



January 27, 2025

## **EX20.12 - Reducing Stormwater Runoff and Mitigating Basement Flooding**

Dear Mayor Chow and Members of the Executive Committee:

Cliffcrest Scarborough Village SW Residents Association (CSVSWRA) is an incorporated, not for profit association that works with other like-minded organizations in Scarborough. Because the southern parts of our neighbourhoods are directly adjacent to the magnificent but rapidly eroding Scarborough Bluffs, we are extremely concerned about stormwater runoff and are supportive of expanded and new subsidy options for private properties under the BFPSP. CSVSWRA believes that the City of Toronto needs to ensure that the other side of the permeability equation is addressed. Yes, it is important to help private property owners increase permeability but it is equally important to prevent the loss of permeable land.

Our city, to its credit, has acknowledged the severity of the climate crisis. Two “once in a hundred years” rainfall events last year were the impetus for the item under consideration.



Unfortunately, the numerous changes to our Official Plan and zoning by-laws through EHON and HAP will significantly decrease our existing supply of permeable land. In the 2018 Tree Canopy Study, Urban Forestry pointed out that “trends show increases in impervious surface cover across all land uses; however, the largest increase being found on single family residential lands.”

Recent Committee of Adjustment approvals in Scarborough have:

- Allowed the homeowner of a luxury home to widen their driveway to accommodate six to eight vehicles, even though TLAB’s approval of the application was on condition of abiding by the zoning by-law related to driveway width;
- Permitted four-plex applications to pave over back yards for parking;
- Approved setback variances and lot severances, which decreases permeable land and results in the destruction of mature trees.

In 2019, Toronto launched a Resilience Strategy to address the climate crisis. This strategy designated flood resilience as a priority action and determined that resilience needs to be integrated into development and land use planning processes. And let's not forget that over half a century ago, Conservation Authorities were formed to address erosion and flooding. It appears that Toronto City Councillors have forgotten the impact of development on increasing flooding risks.

Governments are great at developing strategies; governments are not so great at implementing these strategies, especially where development is concerned. Today's policy environment is permitting the severing of properties and building of multiple and larger homes and wider driveways, essentially eradicating permeable/green areas, trees, and the ability of the property to absorb stormwater runoff, which leads to practically absolute reliance on the City infrastructure and larger channels/pipes to manage stormwater runoff.

### **What can be done?**

**We recommend that the City of Toronto not remove Segment or Avenue Studies (Planning staff have suggested that the City move to after build monitoring) - but rather consider development applications in the fuller context of multiple nearby sites along an avenue.** Only studies conducted by the City or the City's consultants can objectively determine potential impacts of development applications to mitigate basement flooding and other problems down the line.

**We recommend that the City's EHON, HAP, Garden Suites, and other planning initiatives be revisited to give real consideration to how to reduce stormwater runoff and mitigate basement flooding.** Recent changes to the Official Plan have reduced setbacks and eliminated the careful balance of lot coverage and FSI. Only the City's own by-laws and requirements and guidelines and enforcement of those rules can reduce stormwater runoff and mitigate basement flooding.

**We recommend cumulative assessments and studies to monitor and manage changes to sites, so that developments do not get approved without careful understanding of the impact to communities, infrastructure and regions on the whole.** Natural features which allow for water infiltration and management need to be maintained. Surface water management and water infiltration is contingent on the soil conditions which exist on site. Any proposed subgrade water management systems proposed must be evaluated for efficacy through soil condition assessments and studies.

**We recommend the City of Toronto looks at practices in other regions, such as York and Peel.** In York and Peel Regions, planning and design practices promote sustainable surface water management.

Programs to subsidize sump pumps etc. are only band aids on a larger problem, which with climate change, is due to grow to unprecedented levels.

Yours sincerely

Janet May  
Director, CSVSWRA