



PUBLIC NOTICE

STORMWATER CREDIT AND REBATE POLICY DEVELOPMENT

THE STUDY:

The Cities of Kitchener and Waterloo are working together on developing a stormwater credit and rebate policy. A stormwater credit and rebate policy provides financial incentive for properties to provide on-site controls that reduce their individual contributions of stormwater runoff and pollutant loading to the municipal stormwater management system. A credit and rebate policy would also recognize those existing properties with stormwater controls or stormwater best practices already in place. A credit program would give users who reduce their stormwater runoff a regular credit that lowers the amount they pay for stormwater management on a monthly basis. A rebate program would provide a single lump sum payment to implement stormwater best management practices, and users would see no change to their monthly stormwater utility fee.

The Cities of Kitchener and Waterloo are looking for public input into what this program should look like. Information gathered from the public consultation process will be an important part in the development of the policy. Stormwater Credit and Rebate Policy recommendations will be presented to both Councils at the end of 2011.

BACKGROUND:

What is stormwater and how does it impact us?

Stormwater is water that flows across the land and is routed into drainage systems and ultimately into our natural areas such as creeks, lakes and wetlands. Stormwater is not limited to precipitation, but may also come from watering the lawn, washing the car and many other sources. As our landscape changes from undeveloped, natural areas to cities with houses, businesses, roads and parking lots, the amount of permeable area is being reduced and replaced with hard impermeable surfaces that don't absorb stormwater. In other words, these hard impermeable surfaces would generate excessive surface runoff that could turn into potential flood or erosion hazards if not managed.

What is a stormwater management system?

To avoid flooding, erosion, and water quality impairment, we need to put in place measures and tools to manage the runoff in the form of a stormwater management program. Stormwater management is planning for and controlling stormwater runoff from rain and melted snow, to reduce downstream erosion, water quality degradation and flooding. It also reduces the impact of changes in land use on the aquatic environment.

How do the cities manage stormwater?

The Cities are responsible for managing all aspects of stormwater within their jurisdiction. The Cities operate and maintain drainage facilities that are located within the public right-of-way limits or public easements.

In June 2010, the City of Kitchener and the City of Waterloo Council approved the implementation of "tiered flat fee" stormwater rate structures based largely upon a property's impervious area. The rate methodology provides for a fair and equitable approach allocating costs associated with stormwater management to all property owners, instead of basing it on property value.

As a component of the stormwater rate implementation, both municipal Councils requested that staff report back on a recommended credit and/or rebate policy to reward customers that have reduced their stormwater contribution to the municipal stormwater system through on-site stormwater controls.

THE PROCESS:

The Cities of Kitchener and Waterloo are working together on developing the Stormwater Credit and Rebate Policy to realize efficiencies in the development efforts and to be consistent where possible in the policy framework.

Alternatives for a credit and rebate policy will be fully explored and follow a process similar to an environmental assessment to arrive at a preferred policy alternative. This process generally includes the following steps:

- Identification of a problem or opportunity;
- Identification, assessment of impacts, and evaluation of alternative solutions;
- Selection of a preferred solution; and,
- Preparation of the policy.

Public consultation will be integrated into this process and will include at least two (2) public information centers at which the public will have opportunity to provide input and feedback.

PUBLIC INFORMATION CENTRE:

We would like your input on the alternatives being considered and the evaluation criteria being used.

Public information centres will be held at the following locations:

City of Kitchener consultation: Sept. 29, 2011, 6 to 8 p.m. Downtown Community Centre Multipurpose Room 35 Weber St. W.	City of Waterloo consultation: Oct. 4, 2011, 6 to 8:00 p.m. RIM Park Manulife Financial Sportsplex & Healthy Living Centre 2001 University Avenue East, Waterloo Forbes Room, 2nd Floor
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COMMENTS:

We are interested in hearing any comments that you may have about the study. City of Kitchener and City of Waterloo staff will be present to discuss elements of the project and to answer questions. With the exception of personal information, all comments will become part of the public record. The information will also be available on the City of Kitchener and City of Waterloo websites.

