

Appendix B
Written Submissions

Adir Gupta, P.Eng., MBA
Manager, Financial Policy - Corporate Finance
City of Toronto
416-392-8071
agupta@toronto.ca

Dear Mr. Gupta,

Re: Proposal for Innovative Options for Providing Stormwater Infrastructure and Services

We, the undersigned, are supportive of establishing an independent stormwater rate, and doing so through a stormwater utility in Toronto, but it must be designed within a larger stormwater management framework that aims to improve water quality through innovative and comprehensive approaches to stormwater. Stormwater is rain and melted snow that flows over surfaces and that can overwhelm storm sewers and back-up sewer pipes causing basement flooding or the pollution of our water bodies. Stormwater management is a challenge that is exacerbated by climate change and Toronto's aging and outdated infrastructure. The fee can help support stormwater management approaches that are more effective and less costly than 19th century piped infrastructure. As an example, a smart infrastructure alternative would be distributed lot-level utilities. We support the City of Toronto in its efforts to build a stormwater resilient city that sufficiently addresses the leading source of property and casualty insurance claims in Canada.

We do not agree with the approach proposed in the November 6, 2014 Stakeholder Meeting presentation entitled "Funding Toronto Water's Capital Program". The funding for a stormwater utility cannot be considered independent of the planning and building of stormwater infrastructure. While we agree that a rate adjustment is needed to address the ongoing challenge of maintaining a state-of-good-repair budget for water, wastewater and stormwater infrastructure, we urge City Council to consider innovative options that ensure dedicated financial and environmental sustainability of municipal stormwater infrastructure.

Currently City Council has approved significant large-scale projects to implement the Wet Weather Flow Master Plan (WWFMP). A significant expenditure however has been dedicated to the building of large underground storage tanks that pool storm and wastewater during wet weather events such as storms. While this "business as usual" approach reduces the pollutant loadings that foul our streams, rivers and Lake Ontario beaches, it is less resilient, far more costly, and less effective than innovative distributed stormwater management methods that eliminate the majority of the flow before it requires expensive, cross contaminated, end of pipe storage.

Rather than expanding the capacity of the faulty combined sewer system, we recommend "doing more for less" by directing public dollars to approaches that are lower cost with added effectiveness. We urge City Council to direct Toronto Water to consider decentralized, scalable, and cost-effective alternatives to conventional dug infrastructure as a means of cheaply and effectively controlling runoff, mitigating flooding and minimizing the adverse impacts to communities and the natural environment.

Automated, decentralized stormwater management systems, which capture and store stormwater more cheaply at the lot-level, avoid strain on the sewer system and thereby extend the life of the

infrastructure. Where feasible, other Low-Impact Development (LID) solutions that can be implemented on the property level should be considered, which include a rain harvesting utility, urban canopy protection and restoration, roof gardens, permeability requirements for all hard surface, bioswales, and rain gardens.

City Council should direct Toronto Water to undertake more research to ensure that the stormwater fees are introduced in such a way that they incentivize responsible distributed stormwater management, without undue burden on vulnerable groups, or strain on commercial property business viability. As proposed, the rate structure does not allow any incentive programming to reduce runoff and therefore reduce negative impact on water quality for properties less than 1 ha in area. Establishing a separate stormwater charge across all properties is a more transparent method of funding. However, we encourage City Council to adopt a fee determined by the volume of runoff generated by the property's impermeable surface. This would align with the general practice utilized by other jurisdictions, such as the City of Edmonton, to bill properties on an equivalent run-off unit (ERUs) basis. To calculate a fair rate structure, such ERUs can be determined by taking the roof/building area, readily found in the property tax database. This also allows City Council to direct Toronto Water to establish lot level stormwater programs funded by the stormwater fee.

Further, we suggest that Toronto Water engage and consult more widely with the public as it considers a stormwater utility. Council must re-establish Toronto's citizen leadership derived from Task Forces and related groups eventually marginalised by the Wet Weather Flow Management Master Plan process directed by Toronto Water.

In summary:

1. The overall approach to stormwater infrastructure needs to be broadened to reflect an opportunity to improve ecological health of Toronto's rivers and Lake Ontario. Implementing an effective funding model is only one component of a successful approach to stormwater management. A comprehensive approach to improving stormwater management is needed. Toronto Water should improve stormwater programs that support source protection best management practices, significantly reduce stormwater runoff by volume and improve the quality of stormwater that does flow into Toronto's rivers and Lake Ontario.
2. We support the move towards establishing an independently funded stormwater utility provided that the rates are transparent, fair and create a universally accessible incentive for Toronto Water stormwater runoff programs for all property owners (not just large commercial properties over 1 ha).
3. Transparency is crucial to ensure the funds are allocated in alignment with Council directed priorities. We encourage Council to establish a citizen-led Stormwater Innovation Council following the terms of reference similar to the Task Force to Bring Back the Don or the Stormwater Working Group to advise Council on innovation alternatives now ignored by Toronto Water. The effectiveness of the funded projects should be tracked against identified economic and ecological goals such as delisting Toronto as an Area of Concern under the international Great Lakes Water Quality Agreement.

- The capital acquired through the fees should maximize the value of these public dollars through a dedicated fund for expenditures on approaches that reduce the rate of water entering the stormwater system. This has the benefit of both lower costs and enhanced effectiveness. Large scale, Business as Usual (BAU) projects, such as combined sewer collection systems, stormwater ponds and conveyance systems must be compared in full life-cycle terms of cost-efficiency, environmental protection, and social viability against innovative distributed stormwater management alternatives.

Thank you for considering our comments. Any questions may be directed to Nancy Goucher, Water Campaign Manager, Environmental Defence at ngoucher@environmentaldefence.ca or 416-323-9521 ext 257.

The following organizations have endorsed this submission:

 <p>environmental defence INSPIRING CHANGE</p>	<p>Environmental Defence Nancy Goucher, Water Program Manager</p>
 <p>RainGrid LOT-LEVEL STORMWATER UTILITIES</p>	<p>RainGrid Inc. Kevin Mercer, President</p>
 <p>EARTHROOTS</p>	<p>Earthroots Josh Garfinkel, Senior Campaigner</p>
 <p>SIERRA CLUB ONTARIO</p>	<p>Sierra Club Ontario Dan McDermott, Chapter Director, Sierra Club Ontario</p>
	<p>Ecojustice Liat Podolsky, Staff Scientist</p>
	<p>Dr. Lino Grima Professor</p>
 <p>Canadian Environmental Law Association EQUITY. JUSTICE. HEALTH.</p>	<p>Canadian Environmental Law Association Theresa McClenaghan, Executive Director</p>

Appendix 1 – Updated Comments on Rationale for Toronto Water’s Future Rate Increases

We are generally supportive of water rate increases in Toronto. Despite years of efforts to raise the residential and industrial water rates, Toronto maintains some of the lowest water rates in the region. This continues to undermine the city’s ability to support conservation efforts or to provide for adequate investments in the maintenance and expansion of Toronto’s drinking water, sewage collection and treatment, and stormwater management infrastructure. Low water rates translate into a lack of investment in water infrastructure which can result in instances of sewer system surcharging that cause basement flooding, combined sewer overflows, and costly system capacity operational demands, not to mention impaired water quality for streams and lakeshore habitats, and threats to potable water quality.

More leadership is needed from City Council to ensure that Toronto’s water rates facilitate responsible water management by Toronto Water and that individual property owners pay the full-cost of water services to their properties, keeping in mind the policy objective to do so without placing an undue economic burden on low income families.

With regard to the 2013 proposal regarding financing of water and wastewater system good state of repair and future operations, we prefer option 3: introducing a separate charge for stormwater that reflects the cost of operating the stormwater system. In addition to levying individual lot level stormwater charges, we recommend Toronto Water maintain a general water rate increase of 3% annually to support the state of good repair priority for capital investments, water conservation programs, and operations and maintenance.

Rationale for support of separate stormwater rates:

- Stormwater charges would better help cover the costs of providing stormwater services. Someone ultimately has to pay these costs. It just makes sense to do so directly through a separate fee on the water bill.
- Stormwater runoff is a major environmental issue that results in flooding, and environmental degradation of our streams, rivers, and lakes (through direct runoff and combined sewer overflows). Nutrients and pollutants from the urban landscape contribute to the eutrophication of water bodies and algal blooms. Actions taken by property owners to reduce stormwater runoff can help improve water quality in local streams and lakes. Drinking water source protection is significantly affected by runoff water quality and quantity issues.
- Stormwater rates could help fund integrated, cost-effective and environmentally-sound services that better consider the
- Having a separate stormwater charge provides more direct information to the customers about the costs of managing stormwater, thereby indirectly informing customers about the environmental linkages within the urban water system. The calculation of stormwater utility fees must be calculated on the basis of permeability coefficients that are at least reflective of the rooftop lot coverage of the buildings on the property. They should not just be based on a standardized charge per residential, commercial or institutional property.
- As a question of equity and fairness; property owners who have largely paved their land or built to the lot lines, must not be charged the same amount as those who have done their

best to reduce stormwater runoff?

- Revenue generated by stormwater rates can be reinvested into the capital water budget to repair aging infrastructure, develop and enhance stormwater reduction programs, and runoff reduction programs that apply to the individual property rather than end of pipe or conveyance infrastructure. Ultimately, this is an investment in the future of Toronto, and an acknowledgement of the principles contained within the original Wet Weather Flow Management Master Plan that Council approved.
- Improved pricing provides a strong incentive to innovate, and a significant portion of the funding from any stormwater charges must be allocated to the financing of low impact development best practices.
- Stormwater utilities are a common administrative structure of many other cities throughout North America and successfully illustrate that dedicated funding along with explicit policies to reduce stormwater at source are effective measure to ensure the fiscal and infrastructure health of a city.
- Stormwater will increasingly be a problem in the future. Scientists are predicting that climate change will result in more frequent intense precipitation events. It is definitively cheaper to utilize methods that slow the rate of, and enhance the quality of water entering the major and minor drainage systems. A storm water utility and property-by-property permeability pro-rated charge is needed to incentivize land owners to expand the capacity of the stormwater system beginning where the rain falls.

