open spaces and the desire to intensify the city, the need to view potential for increased park development should be acknowledged as an important consideration and a potential "constraint" in considering use of these lands.	We acknowledge that future park use and intensified use of parks must be considered for each proposed project. We believe that on occasion green end of pipe facilities may provide an opportunity for additional walking trails, landscaping etc which would assist in meeting future needs. In some instances, such as Terraview/Willowfield, recreation use [soccer fields] led to installation of a below ground filtration technology, rather than above ground facility so new parks facilities and new stormwater facilities are created for a win-win situation.

Names/Affiliations	Agency Comments	Staff Responses
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	222. The studies should reference the TRCA's Natural Heritage Study, which identifies natural heritage resources.	The studies have identified the TRCA Natural Heritage Study, and considered its implications in their evaluation criteria. It should be noted that the Heritage Study was completed mid-way through the WWFMMP study process. Additional work is required to make the Natural Heritage Study sufficiently holistic. The Natural Heritage Study findings were incorporated, where appropriate.
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	223. The sections of costing of the proposed facilities do not refer to the cost of the land, which would be based on the assumption that required lands are public or will be acquired separately from the construction estimates. This should be clarified in the appropriate sections.	The costing information [see Section 4.6, Chapter 4 of the Technical Reports for each study area] assumed that all lands for EOP facilities were public and hence involved no cost to the City.
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	224. In terms of implementation, the studies note that additional municipal approvals will be required, along with other regulatory requirements. I do not see the basis for the statement in section 8.5.2 about input from parks staff on "requirements with respect to construction is [in] City parks and public lands." I don't recall that input at the steering committee or in a parallel discussion directly with WWFMMP staff or consultants. There is a great deal of ground to cover between departments with respect to issues of land use, facility design, and integration of facilities within parks and public lands.	We agree that there is still a great deal of ground to cover. As noted in #220 above further investigation and consultation through the Class EA process for the proposed EOP facilities before implementation can proceed.
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	225. In identifying the alternatives, input we made on the identification of opportunities for EOP facilities was not address, in particular the need for a more informed basis for qualitative assessments of open areas. The text in this section overstates the case and suggests that facility development will largely be a case of "site plan approvals and permits" which is not the case. It is our understanding that more planning with public, stakeholders, host departments, etc. will have to occur to prove up the identified proposals and follow appropriate processes (including EAs) that will evaluate project merits, impacts, tradeoffs, etc. From our perspective, these are important requirements.	Agree See Response #220 and #224
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	226. A document summarizing the technical reports and the consultants' findings that provides an overall framework would be quite helpful in presenting the master plan effort.	An Overview of the WWFMMP and the 25 Year Implementation Plan has been prepared as a part of the Technical reports. Aspects of all consultants' reports are summarized in the Waterfront Report. However, we recognize that there is a need for further communication materials to assist staff in all departments and we will work toward that goal.
Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation	227. Communicating the scope and detail of the plan resides in the ability to understand exactly what the dots on the map actually mean (i.e., proposed facility locations), how they got there, and what might happen to them from this point onwards. An outline of the extent of location and site screening for the proposed locations would be helpful in understanding the degree of certainty associated with the dots on the map. At present, the criteria are listed as "drainage area, existing and adjacent land uses, access and existing vegetation." Are there other aspects that need to be investigated to determine if a location or site is feasible?	We appreciate the need for additional information on each site and the degree of certainty associated with each proposed site. Further investigation and consultation will be undertaken through the Class EA process. See #215, #220 and #222

Names/Affiliations	Agency Comments	Staff Responses
<p>Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation</p>	<p>228. In terms of process, approval interventions in parks and other greenspaces should generally be viewed as following a higher level of EA process (i.e., elevate new ponds from Schedule B to Schedule C). While recognizing this may be a discretionary step, interventions in parks and green space are typically regarded as significant changes by the host community or other interested groups and the planning/approval process. Recent experience with proposed SWM facilities in parks (some of which are not included in the WWFMMP) suggests situational decisions on how to proceed in planning/evaluating a proposed facility can be confusing both within the City as an organization and with the community, so it would be important to establish a general practice that provides for higher levels of environmental impact and public concern.</p>	<p>The EOP facilities will be considered as Schedule B facilities for EA purposes, but careful consideration will be given to the number of public and City department contact points in consultation efforts. We take that comment as directed to the degree of consultation and contact and recognize that the number of contacts needed in a Schedule B undertaking are a minimum, not a maximum.</p>
