



January 24, 2025

Mayor Olivia Chow, Executive Committee Chair
Members of Executive Committee
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2
To: exc@toronto.ca

Dear Mayor Chow and Members of the Executive Committee

RE: EX20.12 Reducing Stormwater Runoff and Mitigating Basement Flooding

We would like to thank City Council and staff for their ongoing efforts to ensure Toronto's climate resiliency, particularly by addressing the growing need to manage stormwater runoff. We also appreciate the opportunity to participate in consultations on the potential implementation of a Commercial and Industrial Stormwater Charge.

We support City staff's recommendation to suspend further consideration of a stormwater fee. As noted in the staff report, commercial and industrial properties account for less than 35% of Toronto's impermeable surface area. Moreover, no other municipality has implemented a stormwater charge specifically targeting these property types.

While we recognize staff's recommendation to explore a Green Infrastructure Incentive Program as a positive step, its greatest impact would be on residential properties. To further advance the City's climate goals, we encourage the development of additional incentive programs tailored to assist large commercial and industrial properties in reducing impermeable surface areas and adopting green infrastructure solutions.

We would welcome the opportunity to participate in consultations for the design and implementation of such programs, ensuring they are effective and equitable for all stakeholders.

Please do not hesitate to contact us if you have any questions.

Thank you,

BOMA Toronto
NAIOP GTA
REALPAC
Toronto Financial District BIA