



Don Mouth Naturalization & Port Lands Flood Protection Project

Working Session #3

Meeting Notes

September 7, 2005

Working Session #3
Don Mouth Naturalization and Port Lands Flood Protection Project

Wednesday, September 7, 2005

Ralph Thornton Centre, 765 Queen Street East, Toronto, Ontario

6:30 – 9:00 p.m.

SUMMARY NOTES

1.0 Welcome, Introductions and Agenda Review

The doors were opened at 6:15 p.m. Members of the public viewed the display boards that were posted at the back of the auditorium. A copy of the poster boards is found in **Appendix A to the Public Forum #1 Meeting notes dated June 23, 2005**. Toronto Region Conservation (TRCA) and members of the consulting team were on hand to answer questions before the Working Session began.

All participants received the following information as they signed in:

- Participant workbook
- Copy of presentation slides
- Proposed Approach to Stage 2 Consultation (Updated draft for discussions at Working Session #3)
- Sample Criteria Table
- Notice for Public Forum #2 (**editor's note: the meeting is now scheduled for November 7, 2005**)

The following information from previous meetings was also available to participants:

- Meeting notes from Public Forum #1, June 23, 2005
- Meeting notes from Working Session #1, July 25, 2005 (including a colour copy of the map from Appendix C)
- Meeting notes from Working Session #2, August 23, 2005

59 participants signed in at the meeting. A list of project team members present at the meeting can be found in **Appendix A** to these notes.

Adele Freeman (Director, Watershed Management Division, TRCA) opened the meeting at 6:40 p.m. and thanked participants for attending. Adele briefly explained previous consultation activities for the project and the purpose of each meeting. To date, participants have discussed and provided feedback on the approach to developing the terms of reference, information sources, and different alternatives being considered. Stakeholders also participated in an informative site walk of the mouth of the Don River.

Nicole Swerhun was introduced as the facilitator. Nicole's role is the provision of third party, neutral facilitation services and to keep the discussions on time and focused. The

project team will be developing the Terms of Reference for the client(s) and submission to the province for approval.

Nicole pointed out the information that was available at the sign-in desk, described the overall consultation process for the project's Terms of Reference, and walked participants through the agenda. Tonight's meeting focuses on evaluation criteria that will be used to select a preferred solution during the Environmental Assessment (EA) and the proposed public consultation process for the EA. Following the presentations, small groups will participate in discussions about a series of focus questions related to these two topics.

2.0 Overview Presentation: Evaluation Criteria and Consultation Approach

Evaluation Criteria

Don Gorber, SENES, outlined the purpose of the meeting, as follows:

- To provide an overview of why and how evaluation methods are used in an EA
- To present and seek feedback on the proposed approach to conducting evaluations as part of this EA
- To present and seek feedback on the proposed public consultation approach for the EA
- To learn from the public what additional information should be considered

A copy of the presentation can be found in **Appendix B** to these notes.

There are a number of other projects that are ongoing in this geographic area. This study is not being carried out in a vacuum. A great deal of information is available from these various sources that will be integrated into this study, along with the very specific information that is collected during this study. This project is on schedule, with the completion of the Terms Of Reference (TOR) expected early in 2006. Following the TOR (after its approval), the Environmental Assessment will be conducted.

Don outlined the current study goal, which is: ***“to establish and sustain the form, features and function of a natural river mouth within the context of an urban environment.”*** The words “and sustain” were added as a result of early consultation efforts. Other public feedback related to the goal and objectives was also highlighted.

For this project, there are two study areas: naturalization study area; and, flood protection study area (2 spill zone areas). There is some overlap between the two areas.

Don explained the following terms: naturalization; alternative to; alternative method; evaluation method. These terms have been described at previous meetings. Tonight's meeting focused on the terms: weighting; trade offs; criteria/criterion; indicators. An EA evaluation methodology is the procedure that will be used to establish preferences

between alternatives. Comparisons and tradeoffs, and reflection of public values are important. The process will have to be traceable, replicable and understandable.

When there are many alternatives, there are few details for each. As the number of alternatives goes down, the level of detail goes up. The methods for narrowing alternatives can be qualitative, quantitative or both. Criteria, based upon the project objectives, are measured by various indicators. Weighting is done to give an indication of differences in importance. Public input will be invited on each of these components.

A list of “alternatives to” has been developed by the project team and expanded through public input received. Currently, there are six alternatives to: do nothing; river with discharge to the inner harbour; river with discharge through the Port Lands; combination of discharge points (primary and regional flood overflow); third discharge into lake creating delta; eastern discharge point. All of these alternatives will be evaluated based upon the project objectives: naturalization; flood control; manage the operation of the river; integrate with existing infrastructure; support compatible recreational, cultural, and heritage opportunities; coordinate with other planning efforts. Only alternatives that meet all of the criteria will be carried forward.

A stepwise process of combining functions is applied to identify alternative methods. To get from the long list to the short list, those alternatives that are not “technically feasible” will be eliminated. For each project objective, criteria will be developed along with associated indicators and the weighting. Only the first two objectives will be used at this point.

Once a short list of between 5 and 10 alternative methods is established, the remaining objectives will be used to enhance the description of each alternative. The short list will then be narrowed to the preferred alternative. At this point, the alternatives to and alternative methods are in place from the short list, all project objectives and technical disciplines are addressed.

Public Consultation Approach

Nicole Swerhun introduced the public consultation approach being suggested for the EA, which follows the approval of the TOR. The approach includes a description of guiding principles, objectives, mechanisms, stakeholders and focus. Guiding principles have been identified in the Toronto Waterfront Revitalization Corporation Public Consultation Strategy. The consultation mechanisms include: open houses and workshops, site walks, a Community Liaison Committee, a Technical Advisory Committee, and a Specialist Design Workshop. These activities are in addition to ongoing activities such as the project newsletter and website updates.

Nicole outlined the key stakeholders for the project, and the timing of the consultation activities as related to the decision points. The TRCA has committed to bringing in international design expertise to look at different ideas. This will be done through a design charette.

In the next project steps of the current phase of the project, the TOR will be developed and presented to the public at Forum #2, which is being planned for November 7, 2005 (**editors note: the original date of October 25, 2005 has been changed to allow consolidation of, and meaningful attention to, all comments received on this project over the summer**). Following this public forum and the consideration of input received, it is anticipated that the TOR will be submitted to the Ministry of Environment (MOE) in December 2005.

