

Consultation on Water Fees, Charges and Programs
Discussion Guide #2: Water Fees and Charges, and
Stormwater Management Incentives for Industrial and Commercial
Customers

December 2, 2020

Consultation Purpose and Scope

Toronto Water and Economic Development and Culture, as directed by City Council, are undertaking stakeholder consultation with water users on water fees, charges, programs and other measures designed to support business retention, economic growth, investment and employment ("Consultation").

The purpose of the Consultation is to receive stakeholder feedback on options being explored by the City of Toronto (City) with respect to water fees, charges and current programs to further support the economic competitiveness of the City's industrial and commercial businesses and the objectives of the [City's Resilience Strategy](#).

Topics being explored within the scope of this Consultation include:

- A. Current support programs offered by Toronto Water for Industrial, Commercial, and Institutional ("ICI") customers, including the Industrial Water Rate Program, Capacity Buyback Program, and the Sewer Surcharge Rebate Program;
- B. Current policies and practices under Municipal Code Chapter 681, Sewers ("Sewers By-law"), with a view to identifying any potential opportunities for administrative efficiencies;
- C. Water fees and charges:
 - An administration fee option that separates certain fixed operational costs from the water rate;
 - The decoupling of industrial and commercial customers' ("I&C") water rate from costs associated with stormwater management, including a stormwater charge option for I&C properties;
 - A stormwater management charge (SW Charge) option for owners of commercial parking lots to recover serviceable costs of the collection, transmittal and treatment of stormwater-runoff generated by these properties;
- D. Incentive options for industrial and commercial customers to undertake sustainable stormwater and flood management solutions, including stormwater management charge credits and green infrastructure funding.

Discussion Guides - Purpose

The Consultation process will comprise two rounds of stakeholder consultation in Fall 2020 and Winter 2021. As part of the Fall 2020 consultation, two discussion guides are being made available by the City for stakeholders on the City's website at toronto.ca/waterconsultation (collectively, "Discussion Guides").

This **Discussion Guide #2: Toronto Water Fees and Charges, and Stormwater Management Incentives for Industrial and Commercial Customers** provides background information, an overview of options being explored by the City, and discussion questions for feedback concerning the topic areas in Parts C and D of the Consultation scope above ("Discussion Guide #2").

The other Discussion Guide titled **Discussion Guide #1: Toronto Water's Support Programs for Industrial, Commercial and Institutional (ICI) Customers and the Sewers By-law** provides information, an overview of options being explored by the City, and discussion questions for stakeholder feedback concerning the topic areas in Parts A and B of the Consultation scope above ("Discussion Guide #1").

Consultation Feedback

Feedback on the discussion questions contained in the Discussion Guides should be submitted by **Monday, December 21, 2020** through an on-line survey available on the City's website at toronto.ca/waterconsultation.

Please share your comments, experiences, and suggestions on topics that are of interest to you and your organization.

Thank you for your participation in this Consultation.

Disclaimer

These Discussion Guides are intended solely for information and Consultation purposes only. They are being made available for comment and discussion purposes, and to facilitate this Consultation with water users for the stated purpose. Any estimate, calculation or analysis, preliminary or otherwise, is provided for illustrative purposes only and should not be relied on as being current, accurate, or complete, and is subject to change without notice.

Notice of Collection of Personal Information

Personal information received by the City through this Consultation is collected for the purpose of determining what, if any, water fees and charges, programs or other measures may be appropriate for City staff to recommend to City Council and, if accepted, implemented, to support business retention, economic growth, investment and employment to further the objectives of the City's economic competitiveness strategy and resilience strategy. This collection will also be for the purposes of reporting to City Council, and any related City Committees, including the City's Infrastructure and Environment Committee, on the Consultation and any recommendations arising from it. The personal information is collected under the authority of sections 8 and 259 of the *City of Toronto Act, 2006*, and City Council Decision Nos. 12 and 13 with respect to [Item EX11.2](#), as confirmed by City of Toronto By-law No. 1804-2019.

The reporting to City Council concerning the Consultation and recommendations may include the disclosure of personal information as may be determined to be required by the City, and any such related reporting documents are created for the purpose of inclusion in a collection of records which are maintained for the purposes of being available to the general public.

Questions about the collection of personal information may be addressed to the Manager, Public Consultation, Metro Hall, 19th Floor, 55 John Street, Toronto, Ontario, M5V 3C6 or by telephone at 416-392-2990.

