

working to keep jobs in South Etobicoke

BY E-MAIL exc@toronto.ca

May 15, 2017

EX25.6.5

Executive Committee 10th floor, West Tower, City Hall 100 Queen Street West, Toronto, ON M5H 2N2

Dear Mayor Tory and Members of the Executive Committee,

## Re: EX 25.6: Proposed Stormwater Charge - Results of Consultation and Next Steps

We are writing to express our concerns with the proposed recommendations in EX 25.6 as they do not begin the implementation of the plan for a separate stormwater management charge on the water bill, as directed by City Council in December 2015. We are asking Executive Committee to direct Toronto Water to begin the implementation of a separate stormwater management charge, or provide alternate means to address the cost imbalance borne by industrial water users in the interim.

The South Etobicoke Industrial Employers Association (SEIEA) represents a group of industrial businesses and manufacturers located in South Etobicoke employing over 2500 people. The cost of water is an important input cost for many of these companies, and significantly impacts their competitiveness.

Toronto Water has conducted a very thorough analysis with extensive consultation. The analysis revealed that the current allocation method disproportionately places stormwater infrastructure costs on water users. Simply said, the amount of stormwater infrastructure used by a property owner has no relationship to the amount of water they purchase. Using the water meter to allocate these costs is inappropriate, unfair, and lacks transparency.

Recommendation 1d recognizes the importance of "attracting and retaining the manufacturing sector in Toronto". However, the recommendation to "report back to Executive Committee in the spring of 2019" would lead to several more years of industrial water users bearing a disproportionate share of stormwater costs, thereby undermining the recommendation to "attract and retain...".

A stormwater management charge would more appropriately match the City's 'cost to service' with property owners' use of this service. This would raise awareness, create visibility of the cost of stormwater infrastructure, and open up the opportunity for broader participation and innovation in stormwater retention and reduction. Over time, these improvements should also reduce the cost of this infrastructure.

Yours very truly,

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South Etobicoke Industrial Employers Association Al Brezina, Executive Director