<p>Parks and Recreation Planning Brian Rutherford, Policy and Development, EDCT And Teresa Bosco, Parks and Recreation</p>	<p>229. The matter of land requirements and cost is an important aspect. The loss of use of such land, including the potential for future recreational uses, will need to be assessed and considered. It should also be emphasized that land dedicated to the City for parks purposes should not be used to host stormwater management facilities. The planning process may provide opportunities for land to host facilities that may be conveyed to the City for stormwater facilities, but these should be regarded as distinct from lands dedicated or conveyed to the city for parks purposes. The WWFMMP should also address the benefits of acquiring and conserving greenspace in the City as an important component of water management, as both a potential program area (e.g., acquiring land in conjunction with other agencies and City programs to increase greenspace cover) and as subject for monitoring.</p>	<p>These are all important considerations which will be considered at the next stage of site-specific consideration. We also note that since conversion of green space such as around decommissioned schools and hydro corridors will affect future decision making and opportunities, WWW wishes to work proactively with Parks to conserve such sites and as such wish to develop a pro-active effort to forecast where these opportunities will occur, and to obtain these sites where necessary and where justified for water conservation and green space conservation.</p>
<p>Adele Freeman Acting Director Watershed Management Division Toronto Region Conservation Authority</p>	<p>230. Integrate modeling and evaluation of upstream stormwater management measures into further investigations regarding the potential benefits of the proposed deflector arms.</p>	<p>Regarding the idea to delay of the consideration of these new landforms are premised on the hypothesis that additional measures in rural and urban communities in the 905 area will result in achieving beach water quality objectives at the Toronto waterfront. Related concerns and hypothesis have been advanced by some of the TRCA watershed groups. We propose to use the Environmental Assessment Process to address these hypotheses.</p> <p>You note, in point one, that <i>“We appreciate the City’s desire to address beach closures as soon as possible and recognize that implementation of enhanced stormwater management measures, as described in the preferred strategy (#5), may not fully achieve this objective at all waterfront beaches.”</i> One overarching point that has been expressed by specific public members has been to advance the rate of implementation of the Plan. This includes, for example, accelerating Plan implementation to have all waterfront beaches meet beach water quality objectives within the first 10 - 15 years of the Plan. While respecting the hierarchy of controls and the measures that can be implemented with the target level of financing [through municipal financing and measures that will be implemented on private property], the proposed plan has attempted to develop a balance among the competing priorities.</p> <p>While the Master Plan provides for control of City sewer outfalls which directly impact the beaches, these improvements are masked by the impacts of watersheds, which extend well beyond the City limits. The modelling analyses that had been carried out during the evaluation of alternatives for achieving beach water quality objectives demonstrated that flows from the Humber River will continue to impact water quality along the Western Beaches and similarly, the flows from Etobicoke Creek will continue to impact Marie Curtis Park beaches. These beaches continue to be impacted, after implementation of all land - based controls in the 25 Year Plan within the respective watersheds [Humber R watershed, Etobicoke Cr watershed], and with implementation of additional controls in the 905 area assuming performances typical of designs contained in the MOE SWM Planning & Design Manual, and even with the long-term preferred strategy.</p>

Names/Affiliations	Agency Comments	Staff Responses
		<p>It has been demonstrated that no matter what we do at source, conveyance and end-of-pipe, the degree of restoration of the hydrological cycle is insufficient to achieve beach water quality objectives. This led to an evaluation of additional alternatives which could achieve beach water quality objectives and resulted in inclusion of a new land form in the 25 Year Plan as necessary for achieving this goal. The concept of a “deflector arm/ fishing pier structure” was evaluated and the computer simulation results demonstrate that it, in conjunction with all upstream measures contained in the plan, can significantly improve water quality along the Western Beaches and Marie Curtis Park Beach West. The exact type of landform has not been specified and could include a fishing pier, a set of interconnected shoals and islands, a peninsula or an isthmus. This respects the hierarchical principle by implementing source, conveyance and end-of-pipe controls on land first, prior to considering in stream or in water measures.</p> <p>The approach in the 25 Year Plan for achieving beach water quality is similar to the strategy for stream restoration. For stream restoration, it has been demonstrated that no matter what we do at source, conveyance and EOP, the degree of restoration of the hydrological cycle is insufficient to alter the impacts of imperviousness, leading to the conclusion that direct instream works which expand the hydraulic geometry of the stream are necessary.