



Tom McDonnell

Manager, Planning and Development

Ontario Place Redevelopment Secretariat, Ministry of Infrastructure

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September 2nd, 2023

Isabel Fleisher

National Manager of Water Monitoring Programs

Swim Drink Fish

600 Bay Street

Toronto, ON M5G1M6

RE: Commenting on the Ontario Place Redevelopment Project Ministry of Infrastructure Category C Public Work Class Environmental Assessment.

Dear Tom McDonnell,

Swim Drink Fish has a long-standing interest in the Ontario Place redevelopment project. We've attended all engagement events and given comments throughout the project. We have advocated for a swimmable Ontario Place since we started our water monitoring work there in 2019.

Swim Drink Fish's comment on the project's Environmental Assessment is consistent with our position outlined thus far: Ontario Place should provide suitable access to swimmable waters. 'Swimmable' waters are waters clean enough to touch without risking illness and where sewage and stormwater pipes near the waters are controlled. Swimmable waters in Toronto have rarely been prioritized; the freshwater capital of the Great Lakes has only 11 public beaches where water quality is monitored and reported. The current project has an opportunity to support swimmable waters in Toronto and respond to the public desire to do so here.

Swim Drink Fish looks forward to helping the MOI promote a swimmable, drinkable, fishable Lake Ontario.

Sincerely,

A handwritten signature in black ink, appearing to read "Isabel Fleisher".

Isabel Fleisher (National Manager of Water Monitoring Programs)

Swim Drink Fish Canada

Swim Drink Fish Canada (formally Lake Ontario Waterkeeper) appreciates the opportunity to submit these comments on the Ontario Place Redevelopment Project Ministry of Infrastructure Category C Public Work Class Environmental Assessment.

Swim Drink Fish is a not-for-profit organization working to connect people to and protect Lake Ontario's shoreline since 2001. We have been routinely monitoring Toronto's waterfront with volunteers and staff since 2016 and monitoring the waters at Ontario Place since 2019 to support the growing number of recreational water users at the site. Our work has animated Toronto's shoreline and brought our residents back to our water's edge because we all deserve access to clean, swimmable waters.

General Comments:

While we support many of the updates and comments made in the environmental assessment (EA) concerning the on-land developments and animation of spaces that may connect people to the water's edge, we believe that the Lake Ontario waters and the request from the public to access these waters were not sufficiently addressed and evaluated as part of the EA.

Throughout all engagement events for the project, overwhelming feedback requesting access to the water for swimming was delivered to the proponent. Yet, the final draft of the EA does not reflect the public feedback adequately. Where it does incorporate public feedback to create access, it does not address water quality concerns that may arise due to this project or assess how current water quality may support access to swimmable water.

Swim Drink Fish continues its call to the Proponent to adequately address the interest from the public for swimmable waters in this project. We request that the proponent fully assess where access to the water is feasible on the East island, and/or give sufficient evidence of why access is not possible across the site beyond the small beach at Brigantine Cove. We suggest that additional infrastructure be built to support access to water for primary and secondary contact recreational water use activities where feasible across the project site.

We request that the proponent completes a detailed study of Lake Ontario as part of the current work to accurately assess the full suite of project impacts on the water. To not assess the site's surrounding water quality (within the site property and LSA) is to not value our waters, and grossly undermines the site's potential.

Ontario Place wasn't built at the lake's edge; it was built *in* it. Ontario Place is meant to allow Ontarians to experience our lake. Not deeply incorporating the lake into this design does not support the public interest, and does not support the well-being of our waters.

Detailed Comments

1. The EA fails to demonstrate that it has reasonably and sufficiently attempted to incorporate public feedback regarding access to the lake for swimming across the site.