As Toronto Water considers an increase in water rates, there are two important factors to keep in mind:

1. It is critical that Toronto Water ensures that any stormwater charges act as an incentive for property owners to reduce runoff and therefore reduce negative impact on water quality. For example, the City must establish sufficient substantial property-based incentives and programming methods to reduce stormwater without relying upon property owners to voluntarily implement low impact development best practices (BMPs) to reduce the rate of stormwater runoff.
2. Any water rate increases cannot impose undue burden on low income families. Potential negative consequences of water rate increases must be mitigated. Programs to ensure equitable access to water services should be considered alongside rate increase plans.

Thank you for considering our comments. Any questions may be directed to Nancy Goucher, Water Campaign Manager, Environmental Defence at ngoucher@environmentaldefence.ca or 416-323-9521 ext 257.



November 20, 2014

City of Toronto Water and Wastewater
Toronto City Hall, East Tower, 24th Floor
100 Queen Street West
Toronto, Ontario
M5H 2N2

Attention: Mr. L. Di Gironimo,
General Manager, Toronto Water

Dear Mr. Di Gironimo:

Re: Funding Toronto Water's Capital Program

Thank you for the opportunity for the TCDSB to provide input into the next phase of the Funding Toronto Water's Capital Program. Your presentation provides good insight into the existing problems facing Toronto Water and its direction for the foreseeable future.

Currently the TCDSB owns and operates approximately 205 sites, 175 of which are elementary school sites. Our elementary school sites are smaller than the typical elementary school site. Many are less than 1 hectare and most are less than 2 hectares. Only 29 are greater than 2 hectares and most of those hover around the 2 hectare mark.

Our secondary school sites vary from less than 1 hectare to our largest which is just over 11 hectares. Our school sites are a combination of hard and soft (permeable) surfacing. Without exception, every elementary school requires a hard surface (asphalt) play yard.

Our current 2014 water billing is for 2014 is \$1.73M. Estimates for 2015 and 2016, assuming an increase of 8% would be in the range of \$1.87M and \$2.02M respectively. In 2017, when the Storm Water Cost is introduced, estimates range from \$3.56M to \$4M for combined consumption and storm water costs.

Given your proposed pricing regime for 2017, this represents at the doubling of rates over 3 years, i.e. 2014 to 2017 for the Toronto Catholic District School Board. The TCDSB cannot absorb this rate of increase for water consumption and storm water use within current or future operating budgets.

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The Ministry of Education provides funding to school boards in Ontario through a Pupil Accommodation Grants (PAG), based on enrollment. The TCDSB's Operations budget has been negatively impacted by declining enrollment. In addition, we have an aging portfolio of building with a deferred maintenance backlog of \$637 M. (as of June 2014). We have also seen an increase in our hydro and gas rates despite pursuing programs to reduce energy consumption in our buildings. Therefore the TCDSB propose that the following items be considered:

1. That the combined rates for all TCDSB school sites be capped at a yearly increase of 8% (current pricing). Closed schools and administrative buildings can be subject to the normal SW charge and;
2. That The City of Toronto obtains or actively assists the TCDSB to obtain any increase above the current funding from the Ministry of Education (or Finance) as appropriate prior to the approval of the Storm Water Charge.

Thank you for your time and attention to this matter,

Yours truly,

A handwritten signature in black ink, appearing to read 'Maia Puccetti'.

Maia Puccetti, M.Arch, OAA
Superintendent of Facilities Services

cc Angelo Sangiorgio, Associate Director of Planning and Facilities, TCDSB
Paul de Cock, Comptroller of Business Services, TCDSB

November 21, 2014

Mr. Adir Gupta
Manager, Financial Policy
Corporate Finance
Toronto City Hall
5th fl. E., 100 Queen St. W.
Toronto ON M5H 2N2

Re: Funding Toronto Water's Capital Program- Real Estate Industry Concerns

Dear Mr. Gupta,

We have previously commented on the City of Toronto Water Department's proposal to design and enact a 'stormwater charge' for owners of large-scale commercial and industrial real estate.

Specifically, the City is seeking to impose additional fees on residential and commercial property owners, based on the runoff contributed to the stormwater system. This proposal is fraught with issues, and is of significant concern to our membership, which consists of owners and managers of properties housing Toronto's retail, office and industrial tenants.

By way of background, REALpac has been very active on water related infrastructure consultations in the past, and recognize the importance of addressing capital funding deficiencies in the city. We seek to ensure that if charges are considered for any reason, that they be enacted in a manner that:

- i. is fair and evenly distributed amongst the commercial and residential sector
- ii. is tied to the current method of consumption based usage measurements;
- iii. is simple, accountable, transparent, and well-conceived.

REALpac believes that extending rate increases as originally put in place in 2005 would be the most appropriate tool to address capital funding deficiencies. By extending rates over the next several years and thereafter reducing rate increases to a yearly inflationary level, our respective members hope Toronto Water will be able avoid impacts to the quality of their service, and trust that the revenue generated will enable the city to raise the additional funds required to follow through with the original capital plan. As part of this process, we request to be included in a consultative process when setting rates for the years 2015 – 2021, so to find the plan that best meets the need of the city and key water stakeholders.

In addition to recommending continuation of the existing consumption based revenue tool, we see it as imperative to bring to light issues with other potential options outlined in this consultation.

Based on our initial understanding of the City's proposal, REALpac and our members are **strongly opposed** to the separate stormwater charge as a potential revenue tool. We identify a number of issues herein, which we find problematic with respect to this matter:

Improperly framed Problem

- The City has framed the problem as volume of stormwater runoff, not the timing of such runoff. More work need to be done with stormwater management ponds, natural absorption areas, concrete riverbank de-construction, wetland restoration, cistern usage, and pervious paving before considering a separate charge.
- The problem can also be framed as a timing problem, with delay in runoff achieving similar benefits as immediate runoff management in a more environmentally friendly manner and at potentially reduced costs. Local and natural solutions are preferable over massive engineered ones.

Policy Slippery Slope

- Unbundling City budget items and targeting specific users is a policy slippery slope. Should commercial owners then pay for welfare? Or parks and recreation services? Should the TTC be then fully self-funding by users only? All City roads tolled? The general municipal tax base and specific consumption water rates should be adequate funding sources for water based public works without unbundling costs and pitting landowner against landowner
- Note in the case of Ontario Power Authority and the Local Distribution Networks, conservation has been a major priority, but we see no similar initiatives with water.
- Many of our members have undertaken a green roof compliance program as a condition of City approvals, in part to absorb rainwater.
- Capital works in the City of Toronto should be paid for out of the general revenue base, same as roads and parks.

Undue burdens on commercial property versus residential and public property

- This would guarantee a significant increase in stormwater management costs to horizontal properties with large parking areas (i.e. shopping centers/box stores and industrial facilities) and provide no incentives for on-site mitigation. Businesses occupying these large horizontal properties require impervious sites for their operation and will be heavily impacted.
- This would impose a change in billing methodology to impervious area which would shift stormwater costs between classes of property and between properties within each class. Furthermore, impervious area allocation of stormwater management costs shifts liability from residential property to non-residential property. As costs increase, businesses reconsider locating in the City of Toronto. There are consequences when costs are increased.
- A major source of stormwater runoff is from common municipal roads, sidewalks, municipal buildings and municipal parking facilities. A shift in funding responsibility to non-residential property through the use of impervious area will allocate a

disproportionate share of these common use facilities to non-residential owners, when government is also a major cause.

Potential public policy considerations not considered

- The proposal lacks an accountability framework, which defines what the collected funding can be allocated toward. Real estate owners are without any assurances that money collected under the charge framework will be used for capital improvements or storm water management objectives. We believe that more definition is needed as to where money will be spent.
- Tax exempt entities with parking facilities (churches, schools, colleges, universities, charities) will expect to be exempted from increases in stormwater management costs and if granted will further increase costs to other taxpayers. The City has not considered how exemptions to this policy will be managed, and that impact on taxpayers.
- Advocates of stormwater charges based on impervious area state that the area measure is more equitable as it quantifies the relative contribution of stormwater runoff as a function of land use practices and development decisions of property owners. In reality, many of these decisions were established many years ago based on municipal zoning requirements, particularly respecting off street parking requirements. Landowners may be punished twice for complying with City requirements.
- Off street parking design standards requiring impermeable surfaces were previously mandated by the City. Only recently has technology allowed for hard surface permeable parking areas, however, at a significant cost premium. Commercial properties requiring off street parking are disadvantaged when compared to street front business which only utilize exempted street parking.

Fee framework would lead to significant economic impacts

- The real estate industry is already overtaxed and underserved in the City. Toronto has one of the highest commercial property tax rates in Canada compared to residential. The City is a high cost, high development risk (long development timeline) municipality. Adding a stormwater charge to the list would effectively put more weight on the shoulders of the City's businesses. The shifting of stormwater costs from residential to non-residential will result in an effective increase in fixed costs to business.
- The increase in fixed costs would translate to a reduction in property values and a corresponding decrease in assessed values, or another incentive to locate elsewhere. This, in turn, would impact the City of Toronto's tax rate and/or tax revenues.
- Tenants compete for business on a regional level and additional stormwater management costs in Toronto will place them at a disadvantage relative to their competition in neighboring municipalities who have lower overall costs, as well as municipalities in other, more competitive provinces.

- A change to impervious area will require the creation of a new costly administration to measure and calculate charges based on impervious area including the creation of an impartial dispute resolution process to handle area disagreements. The database will have to be maintained and constantly updated to reflect physical changes. This may increase administrative costs for the City.
- Existing developed properties are not able to reduce their impermeable area without incurring prohibitive retrofit costs, therefore, an impermeable rate structure is not an effective incentive to reduce runoff. Nowhere in the City's preliminary materials, is there mention of mitigation efforts, or conservation techniques. Proposal of a charge system, should be matched with a proposed credit system that could help limit the burden on businesses.