</p> <p>In the Humber River watershed, the Master Plan gives high priority to projects with the largest impacts on improving water quality in the Humber River, this includes eliminating sources of dry weather pollution. The City will also be working with the TRCA and upstream communities to improve water quality from all sources to the Humber River.</p> <p>Achieving the Plan’s beach water quality improvement objectives within the 25 year implementation plan can not be realized without these structures. Based on these analysis, it is the City’s conclusion that the need and justification for the concept of this type of structure has been demonstrated, as an essential element for the 25 Year Master Plan.</p> <p><i>This proposed project is subject to review and analysis through the Class Environmental Assessment process which will address all concerns that have been raised and further evaluate the justification for this project and consider and assess options for the configuration of the structure and opportunities to integrate it with recreational uses and the ecological function of Humber Bay (e.g. fishing pier and park features above water and fish habitat features below water). In following the EA process, please note</i></p> <ul style="list-style-type: none"> • Firstly, the original 25 Year Plan, presented to the fall 2002 round of Public Consultation, scheduled the construction of a new land form in the first five year set of projects. This would address the City’s commitment to make the waterfront beaches swimmable in the decade or so. Due to concerns expressed by stakeholders, the budget for implementation of such a structure has been postponed to the second 5 year period. • Secondly, through a motion by Works Committee on September 4, 2003, the City is committed to “delaying the Class Environmental Assessment process for the Humber River and Etobicoke Creek Deflector Arms and instead, requesting that the Commissioner of Works and Emergency Services report back to the Works Committee by April 2004 on consultations with expert stakeholders and the community in these watersheds”. • Thirdly, an essential part of an environmental assessment process concerns the problem definition stage. Since it is recognized that public consultation or agency consultation concerning the problem definition phases are a part of any Environmental Assessment phase of a project, the commitments made at Works Committee require starting an EA process now for these Problem Definition stages. <p>In commencing an EA to address this proposed project by incorporating the above activities into the first phase of the EA study, the City will</p> <ul style="list-style-type: none"> • Carry out additional technical studies between now and next summer to further synthesize our understanding of the problem and its causes • Provide a more succinct definition of the problem • Work with TRCA to confirm and to extend as appropriate the control measures in the Master Plan to the upstream communities

Names/Affiliations	Agency Comments	Staff Responses
<p>Adele Freeman Acting Director Watershed Management Division Toronto Region Conservation Authority</p>	<p>231. Advocate that the Province develop improved stormwater management guidelines including areas such as rates of discharge for erosion protection and erosion and sediment control during the construction phase.</p>	<p>We agree that the 'Preferred Strategy' of the WWFMMP moves beyond the current MOE BMP manual for stormwater quality management. The City will work with our partners to develop new guidance as appropriate. The City will advocate that the province take the lead in developing this guidance, but the City notes that many elements of the guidance is contained in such WWFMMP reports as the 'Blue Book'.</p> <p>Some of these elements will be included in the City's new arsenal, the Technical and Management Guidelines, which are under development. This will include consideration of surficial soil erosion and sediment control for construction sites.</p>
<p>Adele Freeman Acting Director Watershed Management Division Toronto Region Conservation Authority</p>	<p>232. Clarify the rationale for the extent of proposed restoration works, define restoration levels (e.g. limited, moderate, significant, enhanced) as they apply to each proposed site, and conduct detailed field assessments prior to proceeding with full scale planning for implementation of all proposed stream restoration works.</p>	<p>In consultation with TRCA staff, the City has started a Geomorphic Systems Study for the Highland Cr watershed to address issues associated with Trunk sanitary sewers. The City will extend this study to establish a plan of projects for managing the fluvial geomorphology of the Highland Cr and defining, in detail, stream restoration projects in the Master Plan. This approach is essential to develop further priorities and for identifying the appropriate approach for specific stream reaches within the different valley segments according to Seelbach's classification system.</p> <p>A similar methodology will be applied to the other watersheds, once the template is developed and tested on the Highland watershed. In terms of specific streams such as Wilket Creek, The City has initiated monitoring studies on Wilket Creek and is developing a Terms of Reference for addressing these problems.</p>