Goals and Objectives

This section provides a more detailed description of the objectives of this Consultation with respect to the development and consideration of options (e.g., potential new fees, charges, other measures and changes to existing programs) that may be recommended to City Council.

- **Furthering the [City's Resilience Strategy](#) objectives** - support the Strategy's goals under the infrastructure focus area including making Toronto's water and sewer infrastructure more resilient to climate change and reducing the hazards of flooding;
- **Supporting the economic competitiveness of Toronto's Industrial and Commercial (I&C) businesses** - opportunities to provide cost savings related to water, wastewater and stormwater costs for I&C businesses, and to increase and broaden participation in Toronto Water's current support programs for ICI customers;
- **Cost-effectiveness and transparency** - promote enhanced transparency with respect to water rates, charges and fees while recovering the full serviceable costs of the collection, transmittal and treatment of stormwater run-off generated by I&C properties, and providing for the continued long-term financial sustainability of Toronto Water's programs;
- **Administrative efficiencies and customer service improvement** - streamline processes thereby increasing the potential for further increased efficiencies in the City's administration of ICI support programs and the Sewers By-law; and,
- **Environmental stewardship** - improve surface water quality by promoting more sustainable stormwater management practices by I&C businesses.

Part C: Water Fees and Charges

Toronto Water's water and wastewater (including stormwater) services are funded on a "pay-as-you-go" system through a combined water and wastewater consumption rate ("water rate") charged to metered and flat rate customers without any reliance on property taxes or borrowing/debenture financing. Revenue from these services is derived primarily (92%) from the water rate which is charged based on the volume of water consumed.

Currently, the water rate is structured in two blocks as follows:

2020 Water Rates	Rate if paid on or before due date
Block 1 – all customers of water including the first 5,000 m ³ per year consumed by industrial customers	\$4.0735/m ³
Block 2 *(Industrial Water Rate Program) – annual consumption over 5,000 m ³	\$2.8514/m ³

* Applies to eligible industrial customers participating in the Industrial Water Rate Program (30% discount on the Block 1 Rate)

Toronto Water also has in place various water and wastewater fees, exclusive of the water rate, to recover the costs of certain water and wastewater services provided for a user fee. Examples of these types of service fees include the installation of new residential water services and meters, installation or disconnection of new residential sanitary sewer services in the road allowance, fire hydrant permits, etc. A full list of 2020 fees is provided at https://www.toronto.ca/legdocs/municode/1184_441-d.pdf

Through this Consultation, Toronto Water is exploring options related to water fees, charges and rates, to support economic competitiveness of I&C businesses and the objectives of the City's Resilience Strategy. Options being explored include:

- An administrative water fee that separates certain fixed administrative costs (i.e. costs that do not change in direct proportion to water consumption) from the water rate;
- The decoupling of industrial and commercial customers' water rate from costs associated with stormwater management services; and,
- A stormwater management charge (SW Charge) for owners of commercial parking lots to recover serviceable costs of the collection, transmittal and treatment of stormwater run-off generated by these parking lots.

Administrative Water Fee

An administrative water fee option contemplates a fixed charge for the administration of water and sewer services portion of the utility bill and other "overhead" Toronto Water operating expenditures which are irrespective of water consumption and would be removed from the water rate. Currently, this administrative operating cost is funded by the water rate.

Some Ontario municipalities (e.g., Halton Region, Durham Region and the City of Hamilton) charge a fixed fee to water and sewer utility bills to recover fixed operating costs. The costs included in the fee and how the fee is applied (e.g., by water meter size) vary by municipality. Some common operating costs that are included in the fixed charges of these municipalities include:

- Administrative activities such as administration and issuing of the water and sewer utility bill;
- Installing, maintaining and repairing water meters;
- Maintaining water and sanitary service connections;
- Providing fire protection capacity in the water system; and,
- Other "overhead" operating expenditures which do not vary based on water usage (e.g. customer service operational costs).

Similar to fees to recover fixed operating costs implemented by other municipalities, Toronto Water is exploring the option for an administrative water fee, which would:

- Remove certain fixed operating costs from the water rate; and,
- Be charged as a flat fee which would appear as a separate line item on the water and sewer services portion of the utility bill (e.g., one-time annual fee at the beginning of the year).

