

**West End Home Builders' Association**

1112 Rymal Road East, Hamilton

Serving members in Hamilton and Halton Region

June 27, 2023

To:

Members of City Council

City of Hamilton

71 Main Street West

WE HBA Letter: Stormwater Funding Review

The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Burlington. The WE HBA represents 300 member companies made up of all disciplines involved in land development and residential construction. In 2022, the residential construction industry employed 23,000 people, paying \$1.6 billion in wages, and contributed over \$3.4 billion in investment value within the City of Hamilton.

WE HBA would like to thank the City of Hamilton for providing an update on the Stormwater Funding Review that will inform a new Stormwater Rate Structure to be implemented by September 1, 2025. WE HBA understands that under the current model, stormwater management is primarily funded through water and wastewater utility revenues. We acknowledge that the proposed Stormwater Rate Structure will shift towards a user fee model and use a Single Family Unit (SFU) stormwater fee structure based on one billing unit per 291 square metres of impervious surfaces, or a calculated average of single detached homes. Additionally, WE HBA recognizes that low-to-medium density residential billing will be based on the calculated average area of impervious surface by category; all single detached dwellings will fall into same category, being assigned one SFU, while fractional billing units are to be used for other low-to-medium density residential property types. Industrial, commercial, institutional, mixed use, and high density residential billing will be based off a measurement of impervious surface using recent aerial imagery, and land classified as undeveloped would be excluded. It is critical that costs and impacts be carefully evaluated and monitored throughout the implementation period as well for potential consequences.

Finally, we appreciate that the new structure will include a legal mechanism for appeals or review of a property's stormwater charge. It is important to recognize that site specifics may differ vastly from property to property. We request to be involved in the development of the financial incentive and credit programs to provide industrial, commercial, institutional, mixed use, and high density residential with incentive to reduce pressure on the stormwater management system. Our members will have input with respect to best management practices, innovative low impact development opportunities as well as the costs and feasibility of implementing different options.

WE HBA is requesting further engagement and consultation as the City of Hamilton works out the implementation of these programs.

Sincerely,

Michelle Diplock, RPP, MCIP, MPI

Manager of Planning and Government Relations

West End Home Builders' Association