Questions and Comments from Participants

The following statements were made and questions regarding clarification were asked. The response given by the study team follows each comment.

What is the role of the public in this process? If public values are saying that we want a natural marsh rather than economic development, will this be given additional weight in the TOR? A short statement of public guiding principles should be developed and presented within the TOR.

The public will be given the opportunity to weight the various project objectives to guide that the more important public values are reflected. Public values are also considered in developing indicators and trade-offs. An extra step should not be created for this process, especially not one that prejudices or adds another step to the overall process.

There was one point left out of alternatives to. #3 should also include a branch to the east along the ship channel.

This input was noted by the study team.

It looks like there are two months to develop the evaluation system. If alternative evaluation systems are considered, weights would not be necessary. Will you take seriously a different type of evaluation system that does not use weighting? There are other quantitative systems that should be considered.

Both qualitative and quantitative methods are being considered.

Slide 35 – is this showing the stages of the TOR?

This slide shows the EA process, which will follow the approval of the Terms of Reference.

At what point does naturalization and flood protection happen – are these two written in stone? When did this happen? Where did water quality go?

Water quality isn't an objective but rather will be used as a criteria used to evaluate or compare the various alternative methods. Water quality may fit in as one of the criterion under the objective, "support compatible recreational, cultural, and heritage opportunities."

Regarding the international design charette – a lot of charettes allow observers and/or public participants. Being inclusive is more productive. In New Orleans, some

biologists have stated that it may have been better if they would not have changed the wetlands.

The TRCA will consider how the public can be involved in the design charette.

Who is the contact for the TAC?

TRCA project staff can be contacted regarding the Technical Advisory Committee.

I am a consumer and have never been involved in any other City planning initiatives. What I heard was that there are alternatives to (5 of them), and alternative methods (i.e. fish, vegetation). What I understand is that we have very limited resources to get to where we want to go. I don't understand this.

We have a series of "alternatives to". For each of these alternatives to, we will try to visualize the function of the river (alternative methods). These will be put together into a long list. We will then determine which ones are technically feasible. To go out and do field evaluation, we need to have a reasonable sized short list. The public will be involved in determining how the lists will be evaluated and selections made. At each point, the good things will be retained. This process is meant to get from a long, unmanageable list to one that can be further evaluated.

If we are going to look at flood control, what kind of weather are we looking at?

Part of the evaluation will be to look at climate change, lake levels, etc. We are looking at Hurricane Hazel-sized storms.

The idea of the long and short lists is rubbish. There is a dam at Finch that controls the flow of the river. These lists encompass solutions for less than 1% of the Don River system. Who is going to decide what is technically feasible? It is technically feasible to do almost anything, the outcome is more related to resources. You have never talked about what is in the river. Put all of your ideas down on paper and then we will decide what will work or not. Everyone is interested in clean water in the Lake for drinking. What are you doing to clean up in the river?

There are a number of current initiatives being undertaken on the River including source water protection from the province, integrated watershed management plans, and the City's Wet Weather Flow Management Master Plan. There has and will be much consultation on all of these. This project is one piece of the overall regeneration of the Don. We would be happy to discuss any and all of these projects following the meeting.

Excellent documentation of the process. Congratulations. A number of the discussion threads need to be connected. When I read the 6 project objectives, I don't know what naturalization and the other objectives include. I request clarification on this matter (slide 21). I support the idea of some guiding principles.

On the project team, we have tried to determine which criteria fit under each objective. This is a major undertaking to develop. Public comment is critical to determining how public values will be reflected and lists will be refined. Water quality, for example, may be a key evaluation criteria that influences the selection of alternatives to and alternative methods.

I would like to propose that the EA include the north end of Riverdale Park and go to the river mouth. In our area, there has been a proposal to put tanks in the old incinerator (Dundas and Gerrard) site. Cleaning up the water is certainly an issue, but putting tanks into our community is definitely an issue. We were not consulted on the incinerator project, and we don't want to see this happen again. I'd be really concerned about the process and the timing. We want to be consulted. A wetland has been created in the north end of the park.

Maybe you can think of and propose mechanisms, in addition to what has been suggested, to ensure that the public is consulted. The project that is funded is for the naturalization of the mouth of the Don River. The Task Force asked us to consider what could be done within the channel. This is being done. The question is whether any more can be done that will not aggravate flooding. The naturalization of Riverdale Park was begun in 1991. It is not likely that we will add this area into this study.

There is an elephant in the room. It has been suggested that the Don Greenway would not undergo an environmental assessment.

(editors' note: While the Don Greenway will be planned through a separate TWRC led process, the flood management alternative that affects the Greenway will be studied through this process. –AF)

The Parks Declaration Order process is an alternative EA process that (if approved) will still involve considerable environmental studies and mandatory public consultation.

If the Don Mouth Naturalization and Port Lands Flood Protection Project EA concludes that the preferred alternative should involve discharging the river south (through what is now shown as the Don Greenway), the EA for this project over-rides the Parks Declaration Order. In other words, this EA process takes precedence.

The Parks Declaration Order is an important process enhancement if another discharge location is chosen.

4.0 Closing Remarks, Next Steps and Next Meeting

Adele Freeman thanked participants for their questions and input.

Adele announced the date of the next meeting, Public Forum #2 as October 25, 2005. **(editor's note: Please be advised that the meeting has been rescheduled and will now be held on November 7, 2005 at Metro Hall, beginning at 6:30 pm.)** All feedback will be summarized over the next week. The consulting team will then be considering all of the input received. Normally, this level of detail is not discussed in a public forum. For this project, we want to bring the best of the best and introduce new, fresh images. To date, consultation has been heavy on process, but we will move to discussing solutions during the EA.

Flooding is on everyone's mind right now. Adele offered to show participants the areas that would flood under a Hurricane Hazel type scenario.

Anyone on the mailing list will receive notice of upcoming meetings. Stakeholders were thanked and the meeting was adjourned at 9:15 p.m.

