

June 27, 2023

Re: Item 7.2 – Stormwater Funding Review

Dear Members of the General Issues Committee,

As President & CEO of the Hamilton Chamber of Commerce, Hamilton's oldest institution at 177 years old, I have the privilege of speaking for our 1,000+ members that employ over 75,000 people in our community. Following consultation with several of Hamilton's largest employers that will be significantly impacted by the forthcoming changes, the Chamber would like to take this opportunity to provide feedback on the Stormwater Funding Review as well as the proposed Stormwater Rate Structure.

Our organization is committed to advancing a net zero carbon future because the economic and social prosperity of our community is directly linked to our ability to preserve and sustain our ecological diversity. This includes acknowledging the critical importance of managing our local water resources in a progressive and environmentally sensitive manner. The Chamber believes that implementing a dedicated user fee for storm services is a progressive approach to addressing the environmental impacts of impervious services on waterway and stormwater management while simultaneously generating additional financial resources to invest in other environmental initiatives as proposed.

While the Chamber and its membership acknowledges that residential rate payers have been historically subsidizing some of the financial impacts of stormwater management on institutional, commercial, and industrial stakeholders, there will be a significant financial impact to several key stakeholders under the proposed changes. These may be justifiable, but the Chamber would like to take this opportunity to raise a few points of consideration brought to our attention by our members.

Firstly, several of our members, and the Hamilton Chamber of Commerce itself, were not included in any of the formal consultations or stakeholder engagement opportunities executed to inform this policy. We were surprised when another community organization shared their concerns with the Chamber about proposed stormwater funding changes. In ensuing conversations with our large institutional, commercial, and industrial members, nearly all of them indicated no formal participation during the consulting period, along with no engagement from the City to understand the potential impacts to our business community.

The Chamber would like to ensure that this is avoided in the future and offers its resources and convening power to help inform future public consultations on changes to municipal policy that will significantly impact our community stakeholders. We would

welcome any opportunity to host an information session in partnership with the City to educate affected institutional, commercial, and industrial ratepayers on the forthcoming changes to stormwater funding in Hamilton.

With that said, we would like to highlight a few key considerations our members shared with us that may have been missed during the formal consultation period for Committee's consideration.

Members expressed concerns about the applicability of adopting a generic average billing unit defined as an impervious surface, particularly without any concessions or acknowledgement for on-site features that serve to counteract the impacts of runoff. The City ought to consult with the largest institutional, commercial, and industrial rate payers in Hamilton to explore opportunities to tailor some of the stormwater rate changes to reflect the realities of a given property. For example, many of our members utilize a private stormwater management system rather than the municipal system – how will this be accounted for in their stormwater bill? Additionally, how will the City account for investments to create various “sinks” on institutional, commercial, and industrial properties to reduce their impervious surfaces?

Related to this, providing clarity on how, or if, the City plans to create specific concessions for some of our community's largest rate payers is critical to the long-term capital and operating budgets of these organizations. Clarity is required to inform short- and long-term financial planning for community stakeholders who are actively seeking ways to green their operations, reduce their energy costs, and minimize their environmental footprint.

Hamilton businesses are committed to advancing the environmental prosperity of our community and want to be seen as partners and allies to the cause. This begins with a mutual understanding about what actions are being taken to incentivize our community to become greener, and to empower those taking strong climate action. Our members need certainty about the investments they are making locally to reduce operational footprint and ideally drive down operational costs.

Our members are interested in robust communications detailing the timing of the proposed changes and how the new tax revenues will be utilized and invested. Transparency will be critical to avoid confusion and frustration when the new rates are rolled out, and moreover, rate payers will be interested to learn how the City is utilizing these potential reserves to improve Hamilton's existing water and stormwater infrastructure. This information will be key in incentivizing stakeholders to make investments into their own operations to reduce impacts on the municipal stormwater system.

In closing, the Hamilton Chamber of Commerce strongly encourages members of the General Issues Committee to ensure that all affected stakeholders are informed of the proposed changes to stormwater funding. These organizations believe in the importance of protecting our community's environment, but need more clarity about the short-term and long-term impacts of the policy change as well as a better understanding of how they can work together with the municipality to reduce impervious surfaces and make strategic infrastructure investments.

The Hamilton Chamber of Commerce looks forward to providing ongoing support to our members impacted by these changes and to continue our enduring relationship with the City of Hamilton to facilitate as smooth of a transition as possible to any new stormwater funding policy. There are numerous instances of successful partnerships with the City in the past, and we are eager to participate together in educating our community stakeholders together.

Sincerely,

A handwritten signature in black ink, appearing to read 'GD', with a stylized flourish extending from the end.

Greg Dunnett
President & CEO