



January 27, 2025

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Cathrine Regan

EX20.12 Reducing Stormwater Runoff and Mitigating Basement Flooding (Ward All)

This report makes five specific recommendations pertaining to stormwater runoff and basement flooding. Our comments respond to each of the recommendations, but also raise wider but related issues that the report fails to address.

The report recommends that City Council:

- (1) request the General Manager, Toronto Water to report back to the Infrastructure and Environment Committee, no later than Q3 2025, on a plan to implement three new and expanded subsidies under the City's **Basement Flooding Protection Subsidy Program**, subject to City Council approval, for a **home stormwater assessment subsidy, an increased backwater valve subsidy, and an increased sump pump subsidy.**

Recommendation 1 - FoNTRA response:

We do not oppose this recommendation in principle, but the City needs to justify the need for, and effectiveness of additional subsidies, and be attentive to the fiscal implications at a time when the City is facing serious financial challenges.

- (2) request the Executive Director, Environment, Climate and Forestry, in consultation with the Chief Financial Officer and Treasurer, the General Manager, Toronto Water, the General Manager, Transportation Services and any other relevant divisions, to report back to the Infrastructure and Environment Committee, no later than Q3 2025, on a plan **to implement a green infrastructure incentive program for private property**, subject to City Council approval

Recommendation 2 - FoNTRA response:

We support this recommendation

- (3) request the General Manager Toronto Water and the Chief Financial Officer and Treasurer to **indefinitely suspend further consideration and/or engagement on a stormwater charge**, based on the feedback from stakeholder engagement conducted as part of the consideration of a commercial parking levy; feedback received through previous City consultations on a potential stormwater charge; and in recognition of actions being undertaken to reduce stormwater runoff in Recommendation 2 above.

Recommendation 3 - FoNTRA response:

We oppose this recommendation. The storm water charge is a rational policy instrument that is used in several other jurisdictions (e.g. Mississauga). The fact that there was negative feedback from those potentially affected does not necessarily militate against its use, given its advantages, including fiscal.

- (4) request the General Manager, Toronto Water, in consultation with the Chief Engineer and Executive Director, Engineering and Construction Services, to report to the Infrastructure and Environment Committee on an assessment of options to **accelerate the construction of recommended local sewer infrastructure improvement projects** from completed Basement Flooding Environmental Assessment (EA) studies under the City's Basement Flooding Protection Program, taking into consideration the findings from Engineering and Construction Services' recent review of capital delivery models for large complex municipal infrastructure programs and projects.

Recommendation 4 - FoNTRA response:

We support this recommendation.

- (5) City Council direct the General Manager, Toronto Water to indefinitely suspend further consideration and/or engagement on a **water service charge**, based on the findings from the City's public consultation on a water service charge that was paused in April 2024.

Recommendation 5 - FoNTRA response :

We oppose this recommendation as our reading of the results of the public consultation survey responses does not lead to this conclusion.

Other comments

More broadly, FoNTRA makes the following comments:

1. We do not believe that a survey of this type is a very effective way to engage the public and obtain useful feedback. Indeed in this case the survey appears to be seriously flawed – of the number of respondents (973), 81 (8.3%) of them came from one postal code (out of 400) in Toronto!. The City needs to undertake a much more comprehensive review of the issues.
2. More generally, FONTRA strongly advocates for maintaining permeable surfaces and growing spaces, and maintaining an adequate permeable surface to hectare ratio. For example the City needs to be using flood maps, as an input to regulatory decision-making. The City should work to reduce

asphalt and heat island effects and require heat absorbing surfaces to be made more reflective.

3. FoNTRA regularly hears about issues which directly or indirectly impact on stormwater runoff and basement flooding, such as:
- Excessive lot coverage approvals (beyond the permitted allowed by the zoning bylaw) by the Committee of Adjustment;
 - Lack of enforcement of City building regulations and Conservation Authority regulations in ravine adjacent areas (TRCA) and Urban Forestry (illegal tree cutting);
 - Iceberg Basements¹. – we note that the staff report back to Planning and Housing Committee is overdue (requested for fourth quarter of 2024).

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cathie Macdonald
Co-Chair, FoNTRA

Cc: James Nowlan, Executive Director, Environment, Climate and Forestry
Eleanor McAteer, Director, Water Infrastructure Management, Toronto Water,
Alice Xu, Director, Policy, Planning and Outreach, Environment, Climate and Forestry,
Lou Di Gironimo, General Manager, Toronto Water
Jason Thorne, Chief Planner and Executive Director, City Planning Division
Kyle Knoeck, Director and Secretary Treasurer, Zoning and Committee of Adjustment, City Planning Division,
Caroline Samuel, Manager, Zoning Section, City Planning Division

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.

¹ PH11.4 - Zoning for Residential Basements - Preliminary Report April 5, 2024
<https://secure.toronto.ca/council/agenda-item.do?item=2024.PH11.4>