Prepared by:

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Appendix A List of Project Team Members

September 7, 2005

TRCA Project Team members

Cassandra Bach
Adele Freeman
Michelle Herzog
Deborah Martin-Downs

Consulting Team Project Team members

Paul Murray	Gartner Lee Ltd.
Don Gorber	SENES Consultants Limited
Anneliese Grieve	SENES Consultants Limited
Nicole Swerhun	facilitator
Tracey Ehl	Ehl Harrison Consulting Inc. (Meeting Notes)



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Appendix B Presentation

September 7, 2005



Don Mouth Naturalization & Port Lands Flood Protection Project

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Appendix C Workbook Summaries

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Appendix C: Workbook Summaries

1. Are you comfortable with the proposed evaluation approach? Why or why not?

Responses:

- Yes, great exercise, but we need a high profile (and weighting) for ecological functions
- No, we are not informed enough
- Should cover whole river
- Consider access to river at all points
- Commitment to giving nature priority over human needs should be more strongly stated – including natural sanctuary space
- Mostly as good an approach as any
- No, process not clearly identifying objectives
- Weighing and short listing doesn't provide an opportunity for a bigger vision
- Needs to address water quality which is not included as an objective
- Disagree with listing as an objective "integrating existing infrastructure"
- Don't like the determination of "Alternatives to" slide 21
- No – doesn't need to be complicated – presentation didn't clarify approach in "community member" language
- Preconceived notions should not be embraced prior to potential opportunities
- I am not comfortable with the proposed evaluation approach because the proposal team is already complimenting itself on all the planning done 14 years ago that may/will not work now
- The proposed evaluation approach is very good; thorough and effective
- Yes, project objectives clear, evaluation will be transparent, objective
- ToR should not screen alternatives to. Weights cannot indicate which alternative method is preferred. Effects are nonlinear and interconnected and no set of weights can really calculate the preferred alternative method.
- No, evaluation approach needs to be accountable and transparent (*note: This is a Group Comment as provided by an individual who participated in that group's discussion*)
- Weighting and mathematical evaluations can be difficult re: accountability, transparency and reasonableness in satisfying alternatives to reaching a preferred alternative (*note: This is a Group Comment as provided by an individual who participated in that group's discussion*)
- Process to date has not allowed for a public "vision" (*note: This is a Group Comment as provided by an individual who participated in that group's discussion*)
- When Vancouver evaluated their biosolids program through a master planning process the City was able to state an overall goal of 100% beneficial use and then was able to evaluate the program alternatives and implement a successful program through an investigation that did not rely on using numerical values assigned to each of the alternatives. It was an evaluation based on identification,

size and feasibility of markets, biosolids product identification and costs of program implementation. As a member of the public I was able to read the report, understand its evaluation and deem that the preferred conclusions matched the information and its evaluation. The process of not using numerical assignments and weightings is, in my opinion accountable and transparent. On the other hand Toronto's Master Planning process was based on numerical assignments and weightings. The conclusions reached have raised the spectre of a peer review process to validate both the methodology and the findings.

- At the outset the goals and objectives must fit the "vision" and must be clear in their intent so that they influence decision-making to achieve the vision.

2. Do you have any suggested edits or refinements that you feel could strengthen the approach?

Responses:

- No
- Find a way to increase interest/info
- Must have a debate/battle and vote – in paper –
- Vote for a Don Mouth ideal
- Alternatives: Contest at CTV
- Don mouth ideal by popular vote
- 1200 hectare marsh – 5,000 years old
- Factors must be weighted – can't decide without weighting options
- If weighting is to be an issue, must be fully discussed
- Clear well defined criteria
- Simple language in describing alternatives
- Make people aware of overall timetable
- Difference between consultative and evaluative approaches isn't clear enough – both seem the same
- This process is preventing a greater vision. Decompartmentalizing it doesn't take the bigger picture into concern. This is more about process than a vision.
- Precinct planning and dividing up into small areas is spoiling the unity of a greater vision
- More emphasis of function of high flow/volume urban on restoring the original 1200 ha marshland or at least as a basis for ecosystem approach or benchmark starting point for starting the process
- Address the issues of – volume of water in a storm event – water quality
- This process is not assisting in the Greater Vision. E.g. Don River mouth exiting at the Eastern portion of the Portlands – flowing to the ship channel – the opening up the fiord close to the Hearn – and exiting to the outer harbour
- We would rather see the water channel over to the ship channel and forming islands/fiords

- What are the existing pollutants and how will releasing these pollutants during 'clean up' affect community member's health?
- Healthy wetlands will help to reduce West Nile
- The volume of water in a major storm event: we could see the water channeled over to the ship channel and small islands be created beyond the opening east of the Hearn's plant
- Anything that could speed up the approach would be desirable. It seems it will take much too long.
- Language is very confusing- edit before going back to the public (suggests "alternative to" could instead be "proposed solutions", "alternative method" = "suggestions (on) ways to implement the solutions"). Hire an expert to translate technical jargon.
- Use descriptive statements to show the tradeoffs between alternative methods. Focus on tradeoffs- get public input on specific gains and losses. Ranking of alternatives should be focused on specific tradeoffs (quantify). Only rank once values are known. As much as possible, descriptive tradeoffs should lead to rankings without using a weighting system- descriptive analysis should be used for ranking without weighting calculation. Strategic management level analysis should be used to select preferred alternative based on tradeoff analysis.
- The evaluation approach needs to be made up of verbally articulated values and principles that embody a public vision. *(note: This is a group comment as provided by an individual who participated in that group's discussion)*
- The evaluation should avoid numerical evaluation as the ultimate calculation for decision-making. *(note: This is a group comment as provided by an individual who participated in that group's discussion)*
- Where are the guiding principles? *(note: This is a group comment as provided by an individual who participated in that group's discussion)*
- Is there consensus on the guiding principles, the vision, the goals and objectives? *(note: This is a group comment as provided by an individual who participated in that group's discussion)*
- To date the feeling, I believe, is that the public does not accept that the criteria for this project are sufficiently qualitative and that the criteria will lead to a conclusion that fulfills/reflects the values of the public.
- The public has stated that they want natural solutions to be preferred over hard engineering solutions. Nature is to be given priority over both "engineered" solutions and immediate human needs/political needs such as "development of the lands" for monetary gain. Environmental quality, water quality and air quality need recognizable/quantifiable criteria in the process.
- There still needs to be a consensus building of what the public values and what the public vision is for the project.
- The public needs to know the long term water quality objectives and goals.
- The public want the process to optimize natural solutions and this should be possible since most of the lands in the Portlands are public lands.
- Any process that I have been in that claims to "balance" the decision-making process tends to miss the mark. There has to be a preferential direction set

to achieve goals that set new directions for the Don Mouth and Flood Protection.