If you are unable to attend and would like to provide input into the study, please address your comments to either of the Project Team members below:

Mr. Nick Gollan, C.E.T.
Manager, Stormwater Utility
Engineering Services Division
City of Kitchener
200 King St. W.
Kitchener, ON N2G 4G7

Phone: 519-741-2422
Fax: 519-741-2747
Email: Nick.Gollan@kitchener.ca

Website:
www.kitchener.ca/stormwatercredit

Ms. Nancy Corbett, P.Eng.
Project Manager
Capital Projects and Services
City of Waterloo
100 Regina St. S.,
Waterloo, ON N2J 4A8

Phone: 519-747-8509
Fax: 519-747-8646
Email: nancy.corbett@waterloo.ca

Website:
www.waterloo.ca/stormwater

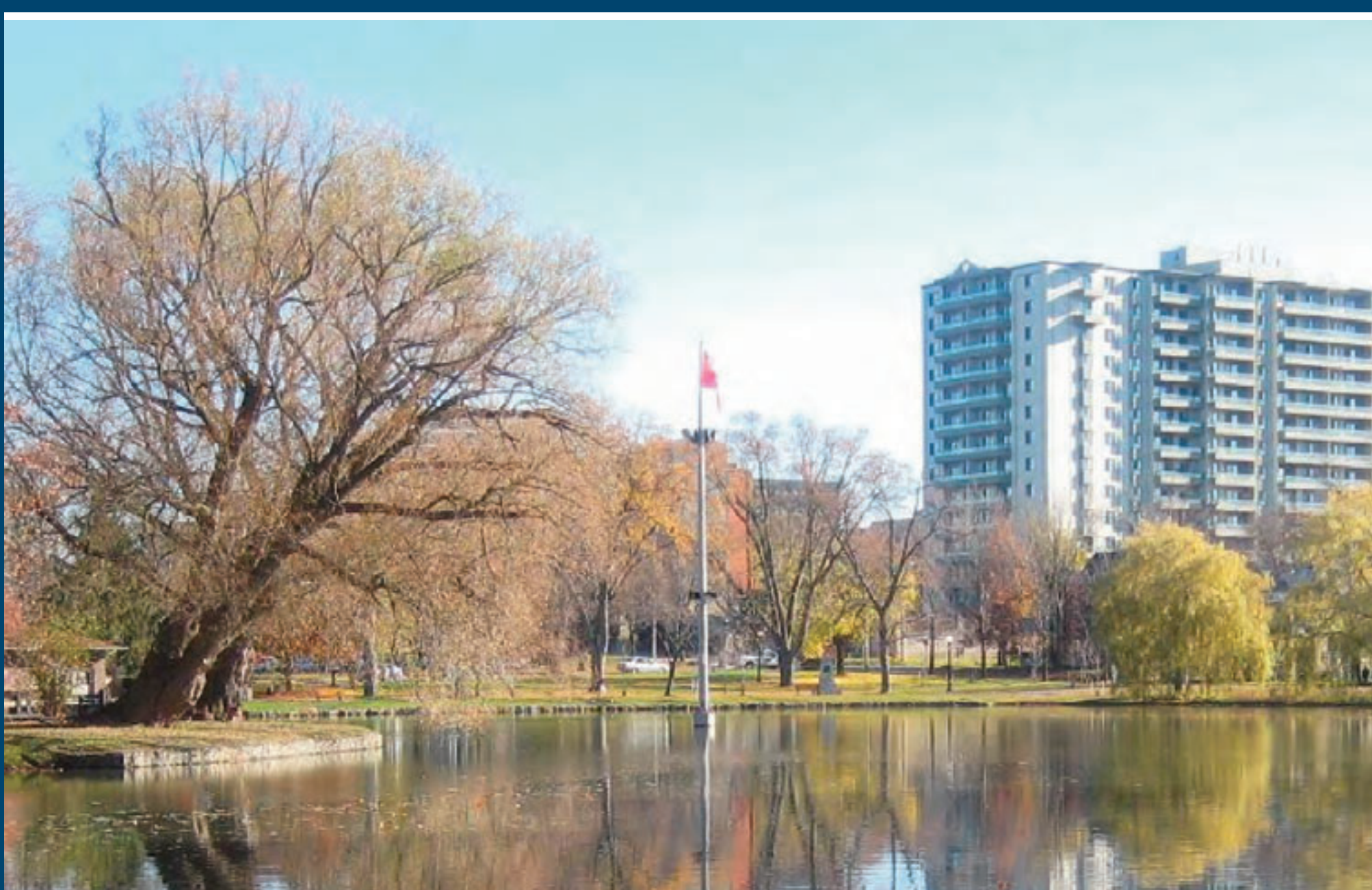
Public Information Centre

Stormwater Credit and Rebate Policy Development

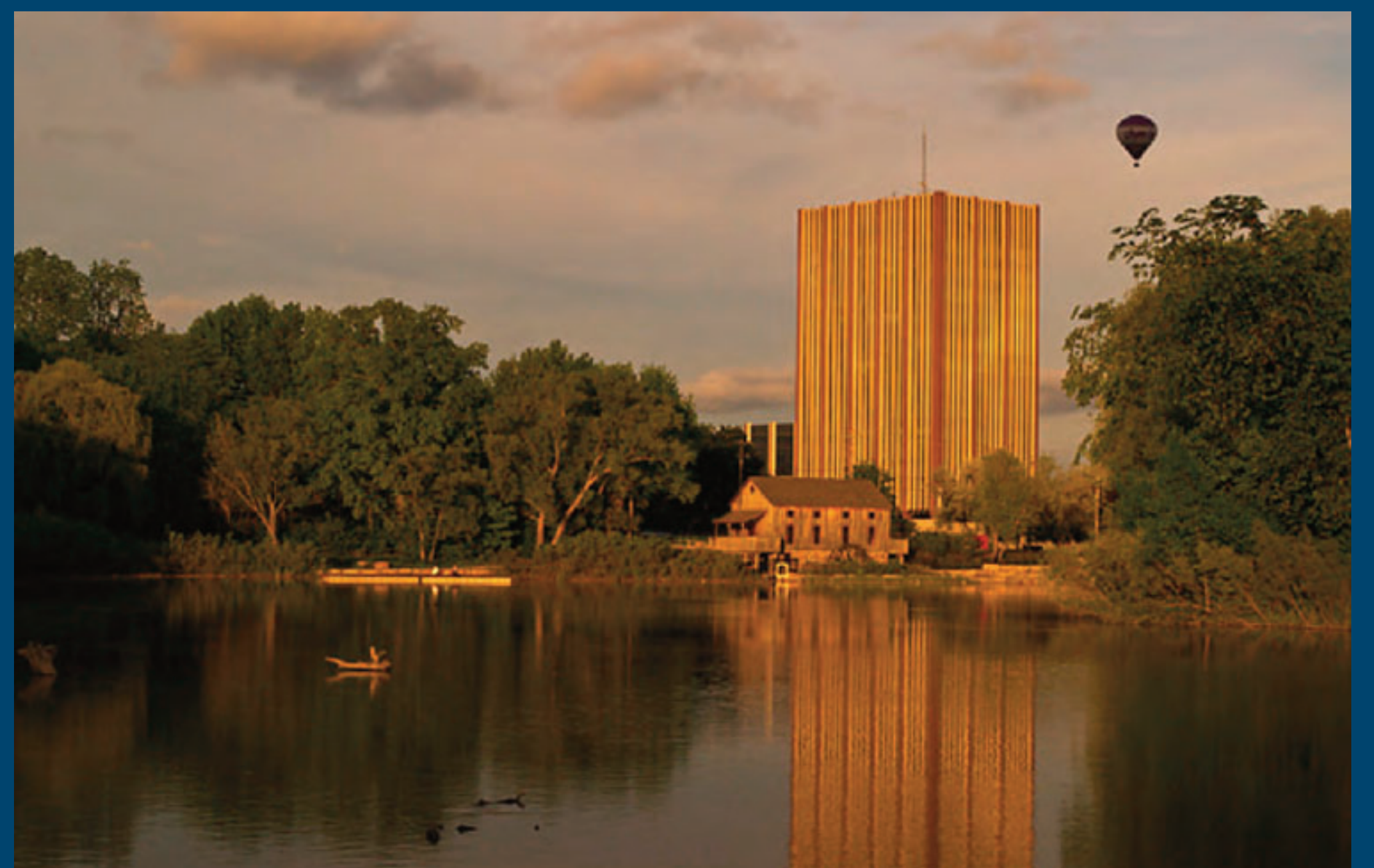
City of Kitchener - September 29, 2011
City of Waterloo - October 4, 2011

Welcome

Please complete the sign-in sheet and review the display materials. Staff are available to answer your questions and address any concerns.