Recommendations

We respectfully request that Toronto Water consider the following three recommendations moving forward:

1. Stick with the current water rate increase program.
2. Do not proceed with the enacting of a stormwater charge, as it has inherent and far-reaching negative economic impacts on Toronto businesses.
3. Undertake a more fulsome review of potential options that could assist in reducing stormwater, under the Wet Weather Flow Master Plan (WWFMP), with the consultation of the wider real estate community. Consider more naturalized improvements to mitigate stormwater runoff.

We hope that you will carefully consider this matter, and we look forward to any opportunity to work with you, or your staff, in identifying and strategies that work for both the City as well as Toronto real estate community.

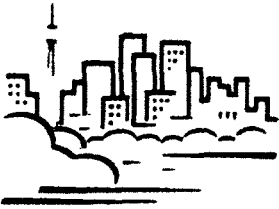
Respectfully submitted,



S. Michael Brooks
Chief Executive Officer
mbrooks@realpac.ca
416-642-2700 x225



Brooks Barnett
Manager, Government Relations & Policy
bbarnett@realpac.ca
416-642-2700 x224



The Toronto Industry Network

November 21, 2014

EMAILED

Mr. Adir Gupta,
Manager, Financial Policy & Research,
Corporate Finance,
5E – City Hall,
100 Queen Street West,
Toronto, Ontario,
M5H 2N2.

Dear Adir,

Re: Funding Toronto Water's Capital Program

The Toronto Industry Network (TIN) appreciated the opportunity to attend the November 6 public consultation led by Lou Di Gironimo regarding proposals including a Storm Water Charge (SWC) to fund future capital program requirements of Toronto Water. In response to your request, we offer the following comments for your consideration in developing policy recommendations to council on this issue:

General

TIN believes that Toronto should nurture its existing businesses to ensure an enduring prosperous relationship for both parties. Manufacturing is an important part of the business mix; it accounts for more than 10% of the employment base providing good paying jobs and contributing to the socio-economic fabric.

In lowering its property tax rate, offering tax credits for new industrial assessment and in avoiding the temptation to apply development charges for industry, Toronto has provided some business tax relief. However, Toronto remains a challenging environment for business. Its regulatory requirements are severe and the traffic congestion is crippling. There are other places in North America that work harder to retain existing business and attract new.

TIN very much understands the challenges facing Toronto Water from declining revenues, and the demands of maintaining and replacing its infrastructure including storm water systems. More than ever, Toronto Water needs the ongoing revenue from industrial water consumption to help meet its capital and operating needs.

Storm Water Charges

For some time, TIN has advocated for the need to make water bills fairer and more transparent. The City is to be commended for proposing to charge for storm water management separately from the cost of purchased water as the quantity of water purchased is generally unrelated to the quantity of storm water discharged.

Because of its simplicity, we subscribe to the City's philosophy of making the SWC a flat rate for most residential, multi-residential and ICI properties of less than one hectare.

For properties larger than one hectare, particularly when such properties manage and control their storm water discharge rates, TIN believes the most reasonable method for charging for storm water management is that based on volumetric discharge from the property. Where actual measurement of volumetric discharge is impractical, the SWC could be based on the property's impervious area.

TIN members have asked what SWC credits will be applied to facilities with storm water control systems already installed as well as systems installed after the SWC comes into effect. A number of companies have made significant capital expenditures on storm water control.

Water Rate Increases

Block 2 customers have experienced a 9% annual water increase for the past five years. This occurred after a period of 3% annual increases that lowered the Block 2 rate to 30% of that of Block 1.

Input cost increases of 9% are extraordinary in the manufacturing sector and are very challenging to pass along to customers. Such increases draw unwelcome attention from senior management and can result in flagging a facility for review and potentially decommissioning. Many multi-national companies benchmark their facilities for such anomalies and frequently move production to lower cost cities.

The three-year rate increase of 8% for industry is a suggestion by Council and not necessarily the best planning tool available. We suggest Toronto Water provide rate increases to its industrial customers matching inflation which would send out a very positive signal to business. We recommend the staff report to Council show an analysis not using an 8% increase.

Debenturing

TIN questions the need for Toronto Water to conduct its capital program on a cash basis. The element of fairness should apply in that current water ratepayers should not have to pay for all the benefits of capital improvements including basement flooding mitigation that will affect many generations of ratepayers to come. We understand the City's reluctance to add more debt and interest payments, however some debenturing of some capital programs would help reduce costs to industrial and other ratepayers and strengthen Toronto's competitiveness.


In conclusion, the City must do all it can to increase its competitiveness as a place to do business and invest. Manufacturing provides the greatest socio-economic benefit in terms of tax revenue as well as direct and indirect employment.

I have provided a recent article on Hamilton's desire to increase its industrial assessment which an invaluable part of its tax base. (You will note the reference to Canada Bread that moved from three facilities in Toronto to Hamilton with the loss of 435 jobs.)

We look forward to reading the staff report and its recommendations. If you have any questions, please do not hesitate to contact Mr. Paul Scrivener, Director of External Relations at 416-444-8060.

I thank you for your attention.

Yours sincerely,



Fatima Correia,
Chair,
TIN Water Group

c.c. Michael Williams

attach.

metroland
THE HAMILTON SPECTATOR

Wanted: three new steel plants, please

Hamilton Spectator

Hamilton would need three new ArcelorMittal Dofasco plants to bump up its commercial and industrial tax assessment by just 1 per cent.

Or, if you prefer, seven extra U.S. Steel plants.

Or 28 new Canada Bread factories.

That's the size of the challenge the city faces in trying to ease the tax burden on Hamilton homeowners, with industrial and commercial properties accounting for only 13 per cent of assessment compared to 87 per cent residential.

The average large Ontario city can rely on 17 per cent commercial and industrial assessment.

To improve our ratio by 1 per cent, the city needs an extra \$650 million in non-residential assessment — or, as city manager Chris Murray said Thursday, "three new ArcelorMittal Dofascos."

"We are heavily dependent on the residential taxpayer ... That's a challenge households are going to struggle with," mayor-elect Fred Eisenberger said in a post-election speech Thursday, suggesting it will be difficult to maintain the low annual tax hikes of the past four years.

Homeowners, commercial and industrial businesses are taxed at different rates, but Hamilton homeowners still account for \$747 million of the \$970-million tax levy.

"That's the reality and that's why we need to put a strong focus on that — jobs, jobs and more jobs," said Eisenberger, pointing to the airport employment growth district, brownfields and waterfront redevelopment as priorities.

On the upside, Murray said the city has an "award-winning" economic development team and "once in a generation" opportunities for growth, including the planned commercial and residential development of Piers 7 and 8. He noted the Conference Board of Canada is forecasting manufacturing growth for Hamilton, too.

"We have one of the most diversified economies in the country," Murray said.

The city is slowly growing its assessment base, said economic development director Neil Everson — but repeated tax appeals have limited the overall benefit.

The city's largest taxpayer, ArcelorMittal, pays more than \$10 million a year, while U.S. Steel pays around \$4 million. Both those totals have dropped due to successful assessment appeals over the years.

Successive years of issuing record numbers of building permits will also translate into new sources of taxes a few years down the line, Everson added.

But he said there's no avoiding the hard truth: there aren't many Canada Breads out there, let alone successful steel plants.

"There are not dozens of businesses of that size looking to relocate," said Everson, which is why the city is working on an "aggressive" strategy to attract foreign investors.

Helping businesses grow is even more important, he suggested.

"There's a rule of thumb out there that suggests 80 per cent of growth comes from existing businesses, and I think that's largely accurate."

mvandongen@thespec.com

905-526-3241 | @Mattatthespec



Hamilton would need three new ArcelorMittal Dofasco plants to bump up its commercial and industrial tax assessment by just 1 per cent

THE TAYLOR MASSEY PROJECT

Celebrating and Protecting Taylor Massey Creek

December 1, 2014

Dear Mayor Tory,

Congratulations on your recent election as mayor, and all the best for the next four years.

We had been planning on sending you a letter at this time to orient you to the TMP and to suggest that the City needs to review and renew its commitment to watershed management.

Unfortunately, current events also require us to request your involvement in a poorly conceived and financially irresponsible initiative to impose \$3.962B of new charges for storm water, in disregard of both those involved for years in the City's Wet Weather Flow Master Plan and the City's standards for public consultation.

Background on the TMP and the City's Approach to Watershed Management

Since the TMP was founded more than 12 years ago, we and our partners have staged 90 events involving more than 4,900 participants who have planted 4,485 trees and shrubs and picked up over 1,685 bags of litter, as well as hundreds of items too large for bags, including tires, TVs, a couch, and a kitchen sink.

Over the course of those 12 years, we have participated in many meetings on Wet Weather Flow (WWF), various aspects of Don Watershed planning and report cards, and numerous shorter-term consultations. Specific aspects of these and our broader efforts include:

- Submitting a report to the City on the protection of Warden Woods, including the need to ensure no lights are ever installed there as that would impact this unique animal habitat;
- Successfully advocating for identification of Taylor Massey Creek as a separate component of the Don fishery plan;
- Conducting several on-site meetings with City staff on the potential construction of a WWF cistern in Farlinger Ravine; and
- Participating in consultations on the geomorphic study of the Creek, for which our continued requests for the creation of a Community Liaison Committee have been repeatedly and summarily rejected, without discussion or explanation.

On that, some context is required. In 2009, the TMP published Ontario's first community-led watershed regeneration plan, Reach By Reach. This plan summarized conditions in the creek, suggested a reach-by-reach approach to regeneration and community-building through enhanced trail linkages and the planting of 250,000 trees and shrubs in the Warden Hydro Corridor, and identified five priority reaches to be restored for one million dollars each over five years.

While our work was essentially ignored in the creation of the TRCA's Don Watershed Plan, City staff moved to craft a much more professional appraisal of the Creek in their Geomorphic study. In fact, their first draft identified over 140 locations where restoration was needed. Unfortunately, Toronto Water was disinterested in involving the community for more than a few hours at and submissions following an open house.