- What exactly is meant by “Flood Protection”?
- What exactly are the competing goals and objectives...the ones written in stone that will be limiting the goals and objectives of this project?
- The Sample Criteria Table just does not evaluate this project in a way that is understandable. It will not be accountable and its transparency is highly questionable.
- The idea of extending the project limits should be considered more seriously. It may be necessary to change the way the Don River transports both its sediments and trash. There may be better upstream solutions to sediment transport and trash removal.

3. What do you see as the potential challenges and opportunities that could arise through the evaluation process? What suggestions do you have to address those challenges and take advantage of the opportunities?

Responses:

- Am uncomfortable with the prospect of multiple evaluations for ecological values under the 6 project objectives. Perhaps we need a matrix of project objectives and where/how more detailed analysis will occur:

E.g.	Species	Barriers	Water Quality
Naturalization	*		
Flood Control			
Operations			
Infrastructure		*	
RCH			
Other efforts			*RAP; WWF, etc.

- Don't agree with “integrating with existing infrastructure” – review the “Don River Delta Proposal” submitted by a meeting participant – excellent concept!!!

Potential Challenges

- The relative importance of different objectives
- Reconciling people's personal agendas
- Trying to accommodate too many ideas
- Frame 21 lists an objective #4 that we do not agree with. So any sensible vision will be eliminated because it doesn't meet objective #4 - integrating with existing infrastructure
- Need to address run off water into the Don
- Objective to hold volume of water during storm event- how will that benefit water quality?
- How will these effective changes make viable solutions

- Address the railroad to ensure the continual flooding is alleviated
- Objectives not in sync with residents
- It seems like it will take forever!
- Minutia will drag the process down.
- The potential challenges are starting to finalize a process that did not have consensus at the beginning. Before it is too late there needs to be verification of the decisions in the current process.

Suggested refinements

- Weight each to represent the importance
 - 1 – 20%
 - 2 – 40%
 - 3 – 20%
 - 4 - .5%
 - 5 – 10%
 - 6 - .5%
- List of criteria very clear and comprehensive
- Distribute meeting materials ahead of time to focus discussion
- Short list good idea
- Open process to other visions
- Listen to the residents not the developers!
- It is important that residents can get to the river. Canoe on the River, kayak on the River, enjoy the River as part of their community
- Provide meeting material prior to meeting for attendees to review – 2 ½ hours of dissertations by facilitators is too much!
- Include the recommendations of residents and those who are likely to face the consequences of bad decisions made by those not familiar with the area
- Use as much existing data and research as possible. Allow the EA to make conclusions based on reasonable, expert, commonly accepted scientific knowledge
- Keep discussion high, use pictures
- You can probably get good agreement on value statements
- The evaluation process must end up with conclusions that are not manipulated. The Task Force 2010 Report manipulates “good public input and intentions” by reaching a conclusion that its goal is 100% diversion from landfill by 2010. The operative word manipulation is the use of “landfill” rather than “disposal” which leads not to increased diversion through 3Rs and composting but, in practice, could substitute one disposal technology for another like incineration for landfill. This is manipulative since the public input placed an emphasis on the 3Rs and composting over disposal.
- The evaluation process used in the Wet Weather Flow Management Master Plan did not put a great deal of emphasis or funding allocation to the reduction of water quantity or quality through source control implementation. Rather than emphasizing source control evaluation and implementation over “in pipe” and “end of pipe” controls the WWFMMP stated once solutions were

The Don Delta Reformation Project.

By Terry Fahey

An Ecosystem Approach to Planning:

The regulatory bodies and the E.A. process should get on board with an eco-system approach to planning and development. Planners and the development community would welcome a broader set of full-proof innovative ideas such as those found in "Waterfront Precedents". Once approved, this expanded repertoire of possibilities would greatly enhance development/environmental opportunities not just here, in the West Donlands, but throughout the Toronto waterfront.

Visioning and Ecological Restoration:

It must be stressed that most of these publicly owned lands remain in the river domain and are subject to the same flood/silt delta forming conditions albeit accelerated by watershed urbanization, are never the less, appropriate to river valleys and river mouths. It is these present conditions coupled with the past history "the bay and neighboring marshes were "the hitherto un-invaded haunts of immense convoys of wild fowl" Joseph Bouchette upon entering the harbour in 1793. "At 8 this dark evening we went in a boat to see salmon speared. the blaze of light from the torches attracts the fish" Mrs. Simcoe November 1st,1793. together with numerous stories ,place names and other references that provide us with an original sense of place.

"In restoration the past becomes the basis for setting forth our best judgment about the present and in this respect will influence how in the future we will adjudicate our actions." Eric Higg, *Nature by Design: people, natural processes and ecological design*, 2003. Environmental restorationists see a better past alongside a worse present, but with a hopeful future. Publicly owned lands, on the waterfront at the mouth of a silt laden river holds great potential. With this in mind I remain hopeful that we are still in a visioning process, and that planning would welcome, remain fluid and responsive to new ideas during the long process of transformation. A successful vision is imminent, its soul is derived from place. A comprehensive vision integral to place can fire peoples' imagination...Imaginative ideas that fit with place should also be allowed to contribute, and even challenge the master-plan. At the very least be openly reviewed and discussed. These valley/delta lands have great restorative potential. Good government would place high value on this potential and facilitate a place-based visioning process, be guardians that intervene when

needed to temper market driven forces, and the development for profit planning focus that currently prevails on the waterfront. A vision for our waterfront that is steeped in both natural and human history is place-derived and water-focused and respectful of the prevailing forces of nature is entirely relevant and needs shepherding through the process. Sadly it has been my experience that the stakeholder disseminated public information sessions were designed, perhaps by intent to prevent the surfacing of any meaningful and creative place-based visions.

The health of the natural environment is critical to our quality of life. This should be a priority in matters of planning and urban development.

Revitalization:

The operative word in T.W.R.C. is revitalization, which means to give new life or energy to somebody or something. The word has I believe been appropriated largely for economic development purposes by the Corporation. Its thinking focuses on the economic re-development of our waterfront with an efficient business plan strategy that retrofits re-development into an existing grid pattern of infrastructure built on lands claimed from the lake and the former Don delta/marsh. This focus is on economic revitalization but I believe that the focus should be equally on the natural environment.

