



September 6, 2011

SIERRA CLUB ONTARIO DEPUTATION TO THE CITY OF TORONTO PUBLIC WORKS AND INFRASTRUCTURE COMMITTEE

Re: The Don River and Central Waterfront Project and the Basement Flooding Protection Program – Agenda Item PW 7.6

The City of Toronto's proposed Don River and Central Waterfront Project and Basement Flooding Protection Program would cost taxpayers nearly \$2 billion and fail to prevent untreated sewage from contaminating the Great Lakes ecosystem. The DR&CW Project does not correct the City's basic outdated design of combined sewers. During wet weather we will still be at risk of Ashbridges Bay releasing untreated sewage into Lake Ontario for another hundred years or more. During heavy rainfall, e-coli from our toilets will still flow into our rivers, parks, beaches, Lake Ontario and occasionally into basements. It is also important to note that the DR&CW project will not repair or renovate the City's old infrastructure; it is a containment strategy, a wall-to-wall end-of-pipe solution, which normally costs more than a control-at-source approach. The combined sanitary sewage in the tanks and tunnels will receive High Rate Treatment, basically primary treatment and possibly chlorination, not the secondary treatment that will likely be mandatory across Canada. Torontonians should expect more from their \$2 billion investment.

Sierra Club Ontario fully supports the first phase of the Project, which represents the twinning of the Coxwell Sanitary Trunk Sewer and associated pumping station; we also support the financial assistance to low-income households for downspout disconnection and we commend the City for its efforts to repair its old and crumbling combined sewage infrastructure, most of which dates back to the late 19th century and is well over 100 years old.

Toronto's four sewage treatment plants sufficiently accommodate the sanitary sewage from our current population of about 2.5 million – most of the time. Yet, in a large part of the City, during a heavy rainfall, untreated human waste contamination continues to be a public health and environmental hazard. The cause of this contamination is the combined sewer system, not heavy rainfall. Newer municipalities have kept their sanitary and storm sewers separate and appropriately treat sanitary sewage in sewage treatment plants and storm flows in ponds and wetlands. The ponds and wetlands are more ecologically friendly, more attractive and cost about 10% of underground facilities.

The \$2 billion solution proposed by Toronto Water is the DR&CW Project, which is before the PW&I Committee. It proposes building a complex of storage tunnels and tanks to house excess wastewater from combined sewers during peak-flow periods. It includes a series of subway-scale tunnels along the lakeshore, stretching from Strachan to Victoria Park, and has about 30 peripheral tanks and tunnels in the Don River Watershed. The City's other efforts to reduce stormwater, such as innovative green roofs,

downspout disconnection and porous pavement projects are commendable, but unfortunately the Don River and Central Waterfront Project fails the test of biosolid containment.

Biosolids are a difficult end product to manage and the amount of biosolids in our ecosystem needs to be reduced rather than increased. More biosolids contamination will result from these proposed tanks and tunnels. In addition, development pressure in the project area will only make matters worse when new and/or infill developments are connected to combined sewers.

A greener, sustainable approach would disconnect road sewers from the sanitary sewers, diverting sewage to the treatment plant and stormwater toward above-ground, less expensive and more attractive facilities, which are common in the more modern municipalities such as Etobicoke, North York and Pickering. These modern municipalities very sensibly keep the rain out of the sanitary drain by disconnecting the sanitary from the storm sewage flow. Sierra Club Ontario supports these changes to the current plan and urges more and better dialogue with the public. In general, we are in favour of proposals that would end the practice of allowing e-coli being released into close proximity with people and into Lake Ontario. SCO also supports putting a much greater emphasis on handling stormwater run-off using greener, low-impact solutions rather than defaulting to massive, expensive end-of-pipe infrastructure.

Sierra Club Ontario does not favour more studies. Instead, two pilot projects should be planned and built: one that uses end-of-pipe infrastructure and the other that disconnects the sanitary sewage flow from the road sewer flow.

Dan McDermott, Chapter Director
Sierra Club Ontario

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