Worse, by the time the City unveiled its second draft, broad restoration was off the table; the only suggested work items revolved around City-owned hard infrastructure such as pipes, bridges, and trails; both the risk assessment and decision-making processes to lead to the selection of priority sites for restoration efforts were not described nor open to public oversight; and the City again rejected a broad appeal for a Community Liaison Committee.

From our perspective, this is neither proper watershed management nor civic engagement. And it's not the only example.

Since we published Reach by Reach in 2009, we have been calling for the creation of a list of restoration priorities for the Creek. Instead, it would appear that projects get selected essentially behind closed doors, serving as pet projects for local improvement instead of within a vision for the Creek. This includes, for example:

- The allocation of \$300,000.00 for an off-line pocket wetland in the Goulding Estate, with limited ecological benefit and no alternate considerations;
- The un-announced expenditure of a significant portion of about \$1M for emergency erosion work in Warden Woods. While we accept the need for and the usual delivery of the emergency erosion budget to protect sewers and creeks from each other, a significant portion of these funds were used to harden a long section of streamband for which there was no consultation and which did not take in to consideration our previously tabled suggestions to restore historic on-line overflow wetlands along this streambank; and,
- A recent motion at a committee meeting that waxed philosophically about polluted water and Wet Weather Flow, while getting the names of City departments incorrect, and then sought to appropriate scarce resources for a master plan not to address water quality nor quantity but the refurbishment of washrooms and BBQs in Taylor Creek Park.

While each project might have its merits, they were not weighed against a vision for the Creek that might include water quality, enhanced delivery of the downspout disconnection program, pedestrian safety at open railway crossings along creek greenspace, illegal encroachment, riparian plantings and the eradication of invasive species, or the establishment of the Taylor Massey Trail, including in the Warden Hydro Corridor.

This brings us to the City's proposal to create a new storm water fund and establish rates to raise \$3.962B of new money.

The New Storm Water Fund

On November 20, the TMP became aware of a proposal to create a storm water rate to raise new monies to fund the delivery of \$3B of Wet Weather Flow and \$962M worth of the Basement Flooding Prevention Program. While comments were due at 3 pm November 21, staff kindly gave us an extra week to ten days.

During that week, we discovered that:

- The consultations were being conducted by the Finance Department, who had no idea of who had been involved in the 15 years of WWF discussions to date;
- Neither Toronto Water nor the City's consultation unit gave any contact information about organizations involved in WWF to the Finance Department;
- The City's consultation unit did not in fact even know about the efforts being led by Finance;
- There is no indication on the City's website, as required, about this consultation;

- In spite of our being involved in both WWF generally, and in the four Farlinger site and Geomorphologic study meetings mentioned above, no one from the City at any of those discussions ever mentioned anything about the proposed storm water charge and its consultation;
- Of the list of organizations listed by Finance, one (Save the Oak Ridges Moraine) does not function in Toronto at all; others told us they did not receive an invitation; and one noted that they had received a very general notice but that it did not mention WWF nor the scale of the funding being sought; and,
- While we were told by a senior manager at Toronto water that these consultations were very preliminary and that there would be more at a later time, the manager refused to put that in writing in an e-mail to us.

In short, it would appear that this whole exercise might constitute an end run by Toronto Water around its normal obligations to obtain almost \$4B of new money, without properly involving its key stakeholders.

In addition the TMP is very concerned about the lack of specifics in a \$4B proposal. These include:

- What might be included in the expenditure of an \$3.962B;
- No indication of the potential use of the funds other than for pipes and cisterns.
 - To the TMP, this ignores the natural restoration aspects of WWF, including the removal of fish barriers, the replacement of the massive failure of gabion basket technology, and extensive riparian plantings, as well as the promised increased application of bylaw enforcement vis-a-vis both illegal encroachment onto public lands and the illegal exterior storage of certain types of waste;
 - To others, this means the prospect of little investment in alternate technologies, such as rain gardens and other decentralized methods of stormwater retention and treatment, and indeed no funding for pilot projects, or linkages with Ontario's Water TAP or the Southern Ontario Water Consortium;
- No indication of where the funds will be held, the process to ensure they are spent only on issues for which they are raised, how expenditures will be approved for release, if-how-and-who will perform value-for-money audits, and over-all methods to ensure transparency and accountability.

More importantly, there is no indication in the proposal about anticipated results. In particular, the TMP would like to know if the City thinks that the anticipated improvement in local water quality might allow it to achieve F-5-5 in our receiving waters, as promised by Mayor Miller, and /or the delisting of Toronto as an Area of Concern by the International Joint Commission on the Great Lakes, both of which were key rationales for the development of WWF.

Stormwater quality and basement flooding are serious issues in Toronto. They impact a lot of people and must be addressed. But \$4B is a lot of money. It must be properly vetted through stakeholders and have high prospects for professional management and success if it is to enjoy the approval of the community.

We find the current proposal little more than a series of multiplication tables for increased funding. It is disconnected to other initiatives on the ground, has ignored existing stakeholders, lacks any linkage between priorities and financial needs, does not describe how almost \$4B will be managed, and places all responsibility in a black box of government decision-making.

We ask you to ensure that this proposal does not go forward in its current format.

Sincerely,

Andrew McCammon
Watershed Specialist

Funding Toronto Water's Capital Program to address Toronto's Funding Shortfall of \$1 Billion over the next ten years

Stakeholder and general public consultations were held, as follows:

- by invitation in June 2012
- 4 public meetings in July and August 2012
- by invitation on September 11, 18 and 26, 2013 (as directed by Council)
- 2 focus groups with residential utility bill payers

The results indicated there was widespread agreement that Toronto Water needs to raise the additional funds required to maintain existing levels of service and to fund projects, even if this means increasing charges for residents.

There was support for a 6% water rate increase and there was support for a separate storm water charge related to the actual runoff generated by a property. Those who supported a separate stormwater charge felt it was more transparent and fair. The NGO sector felt that a stormwater charge was the fairest approach that was best at reflecting the cost of stormwater management. The industrial sector agreed with the stormwater charge in principle and supported credits where stormwater initiatives were undertaken.

While there was varying opinion on the preferred financing method, there was general consensus that each stakeholder group would like to have further analysis and details around the funding option(s).

The above information is excerpted from a Staff Report dated October 16, 2013: Future Options and Public Attitudes for Paying for Water, Wastewater and Stormwater Infrastructure and Services received by the Executive Committee from the General Manager, Toronto Water, Deputy City Manager and Chief Financial Officer.

It should be noted here that many NGOs had not been included in any of the original stakeholder meeting and were very critical of the Stakeholder Consultation Plan. They were also not supportive of the Toronto Water Stormwater Funding Proposal and have subsequently, in the fall of 2014, made submissions to Toronto Water through Adir Gupta or Mayor John Tory.

Comments on the Proposed Toronto Water Proposed Stormwater Charge

by Karen Buck, President, Citizens for a Safe Environment

1. The proposed stormwater charge, as a separate charge on the water bill, is supported.
2. However, the proposed flat fees, based on average impervious area, for each of the following User Groups
 - Residential (435,972 properties)
 - Condos/MFR (7,668 properties)
 - Industrial (4,586 properties)
 - Commercial and Institutional (20,093 properties)have removed any incentive for individual property owners to participate in on-site at-source low impact development lot-level solutions to stormwater and its impacts on the City of Toronto Sewer infrastructure.

See slide 13 from the November 6, 2014 Stakeholder Meeting presentation by Lou Di Gironimo for the proposed flat fee structure for future Stormwater Charges to the property owner/bill payer.
3. The proposed flat fee is not fair, especially to property owners and bill payers who have, at their own expense, implemented one or a number of at-source solutions that retain and infiltrate clean rainwater into the watershed and keep clean rain water out of the separated and combined sewer systems of the City thereby benefitting the City in its efforts to stem basement and area flooding and of improving the quality of water in the City's streams and rivers and at the waterfront.
4. The proposed flat fee is counterintuitive to:
 - the Mandatory Downspout Disconnection By-law and removes any incentive for the property owner and bill payer to conform to the By-law
 - the recommendations of the completed Area EAs which include downspout disconnection and other source control remedies to basement and area flooding
 - the contents of the Toronto Water public meeting presentations which encourage property owners to implement downspout disconnection and at-source solutions to storm water's impact upon the sewer infrastructure of the City

Need for Further Analysis and Details around the Proposed Funding Option

Toronto Water has looked at a number of Stormwater User Fee Models that have been adopted across North America and has prepared a summary. The Toronto Water summary is just that and until you look at the details of the Stormwater User Fee Models that are part of that summary it is difficult to choose a funding option that may meet the needs of the City of Toronto.

I have had the opportunity now to review the information on the Kitchener and Waterloo shared RAIN Program.

The Kitchener and Waterloo Rain Project has established a Stormwater Management System which consists of two parts:

- a Municipal Stormwater Management System
- a RAIN Ecological Stormwater Management System which is a community-based social marketing program that engages property owners in action and long-term behavior change based on 3 key messages for managing rain...Slow It Down, Soak It Up and Keep It Clean

The Kitchener Stormwater Utility uses a Fee Model that has set a Stormwater Charge through a Classification Code for 10 Residential Property Classes based on building footprint or dwelling units and 6 Non-Residential Property Classes based on impervious area. The Stormwater Charge is a standardized fee charged to each of the Classes. Each property owner within a Class can apply for a Stormwater Credit for up to a 45% reduction in the standardized monthly fee. The Credit represents an incentive to property owners who use Best Management Practices to reduce the quantity and improve the quality of stormwater runoff entering the Municipal Stormwater Management System. Encouraging the use of Stormwater Best Management Practices supports the City's Stormwater Management Policies and Water Quality Initiatives.