The meaning of Revitalization should be equally attached to eco-systems and watersheds, in our quest for waterfront revitalization. to accommodate and restore natural features and at our waterfront might enhance urban development Revitalization in my mind also means giving new life to the natural environment and in particular the main features that gave rise to Toronto in the first place. Revitalization evokes word Implied in the name Urban revitalization cannot be achieved Toronto's Waterfront Revitalization Corporation I subscribe to the notion that ecological restoration will become paramount to heal the wounds of urban growth on the natural environment predict that future generations

What is revitalization and what are we are trying to revitalize? Fitting urban development into restored eco-systems is what it means to me.

2. Principles of Design:
feng shui

The Don Delta:

A delta is where a river reaches its receiving lake and branches out rather like the roots of an oak tree as its energy dissipates through wetlands. If dredging activities were to cease at the Don mouth a delta reformation would

occur over time. The waters would rise and wash over the filled lands of the historic marsh and become marsh/wetland once more. In an eco-system approach to planning and development a delta with a functionally restored wetland is an appropriate land use here at the Don-mouth. Deltas by their very nature are expansive. The surface area requirements for a functionally restored delta/wetland in the basin of this now urbanized watershed would be at least as large as the historic Delta-marsh. Despite the large spacial demands of a restored delta/marsh, a delta-wetland marsh is as valid a land use as other urban land uses. What should be revitalized? Which would be a more appropriate land use, a parkland/sports field that includes a token delta or a functioning in-situ delta/marsh? Despite dredging on an annual basis to maintain a channel that conveys the river to the lake, these lands are still subject to periodic flooding. In the proposal they are sustained artificially by an expensive flood protection feature (berm) and costly annual dredging.

Could an expansive delta/marsh concept also accommodate passive recreational activities and related development opportunities?

What sort of development opportunities might border the delta?

Would the delta concept enhance opportunities for water quality improvements in the bay?

The Don Delta Reformation Project. How could this be realized?

Just where and how would these displaced recreational and development opportunities present themselves in a broader waterfront context is I believe, very much contingent on a broader vision question of the portlands?

The West Donlands

The location and the type of flood protection feature has been somehow decided to maximize development potential at the expense of the environment and this happened prior to the environmental assessment. How can this be seen as an ecosystem approach to planning and development? How do we balance the needs of the urban environment and the natural world? Where do we end the city and begin the natural world? Where do we draw the border between the built city and the natural world? At what point does development become encroachment?

An eco-system approach to planning and development would validate the E.A. process. An eco-system approach would provide a measure of integrity to the decision making process. It would make us immediately accountable for our actions.

The slopes that fall in a gentle sweep to the river in the lower Don are a landscape now obliterated by years of filling. Fill the natural landscape trivializes leaving concerns for urban planning the natural environment to others.

As demonstrated in the recent plans for The Lower Don/ West Don Community the elevated flood protection feature was the best option tabled for the planners to integrate with denies any meaningful connection with the river. because that was the favoured option will be r is hopelessly flawed which is in my and not thenatural en away from the natural environment and attached it to a rather aggressive model of urban development The Corporation's current plans have in my opinion not paid enough attention to details, such as the type of flood as appropriate distance, type of edge, flood wall integration with development and many other not presented options the appro of the urban/natural environment interface.

The how, what, where, when, and why exclude and further obliterate at least two important and unique natural features and functions that currently or potentially still exist on our waterfront. The Toronto shoreline is at the terminal confluence of two littoral zones. "A River that is continuously making a delta, and waves that are continuously making a sandbar." The "Toronto formation," began when present lake levels stabilized about 5000bp, when an emerging delta deflected a west bound sandbar to form a continuously building and recurring sand spit. This formation, "the peninsula" as it was called in the Simcoe's day contained a large bay, that afforded a natural harbour and a river delta with extensive marshes. Bouchett and simcoe quotes) These descriptions, low sand peninsula shelteringed bay and marsh are the origins our place. A place-based vision would begin by understanding These two forces are the basis of a visioning exercise that might re-orient our thinking on planning and development on the Toronto waterfront, and allow us to appropriately be more water-focused. ha. are the Applying an eco-system approach to planning and development might benefit the visioning process on our Toronto waterfront. in the proposed development plans for the West Donlands and the adjacent Don mouth lands raises some interesting questions about development in general, on the flood prone lands of the Toronto waterfront. Reclamation of flood plain lands for Urban Development...How mu

The " Lower Don River West Remedial Flood Protection Project" as described in the E.A. document, "The berm" is taking lands belonging appropriately in the riparian zone, and re-claiming them for urban development. The berm is a compacted, impermeable, valley filling, water- displacing feature, with the same impacts as urban development has on the natural environment. The berm is urban development and its close proximity to the river displaces space that more appropriately and beneficially should remain in the rivers domain.

It is the historic filling of valley lands coupled with the flow obstructing rail embankment that is the root cause of the enlarged flood spillway/zone.

Who has been given the authority to remove these lands from the river domain and re-assign them to urban development? In my opinion these plans constitute a grievous encroachment on the natural environment. Valley-land fillings such as this coupled with other obstructions (bridges abutments) contribute to and are perhaps the leading cause of upstream flooding. The berm compromises the river-valleys capacity to deal with floodwater. Placing a berm in this section of the river where the valley narrows... re-enforces a severe bottleneck situation that restricts flow in the worst possible place, near the bottom of an increasing urbanized watershed. Ecologically, concentrating flow at a point where the river naturally begins to widen and disperse flow makes no sense. Defusing force is a good strategy that requires space. Backing off the urban development and supporting berm away from the river and incorporating them into the higher reaches of the floodplain would free space appropriate to river valleys and serve to increase the valleys flow and storage capacity. Backing away and perching the development potential for increases ing flows and storage capacityhas a muchi and incorpating them into the development Decreasing the bottleneck would remediationq does not remediate upstream flooding. It s will aggravate this decreasing the lower river valleys flood-water capacity potential. to waters abilitys . The proposed berm severely diminishes any serious attempts at improving the natural environment in this section of the river. Once implemented these plans will almost certainly have a negative and irrevocable impact on the potential for a grand delta /marsh vision that might benefit future generations. act to stifle or to approximate a reclamation of historic delta/marsh conditions in the future. While the T.R.C. and the E.A. document acknowledges these historic conditions and places high values on watershed conservation and environmental protection, I fail to see how these resultant plans are equitable to the river environment and how they might contribute to our quality of life in any meaningful way. These plans are short-sighted and also fail to the anticipate the needs of future generations. With deltas, size matters re plan that satisfys in my mind size and design solution to this encroachmentwas felt that existing cost and space constraints precluded any further considerations to re-create historic conditions. Despite the high values ascribed to natural environment in the E.A. processas set out in the precinct planning principles development for I should thin for delta reclamation and other restorative iniatives appropriate to rivers.ariverine t future attempts for d to dis to be locatedin the lowhBecause size is important This encroachment diminishes the potential for any meaningful restoration initiatives appropriate to river valley mouths ie. deltas the lower Don/ Don-mouth, and therefore impacts negatively on future generations. The close proximity of your prescribed flood protection footprint, 40m from river edge further constricts flood-water flows in an already exceedingly narrow section of the river. This valley filling earth structure or berm displaces the potential for valuable river functions ie. Post flood water detention/storage and water cleaning mof this valley filling earth structure that creates yet another barrier to the rivers edge seems to fly in the face of The Official Plan's 'ecosystem approach to

