September 7, 2011

BY MAIL & EMAIL: pwic@toronto.ca

Councillor Minnan-Wong and Members of the City of Toronto Public Works and Infrastructure Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

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

Re: Wet Weather Flow Master Plan Basement Flooding Protection Program
Agenda Item PW7.6 for the PWIC meeting of September 7, 2011

Scientific data confirms that stormwater and combined sewage overflows (CSO’s) are the major source of pollution of our waterways. The new Don Watershed Plan, approved by the Toronto and Region Conservation Authority, supports the City’s Wet Weather Flow Master Plan in tackling run-off and CSO’s in a comprehensive way so that we can all enjoy cleaner water, achieve reduction of flooding and erosion, alleviate basement flooding and reduce the high costs of emergency repairs after major storms.

This comprehensive approach to protecting our watersheds and improving the water in the rivers and the Lake in the Wet Weather Flow Master Plan, 2003 (WWFMP) puts strong emphasis on capturing rainwater at source, then improvements to the conveyance system and aggressive “end of pipe” solutions to clean the water before it is released into the river and the Lake. The City has already taken significant action on source controls, with approval of the downspout disconnect bylaw; the Wet Weather Guidelines for new development; and is making conveyance improvements in conjunction with road works when the opportunity arises. However, a major improvement to the quality of water entering our waterways can only be achieved by capturing and cleaning the high volumes of stormwater and combined sewer overflows (CSO’s), as proposed in the Don River and Central Waterfront project.

The Don Watershed Regeneration Council (DWRC) was a stakeholder in the development of the Wet Weather Flow Master Plan, and participated in the public consultations for the environmental assessment. Although the DWRC has not seen the final Environmental Study Report (and will respond when this becomes available), we offer these comments on the staff report.

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**Staff Recommendations 6 and 7 (a):**

The Don River and Central Waterfront project (“Cleaning up our Waterways”) is the means to achieve a major leap forward in cleaning our waterways within our lifetime. The projected improvement is dramatic: a CSO reduction from 42 events annually to one. Beginning with twinning of the Coxwell trunk sewer, including a series of tanks and tunnels with surface structures for access and monitoring, and a new treatment facility on the waterfront, this project will clean up the river and go a long way to address the City’s responsibility to de-list the waterfront as an Area of Concern under the Canada – Ontario Agreement on the Great Lakes Basin Ecosystem. In selecting specific locations for the tanks and tunnels, the project includes a commitment to not only protect sensitive natural features and functions, but to enhance the natural environment through a consultative process with the local communities. The DWRC is convinced that this type of grass roots partnership with the City will achieve the best and most creative solutions to satisfy technical requirements and community goals.

**Therefore the DWRC encourages the City to finalize the Environmental Study Report and submit it to the Ministry for approval so that the first phase of “Cleaning up our Waterways” project (twinning of the Coxwell trunk sewer), which is urgently needed to service and protect 750,000 people (and projected growth), can proceed without delay. Funding for the design of the first phase (the twinning) should be secured, so that design work can proceed as soon as Ministry approval is received for the EA. Further, community involvement must be assured at all stages of development of the detailed designs.**

**Staff Recommendation 7 (b):**

Funding for implementation the of the WWFMP ($1 billion in the first 25 year phase) will require commitments from all levels of government, as well as new funding mechanisms. It is essential that sources such as the annual 9% increase in the water rates, which has been accepted by the public as a necessary infrastructure cost, should be continued. In addition it will be necessary to find new sources. One option is a “user pay” mechanism, which charges property owners by the percentage of hard surface unavailable for infiltration. This is already in use in Canadian cities such as Halifax and Edmonton, and is supported by the DWRC as an equitable charge directly related to the problem of stormwater. In times of economic restraint, it is to everyone’s benefit to research new partnerships and fundraising ideas to ensure that the City’s infrastructure and quality of life do not slip into a decline, which will be much more costly for the next generation.

**The DWRC urges the City to secure the necessary funding for seamless implementation of the Don River and Central Waterfront Project through the budget process; to secure ancillary funding partnerships with other levels of government; and to explore new funding mechanisms which are fair and effective.**

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Recommendation 11:

The report recommends discontinuance of the Community Program for Stormwater Management. This very successful program achieved two objectives: it involved community groups and, through their projects, it achieved tangible environmental improvements. The DWRC acknowledges the intent of the proposed change to capture a wider audience and increase preparedness for the impacts of climate change. However, the thrust is defensive compared with the original community based projects, which brought people together and were creative and constructive. The DWRC would like to see the education and communication program broadened to include more lot level and neighbourhood measures (not only related to basement flooding) that can improve the overall environment and will, in the long run, provide effective protection from the ravages of severe storms.

The DWRC recommends that the $250,000 be utilized not only for education on the impacts of climate change on basement flooding, but be broadened to incorporate a wider menu of lot level and neighbourhood measures to regenerate the environment, and which will have an even greater benefit in terms of adapting to climate change and absorbing the impacts of major storms.

Sincerely,

Phil Goodwin
Chair, Don Watershed Regeneration Council

PG:MB:aw

Cc: Adele Freeman, Director, Watershed Management, TRCA
Stephanie Hawkins, Project Manager, TRCA
Brian Denney, CAO, TRCA
Judith Reda, TRCA

*Don Watershed Regeneration Council*

The Don Watershed Regeneration Council (DWRC) is a formal community-based committee established by the Toronto and Region Conservation Authority (TRCA) in 1994 to help restore the Don River watershed to a healthy, sustainable natural environment. The DWRC reports to the Authority on a regular basis and is composed of community members, elected officials and representatives from businesses, agencies, environmental groups and academic institutions located within or concerned about the future of the Don River watershed.

A new, updated regeneration Plan “Beyond Forty Steps” was endorsed by the DWRC and approved by TRCA in 2009 and guides the DWRC in commenting to other government agencies (federal, provincial and municipal) on matters pertaining to the future of the watershed. The new Plan addresses the broad watershed issues of sustainability including water and energy efficiency and emerging challenges such as climate change.