It should be noted that under the Fee Model there is a Municipal list of services provided for the levied Stormwater Charge. These include:

- cleaning of sewers, catch basins and stormwater ponds
- removal of obstruction in creeks and watercourses
- street sweeping
- leaf collection
- site inspections
- spill response
- flow and water quality monitoring
- Stormwater Management Audits on a 5-year basis
- system rehabilitation, renewal and retrofit projects
- stormwater infrastructure projects

- emergency maintenance
- policy development

For your information, the RAIN Stormwater Management System as a Community-Based Social Marketing (CBSM) set a strategy in place to overcome barriers and achieve action. The CBSM strategy included:

- financial credits for property owners who implement green stormwater measures
- contractor training, to increase access to knowledgeable contractors, and to engage contractors in promoting infiltration landscaping
- face-to-face and neighbor-to-neighbour engagement, inspiring action through personal contact
- yard signs that encourage neighbours to join in taking action
- creation of residential and non-residential case studies
- hands-on workshops and training – because doing is learning
- high profile demonstration projects
- clear, simple and consistent messaging – Slow It Down, Soak It Up, Keep It Clean
- multiple partnerships and support from community champions, which reinforces credibility and impact

This example of a Stormwater Utility is very supportable and within the City of Toronto would ensure that over the long-term there could be the achievement of the delisting of the City of Toronto and Region watersheds and waterfront as an International Joint Commission Area of Concern within the targeted timeframe of 2020.

The City will only be able to achieve the delisting of the Area of Concern through the efforts of all of us working collaboratively and cooperatively together.

Karey Shinn
Safe Sewage Committee
42 John Street
Orangeville, ON L9W 2P3

February 27, 2015

Adir Gupta, Manager
Corporate Finance
City of Toronto

Re: Report: Funding Toronto Water's Capital Program, Nov. 6, 2014

Summary

RATES AND VALUES

Having looked over the Toronto Water stakeholder report. I see that 93% of revenue is being collected through water bills. It would be more of a User Pay system if the stormwater program was funded by far more users of impervious surfaces than primarily landowners with existing meters. The stormwater program will benefit city residents, businesses, tourists, visitors, and commuters alike. It is essential to the economic well being of the City to prevent the kind of flooding that is shutting down essential services, such as subways and electricity, to name a few. For this reason I am suggesting a different approach, and addition, to your Flat Rate program, that could attach rates from other developers and users of impervious surfaces.

Firstly the report establishes a rate of \$0.77 /square meter. Let's say a car is 3 square meters. If the vehicle is not parked underground or on the property of a landowners driveway, the required publicly owned surface parking is worth some rate, based on some average size, (say some percent of 3 square meters x \$0.77 x 364 days a year = \$843.15). The City of Toronto Parking Authority already has the names, addresses and license plate numbers for all the cars parking on the streets. If 33% of neighbourhoods is streets, I would guess almost all of the residential streets are full of street parking vehicles. These are potential stormwater rate- payers.

This impervious use rate' should also represent a value. This value could be represented by some image of a water drop on the parking sticker, and a thank you for contributing to new programs to reduce flooding. Make them proud to be contributing to solving the flooding problem and improving their drinking water from Lake Ontario.

I also suggest that civic employees, who currently park for free on outside publicly owned parking lots, also pay this fee, and require a sticker for their cars. Many teachers, TTC employees, etc. are lucky to be given a convenient space to park. That

doesn't mean that residents with water meters should be targeted for their impervious parking spots. Likewise high school students, lucky enough to drive to school, as well as teachers, should be paying a rate for impervious use parking. They would get a nice blue watery looking parking pass or sticker, or a nice message from a meter saying.... 'Thank you for contributing to the City of Toronto Stormwater Program'. Imagine, although the cost might encourage car pooling, they could still feel good about contributing to the stormwater problem created by all the run-off they are generating. Just an idea. Nobody likes flooding.

It may also be a good idea to start requesting the Province to contribute a City stormwater rate, through their vehicle license sticker program – to capture more road vehicle/cars for rates, as all vehicles are totally dependent on impervious surfaces, and the pollution of salt, gravel, and chemical in run-off from the roads. Too many roads are designed to drain into the storm system. Of course it would be better, where possible to build roadside ditches.

Stormwater rate money from cars could pay for the separation and completion of the road storm sewer system in the City, for a start.

I think many other Cities and towns are doing multi-tiered stormwater rate programs. A good part of most of these programs feature financial incentives to homeowners, and Toronto should do the same.

The absence needed open space for infiltration in the City of Toronto core, some rates for impervious surface developers and users is necessary. These new rate-payers need to have the stormwater program promoted, as a value for these rates. New money by all the users, needs to be created to raise the real money required to actually pay for what needs to be done.

What value is it for a Go Train user to know the Coast Guard won't have to rescue them from the flooding Don River?

What value is it for Toronto Transit Commission subway users to know the subways won't flood?

What value is it for Toronto Hydro to know their sub-stations won't shut down when flooded with salt water?

Other people, utilities, and businesses all benefit from stormwater programs. This is just a short list of potential City of Toronto Commissions and agencies, that are big USERS of City space that need to contribute to the stormwater projects, because it is they who directly benefit – not always some landowner with a meter, who has been paying 93% of the costs, for everyone! Why are costs dumped on Toronto Water when these other City connected bodies are creating more costs for Toronto Water. How is Toronto Water supposed to raise enough money to upgrade piped systems when it is nearly impossible to maintain the sewers.

It is well known that the larger combined sewer under Queen Street East, in the Beach, needs replacing and CSO separation. No City Council has had the guts to dig

up this street because of the streetcars and festivals etc. Meanwhile neighbourhood basements, south of Queen Street fill up with even moderate rain events. Please note the TTC has disrupted everything at Leslie to put in their massive new streetcar maintenance yard at Lakeshore and Leslie. Why isn't it just as important to upgrade the sewers as the TTC???????

A 'User' in terms of User-Pay funding for stormwater projects might best be described as 'person or any equipment owner using or requiring impervious surface area' in the City. A definition something like this may capture or even penalize sloppy construction practices that dump large amounts of soil and sand into the sewers in run-off.

The real problem for Toronto Water is to change their program so it will prevent flooding in the downtown core, and several residential neighbourhoods. Up until now the only plans are to direct all the stormwater through the core, linked to the sewage system, to the lakefront. If the stormwater projects actually deliver improvements to stormwater problems, people will notice and be glad to contribute. If flooding continues, and basements fill up with sewage, people will not be willing to pay.

History, Issues, Recommendations, Comments

I was a public member of the City's WWFMMP, and previous to that I was a member of the former City of Toronto's Stormwater Working Group. I, as other public members of the Wet Weather Plan Steering Committee, didn't agree with several aspects of that plan. I remain hopeful that there is still time to manage more stormwater away from the most densely built and impervious areas of the City, away from the Lake. Better ideas are needed for the future of the City.

The onus of any financial plan should be to spread costs to all the users and reduce the long term burden of increased costs. The plan needs to pay for improved infrastructure so that stormwater is slowed down, soaked up, and remain as clean as possible. This avoids capital expense to expand the sewage and stormwater treatment systems, as well as the future need to upgrade the water filtration plants that draw the City's drinking water supply from Lake Ontario.

There is no doubt that large amounts of new funding will be necessary for stormwater reduction, through infiltration, management of variable stormwater event flows, and treatment to protect Toronto's only drinking water source, Lake Ontario.

The question, relative to this report is: **Is the current WWFMMP adequate to not just deal with the token 2 year storm, but prevent the more frequent costly flooding** into the collective Toronto infrastructure such as the sanitary sewage system, the subway stations, the electrical system, and other communication systems that are underground, or in the floodplains? As a public member of the original WWFMMP steering committee, I can say that no plan was ever considered

to deal with extreme weather, and that is missing. There is no plan for the City to cope with these more frequent unusual storm peak flows, often occurring during the evening rush-hour, which is also a peak use for the sanitary system.

The City needs to know: How much it will really cost for Toronto to deliver a program, not just to pipe some average storm, but control the new peaks from storm events that damage not just private property, but prevent other essential Toronto infrastructure from going out of service. New funding sources need to be identified by all users.

Sending all the stormwater in the city to the waterfront as quickly as possible, could be the wrong way to protect various other Toronto infrastructure. Some of these stormwater projects are designed to load the stormwater through the City. What would prevent Mayor Tory's new subway line along Queen (?) from flooding? At what cost? The TTC should pay for that flood prevention if it's needed to come out of Toronto Water, or budget for that cost and how to raise the money for Toronto Water to do the work. What is that worth? Who will benefit? Who has to help pay?

1. Roads, Municipal and government owned land and impervious surfaces.

The Funding program notes that approximately 33% of a residential neighbourhood is paved roads.

What is the total square meters of the City? How many square meters of the City are roads and other infrastructure related, impervious surfaces? This must be a very high and growing percent of the shared impervious surface of the City.

If there is a flat rate, this space may represent the biggest unmetered cost to service. Funding must come from all the uses of the City's impervious space.

Does this report, by omission, think that only the 473,211 Property owners are to pay for everything, for all 2.6 million people who live in Toronto, not to mention Visitors and Commuters? Car owners for example are totally dependent on impervious surfaces. Cars, trucks and transportation vehicles contribute enormous amounts of polluted stormwater run-off. Road maintenance including massive amounts of corrosive salt, and abrasive sand, in winter, plus many persistent toxic chemicals, adds massive amounts of contaminants to run-off all year, directly into the sewers.

It is not equitable to target only landowners (representing a small percent of total City impervious areas), to pay the majority of the costs, when so many more people are the real majority of 'Users' that should be funding the system. **A 'User' in terms of User-Pay funding for stormwater projects might best be described as 'any person or equipment owner using or requiring impervious surface area' in the City'.**

Recommendation:

The entire geographic surface area of the City needs to generate money to pay for and reduce the amount of stormwater requiring treatment and/or stormwater management. Roads and sidewalks, more than anywhere, require incentives to keep stormwater out of the sewers, especially out of old Combined Sewers in the City Centre that do not have a totally separate road storm sewer system completed. Redefine the 'User' in the User-Pay Funding modal to better capture all the users. See above.

Develop new funding sources for public surface areas.