planning and development" statement. It also misses a great opportunity for a fresh, innovative vision for a river- focused community.

Precinct planning has a development focused land use agenda that confounds the meaning of place by dividing areas bound by the same environmental conditions. This "maximize development " focus competes directly for the same space that the river wants to form a delta in. It is well documented that wetland/ marshes have remarkable water cleaning ability's. and that If a new delta were allowed to form it would greatly enhance opportunities for water quality improvements to the bay. To be effective this delta would require an area of large expanse and be part of a larger Don watershed management strategy. A new delta formation would in several years reclaim these lands for itself, if dredging activities were to be suspended in the Keating channel. flood/silt washes over the land would result in a new delta formation. This large expansive raised delta/marsh reformation would be contained by a low dam topped with a ring-road with built -in spillways (water level control features) that satisfy both up stream flood safety concerns and water quality initiatives for the Toronto Bay. This plan if implement might require expropriation of some riverside lands in the West Donlands for delta reclamation. Recognizing that clean water is a quality of life imperative. and that if our visionWe must to realize a grand vision... the reclamation of an expansive delta/marsh vision that fits with place, has integrity and for-sight and is somewhat open-ended, should guide and give essential direction on planning matters, such as , where and when to proceed or defer on a project by project basis. Precinct planning complicates the process, by dividing areas bound by the same conditions and is meaningless and contrary in a grand visioning exercise. therefore even if its left for future generations to decide. A proper vision, will allow us to re-focus, simplify problems formally considered complex, and move forward with a solid plan of action. Obstacles such as sedimentation, flooding, roads and express-ways, true costs etc, would all be brought into a new perspective... and have new determinations.

The criteria for flood protection is hopelessly restrictive and has in my opinion not been open and friendly to other ideas. Ideas that with a little tweeking might satisfy the criteria and result in much enhanced connections with the river.

I realize that caution must prevail in matters of public safety and that moving existing barriers to the river edge are costly and that sooner or later planning must stop, and development must begin. However

But please excuse my indulgences. I want to know if the plans below have any validity in plans for the West Donlands? I welcome your comments and suggestions.

Water is a significant feature magnified many times especially when it affords a welcomed break to the urban context. " Land along the waters edge must be preserved for common use. Roads, which destroy the waters edge must be kept back from it, and only allowed near it when they lie at right angles to it. When natural bodies of water occur near human settlement treat them with great respect. Always preserve a belt of common land immediately beside the water and allow dense settlement to come right down to the water only at infrequent intervals along the water edge." A Pattern Language Christopher Alexander

Therefore, plans for this riverside community, if they are truly place-based, would strive to enhance a river focus, to facilitate meaningful connections and engage more fully in river related activities. It is these experience that are tantamount to the quality of life. A river-based place is a key ingredient missing in the current plans for the West Donlands.

Ideas that change our course of directionnerations to come. The net result of the proposed Flood Protection Project in combination with the precinct plan shows little regard for the river's special needs. In my mind there is a potential to co-exist or even co-habit with a functioning eco-system.

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The role of the TRCA:

I was always under the impression that the T.R.C.A.'s role was to protect, when possible, regulatory floodplains from encroachment, and to be guardians of these lands, not brokers for development. The question in my mind is how did we arrive at this scheme to commandeer so completely this place, this floodplain/valley and hand it over to urban development? Intensification? Brownfields? Remediation? Urban renewal? Flood Protection Feature?

Who then will stand on guard and protect and champion natural functions of rivers valleys and eco-systems and the mutually shared quality of life. On one side we have the development- driven stakeholders, armed with a legion of planners, architects and engineers. They have in effect declared war on the natural environment, and are poised to take control of the river lands on the west Don. They are prepared to ignore natural and historic functions to benefit urban development.

It would appear that we have here is a business plan without a clear overall vision.

An Ecosystem Approach not a Berm:

The Don River deserves to be more than a ditch. River valleys should store water not earth. The river needs to expand periodically.

The berm won't stop flooding. The berm will mainly stop floods from the Don River but will not prevent flooding from local sources and in fact may aggravate the problem. During average storm events 95% of flooding is from local sources. It is only during catastrophic storm events that the Don rises and contributes to local flooding.

The function of valleys is in part to direct flow and to store water in storm events. Therefore we need a design that creates a synergy between the river's need to expand (dynamic force) with the city's need to develop (static force). The design needs to accommodate the ebb and flow of the river and the city needs to respect this ebb and flow. After all, it is the city that is encroaching in the river valley's domain.

We need to find ways of removing barriers to the water's edge. We must be careful not to add more barriers in our visioning. Just where should the edge between the river domain and the urban domain be? It should be determined by

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the river's need to expand with our own needs for housing, employment and recreation. The location and type of edge needs careful thought.

In an ecosystem approach we might expect to see dykes, walls and pylon/slab construction versus earth structures/barriers. I would like to see these alternatives explored. Where you position the dykes/walls and the amount of floodplain creates different options.

By placing the barrier you create an edge that on one side is urban environment and on the other side the natural environment.

An Ecosystem Approach to Flooding:

From a quality of life perspective reclamation of land in a river flood plain for a meadow/marsh is as appropriate and as valid as reclamation of land for urban development.

Despite their current filled state, these lands are subject to periodic flooding and are therefore correctly identified as flood plain/hazard lands. It could, without much of a stretch, be argued that from an ecological perspective, these lands have, at least in part, the potential to be functionally restored and be part of a plan that would appropriately connect severely fragmented riverine ecosystems in the lower Don.

