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CANADIAN ENVIRONMENTAL LAW ASSOCIATION
L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

Great Lakes United



Union St-Laurent Grands Lacs

ONTARIO
Water
Conservation
ALLIANCE

Dear Toronto City Council and Staff,

We congratulate Toronto Water for its leadership in reducing Toronto's peak daily usage and in setting a sustainable path for the city's water financing and consumption. The measures that Toronto has put in place have made it a leading city for water efficiency across the Great Lakes and St. Lawrence region, and this is a reputation in which all councillors can take pride.

In light of these successes, we are disappointed by the proposed cuts to the conservation and wet weather flow reduction programs, as well as the deferral of necessary water system enhancements. Cutting funding to initiatives that save residents money and reduce the need for costly infrastructure upgrades is a step in the wrong direction and a significant departure from the leadership Toronto has displayed in water conservation to date. Council should reinvest these savings into a refreshed Water Efficiency Plan which will maintain Toronto's leadership position in the region, and Council needs to keep pressure on the Province if some of the gaps opened by these cuts are to get filled by the anticipated changes to the building code.

As the most recent estimates by Toronto Water show, for every dollar the city has spent in reducing its water consumption, five more dollars have been saved by avoiding unnecessary infrastructure projects. Investment in the WEP is a money-saving program for the City, especially in terms of the City's capital budget. Therefore, it makes good fiscal sense to maintain (if not expand) this critical program.

We recognize that the Water Efficiency Plan is a living program, and must be responsive to changes in the regulatory, technological, social and economic environments. That is why we agree with Toronto Water's recommendations for some adjustments in the WEP. In this context, winding-down the toilet change-out program is sensible in light of the Province's plan to ban water-wasting toilets. Toilet rebate programs, such as Toronto's, have played an important role in setting the groundwork for provincial action, and been a catalyst for improvements in higher efficiency toilets. However, since the Province's regulations on this matter have not yet been passed, we urge the City to monitor Provincial action on this matter and ensure that the Province implements strong regulations regarding the sale of water inefficient toilets and other appliances.

We are also pleased to see Toronto Water's intention to maintain the Capacity Buy-Back Program and cost-share programs with the business community. Toronto Water's intention to implement a city-wide water loss reduction program is also an essential method to reduce water waste. And the City's continued emphasis on public education and communications to promote water conservation initiatives is

critical to ensuring public acceptance of, and participation in, water efficiency efforts.

The cancellation of the Voluntary Downspout Disconnection Program is disappointing as it gave home owners all over the city an opportunity to reduce the stress their property puts on stormwater management infrastructure regardless of their ability to pay for it. However, many of the benefits it would have conferred on the City can still be realized through the mandatory disconnection program. As such, we urge Council to maintain the mandatory program and the financial assistance provided to residents with a gross household income of less than \$40,000. The City should extend this assistance to Torontonians with disabilities who may not be able to disconnect their own downspouts and must instead rely on private service providers.

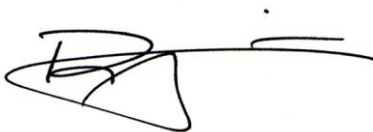
We are pleased to see increased investments in Toronto's Storm Water Management Plan, Basement Flooding Relief Projects and Sewer Replacement Program. These initiatives will save money, as well as improve the quality of life and value for money paid by many of Toronto's residents. We urge Toronto City Council not to delay, defer or otherwise derail any of the planned enhancements to the City's water infrastructure. The problems posed by leaks, inflow, and infiltration that these projects ameliorate or remedy will only get more expensive and complicated the longer they are left unaddressed. In the meantime, Torontonians will pay for them through wasted water, higher than necessary treatment costs, and closed beaches.

The City of Toronto is a leader in Ontario when it comes to implementing sustainable water management programs and transforming the water services market. Many of the conservation programs and storm and wastewater management initiatives that produce benefits to our local environment also produce savings for rate payers and generate revenue for local businesses. But the City has only scratched the surface of what is possible. By re-investing savings from the current WEP programs into more ambitious conservation initiatives, like new and enhanced incentives for developers to build properties that incorporate the latest water saving and harvesting innovations, and expanded public education programs, Toronto can generate even greater savings.

Toronto City Council has an important decision to make: does the city continue to reap the benefits of water-wise programs and show the region what is possible? Or, do we stop investing in our water and wastewater system now, only to pay multiples more in the near future?

We sincerely hope that Toronto rises to the challenge and lives up to the standard set by its own leadership, and that the city continues to demonstrate to the region the environmental, social and financial benefits of sensible water management.

Sincerely,



Rick Smith
Executive Director,
Environmental Defence



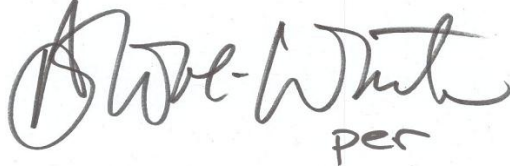
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CELA PUBLICATION NO. 772