

**Monday, July 22nd, 2024**

**RE: MM 20.24 - Reducing Runoff and Mitigating Flooding**

Dear Members of Toronto City Council,

On July 16th, extreme rainfall in Toronto left many residents flooded and without power. Escalating climate change means that this volume of rainfall will become more frequent. We can and must transform our city from pavement to permeable, green surfaces that absorb rain and stormwater before it hits our overburdened sewer system.

Right now, large commercial and industrial properties with lots over 1 hectare (~107,000 square feet) represent 1% of properties in Toronto, but make up 37% of Toronto's hard surfaces. We need a plan to transform these paved surfaces so that they absorb stormwater and help residents take steps to green their own properties and keep water where it should be - in the ground and not in our homes, buildings and streets.

We support Mayor Chow and Deputy Mayor McKelvie's motion calling for staff to explore city incentive programs to green residential properties, and to assess opportunities to mitigate and adapt stormwater runoff from paved surfaces at large-scale industrial, commercial and institutional sites.

Here are more ideas for City Council and staff to consider as they move forward with these actions. These ideas are endorsed by the 18 organizations listed at the end of this letter, including TEA.

We call on the City of Toronto to:

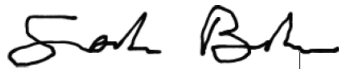
- Quickly establish incentives and support to transition paved areas to make them greener and more permeable to mitigate future flooding;
- Ensure incentives are available for all paved surfaces, from large parking lot owners to small residential homeowners who want to unpave, install rain barrels, or plant trees & gardens;
- Pay for these incentives by targeting the largest lots generating the most stormwater runoff to make sure they pay their fair share- in particular large industrial/commercial lots who don't currently pay any water bills, and therefore contribute nothing to the City's system to manage the flooding/runoff they create;
- Ensure existing planning tools like the Toronto Green Standard require all new paved surfaces to include permeability requirements, and new buildings incorporate strong stormwater management;
- Require and install green infrastructure in all City infrastructure projects (eg green boulevards, green roofs, bioswales) starting with basement flooding areas;

- Ensure the burden of paying the cost of these incentives does not fall disproportionately on residential water users, small homeowners, and tenants, as is currently the case;
- Provide appropriate funding to City divisions to allow staff to perform these duties effectively

Flooding is a public safety issue that impacts all Toronto residents, but poses extreme risks for some residents who are most impacted by extreme weather. For example, we must consider the specific impacts on seniors living alone, people with disabilities, people living in basement apartments, and people who are unhoused or precariously housed.

Over the past 11 years, Toronto has seen three 100-year flood events. As the City continues to see increased severe impacts of climate change, Toronto will experience more flooding events. By acting now to both reduce greenhouse gas emissions and manage stormwater, the City can help to reduce the impact of flooding and help protect all Toronto residents.

Sincerely,



Sarah Buchanan  
Campaigns Director  
Toronto Environmental Alliance

The following organizations endorse this letter:

Toronto Environmental Alliance  
ClimateFast  
Climate Action for Lifelong Learners (CALL)  
Community Resilience to Extreme Weather (CREW)  
CUPE Local 79  
Environmental Defence  
For Our Kids Toronto  
Green Communities Canada  
Green Roofs for Healthy Cities  
Green13  
Progress Toronto  
Social Planning Toronto  
Scarborough Environmental Association  
Seniors for Climate Action Now!  
StopPlastics  
Toronto & York Region Labour Council  
TTCRiders  
Vote16 Canada