

THE TAYLOR MASSEY PROJECT

Celebrating and Protecting Taylor Massey Creek

February 13, 2008,

Environmental Reporting and Disclosure Public Consultation
c/o 7th floor - 277 Victoria Street
Toronto, ON, M5B 1W2
PDF via email

Re: **Proposed Environmental Reporting and Disclosure for Toronto**

The Taylor Massey Project supports Toronto Public Health's proposal for improved environmental reporting and disclosure in Toronto.

While we think that the proposal should be supported by an increase in the number of air quality monitoring stations in Toronto, we believe the measures suggested represent both a responsible approach to protecting public health and the environment as well as a set of reasonable conditions for industrial/commercial/institutional activity.

In addition, we believe that the proposal focuses too narrowly on air emissions and that it should be expanded to include reporting and public disclosure of government agency data on surface water quality.

While increased reporting of air emissions must necessarily come from facilities generating emissions, with disclosure of data through a mandated agency, an extensive network of surface water quality monitoring already exists, to varying degrees, in numerous agencies.

While research into potential increases in surface water quality standards, enforcement measures, and the number of monitoring stations is warranted, **the real challenge on surface water quality is to obtain monitoring information from government agencies and make it available to the public.**

Without impugning the work done by under-mandated and under-funded agency staff, examples where improvements in government agency reporting and disclosure on surface water quality would be useful include:

- The Remedial Action Plan's long-promised provision of electronic maps on the sources of local pollution as well as regular reporting on upstream Beneficial Use Impairments and progress toward RAP de-listing targets;
- Expanded use of the federal government's new Water Quality Index, as per our letter to federal minister John Baird dated December 31, 2007 available at www.thetmp.org/submissions.htm;
- Reports from the province on exceedences of certificates of approval and other surface water violations, compilations of reported and non-reported spills, and water flow, as well as the establishment by the province of standard criteria for the watershed report cards, generated for the most part by conservation authorities;

- Conservation authority reports on benthic invertebrate monitoring, as well as the aforementioned watershed report cards with improved science-based criteria; and,
- Reports from the City on sanitary sewage discharges to surface water from sanitary pipes and combined sewer outfalls, as well as from programs such as the Storm Outfall Monitoring Program.

Many of these reports could utilize GIS technology to link identified locations to agency monitoring data. For example, while the City has done good preliminary work on its Wet Weather Flow Master Plan and the Storm Outfall Monitoring Program, the locations of both combined sewer outfalls for the former and priority outfalls for the latter could be shown on publicly-accessible GIS maps, hyper-linked to the results of site monitoring activities.

By including a requirement for agency compliance to report on and disclose the results of surface water quality monitoring, Toronto Public Health would help expand the protection of public and environmental health in our City and would certainly increase the community's right to know on pollutants in our receiving waters.

We also believe that corollary benefits would accrue with respect to both a more robust onus on pollution prevention as well as with respect to improved by-law enforcement for encroachment and any improper outdoor storage of potential surface water pollutants.

In conclusion, we salute the efforts of Toronto Public Health and ask you to make government agency surface water quality reporting and disclosure part of the proposed new by-law.

Sincerely,

Andrew McCammon
Founding Chair

cc Mayor Miller; Minister Gerretsen; Minister Baird
Councillors Kelly, Thompson, Heaps, and Davis
Task Force to Bring Back the Don
Don Watershed Regeneration Council
Lake Ontario Waterkeeper and other partners

Established in 2003, the Taylor Massey Project focuses on:

- Engaging local residents by coordinating local clean-ups, plantings, and educational activities;
- Developing a comprehensive watershed management approach to protect and restore the Creek; and,
- Connecting the communities of the Creek with new trails, bridges, and street & railway crossings.

Working with more than 20 partner organizations, including the City of Toronto, the TMP has staged 58 events involving 3,114 participants, planting 2,900 trees and shrubs and picking up approximately 1,175 bags of litter over the last five years. This is our 17th submission to a local agency.