A preliminary analysis of an administrative water fee option was undertaken to estimate the fee value and impacts to the water rate. The preliminary estimate is \$109.50 per water account on average (i.e., applied to all water accounts). This estimate includes certain 2020 fixed operating costs for Toronto Water including the administration of the water and sewer portion of the utility bill, interdivisional charges, rent and insurance. The administrative water fee, if implemented, would result in a reduction of the Block 1 and Block 2 rate by an estimated 4.4 percent each.

An administrative water fee option would potentially decrease in costs for large volume water customers and potentially increase costs for small volume water customers. These impacts on water customers require further assessment in addition to City costs to implement this option (e.g. changes to the Revenue Services' billing system and the utility bill).

Decoupling of Industrial and Commercial Customers' Water Rate from Costs Associated With Stormwater Management Services

As requested by Council, the City is consulting on the decoupling of Industrial and Commercial (I&C) customers' water rate from the costs associated with stormwater management services. This section presents an overview of Toronto Water's stormwater management program, information on how other municipalities have decoupled stormwater costs from their water rate(s), and the option of a stormwater charge option for I&C properties as a mechanism to decouple stormwater costs from the water rate for I&C customers.

Overview of Toronto Water's Stormwater Management Program

Toronto Water's stormwater management program includes operating and capital funding for the City's sewer systems and stormwater management plans, studies and projects to reduce the impacts of stormwater (rain and melted snow) on the City's infrastructure and environment. The stormwater management program contributes to the goals and objectives of the City's Resilience Strategy including making City infrastructure more resilient to climate change and reducing the hazards of flooding. Toronto Water's stormwater management program (capital and operating budget) is funded primarily through the water rate.

The Wet Weather Flow Master Plan (WWFMP), adopted by City Council in 2003, is a cornerstone of the Toronto Water's stormwater management program. The WWFMP is a long-term plan to reduce the adverse impacts of wet weather flow on Toronto's environment and improve the ecosystem health of the

City's watersheds and Lake Ontario waterfront. The WWFMP has 13 objectives that address four aspects of a healthy ecosystem: water quality, water quantity, natural areas and wildlife, and sewer infrastructure.

Since 2003, significant progress has been made in completing WWFMP studies and implementing recommended infrastructure projects and initiatives. More information on the WWFMP and its implementation is available at: <https://www.toronto.ca/services-payments/water-environment/managing-rain-melted-snow/the-citys-wet-weather-flow-master-plan/>

Toronto Water's approved 2020 Capital Budget allocates approximately \$4.2 billion from 2020 to 2029 for the WWFMP's implementation. Key program areas include:

- **Basement Flooding Protection Program (BFPP)** - \$ 2.1 billion from 2020-2029 - approved by City Council in 2006 and expanded City-wide in 2013, the BFPP is a multi-year program to reduce urban flooding risks associated with severe storms. The BFPP undertakes basement flooding studies in study areas across the City and implements recommended infrastructure improvements to the City's sewer systems and overland drainage routes to provide an enhanced level of protection. More information on the BFPP is available at <https://www.toronto.ca/services-payments/water-environment/managing-rain-melted-snow/basement-flooding/basement-flooding-protection-program/> ; and,
- **Other WWFMP Program Areas (water quality improvement, watercourse management, waterfront and shoreline management, etc.)** - \$2.1 billion from 2020-2029 for projects and initiatives to improve water quality, mitigate shoreline erosion, and protect vulnerable sewer infrastructure from watercourse erosion impacts in valley lands. Many projects across the City are being implemented including the Don River and Central Waterfront Project (DRCW), the largest combined sewer flow project of its kind in Canada which will achieve significant water quality improvements in Lower Don River, Taylor-Massey Creek and central waterfront when fully implemented. More information on DRCW is available at <https://www.toronto.ca/services-payments/water-environment/managing-rain-melted-snow/what-the-city-is-doing-stormwater-management-projects/lower-don-river-taylor-massey-creek-and-inner-harbour-program/> .

Decoupling of Stormwater Services' Costs from the Water Rate in Other Municipalities

In Ontario and other jurisdictions across Canada and the United States, many municipalities have decoupled stormwater services costs from their water rate(s) through the implementation of a stormwater charge (SW Charge).

Municipalities across North America that have implemented a SW Charge include Aurora ON, Guelph ON, Kitchener ON, London ON, Mississauga ON, Newmarket ON, Orillia ON, Richmond Hill ON, St. Thomas ON, Vaughan ON, Waterloo (City) ON, Halifax NS, Saskatoon SK, Victoria BC., Baltimore MD, Philadelphia PA, Portland OR, Washington D.C., and many others.