Should this not be a priority in our open space initiatives? These lands are still in the river's domain. Is not riverine reclamation on equal footing with reclamation of lands for urban development?

Restoring the historic river valley profile would also meet wet weather flow objectives and at the same time would provide place-based recreation and wildlife habitat opportunities.

A Sense of Place:

I find it strange that your reference to a compelling sense of place, of an extensive delta/marsh and of waters that had once soaked into the ground and ran through grassy fields is ignored in the EA response.

"The view from the old trestle work bridge was very picturesque, especially when the forest, which clothed the banks of the ravine on the right and left, wore tints of Autumn. Northward while many fine Elms would be towering up from the land on a level with the river, the bold hills above them and beyond were covered with lofty pines. Southward in the distance was a great stretch of marsh with the blue lake along the horizon. In the summer this marsh was one vast jungle of tall flags and reeds where would be found the

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conical huts of the muskrat, and where would be heard at certain seasons the peculiar gulp of the Bittern. In winter when there was material for a magnificent pyrotechnical display, which usually once a year came off, affording at night to the people of the town a spectacle not to be condemned." Dr. Scadding, from Toronto of Old.

These are powerful images that provide a much-needed context. If we are to proceed with a whole vision WE NEED A SENSE OF PLACE. The river and its delta should be premiered as a magnificent feature in a defined riparian realm within the city.

"In deciding to base the new colony on a Cartesian grid of settlement roads built deep in the wilderness—beginning with Yonge Street, miles away from the lake – the British instantly negated the water-focused, organic Toronto of the Indians and French, replacing that small but real place with an orderly instrument of Imperial policy." John Barber, Jan. 8, 2001.

The proposed plan marches the Cartesian grid of a city out onto flood plain lands thereby further negating the historic meadows and delta marsh. This is not acting in the best interests of the natural environment or the historic sense of place. An eco-system approach would recognize the importance of river functions and place a natural environment designation that restricts the size and type of urban growth/encroachment. An environmental approach helps us make friendlier connections with the natural world and allows urban designers to create a dramatic interface between the built and natural worlds.

The development should acknowledge place. That place happens to be meadow/marsh subject to flooding historically. Development should acknowledge and orient to the historic features of place, in this case, buried streams and marshes. It is because of the marsh that King St. detours northeast off the grid to meet Queen St. before crossing the Don River. What is the relevance of these former streams and marshes in the development plans? Development should align and front on the edge of the former streams and marshes.

An Ecosystem Approach to the Delta:

"Rivers make deltas." The Nature of Economies, Jane Jacobs, 2000. This is a universal truth not to be trivialized by a token gesture, or commodified and warehoused like some end product.

Deltas are by nature, expansive, ever changing and fecund with life. They are truly part of the natural world. They have large space demands and at this juncture in place and time we have the opportunity to realize a full commitment

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to a bold vision, a vision that places the natural world, with a real functioning delta, in our urban midst.

Dredging is a cost without benefits. This proposal requires the continued removal, transport and perpetual dredging, at \$800,000/year, for the purpose of maintaining the existing infrastructure. In fact, the E.A. does not address the long-term impact of dredging. The process did not conceive of the total restoration of a naturally functioning delta as a viable alternative.

If our plans are contingent on dredging for example, what is the legacy to our children? Is it a benefit or a liability? What is the long-term social / economic /environmental impact of dredging the delta, and transporting it to the recipient site (C cell)? What happens in 50 years when C cell is full? What are the cost benefits of maintaining the road/rail infrastructure in the flood plain? How does the unresolved dredging problem impact on the flood protection plans for the West Donlands and other precinct planning districts? Without a clear vision, these questions will go unanswered. After all, it is urban development that is being imposed on a river delta and despite the extensive filling over the years these lands are still subject to flooding. Sedimentation and flooding are natural processes/functions of rivers and deltas. On the surface, it easy to see why flood/marsh lands was historically not valued in an urban context. In an eco-system approach these values would have necessarily been brought forward through the entire E.A. process.

Restoration of the former delta/floodplain should also be given consideration in light of the history and the sense of place it provides. The concept of a restored delta cannot and should not be ignored in the development plans for the Lower Don and West Donlands.

Restoring the delta marshes is a bold plan that doesn't deny. It embraces the problems. It turns liabilities into assets. What if you stopped dredging the Keating Channel? The sediment would clog the river channel and the Keating Channel. The waters would rise flooding adjacent lands, the Bayview Extension, and the north /south railway tracks, resulting in a raised delta marsh, an alluvial formation. This would be in conjunction with improved management of the upstream watershed to slow sediments. The infrastructure of road/rail can be placed on the east side of the river and tunneled or elevated. The delta marsh becomes the template or setting for the new urban design that embraces it.

The present delta proposal does not go far enough. It is a small token of its former stature. The delta needs to be restored to its original size and function. The decision on the delta impacts the planning for all the other precinct areas. It is essential that it be examined carefully.

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An Ecosystem–Based Vision:

This area represents the bottom of our water/sewer shed. This is where the sewer system levels out. During larger storm events sewers can overflow and cause local flooding. Therefore these bottomlands have a higher frequency risk of flooding. Therefore the rules of engagement for new development in flood prone areas must consider these:

1. All proposed development is removed from the threat of flooding by being elevated. Flood proof the structures and development not the land. Distancing the structures from the potential of flooding broadens the choice of design options.
2. The pattern and layout of proposed development not to be arranged on the city grid but rather clustered onto islands and aligned to front on water-course edges.
3. To preserve views and respect local landscapes building heights must be low in bottom lands, generally 1 1/2 story or cottage height. Exceptions would only be at the center of a cluster of structures where building heights would not exceed 4 stories. The edges of the bottomlands could accommodate 4 –6 story heights. Generally, the higher the land, the taller the buildings in the cluster. Low land = low buildings. High land = taller buildings.
4. "Poles in the Water:" Use flood proof structures built on stilts and pylons in the floodplain. Contrary to popular belief "Toronto" means "poles in the water" not "meeting place." The reference may technically be to Lake Simcoe, where the poles in the water for fishing nets represented the beginning of the trail to Toronto, but it seems the perfect analogy to apply to building in the flood plain.
5. Islands in the Don: Have development clustered into islands in the flood plain. The floodplain extends west almost to Cherry St. where a dyke at the west side controls the flood waters and directs the overflow water through to the RCYC slip into the harbour. Within the floodplain are clusters of built environment on islands or alternatively flanking channels.
6. A dyke wall with a pedestrian promenade borders and contains the flood plain / commons to the east. The built environment is elevated above the floodplain to the west.

