



BUILDING A GREATER GTA
Building Industry and Land
Development Association

February 16, 2011

Regional Municipality of York
Corporate Services Department
York Region Administration Building
17250 Yonge Street, 4th Floor
Newmarket, ON
L3Y 6Z1

Attention: Mr. Denis Kelly, Regional Clerk
Via Email: regionalclerk@york.ca

RE: Inflow and Infiltration Reduction Strategy

The Building Industry and Land Development Association (BILD) is in receipt of the Environmental Services Committee Staff Report for the Inflow and Infiltration Reduction Strategy, dated February 9, 2011 ("the Strategy") and we submit the following comments for your consideration at the February 17th York Region Council meeting:

We appreciate that York Region Staff provided consultation with the BILD York Chapter on October 15th. At this meeting, we were introduced to the Strategy with the understanding that the associated criteria standards would be held in draft form until the Strategy was adopted by the Region and the Ministry of the Environment. Subsequent to this adoption, York Region Staff confirmed that they would consult with the industry on an on-going basis to complete the associated standards.

It has been brought to BILD's attention that these draft standards have been applied to development applications in advance of consultation and formal adoption. BILD considers this unacceptable and strongly advises against this action.

BILD recognizes that this strategy needs to address faults in the existing system and confirm we are implementing new works in an acceptable fashion. BILD recommends that the proposed changes need to focus on correcting faults and completing maintenance in existing systems rather than on radical changes in commissioning standards. In detail, BILD is concerned that the Strategy proposes exorbitant testing which will add unnecessary costs to applicants and delay project schedules. We believe the proposed methodologies will not serve to achieve any additional soundness to the infrastructure. Furthermore, our members strongly believe that the new systems being installed are adequately tested using innovative technologies to ensure environmental protection and sustainability.

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Additionally, BILD is concerned that York Region Development Charges will include repairs to existing systems and we strongly advise against this. We confirm that growth must pay its fair share, but in this instance BILD is concerned that growth will also be paying for historic oversight and maintenance.

BILD suggests that York Region monitor during the construction period to obtain sufficient data that may support an alternative course of action. We understand that the *Greater Toronto Sewer and Watermain Contractor Association* has requested video examples of the suggested problems, and we reiterate this request for information. BILD in collaboration with the *Greater Toronto Sewer and Watermain Construction Association* would like to formally request a meeting with Region Staff for the proposed standards.

We trust that you will take our comments into advisement.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Danielle Chin'.

Danielle Chin, *BURPI*
Municipal Government Advisor

cc: *Erin Mahoney, Commissioner, Environmental Services, York Region*
Daniel Kostopoulos, Director, Capital Planning and Delivery, York Region
Mike Rabeau, Manager, Infrastructure and Business Management, York Region
BILD York Chapter Members
Paula Tenuta, Vice President (Acting), Policy and Government Relations, BILD
Joseph Accardi, P.Eng., Executive Director, GTSWCA