- 1.1. The EA fails to demonstrate that it has reasonably tried to incorporate public feedback regarding access to the lake for swimming across the site. Throughout all public engagement events, feedback is given from the public requesting increased access to the water for swimming (Table 6-6, 6-7) in multiple areas of the site. Despite this, the EA fails to demonstrate that it has sufficiently evaluated alternatives that would support public feedback. Instead, the EA repeatedly states in response to this feedback that “Limited suitable locations for swimming exist on the East Island. As part of the overall Ontario Place redevelopment, a publicly accessible swimming beach will be provided on the West Island.” (pg.6-40,6-46). This response does not demonstrate due diligence in attempting to incorporate public feedback. The West Island is not part of the public realm this EA was created for, is outside of the site boundary, and is not a sufficient means for incorporating public feedback into the public works project.
- 1.2. The EA fails to provide a reasonable explanation between the information presented and the conclusions drawn. Only one comment in the EA infers that consideration was given to swimming. The EA states in response to the Zone 1 feedback: “Due to wave action, this area is not safe for swimming.” (pg. 6-40). This is not a sufficient or reasonable justification for not further exploring the potential for swimming in Zone 1. There is no information on how this evaluation was made, nor is this a reasonable evaluation of potential hazards for a swimming location as potentially alluded to on pg. 4-3, where it is noted that the area is unsuitable for swimming due to ‘safety concerns.’ Hazardous wave action is infrequent, especially during the summer months.

Waves on lakes are caused by storm surges and seiches¹ and occur infrequently in this area, as is demonstrated by our monitoring work in the region that infrequently sees hazardous waves (waves >3m). Large waves are more frequent in the fall/winter² and rarely observed during summer.

- 1.3. Where feedback is incorporated in ‘Zone 3: Brigantine Cove’, to provide a small beach with access to the water for swimming, there is insufficient evidence that swimming is feasible at the site.
- 1.3.1. The EA fails to demonstrate that it has evaluated water quality at this site that would make it useable for primary recreational water use without posing a serious threat to water user's health.

1

<https://www.michiganseagrant.org/lessons/lessons/by-broad-concept/earth-science/surges-and-seiches-2/>

² <https://www.swimdrinkfish.ca/opendata>

- 1.3.2. The EA fails to demonstrate that the Brigantine Cove beach will not cause harm to the proposed nearby wetland - a concern addressed through indigenous feedback that suggests “Concerns about the impact of the beach on wildlife and wildlife habitat” (Table 6-3, pg. 6-19)

2. The EA fails to demonstrate that it has reasonably considered public feedback regarding access to water for secondary recreational purposes (e.g. boating, paddling)

- 2.1. The EA does consider additional boat launch sites for Canoes and Kayaks. We suggest additional boat launch sites for non-motorized boats be considered across zones. We strongly suggest that additional boat launches be considered off Zone 4: Mainland to make access to water easily accessible from mainland parking locations.

3. The EA fails to demonstrate that it has sufficiently assessed the full suite of potential impacts on water, fish, and fish habitat at the site.

- 3.1. The water surrounding the east island is part of the project property and within the defined project boundaries (1.1.1.5). The EA states that ‘A detailed assessment of Lake Ontario was not undertaken as part of this study’ (3-15) and that “Project activities are not considered to be a prescribed threat specific to this vulnerable zone other than potentially during construction’ (3-16). The EA does not do its due diligence in demonstrating why project activities are not considered a threat. This undermines known water quality concerns regarding sewage (3.1.1.) and further supports our concerns that access to water for swimming was not sufficiently evaluated as part of this project.

- 3.1.1. The EA does not address the potential impact that the three nearby combined sewer outfalls within the local site area may have on the water quality once this project is underway and the mainland sewage system is put under additional strain. The EA suggests to “add a new centralized sewer pumping station on the East Island to collect and pump sewage to the municipal sewer network on the Mainland” (pg. 3-28).

The EA does address that these combined sewers exist and discharge water into the lake (pg.3-16), but does not address the potential impact that the project may have on overwhelming the combined sewer system by adding additional load to it, as is a known cause of overflow events³. Adding load to the aging infrastructure may cause the system to be over capacity, as the pipes may not support the increased volume of wastewater from higher site usage on the East Island.

³ Pg. 4-12, <https://vancouver.ca/files/cov/csa-foundations-summary-report.pdf>

It is known that at least one of the nearby combined sewer outfalls has caused poor water quality at the site⁴ during construction activities, and with additional stress on the system as a result of this project, the number of overflow events may increase. Combined Sewer overflow events are known to have a deleterious effect on water quality. Overflow events have been demonstrated to cause fish death⁵. Omitting an assessment of the impact of combined sewer overflows on the site and nearby waters does not comply with the Fisheries Act Regulation 34.4.

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<https://www.cbc.ca/news/canada/toronto/stuff-we-flush-down-the-toilet-ending-up-in-toronto-harbour-environmental-group-warns-1.6558692>

⁵ <https://www.riverkeeper.org/blogs/water-quality-blogs/nyc-sewage-overflows-kill-thousands-fish/>