<p>Adele Freeman Acting Director Watershed Management Division Toronto Region Conservation Authority</p>	<p>233. a) Locate ponds, if possible, outside the 100 year flood line, or at a minimum outside the 25 year flood line, while continuing to have consideration for other factors such as natural heritage features, public use needs and safety issues (as per TRCA's Valley and Stream Corridor Program policies); b) construct these ponds by excavation only; and c) carefully assess the cumulative hydraulic impact of all proposed ponds in valleys.</p>	<p>The City understands concerns with the influence that new EOP facilities may have on depths of flood - flow and whether or not such elements of facilities may act as hydraulic constriction points in the regulatory flood plain.</p> <p>As TRCA indicates in their comments, these issues must be addressed as a local site specific issue; the City plans in including such issues in the class EA and preliminary design portions of a site specific facility, as well as at detailed design stages. The updating of hydraulic models for flood events and in support of flood plain mapping will assist the City in these site specific evaluations.</p>
<p>Adele Freeman Acting Director Watershed Management Division Toronto Region Conservation Authority</p>	<p>234. Develop user-friendly implementation guidelines to support the stormwater policy that was developed as part of this plan</p>	<p>See Response #231</p>
<p>Adele Freeman Acting Director Watershed Management Division Toronto Region Conservation Authority</p>	<p>235. Continue to promote studies evaluating innovative stormwater best management practices (BMPs) and other stormwater management issues. TRCA will continue to develop a proposal for a water managers forum through which this work can be coordinated with similar efforts by 905 municipalities. We would hop that the City would also join the TRCA in continuing to support the Stormwater Assessment Monitoring and Performance (SWAMP) Program.</p>	<p>The City will work with TRCA to promote innovation. Through the construction of several new facilities including the WBT, the Dunkers, and exfiltration / infiltration conveyance systems, the City will be carrying out monitoring studies to field measure the effectiveness of such facilities.</p> <p>The City looks forward to working with TRCA and the 905 municipalities to promote innovation, and more importantly, the City notes the importance of promoting and co-ordinating the implementation of practices consistent with those that the WWFMMP.</p>
<p>Adele Freeman Acting Director Watershed Management Division Toronto Region Conservation Authority</p>	<p>236. Continue to recognize TRCA as an important partner and make use of existing resources and programs, such as the Regional Watershed Monitoring Network, education, outreach, stewardship and regeneration programs</p>	<p>The City recognizes TRCA as a fundamental partner to successfully implement the WWFMMP. The importance, for example for such areas as 'outreach', has been recognized by the City's request to Council through the City Works Committee requesting funding of \$250,000 to TRCA to take the lead in managing and funding certain 'outreach' activities.</p>

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<p>Adele Freeman Acting Director Watershed Management Division Toronto Region Conservation Authority</p>	<p>237. Recommendation: That a new summary document, like the one prepared for Council in Oct 02, be prepared that summarizes the new policy directions, shows prioritization of proposed works in tables and provides the strategic maps required for quick reference. The document should address current inconsistencies between the 5 study areas by, for example, ensuring the same degree of information is available in the budget sheets and figures. (CD ROM format will achieve broader distribution)</p>	<p>An updated summary document was prepared as part of the documentation prepared for the 30 day review period. In addition, a more detailed overview is included in the Waterfront Report. It is the City's intent to update these documents, as appropriate, for the annual update, and the 5 year update where the results from the Environmental Monitoring Plan will be used to update the WWFMMP in detail.</p>
<p>Mr. John Mackenzie Environmental Assessment and Planning Co-ordinator Ontario Ministry of the Environment</p>	<p>238.</p> <p>Projects should avoid piecemealing e.g. if any schedule B or C Municipal Engineers Class Environmental Assessment projects are interdependent they should come forward together under a more stringent schedule C process to ensure a more comprehensive and thorough examination of issues. Projects involving several components coming forward together should be accompanied by a rationale for why the project is being considered as being interdependent.</p> <p>Projects should make ecological sense and avoid duplication of efforts (e.g., be on a subwatershed basis, catchment basis.)</p> <p>Undertakings where several components are present should be documented carefully on a component basis so that if a larger undertaking is subject to a Part II order request, components can be easily separated, if necessary, for the purposes of an MOE technical review</p> <p>If undertakings intend to rely, fully or in part, on information contained in the modeling, watershed descriptions or other WWFMMP supporting documentation, there should be clear direction and linkage in project document to relevant parts of the WWFMMP.</p>	<p>As the City moves forward to implement individual projects under the Municipal Engineers Class Environmental Assessment Process, the City will need:</p> <p>i) MOE assistance in developing a transparent process and in defining the concise documentation necessary which summarizes the WWFMMP decisions, and other EA and planning related decisions which have guided a proposed design for an individual facility, when approval and a Certificate of Approval is sought from MOE Environmental Assessment and Approvals Branch</p> <p>ii) A method for streamlining additional environmental assessments requirements for individual projects. There are several facets including the following.