

July 5, 2021

**Re: IE23.6 Water Users Consultation on Water Fees, Charges and Programs**

To the Infrastructure and Environment Committee,

Toronto Environmental Alliance (TEA) has long advocated for a greener city for all, including advocating for sustainable stormwater management over the past several years.

We are writing to express concern and disappointment about the direction of the Water Users Consultation on Water Fees, Charges, and Programs. In particular, we hoped to see the City take significant steps towards the implementation of a sustainable and fair financing strategy for the City's rising stormwater servicing costs and needs. We urge the Committee to take climate change seriously, as committed to in the Climate Emergency declaration and made evident over the last week with heat waves across the country.

**In particular, there are two options regarding water fees and charges that TEA strongly supports, which were presented in stakeholder consultations, that the staff have chosen not to recommend to Committee members.**

1. Decouple stormwater costs for industrial and commercial (I&C) customers from the water rate through the establishment of a stormwater charge for I&C properties
2. Establish a Stormwater Charge for Commercial Parking Lots

**Stormwater Management for Climate Resilience and Adaptation**

Toronto is facing increased climate risks due to severe rainstorms and flooding, as evidenced by recent emergency events and highlighted in the city's first Resilience Strategy. The operating and capital costs of stormwater management in Toronto are rising much higher than other service areas and the city's state of good repair backlog has not yet been adequately assessed for climate risks.

This is why it is so critical that Toronto Water create a sustainable and fair financing strategy for these rising stormwater management costs and needs to proactively increase the adoption of green infrastructure solutions on both public and private property that can help mitigate flood risks. We can look to neighbouring cities like Mississauga who have a dedicated stormwater user fee and reap the benefits of sustainable stormwater management in Toronto.

**Establishment of a stormwater charge for Industrial & Commercial properties**

TEA strongly supported the option of decoupling water rates from stormwater charges, starting with Industrial and Commercial properties. From attending the stakeholder consultation, we were not presented with additional options such as implementing a stormwater charge for all property types. As such, it was our assumption that Institutional and Residential property classes could be included in future years. Instead, we are seeing the City move backwards and not consider this as an option at all.

We can look to best practices from other jurisdictions to tackle challenges of implementation. For example, the Smart Prosperity Institute published a [2016 report](#) that outlines various solutions to stormwater management. Toronto is lagging behind other Canadian cities; it is irresponsible to our climate future to overlook this solution.

### **Stormwater charge for parking lots**

We also are disappointed with the City for not recommending stormwater charges for commercial parking lots. Currently, parking lot properties that are not Toronto Water customers are getting a free ride, contributing large volumes of stormwater to the system and paying nothing for stormwater management. In addition, it is likely that parking lots are generating potentially harmful stormwater due to the presence of chemical particulates that have settled from vehicle exhaust and other automotive contaminants.

However, the staff report does not recommend this option for implementation partly due to “many surface parking lots will undergo development in the next decade” (IE23.6 Attachment 1: Summary of Consultation Feedback and Assessment of Options). It would be helpful to better understand what kind of development is planned for these surface parking lots and to what timeline.

### **Recommendations**

We recommend that the Infrastructure and Environment Committee reassess the options presented by staff and reconsider the need to implement a municipal stormwater charge. The City must proactively work towards climate resilience and adaptation; this is a fair and sustainable financing strategy that the City is overlooking.

We must move faster to adapt to climate change and extreme weather, and provide solutions that increase our collective climate resilience. We look forward to working with you further to create a greener, more liveable city for all.

Sincerely,



Diana Yoon  
Climate Specialist  
Toronto Environmental Alliance