A SW Charge is a charge based on the impact to a municipal storm sewer system and provides funding for a municipality's stormwater management program. In these municipalities, the SW Charge removes the amount paid by rate payers for stormwater management services from the water rate and typically appears as a separate line item on utility bills. This provides for greater transparency as water customers see how much they are paying for stormwater management services, separate from other services (e.g. water consumption).

In municipalities with a SW Charge, the calculation and application of the SW Charge varies (e.g. flat rate, tiered flat rate based on size of property and/or property class, a charge based on an equivalent runoff coefficient (ERU) calculation or actual impervious area of a property, etc). Almost all municipalities that have implemented a SW Charge have done so for all property classes at the same time. An exception is the City of Philadelphia which implemented a SW Charge starting with I&C properties and then expanded the SW Charge to residential and other property types in subsequent years.

Stormwater Charge Option for Industrial and Commercial (I&C) Properties

In 2016 and 2017, the City consulted on an implementation plan for a stormwater charge (SW Charge) for all property classes (residential, multi-residential, institutional, commercial and industrial). In 2017, a staff report to City Council on the SW Charge consultation (EX25.6) reported back on issues raised during that consultation process including potential exemptions from the SW Charge and demands for individualized stormwater charge formulations, among others. As a result of these issues, City staff did not recommend the implementation of a SW Charge at that time. City Council's decision on the staff report is available at <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.EX25.6>

For the purposes of this Consultation, Toronto Water is exploring a SW Charge for I&C properties as a mechanism to decouple stormwater costs from the water rate for I&C customers only. This option contemplates that only I&C property classes would pay for stormwater services through a SW Charge and water and wastewater services through the water rate, while all other customers (residential, multi-residential, and institutional properties) would continue to pay for water, wastewater and stormwater services through the water rate.

A SW Charge option only for I&C properties poses challenges and, at a minimum, would require:

- Separating out the stormwater management operating and capital program funding for I&C customers from the current Toronto Water financial model;
- Identifying impervious area for I&C properties as a proportion of hard surface area of the entire city;
- Calculating a combined water and wastewater rate for I&C customers which covers only water and wastewater services for I&C customers and not stormwater management services which would then need to be calculated and charged separately under a new SW Charge;
- Developing a model and structure to apply a SW Charge to I&C properties only and assessing I&C customer cost impacts/shifts; and,
- Developing a plan to implement and operationalize an SW Charge for I&C properties.

A preliminary analysis has been undertaken to determine how a SW Charge option could be applied for I&C properties and its potential impacts on the water rate. This analysis involved determining the total size impervious area of I&C properties (from a 2017 GIS analysis), allocating stormwater program funding to I&C customers (2020 year from Toronto Water's approved 2020 Capital Budget) based on the proportion of their property's impervious area in the City, identifying a SW Charge value (per square metre of impervious area), and estimating impacts to the water rate(s).

Based on the preliminary analysis:

- I&C properties represent an estimated 7,609 hectares or 36% of total impervious area across the city (21,025 hectares);

- the total funding allocation for I&C customers for the stormwater management program (\$315 million in 2020) based on the 36% percentage contribution would amount to \$114 million in 2020, which would need to be removed from the water rate;
- a stormwater charge for I&C properties would be \$1.50 per sq. metre of impervious area;
- after separating the stormwater management cost from the current water rate (2020), the Block 1 Rate (2020) for I&C customers would decrease by approximately 25 per cent from \$4.0735/m³ to \$3.0673/m³, and the Block 2 Rate (2020) would decrease for industrial customers by approximately 25 per cent from \$2.8512/m³ to \$2.1471/m³.

The estimates above are preliminary and subject to change pending further analysis. Further assessment of this option is required to determine the feasibility of implementing a SW Charge only for I&C properties that takes into consideration the impacts of this option on the water rate structure (i.e. different water rates for different customer classes), shifts in water costs to water customers, and the practicality to implement this option (e.g. administration costs and costs to operationalize a SW Charge for I&C properties such as IT requirements, GIS analysis, among others.)

Stormwater Management Charge for Commercial Parking Lots

The City is exploring an option of a SW Charge for owners of commercial parking lots to recover the serviceable costs of the collection, transmittal and treatment of stormwater run-off from these parking lot properties.

