



October 13, 2020

Ms. Helen Noehammer
Director, Infrastructure Planning & Engineering Services
Transportation & Works Department
City of Mississauga
300 City Centre Drive
Mississauga, Ontario
L5B 3C1

VIA Email – helen.noehammer@mississauga.ca

Dear Ms. Noehammer:

Re: City of Mississauga Storm Water Credit Program Review

The Mississauga Board of Trade (MBOT) appreciates the opportunity to meet with staff and your consultants on the review of the Storm Water Credit program and submit our comments on some proposed changes to the program.

From the outset, MBOT has been concerned about the financial impact of the storm water levy on Mississauga businesses. Because the levy is based upon the size of the hard surface area of a given property, the levy disproportionately affects businesses with large roofs and parking areas.

However, in its wisdom, the City of Mississauga did adopt a credit program for non-residential properties when it created the storm water levy which does permit for applications for a credit of up to 50% of the storm water charges for a given property.

Now that the program is just over five years old, it is appropriate that the City of Mississauga conduct this review and look at the success (or not) of the credit program.

In the meeting we had with staff and the consultants, you shared five specific areas where you are open to changes in the program. MBOT would like to address each herein.

Formalize the Process for Communal Facilities to Share Credits

MBOT is supportive of this recommendation. Evidence from the Southdown project being coordinated by Credit Valley Conservation (CVC) shows property owners willing to work together on storm water

mitigation and sharing of the credits. One problem will continue to be that the amount of the credit remains too low to allow for greater participation.

Define Variable Credit Criteria by Geographic Region

MBOT is generally supportive of this recommendation and certainly the City of Mississauga should be focusing its efforts on areas of the City with greatest concerns around storm water and flooding. We are concerned about the administration of this but feel if run properly could incent property owners in the most affected areas to perform retrofits for storm water mitigation. Again, the amount of credit back to the property owner will be a major driver in the rate of participation.

Applying a Sliding Scale to Geographically Variable Criteria

MBOT generally supports this recommendation. Again, the costs of retrofits regardless of the standard (new development vs existing) still make most projects cost prohibitive particularly as it relates to existing properties.

Change Maximum Credit in any Category

MBOT is generally supportive of this recommendation but still believes that peak flow reduction will continue to be the highest number of applications the City of Mississauga will receive and should constitute the lion's share of the credit. The City of Edmonton for example in your report, provides up to a 100% credit for peak flow reduction.

Accept New Practices as Eligible Facilities

MBOT supports this recommendation. The City of Mississauga should expand the list of eligible facilities or best practices to increase credit opportunities and customer flexibility.

The Mississauga Board of Trade appreciates the opportunity to comment on these recommendations.

MBOT does however strongly recommend to the City of Mississauga that it increase the credit for non-residential properties from the 50% maximum currently and look to other jurisdictions (like the City of Edmonton) that has set 100% as a maximum credit.

We look forward to continuing to work with you and to speaking to the staff report when it comes before Council later this year.

Yours truly,



David Wojcik
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