September 6, 2011

Councillor Minnan-Wong and Members of the City of Toronto Public Works and Infrastructure Committee

Re:  Wet Weather Flow Master Plan and Basement flooding Protection Program Update, PW&I Committee report PW7.6

Toronto and Region Conservation Authority (TRCA) has been involved as an active stakeholder in the Wet Weather Flow Management Master Plan (WWFMMP) planning and implementation process for over a decade, and has coordinated the implementation of the Toronto and Region Remedial Action Plan (RAP) since 2002. It is in these contexts that we write you to express our support for the Don River and Central Waterfront Project (DRCWP) and, specifically, recommendations 6 and 7 in the Committee report PW7.6.

Non-point source pollution from wet weather flow, and in particular the release of untreated stormwater and combined sewer overflow (CSO), underpinned the designation of Toronto and Region as an Area of Concern by the International Joint Commission Water Quality Board in 1985. Stormwater and CSO were subsequently identified as the greatest source of pollution to the Don River watershed (Forty Steps to a New Don (1994)), and stormwater and CSO management made the cornerstone of the Toronto and Region Remedial Action Plan (Clean Waters, Clear Choices (1994)). Subsequent updates on the Don River and Toronto and Region Area of Concern (Clean Waters, Healthy Habitats RAP Progress Report (2001); Moving Forward RAP Progress Report (2007); Don River Watershed Plan: Beyond Forty Steps (2009), and reports cited therein) have reinforced these findings and conclusions.

Releases of CSOs to the Don River and waterfront contaminate and degrade receiving waters, damage the physical structures and biotic communities downstream of outfalls, and restrict public opportunities for water-based enjoyment and activity. TRCA therefore fully supports the virtual elimination of CSOs through the implementation of the DRCWP. We further express our strong support for the prioritization of Coxwell Trunk Sewer twinning as the first phase of DRCWP implementation; it is impossible to overstate the scale and scope of degradation to the Don Valley and Toronto waterfront should the Coxwell sewer fail in the absence of a contingency system.

TRCA is also pleased to assist the City to develop information required to report on the feasibility and costs of undertaking an Environment Assessment for a Humber Bay Islands landform as identified in Recommendation #12. In conclusion, we congratulate and thank the City for its continued commitment to and effort in WWFMMP implementation. TRCA looks forward to continuing to work with the City into the detailed design phase to ensure compliance with the requirements of O.Reg. 166/06 and advance the project as possible.

Sincerely

Brian Denney, P.Eng.
Chief Administrative Officer