- Get a % of the money collected by the Province from car license stickers. This could even be done based on km travelled, as that data is also collected. This could also discourage more cars in the City. Based on the total workday population, the province should be helping to fund stormwater projects in the shared public space, like roads, where nobody lives, or there is no meter. Big Box stores should have incentives to install stormwater storage under their parking lots .
- Impose building and development charges, sometimes referred to as 'impact taxes' on new development. This charge could be reduced if the development is designed to reduce rather than pave and increase run-off into the nearby sewer, by excessive lot coverage.
- It is generally understood that property taxes generated by residential development do not support the cost of the services those new residents will require from the City. This problem needs a financial solution to balance development with infrastructure integrity and upsizing. This may provide a rationale to leave more open space in developments to manage stormwater. It would have a value.

If not a development tax or stormwater charge to developers – why not?

Upgrades to sewers need to be paid for through some kind of development tax – possibly earmark some of the land transfer tax, especially when the intention of the new owner is to remove existing porous surfaces. If a developer removes one small building and replaces it with larger or multi unit building, with much greater lot coverage, there needs to be a penalty for ignoring the City's need to reduce run-off. Incentives need to be offered to control more run-off being created. In some cases a very high condo tower may be constructed on what was empty industrial land, or sold-off school yards. Some down town commercial towers can have daytime populations equal to an entire town of 10,000 to over 20,000 people. This is a major impact on an older sewer line, or cost for new sewers. New property taxes from these people won't pay for all their services by the City. This means there is a value in having porous open space. New development needs full cost accounting that includes stormwater requirements for the City as a whole.

The Portlands is a case in point. From a piped sewer and piped stormwater perspective, it is not financially viable to actually build large sewers in that deep fill. To avoid cracking of storm and sewer pipes, when the fill shifts with the water table movement, sewers would need to be continuously supported, perhaps as far down as bedrock to make them stable. Surely this is an unreasonable cost for the City to pay and Toronto Works to charge to metered residents. A developer may want to drop 5,000 people on any number of different sites around the Portlands, where nothing may currently be there, and run-off is close to nil in the existing site. The developer makes back their money in a few years. The City runs a debt to give the developer capacity and provide the residents with services, for how many decades?

What about the ultimate bad land use of the TTC, basically annexing 20 hectares of the Ashbridges Bay Treatment Plant site on Lakeshore Blvd. Was Toronto Water compensated for this removal of space that might be used for future stormwater or sewage treatment? Why not? And like a bad developer, this massive TTC facility, which had an alternative site that could have been used, had been a 100% porous area, it had no sewers or run-off problems to add to the stormwater system before. Now it is part of the problem – regardless of the pretty shade trees that may line the street in a decade or so. This kind of other City Departments and Commissions, railroading over Toronto Works land, needs to be avoided.

Recommendation:

The Wet Weather Plan must demonstrate it can work. It is doubtful the current plan, which is pretty much the very old 1989 plan, will even deliver the protection to the down town core that is required of a City of the stature of Toronto. The Don River will still get a failing 'F', in 4 critical water quality parameters, even after already planned stormwater projects are installed. So how will the public perceive these programs in the Don River and along the waterfront? They will be seen as expensive failures.

It is counterproductive for other projects, especially TTC 'improvements', go on planning/building underground infrastructure in the City, with little or no regard for the needs of Toronto Water. How are the Water, Sewage and Stormwater services supposed to magically squeeze into less space, with so much more development? Underground space is going fast.

Also, how was it, that the Financial District of the City was dug up to install Deep Lake Water Cooling, but the street storm sewers cannot be separated from the sanitary sewer because we have been told it would be too expensive and too disruptive to the Financial District? Why weren't these sewers separated in the same disruptive process? Not enough money at the right time? Why?

Where is the co-ordination? Why do other City Commissions and Departments not recognize the importance of getting the most basic sewer infrastructure in place, as a priority. It is a credit to Toronto Water, how well the Water and Sewage systems have been operating, long after their design lifetime. Just lucky? Some other

departments projects/expansions/works could cost the City a lot of additional money by threatening the Water, Sewage, and Stormwater systems space under the City. Open space is often required for stormwater as well, and should be valued as infrastructure to control flooding. Often open space looks empty, but it may have a valuable function, of greater value than a condo tower, for example.

Recommendation:

Re: Flat rates and Selling the program to landowners and the public:

This report needs to reframe the economic arguments for the flat rate. The value of stormwater management is not about making it look like the water/sewage bill is going down and that stormwater will somehow cost less than if their rates weren't called stormwater.

The reality is that the water and sewage system still needs the 9% increase to repair and maintain existing systems. This water rate increase needs to be renewed. The introduction of a stormwater rate is needed to develop new systems to deal with the current inadequate stormwater system.

All landowner rate payers need to know that there are incentives, not just for large properties. It will take new money to provide and improve stormwater management, above and beyond the status quo, which has been demonstrated to be failing against the odds of more extreme weather.

Many property owners have already taken measures to manage stormwater on their land and more would take up projects if incentives were recognized as some deduction in their stormwater rates.

The costs of not charging enough money to protect the City from stormwater will present even greater costs, as the flooding that is currently happening more often, is effecting roads, subways, electrical systems, and people's homes.

2. The Stormwater Program needs to be results based, and demonstrate measurable improvement over say 5 years, if possible, with updates for the Public to observe. The City needs to implement plans that can work to accomplish results, such as drying out a CSO outfall in an area of the City. Successful projects should be done to educate the public and build public support for lot level stormwater run-off reduction.

Neighbourhoods with good certainty to dry out CSO overflows, need incentives and community based projects to achieve these worthwhile results. A case in point is in Moore Park/North Rosedale. The old City of Toronto has already paid for the implementation plan, to dry out a CSO, in a study by J.F. Sabourin. This plan only requires about a 25% uptake of downspout disconnections to dry out the CSO. If completed it would demonstrate how effective community based, lot level projects can be, to stop contaminated stormwater overflowing into the sanitary system and

the Don River. This sort of project reduces flood conditions downstream in the receiving water, and preserves capacity in the piped system for effective sanitary treatment. Why not implement this plan now?

(Reference: J.F. Sabourin Associates, Demonstration of Non-Structural Stormwater Practices – Implementation Plan Overview – Moore Park/North Rosedale Oct. 1998.)

Voluntary downspout disconnection cannot deliver the best results. The effectiveness comes when there is a plan to manage stormwater in a whole overflow area. This is achieved by ensuring some specific project and/or enough downspouts are disconnected along the same CSO or sewer pipe connections over the same time frame.

3. The City needs to consider a Stormwater Utility framework to manage the money to be dedicated to stormwater projects. This is common in most cities. There is usually a three or more tiered rate structure, and many incentives to landowners to reduce run-off. Savings of 2.5% to 50%, off standard rates have been achieved with documented results. The Federation of Canadian Municipalities considers that a Utility that provides dedicated funding for stormwater is a best practice. Victoria B.C., Kitchener Waterloo, and Prince George, all have more progressive programs, because they offer incentives to all landowners.

The City needs a Utility framework that has the authority/power to be have planning co-ordination with the growing number of larger and larger, over ground and especially underground, infrastructure systems. Subways, existing and proposed, water supply piping, underpasses, bridges, roads, Pedestrian Path systems, Deep Lake Water Cooling, electrical sub-stations and wire routes, media cables, etc. are all possible impediments to space needed to pipe the sewers, find space for stormwater retention and separate the road sewers for stormwater.

Much of the existing, very old, sewer system requires replacing, as well as much of the water supply system. The water supply system will need to be better built to withstand very cold weather. Too much of the water main system is vulnerable to freezing temperatures and age, as we have learned this winter?

A Stormwater Utility is not the same as a Sanitary sewage system. The sanitary sewers are governed by the City's Sewer-Use By-Law. The contents of the sanitary system are capable of a high level of treatment and low contamination to Lake Ontario. Stormwater on the other hand starts out clean as rain, and if not infiltrated becomes very polluted with untreatable chemicals and loadings of salt (corrosive) and silt (abrasive), that shorten the life of piped and pumped sewage systems. (These pollutants would not be acceptable in the sanitary sewer under the Sewer Use By-Law, especially in huge seasonal quantities.) This shortens the life of both the sanitary and storm systems currently.

Rain is clean when it falls. Putting rain into sewers pollutes it. Putting sanitary sewage into the sanitary sewer system cleans it. These different flows need to be separated and handled through very different techniques.

5. New climate effects not captured in the Wet Weather Plan

Extreme storm events are causing new problems and often coincide with peaks in the daily sanitary flows, making flooding more polluted, where there are still combined sewer areas.

In 2013 the Coastguard was called in to get commuters off the Go Train in the afternoon rush hour. In 2014, in an almost identical type of rain event, on almost the same day of the summer, a number of Subway stations flooded and people were trapped on trains.

Cost avoidance strategy is needed through stormwater management:

The Weather Network has demonstrated how approximately 25% more rain will be generated in some storm events, over large cities, which have enough built form to create a heat-island effect. This means stormwater, should be stored away from the high-rise and densely paved areas of the city, not directed through the older dense neighbourhoods, to the waterfront as planned. Capacity for extreme weather needs to be preserved for the immediate down town area. The current Wet Weather Flow Master Plan will be making this serious mistake if it is not corrected. Flooding in the lower part of the City will hurt the economy and create risks for residents, visitors, and commuters alike.

Although we have repeatedly been told our stormwater tanks and tunnels are just like the Chicago Tunnel and Reservoir System – it is not. Toronto has no reservoirs planned. We need the reservoirs up in the system (North York), not a build up of flow in the City center.

Chicago is also different from us because they do not draw their drinking water from the river they discharge their sewage effluent and treated stormwater into.

Chicago also had a lot of USA Federal Funding a long time ago.

Better solutions for stormwater storage would be in or around North York, which has a separated sewer system. Using giant shopping mall parking lots for storage and City owned Golf Courses to house large stormwater retention facilities, or convert Golf Courses into retention ponds, would help relieve surges in the more common extreme weather events we now have. This capacity has a value, a value that cannot be afforded in down town Toronto. Reservoirs like the Chicago model need to be located, to make that model work.