This option contemplates the application of a SW Charge to parking lots that do not have a water account but contribute stormwater runoff to the City's sewer system, such as ground surface parking lots and multi-level parking lots with their own roof.

As of June 2020, there were approximately 950 commercial parking lots in the City to which a SW Charge option could be applied. These parking lots comprise approximately 650 privately owned parking lots and approximately 300 Toronto Parking Authority parking lots.

A preliminary analysis (based on partial GIS data) has been undertaken of a SW Charge option for commercial parking lots. This analysis involved determining the total size of impervious area (based on a 2017 and 2020 GIS analysis) of these properties, allocating the stormwater program funding (2020 year based on the 2020 approved Toronto Water Capital Budget) to these parking lots as a proportion of their impervious area to that of the entire city, identifying a SW Charge value (per square metre of impervious area), and assessing the impact to the water rate(s).

Based on the preliminary analysis, commercial parking lot properties:

- represent approximately 242 hectares or 1.15 per cent of total impervious area across the city (21,025 hectares);
- the total funding allocation for these properties for the stormwater management program (\$315 million in 2020) based on the 1.15 percentage contribution would amount to approx. \$3.6 million in 2020, which would need to be removed from the water rate;
- a stormwater charge for these properties would equal \$1.50 per sq. metre of impervious area;
- after separating the stormwater management cost from the current water rate (2020), the Block 1 and Block 2 Rates would decrease by approximately 0.29 per cent each:
 - Block 1 Rate (2020) would decrease from \$4.0735/m³ to \$4.0618/m³

- Block 2 Rate (2020) would decrease from \$2.8512/m³ to \$2.8429/m³.

The estimates above are preliminary and subject to change pending further analysis. Further assessment of this option is required to determine the feasibility and practicality to implement a SW Charge only for commercial parking lots.

Part C Discussion Questions - Water Fees and Charges

C1. Do you have comments on an administrative water fee option (e.g., advantages/benefits, disadvantages/concerns, other considerations)?

C2. Do you have comments on a stormwater charge option for I&C properties as a mechanism to decouple stormwater costs from the water rate for these customers (e.g., advantages/benefits, disadvantages/concerns, other considerations)?

C3. Do you have comments on the option of a stormwater charge for commercial parking lots (e.g., advantages/benefits, disadvantages/concerns, other considerations)?

Part D: Stormwater Management Incentives for Industrial and Commercial Customers

This section presents options being explored for stormwater management incentives to support industrial and commercial (I&C) customers in undertaking sustainable stormwater and flood management solutions on their properties.

Types of incentives programs offered to I&C property owners in municipal and other jurisdictions in Canada and/or the United States that are being explored within the scope of this Consultation include:

- **Stormwater Charge Credits Programs** - provide a credit or discount on a stormwater management charge (SW Charge) based on a reduction of impervious area and/or other implementation of eligible green infrastructure on the property to improve stormwater management;
- **Grants Programs** - provide direct funding in the form of a grant to property owners to implement green infrastructure (e.g. bioswales, rain gardens, permeable pavement, etc.) and other stormwater management solutions on their property; and,
- **Awards and Recognition Programs** - showcase exemplary stormwater management practices by businesses through annual awards.

Stormwater Charge Credits Programs

Many municipalities in Ontario and North America that have implemented a SW Charge provide a SW Charge credit or discount as an incentive for property owners to implement stormwater best management practices and green infrastructure to reduce impacts to municipal sewer infrastructure by controlling stormwater discharged on their property. Many of these stormwater credit programs apply to non-residential properties (industrial, commercial and institutional) while some also apply to residential properties.¹

Some SW Charge Credit Programs apply only to larger properties which have more impervious area and, therefore, offer the greatest potential and benefit in reducing stormwater contributions and are more cost-effective and efficient to administer. For example, the City of London, Ontario offers a Stormwater Rate Reduction Program for all properties greater than 0.4 hectares. As part of the SW Charge implementation plan consultations in 2017, Toronto Water consulted on SW Charge credits for large properties (1 hectare or greater in gross area), as these properties (approx. 5500 properties or 1 per cent of properties by count) account for 42 per cent of impervious area in the City. Approximately 78 per cent of these large properties are industrial, commercial or institutional.