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7. The Flood Plain as The Commons:

The Commons would be low to the river and have a water focus. "We must build landscapes that heal, connect and empower, that make intelligible our relations with each other and the natural world." Alex Wilson, *The Culture of Nature*, 1991. And so, here in the Commons, we find a broad expanse of river flats where the seasonal fluctuations can be seen and observed and synchronized with seasonal flow of human activities. Pond hockey in the winter, migrating birds in spring and fall on ephemeral pools and soccer fields in summer.

8. Venice-like canals and dry-land channels to accommodate and direct flood/storm waters with bridges and boardwalks connecting the islands.

Summary:

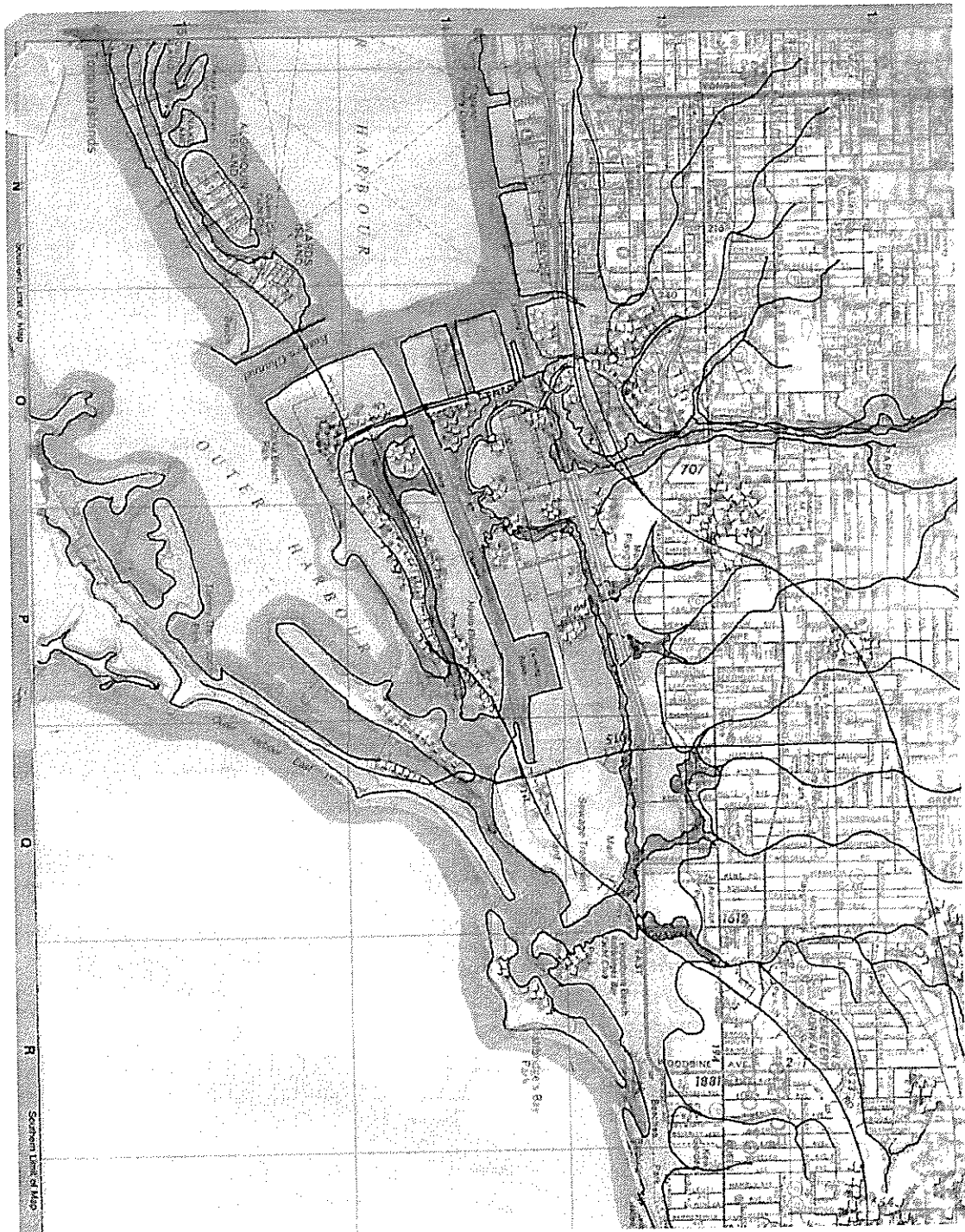
"Human beings exist wholly within nature as part of natural order in every respect." Jane Jacobs, *The Nature of Economies*, 2000

Where is the legislation to protect this land? Would incorporating an ecosystem approach to planning and development into the regulatory acts prevent these injustices? Would the process have a more sensitive, caring, and humane outcome? Would it encourage greater latitude for creative response at the urban/wilderness interface? For example, accessing global precedents for flood protection might yield a wealth of acceptable solutions resulting in a much-enhanced design. A design that respectfully connects the community to the natural world of the river at its doorstep. Any universal traveler would scoff at these proposed plans. Seemingly, the regulatory bodies that control the act are not obliged to import ideas from a broader range of waterfront and water-edge precedents. These ideas should be given consideration particularly in urban areas where open space and space for nature are at a premium. Perhaps the regulatory bodies are complacent and bogged down in a parochial quagmire, or in a slough of despond.

Visioning for the Lower Don, the West Donlands and the Waterfront should be seen as a whole not as individual separate precincts. For planning purposes the area should be considered as a whole not as unique small sections adjacent to each other.

Finally, I implore you to consider an ecosystem approach to planning and to respect the sense of place. You need a vision that inspires people's imaginations and passion

Appendix 1 - The Don River Delta



The delta itself would be raised approximately 1 m above lake level, and would store sediments and form a marsh. Water would circulate slowly through this area and exit via the proposed spillway at Keating Channel.

Special features would include boardwalks, interpretative / viewing huts, muscrats, blue flags, biterns and nagging redwing black birds. During storm events the spillway level would be lowered, and other spillways could also be opened.