Keeping fast moving stormwater away from the concentration of other underground infrastructure is a better investment.

Cheers,

Karey Shinn
Chair, The Safe Sewage Committee

519-938-5538
karey@shinntype.com

August 12, 2015

Mr. Adir Gupta
Manager, Financial Policy
Corporate Finance
Toronto City Hall
5th fl. E., 100 Queen St. W.
Toronto ON M5H 2N2

Re: Funding Toronto Water's Capital Program- Real Estate Industry Concerns

Dear Mr. Gupta,

The Real Property Association of Canada (REALpac) and our member companies would like to thank you for meeting with the association on May 26th 2015, and for your ongoing cooperation with respect to the City of Toronto's proposed stormwater charge. We believe that the meeting was productive, and helped to clarify the City's position on this matter.

REALpac provided the City with a detailed submission outlining our concerns with the proposed stormwater charge on November 21st 2014. Those concerns included:

1. Policy Slippery Slope

- The general municipal tax base and specific consumption water rates should be adequate funding sources for water based public works without unbundling costs and pitting landowner against landowner and causers against users.

2. Undue burdens on commercial property versus residential and public property

- This would guarantee a significant increase in stormwater management costs to horizontal properties with large parking areas (i.e. shopping centers/box stores and industrial facilities) and provide no incentives for on-site mitigation. This may also lead property investors to seek opportunities in neighboring municipalities like York region and Mississauga.

Further to these written comments, we identify below a number of policy implications which we feel have not been properly addressed by the City.

A. Rationale for the Charge

REALpac maintains that the stormwater charge is not needed to fund the city's capital obligations for water and wastewater. Based on REALpac's understanding of the City's stakeholder consultation documents, titled 'Funding Toronto Water's Capital Program' dated November 6, 2014, and an updated version of May 26, 2015 where additional funding options are detailed, including an 8% water rate increase in 2016, followed by 5% increases in 2017 and 2018 and inflationary increases beyond. REALpac questions why the City would not simply continue the approved annual water rate increases, rather than impose a new stormwater surcharge. At the meeting on May 26th, it was acknowledged that the City is able to cover capital

costs through the existing funding methodology. This issue should be properly addressed moving forward.

Capital works in the City of Toronto should be paid for out of the general revenue base, as it is in the cases of roads and parks, and other City infrastructure. Unbundling City budget items and targeting specific users and causers is a policy slippery slope.

The real estate industry is already overtaxed and underserved in the City. Toronto has one of the highest commercial property tax rates in Canada compared to residential. The City is a high cost, high development risk (long development timeline) municipality. Adding a stormwater charge to the list would effectively put more weight on the shoulders of the City's businesses. If the City's capital plans and obligations can be adequately addressed with the existing funding framework, why impose an additional charge with the requisite increase in administrative costs?

B. Unfair burden placed on commercial/private landlords and real estate owners

A major source of stormwater runoff is from common municipal roads, sidewalks, municipal buildings and municipal parking facilities. According to the City of Toronto presentation document, 'Toronto Stormwater Funding Options and Business Competitiveness Initiatives, presented to the Canadian Property Tax Association, the City's infrastructure includes 5,230 km of roads and expressways, 7,100 km of sidewalks, 500 bridges, 8,091 hectares of parkland and other municipally-owned land, 1,465 structures including civic centres, recreation facilities, fire halls, libraries, and ambulance centers. There are also 58,800 publically-owned housing units in buildings across the City of Toronto. It is not clear how municipally and publically-owned infrastructure will be accountable for its share of stormwater costs.

A shift in funding responsibility to non-residential property through the use of impervious area will allocate a disproportionate share of these common use facilities to non-residential owners. These common costs must be allocated to all property types on an equitable basis such as total lot area.

C. Incentives and mitigation

Businesses occupying large horizontal properties require impervious sites for their operation and will be heavily impacted by the proposed charge. In many cases, there are limited on-site mitigation options for certain property types. In other cases, existing developed properties are not able to reduce their impermeable area without incurring prohibitive retrofit costs, therefore, an impermeable rate structure is not an effective incentive to reduce runoff. Nowhere in the City's preliminary materials, is there mention of mitigation efforts, or conservation techniques. This should be addressed prior to formal consideration of this proposal at the City's Budget and Public Works Committees. We acknowledge that the City will be coupling the proposed stormwater charge with an incentive program currently being developed. REALpac would like to remind the City that any Stormwater funding option discussion will do little to mitigate the severe impacts of major storm events. In order to make a significant difference, stormwater flows must be contained within private property and slowly released

into the stormwater system. Mitigation initiatives must include significant financial incentives for property owners in all property classes to retrofit their properties in order to address the cause of the problem rather than to continue to focus on methodology to pay for the repair of inadequate stormwater infrastructure.

We would be happy to consult with the City on the design of such an incentive program.

Recommendation

In our view, the City of Toronto should address the above-noted concerns before implementing any proposed fee. Based on our initial understanding of the City’s proposal, REALpac and our members are strongly opposed to the separate stormwater charge as a potential revenue tool.

We recommend continuation of the existing consumption-based revenue tool as a way to maintain adequate funding for the City’s water and wastewater infrastructure needs. REALpac believes that extending rate increases as originally put in place in 2005 would be the most appropriate tool to address capital funding deficiencies. By extending rates over the next several years and thereafter reducing rate increases to a yearly inflationary level, our respective members hope Toronto Water will be able avoid impacts to the quality of their service, and trust that the revenue generated will enable the city to raise the additional funds required to follow through with the original capital plan. We believe that this solution is not only fair for the City of Toronto, but is fair and transparent for the City’s property and business taxpayer.

As always, we would be happy to discuss this matter further with you, and your policy team.

Respectfully submitted,



Brooks Barnett
Manager, Government Relations and Policy
bbarnett@realpac.ca
416-642-2700 x224

**Submission to the document that proposed
“Funding Toronto Water’s Capital Program”,
a presentation by Lou Di Gironimo, General Manager, Toronto Water
made at a November 6, 2014, Stakeholder Meeting**

Submission is made by Karen Buck

President, Citizens for a Safe Environment,
Signatory to the Mediation Agreement on the
Ashbridges Bay Treatment Plant (ABTP) Environmental Assessment,
Former member of the Steering Committee for the WWFMMP,
Co-Chair of the ABTP Neighbourhood Liaison Committee, and,
Member of the Implementation and Compliance Monitoring Committee
for the ABTP, and,
Community Project Manager for the Residential Rainproofing Project
funded by the City of Toronto in partnership
with the Toronto and Region Conservation Authority under the
Community Program for Storm Water Management

Karen Buck
c/o 58 Leuty Avenue,
Toronto, ON
M4E 2R4
(416) 690-7593
karenbuck@rogers.com

Questions, concerns, issues and comments on the proposed Funding Toronto Water's Capital Program based on a presentation by Lou Di Geronimo, General Manager, Toronto Water at a Stakeholder Meeting held on November 6, 2014.

I was not in attendance at the above Stakeholder Meeting but have since received the power point presentation.

I was not invited to the previous Stakeholder Meeting but attended with Michael Brothers, Council of Canadians, who had been invited.

Re: Slide 4

Question: Why are rain and stormwater being described as the problems in the presentation?

Concerns:

- 1.** Rain and stormwater are natural phenomena that are required to support:
 - healthy watersheds (including healthy streams and rivers and a healthy Lake Ontario),
 - healthy habitats , and,
 - healthy life forms (including humans) within the watersheds.
- 2.** Impervious surfaces described as paved surfaces and inadequate infrastructure are the real problems and they are accompanied by a lack of natural and "at source" solutions.

Issue: It is the overwhelming imperviousness of the City that is created by inadequate regulation/enforcement of new development, re-development and infill that needs correction.

Comment: 1. City resiliency and sustainability with regard to rain and stormwater runoff will only be attainable through new regulation and enforcement of at source and watershed solutions that include low impact development implementation.

2. While there will be inadequacies within the current sewer infrastructure that need to be addressed, monies spent on funding greater piped conveyance and larger end-of-pipe solutions will never address attaining a resilient and sustainable City.

Infiltration of clean rainfall and clean roof runoff (first flush removed – Netherlands model) into the City's watershed will ensure

- replenishment of flows within the City's streams and rivers,
- replenishment of groundwater and aquifers, and,
- removal of these flows from the sewer system as a preventative measure for reduced/eliminated basement flooding, surface flooding and flash flooding and overwhelmed City sewage Treatment Plants where by-passing and discharging can occur.

3. Road runoff with its salt, dirt and car pollutants needs to be captured in a separate road sewer system or a separated storm sewer system. This is a "polluted" runoff stormwater flow that requires appropriate treatment. Infiltration into the watershed may not be the answer to this stormwater flow. The separated road flows may need an end-of-pipe treatment facility to remove pollutants and return cleaned water to Lake Ontario or the City's rivers.

4. Lake Ontario, the drinking water source for millions of Ontarians, is both an Area of Concern that needs to be cleaned up and a concern that, as a drinking water source, needs special regulation to ensure the continued improvement of its quality.

Re: Slide 5

Question: How did the original Wet Weather Flow Master Plan (WWFMP) (The Plan) become a “\$3B plan over more than 25 years”?

Concerns: **1.** The original direction for The Plan was dedicated funding of \$40,000 a year for 100 years. The 100-year timeframe was to be managed as 25-year implementation programs each with a \$1B funding amount or \$4B over the 100-year timeframe.

2. Downspout Disconnection was to be accelerated in the first 25-year implementation program to ensure that rain and snow melt (stormwater) would be managed “at source as a resource”. In support of accelerated downspout disconnection a phased Mandatory Downspout Disconnection By-law was proposed and passed by Council. The first phase in the combined sewer area was to become mandatory in 2011.

Issues: **1.** The Mandatory Downspout Disconnection By-law, when implemented on existing lots, in new developments, in re-development and infill has, in many instances, not been done effectively. Disconnected downspouts are:

- being cut-off right at the foundation putting building foundations at risk,
- directing stormwater back onto streets and back into the sewer system, or,
- directing stormwater flows onto neighbouring properties.