SW Charge Credit programs for non-residential properties vary across municipalities in Ontario and North America and are tailored based on meeting stormwater objectives and/or regulatory requirements in their jurisdiction. Common elements include:

- A credit (per-square-foot credit) or reduction (percentage reduction) on a stormwater charge that is continuous or one-time

¹ Cities in Ontario and other jurisdictions in Canada that offer SW Charge credits to non-residential properties as part of a SW Charge Program include Edmonton AB, Guelph ON, Halifax NS, Kitchener ON, London ON, Mississauga ON, Newmarket ON, Saskatoon SK, Victoria B.C., Waterloo ON, among others.

- Credit eligibility is based on:
 - the implementation of specific stormwater management best management practices and/or
 - the property demonstrating the achievement of stormwater management performance; objectives in categories such as peak flow reduction, runoff volume reduction, water quality treatment, pollution prevention, etc.;
- A credit value of up to maximum (typically 50 per cent in Ontario municipalities) based on different credit categories (as noted above);
- An application and renewal process and submission of an engineer certified stormwater management report; some municipalities apply a review fee; and.
- A verification process (e.g. inspections) to confirm proper installation and ongoing maintenance of stormwater management infrastructure.

Some municipalities provide for the sharing of SW Charge credits among properties. For example, the City of Mississauga's program allows for the allocation of SW Charge credits to multiple property owners for communal stormwater management facilities on private property that service more than one property.

SW Charge Credit programs are an important component of a SW Charge program in many municipalities and contribute to achieving the municipalities' objectives for stormwater management by incentivizing property owners to implement improved stormwater management practices on their properties. In some municipalities, there has been a low uptake of credits due a number of factors such as high upfront costs, uncertain maintenance requirements and costs, and a perceived low return on investment for the implementation of stormwater management best management practices depending on the SW Charge credit amount that is offered.

A SW Charge Credit option for I&C customers in the City would be contingent upon the recommendation and implementation of a SW Charge for I&C properties and would require developing a framework for the credits program (eligibility criteria, performance objectives, credit values and categories, etc.) and an assessment of revenue and cost implications (e.g. program administration, resources, communications, etc.) among other considerations.

Grant Programs

Grant programs provide incentives in the form of a grant to property owners for the implementation of stormwater management best management practices (BMPs) and green infrastructure. Grant programs in other jurisdictions are most commonly provided for residential properties, though a few jurisdictions in the United States, e.g. City of Philadelphia and the Northeast Ohio Regional Sewer District in Cleveland (for their combined sewer area) provide grants for commercial and industrial businesses, which helps these jurisdictions meet state and federal requirements (e.g. combined sewer overflow control).

For example, the City of Philadelphia's Stormwater Grants Program provides grants to support green infrastructure retrofits on private commercial and industrial properties, as well as institutional and multi-residential properties. Applications must demonstrate that the projects are cost-effective (i.e., total cost under \$200,000 US per greened acre), include stormwater management practices that promote infiltration and water quality treatment and commit the property owner to additional funding, among other requirements.

Grant programs offer advantages of helping to address upfront costs which may pose a constraint for I&C businesses to implement green infrastructure projects. This incentive option would require significant assessment to determine the costs and benefits for the City to develop and implement a stormwater management grant program for I&C customers.

Awards and Recognition Programs

Some municipalities in the United States have award and recognition programs that showcase exemplary stormwater management projects by property owners. These programs typically include an application and review process, an annual awards event, and showcase companies and their projects in communication materials (e.g. municipal websites).

One example is the District of Columbia (Washington D.C.) Sustainability Awards which provide annual awards to businesses and organizations in recognition of sustainable practices including sustainable stormwater management initiatives which exemplify environmental stewardship.

Awards and recognition programs help to increase industry awareness of sustainable stormwater management practices and are relatively easy to implement. However, many of these programs have been discontinued in recent years and their effectiveness in incentivizing improved stormwater practices by I&C businesses may be limited.

Part D Discussion Questions - Stormwater Management Incentives for I&C Customers

D1. Is the implementation of measures to improve stormwater management on your property currently a consideration for your organization? Yes ____ No ____ Unsure ____

D2. What are the challenges or constraints for your organization to implement improved stormwater management on your property (e.g. technical, financial, other)?

D3. Do you have comments on the stormwater management incentive options (e.g., advantages/benefits, disadvantages/concerns, other considerations)?

a) Stormwater Charge Credits Program _____

b) Grant Programs _____

c) Awards and Recognition Programs _____

D4. Do you have suggestions for other stormwater management incentive options that could be considered by the City for I&C customers?