</p> <p>a. To co-ordinate and where possible conduct the same EA study to address simultaneously both the requirements of the Municipal Engineer's Class Environmental Assessment process with the federal process [CEAA], where CEAA requirements are triggered. For example, these may include projects which will affect habitat or navigable waters or projects where we will be seeking federal funding for such activities</p> <p>b. To group projects to address EA requirements. For example, three major groupings of projects are [i] waterfront projects designed to control CSO's and improve waterfront water quality, [ii] end-of-pipe facilities in different watersheds, and [iii] stream restoration projects designed to protect sub-surface infrastructure and to restore the aquatic [stream] ecosystems. Projects in the first category will have a separate Class EA for each individual project, while Class EA's in the latter two categories will group several projects together into a single project, for environmental assessment purposes. The intent of the EA study for the last two type of groupings will be to complete a "Master Plan" level EA study sufficient to implement Schedule B projects since these last two categories are Schedule B activities. In this way, we will be able to address your last point.</p> <p>In addition, the City will be undertaking monitoring activities and / or building demonstration projects to advance implementation of the Plan, for which early meetings to co-ordinate all EA related activities are in order. It should be noted that the MOE Monitoring and Reporting Branch is assisting on the monitoring requirements of the Plan</p>
<p>Ms Sheila Allan Environmental Assessment Officer Environment Canada, Ontario Region</p>	<p>239. Recommendation: Accelerate the WWFMMP Plan implementation.</p>	<p>One overarching point that has been expressed by specific public members has been to advance the rate of implementation of the Plan. This includes, for example, accelerating Plan implementation to have all waterfront beaches meet beach water quality objectives within the first 10 - 15 years of the Plan. While respecting the hierarchy of controls and the measures that can be implemented with the target level of financing [through municipal financing and measures that will be implemented on private property], the proposed plan has attempted to develop a balance among the competing priorities.</p>
<p>Ms Sheila Allan Environmental Assessment Officer Environment Canada, Ontario Region</p>	<p>240. Public Education program must be continuously reviewed and enhanced</p>	<p>The City has recognized that public education and involvement is critical; our efforts will focus on specific efforts within the Toronto area, but we also recognize that wider-scale efforts that can be lead and facilitated by agencies such as Environment Canada also have a vital role.</p>

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Ms Sheila Allan Environmental Assessment Officer Environment Canada, Ontario Region	241. Species at Risk Act (June 1, 2004) prohibits projects that may impact "animal species at risk", their "residences" and their "critical habitat" http://laws.justice.gc.ca/en/S-15.3/100460.html#rid-100546	With respect to species at risk especially in areas of shoreline management, stream restoration, the City urgently needs maps and information identifying specific 'local' areas of interest and look forward to working with EC in obtaining this information, as you progress through the coming years.
Ms Sheila Allan Environmental Assessment Officer Environment Canada, Ontario Region	242. End of Pipe Controls: City's monitoring program should include water and sediment quality testing to determine if guidelines for potential contaminant uptake by wildlife are exceeded. Guidance for monitoring is found at: http://www.on.ec.gc.ca/wildlife/factsheets/pdf/fs-stormwater-ponds-e.pdf	In terms of monitoring in general, the City has initiated a co-ordinated surface water monitoring program for the WWFMMP with MOE, TRCA, and EC as outlined in the "Waterfront Response" report component of the WWFMMP. This monitoring study design does address the water quality and sediment quality issues with respect to contaminant uptake into wild-life, outlined in your Aug 11 2003 letter. However, our research indicates that a specific study design is needed to address some of these issues, a study design, which we respectfully submit, should be lead by scientists from NWRI because facilities from a broad spectrum of municipalities and ecological pathways need to be included in the study design.
Ms Sheila Allan Environmental Assessment Officer Environment Canada, Ontario Region	243. EC supports streamlining the respective environmental assessment processes (Federal, Provincial and Municipal) for the WWFMMP	In terms of CEAA and related approvals, the next step in implementation is to group projects to complete their related Environmental Assessments. For example, major groupings of projects include: [i] waterfront projects designed to control CSO's and improve waterfront water quality, [ii] end-of-pipe facilities in different watersheds, and [iii] stream restoration projects designed to protect sub-surface infrastructure and to restore the aquatic [stream] ecosystems. Projects in the first category will be have EA's for each project, while EA's for the latter two categories will group several site locations together into a "single undertaking", for environmental assessment purposes. Since many of these projects will affect habitat or navigable waters and since we will be seeking federal funding for such activities as monitoring and / or building demonstration projects, early meetings to co-ordinate of all EA related activities are in order.
Ms Sheila Allan Environmental Assessment Officer Environment Canada, Ontario Region	244. Wet Weather Flow problems that originate Upstream, beyond Toronto's boundaries need to be addressed in a co-ordinated manner with upstream Municipalities.	See Response #9