There appears to be no definition of, or expectation, or education of property owners, or enforcement of effective downspout disconnection.

2. The Mandatory Downspout Disconnection program required in the combined sewershed is not being enforced or there is a large proportion of properties receiving exemptions.

Comments: **1.** There appears to be no requirement of “at source” solutions (as a priority over conveyance and end-of-pipe) that could be very effective in keeping stormwater out of the current sewer systems to prevent:

- basement flooding,
- flashflooding,
- surface flooding,
- combined sewer overflows to the City’s streams and rivers,
- undertreated effluent flows through treatment by-passing at the City’s sewage treatment plants entering Lake Ontario, and,
- untreated discharges at the City’s sewage treatment plants entering Lake Ontario.

It needs to be noted that when and where the City’s Sewage Treatment Plants are overwhelmed by stormwater flows undertreated effluents or untreated discharges enter to Lake Ontario. In

the combined sewershed those undertreated effluents and untreated discharges include both sanitary sewage and industrial/commercial wastes.

It also needs to be noted that, in the combined sewer system, combined sewer overflows with sanitary and industrial wastes discharge directly, without treatment, into the City's rivers and streams.

2. Citizens for a Safe Environment, under the Community Program for Stormwater Management, was funded and implemented a rain garden and downspout disconnection program, "Residential Rainproofing". Now, after four years since implementation, the Residential Rainproofing Project has been very successful at infiltrating all the roof stormwater runoff proving that effective Mandatory Downspout Disconnection is a viable "at source" solution for the management of stormwater in the City. The "prototype" rain garden was designed for a 25 mm rainfall.

It should be noted that both the WWFMP Policy and its implementing Guideline include the following, for the management of on-site runoff.

"In most cases, the minimum on-site runoff retention requires the proponent to retain all runoff from a small design rainfall event – typically 5mm(In Toronto, storms with 24-hour volumes of 5mm or less contribute about 50% of the total average annual rainfall volume)through infiltration, evapotranspiration and rainwater reuse." Guidelines, page 7.

It would be interesting to know how many of the City's properties (new development, re-development and infill) are required to achieve above the minimum on-site runoff retention.

It would also be interesting to know how many of the City's development and re-development projects have implemented "strongly encouraged" (not required) low impact development" strategies, through site planning, such as:

- source separation of runoff,
- green roof technologies,
- rainwater harvesting (re-use), and,
- absorbent landscaping.

It is worthwhile noting that intense rainfall and snow melt has, to date, caused devastating results within Toronto and associated high costs which are reasons for the City to re-think how stormwater should be managed effectively and cost-effectively to bring about both resiliency and sustainability to the City.

Re: Slide 5

Question: 1. Why does the City, in dealing with stormwater, cite only the large/large scale and high cost sewer system solutions as projects the City is doing to deal with stormwater?

2. Why has the City omitted mentioning and listing the Mandatory Downspout Disconnection By-Law as a project the City is doing to deal with stormwater?

Re: Slide 10, Slide11, Slide 13 and Slide 21

Question: Why state that a stormwater charge (SWC) is based on the demands a customer imposes on the stormwater system (Slide 10) and then add, that the more hard surfaces a property has, the more stormwater runoff it contributes and therefore the more the property will be charged (Slide 10) and then proceed to a funding model (Slide 13) that establishes a flat rate for all properties with the only incentive being given to large properties (Slide 21)?

Concern: 1. The unpredictability of intense rainfall (where and when) makes the funding model irrelevant in preparing the City to be resilient and sustainable across all properties within its boundaries.

2. The funding model appears to be raising funds for a program that has not been identified in terms of its ability to manage water quantity, reduce and eliminate CSOs, reduce and eliminate by-passing and discharging at the City's Treatment Plants while, at the same time improving watershed health and water quality, in particular, the removal of Lake Ontario as an Area of Concern.

3. The funding model while relying on a SWC has not identified the stormwater program it is interested in implementing within a timeframe with monitoring for achieving a suite of beneficial outcomes which also need to be documented and measured.

4. The Don Watershed is, but one example, of a watershed struggling to achieve passing grades for surface water quality, forest conditions and stormwater management within the boundaries of the City of Toronto. The SWC should be linked to programs, projects and timeframes for achieving passing watershed grades.

Issues: 1. A SWC that does not differentiate between pervious and impervious demands imposed on the current sewer system removes all incentives/disincentives to the property owner to implement "at source" solutions, such as compliance with the City's Mandatory Downspout Disconnection By-law and effective stormwater infiltration on the property.

2. The SWC, to be transparent, should be a dedicated fund to implement stormwater solutions with an emphasis of implementation of effective solutions at source, where the rain falls and is valued as a resource.

3. The SWC should be a charge on impervious surfaces based on the demands that they impose on the current sewer system. Effective downspout disconnection and pervious/porous surfaces should be accounted for in the SWC formula as not imposing a demand on the current sewer system.

4. The cost for verification and certification of the impervious/pervious demands should be at the cost of the property owner and the resulting information should be used to inform the City of the appropriate SWC for the subject property.

Comments: All stormwater solutions that remove stormwater from the current sewer system infrastructure should be implemented in areas of the City before the City considers end-of-pipe solutions, since the sizing and, subsequently, the costs of the end-of-pipe solutions are directly related to the size of the managed and treated stormwater flows.

Funding Toronto's (Stormwater) Capital Program

Public Response: Karey Shinn, Safe Sewage Committee

Questions, Concerns, Issues, Comments

1. Roads and Municipal impervious land.

Approximately 33% of a residential neighbourhood is paved roads. Nobody lives on the road and there is no water meter for them. Where is the Missing Square Meters of impervious surface in the City that are roads etc., that this plan has not identified, or figured out how to obtain funding for? This is a very high percent of the City's impervious area without an appropriate funding mechanism.

Does this report imply, by omission, that the 473,211 Property owners are to pay/be responsible for the whole 2.6 million people who live in Toronto, not to mention the Visitors and Commuters, who use the enormous acreages of the City that are the communal paved roads, highways, parks, etc., that collectively generate huge volumes of stormwater, and are subject to flooding? These impervious areas require the financial support from everyone, not just some fraction of the population who happen to be attached to a water and sewage account. (Cars do not have a water and sewage account, but they are totally dependent on impervious surfaces, roads, that require stormwater management. Also, not all the cars using Toronto roads are owned by Toronto Landowners.)

The data of surface area in this report does not represent the entire geographic surface area of the City, that needs to generate money to pay for or reduce the amount of stormwater requiring treatment and/or stormwater management. Roads more than anything require incentives to keep stormwater out of the CSO pipes in the City.

By not identifying how the City intends to pay for the run-off from Municipal infrastructure itself, means the property tax remains, to again hit the Landowners, who are already paying through any new Stormwater rates. This is neither equitable or fair.

2. The Stormwater Program needs to be results based, and demonstrate measurable improvement over say, the next 5 years if possible, with annual updates for the Public to observe.

- No value or water quality improvement has been identified, that will benefit the City of Toronto. Given that the City's own reports have stated that the Don River will still get a failing 'F', in 4 critical water quality parameters, even after the Stormwater projects are installed, how will success be measured for water quality improvement, in the Don River, and along the Waterfront?
- No awareness is generated for the value of cleaning up the water quality through the sanitary and stormwater treatment facilities. The Public needs to know that all this stormwater and sanitary flow returns to Lake Ontario and

because 10,000,000 people drink Lake Ontario water. It is reasonable for the public to know that the City is doing all it can to maintain and improve water quality entering the Toronto's only drinking water resource. This Capital Program should be delivering some good news for Public Health efforts.

- Need to differentiate rates for water/Sewage VS Stormwater

It is not good optics in this report, to introduce a new rate, for something that was previously not accounted for in the Water and Sewage rates, and then somehow jockey with the historical water/sewage rates (that need more money as well), in an effort to make it appear as though the overall rates are going down???? The needs of the water and sewage infrastructure should not be compromised because the City needs to build stormwater infrastructure. The City needs to build new infrastructure it never had, and will be needed more frequently, to protect the City, from the more frequent and intense rain and snow events, that are being attributed to a warmer climate.

Note: More severe precipitation events are being caused by warmer lakes and/or the heat-island effects of concrete cities. The Weather Network attributes 25% increases to some rain events in summer over cities, caused by the heat-island effect of large Cities. The huge amount of snow in Buffalo, was written up on Slate's website today, Nov. 20th, 2014, as being made worse because the huge 50 degree F temperature differential between the warm lake and cold air mass, was precisely what generated the excessive lake-effect snow Nov. 18 and 19th.)

It is becoming obvious that extreme weather will impose more financial challenges to large impervious City areas. These effects need to be mitigated in the Stormwater program and be recognized for their value to the economy of the City as a whole, not just property owners.

3.

It is not clear from this report:

- What is the total area of the City?
- What part of the total area is represented by the 473,211 property owners identified on page 13 of the City slides/Capital Program, and what remaining area requires some other way to generate funds to pay for the run-off and Stormwater Projects, those volumes of stormwater will require?
- It needs to be obvious that this is a Stormwater Capital Program, and should be more independent of the Water and Sewage rates.
- This report needs to be re-written, before it goes to Council, to demonstrate to Councillors what the value of this new Stormwater rate is, without playing with the water rates at all. Currently the report makes it look like the water/sewage bill is going down when it is unlikely that will happen. The Stormwater rates need to be disentangled as much as possible, and stand to make a difference to water quality and reduce flooding impacts. This improvement is above and beyond the current water/sewage system's capabilities and rates, which is why this needs to happen.

* Why do the project numbers in this report not relate to the costs and programs specified in previous plans such as the WWFMMP? Where is the downspout disconnection incentive for homeowners, for example?

Karey Shinn, Chair, Safe Sewage Committee

- Signatory to the Mediation Agreement on the Ashbridges Bay Treatment Plant (ABTP) Environmental Assessment
- Member of the ABTP Implementation and Compliance Monitoring Committee
- Co-Chair of the ABTP Neighbourhood Liaison Committee