Kitchener - Victoria Park Lake



Waterloo - Silver Lake



Stormwater management

What is stormwater and how does it impact us?

Stormwater is water that flows across the land and is routed into drainage systems and ultimately into our natural areas such as creeks, lakes and wetlands. Stormwater is not limited to precipitation, but may also come from watering the lawn, washing the car and many other sources. As our landscape changes from undeveloped, natural areas to cities with houses, businesses, roads and parking lots, the amount of permeable area is being reduced and replaced with hard impermeable surfaces that don't absorb stormwater. In other words, these hard impermeable surfaces would generate excessive surface runoff that could turn into potential flood or erosion hazards if not managed.



Stormwater management

What is a stormwater management system?

To avoid flooding, erosion, and water quality impairment, we need to put in place measures and tools to manage the runoff in the form of a stormwater management program. Stormwater management is planning for and controlling stormwater run-off from rain and melted snow, to reduce downstream erosion, water quality degradation and flooding. It also reduces the impact of changes in land use on the aquatic environment.



Protecting our Water Resources

How do the cities manage stormwater?

The city is responsible for managing all aspects of stormwater within its jurisdiction. The City operates and maintains drainage facilities that are located within the public right-of-way limits or public easements.

In June, 2010, both cities approved a tiered flat fee stormwater rate structure based largely upon a property's impervious area (i.e. hard surfaces that don't allow the water to soak into the ground).

The rate methodology provides for a fair and equitable approach allocating costs associated with stormwater management to all property owners, instead of basing it on property value.

The greater the amount of runoff and pollutant loading from the property, the greater the demand on the cities' stormwater management systems including sewers, ditches and rivers either for flood control or water quality treatment purposes.

Protecting our Water Resources

We all play an important role when it comes to protecting our water resources. Here are a few examples of what citizens can do to reduce the amount of stormwater runoff from pavement, roofs and other impermeable surfaces:

- Use a rain barrel or build a cistern to collect water for your garden. Rain barrels reduce runoff and ease the load on our water treatment plants.
- Limit the use of fertilizers and pesticides on your lawn that can be carried away by rainwater.
- Dispose of hazardous products like motor oil, antifreeze, etc., by dropping them off at our local waste management facility. For details, visit the www.region.waterloo.on.ca.
- Wash your car at a carwash, rather than in your driveway, to prevent soapy water and sediment from entering our stormwater system.
- Sweep dirt from your sidewalks and driveways and put it in the garbage, instead of on the road.
- Pick up pet waste regularly.
- Ensure your downspouts drain onto your lawn or garden areas, not directly onto streets or alleys.
- Consider building an infiltration gallery. An infiltration gallery is an underground structure placed on well draining soils where rainwater is directed to infiltrate back into the groundwater table.

Protecting our Water Resources

In addition, multi-residential and non-residential property owners (for example, apartment building and shopping centres) could incorporate the following:

- Roof top storage
- Infiltration gallery
- Ponds for quantity and/or quality control
- Parking lot storage
- Rainwater cistern
- Green roof/filter strip
- Oil and grit separator
- Snout
- Goss trap
- Paved area sweeping program
- Storm drain stencil program
- Orifice control / super pipe storage



Oil and grit separator



Orifice control / super pipe storage

Opportunity

There are a number of things citizens can do to reduce the amount of stormwater runoff and pollutants produced by their property. Therefore, the Cities of Kitchener and Waterloo are currently exploring options that would provide an incentive to individuals to utilize a method of reducing stormwater. Various programs can be explored, including the following:

- A credit program – gives users who reduce their stormwater runoff a regular credit that lowers the amount they pay on a monthly basis for stormwater management.
- A rebate program - offers a single lump sum payment to implement stormwater management best management practices. Users would see no change to their monthly stormwater utility fee. A rebate program could fund things like rain barrels and other rainwater harvesting devices.

Stormwater Credit and Rebate Policy Development Process

1. Review and collect background information
2. Develop stormwater credit policy alternatives
3. Present credit and rebate policy alternatives: Public Information Centre on September 29, for City of Kitchener and October 4, for City of Waterloo
4. Conduct impact analysis of options
5. Evaluate credit policy alternatives
6. Present preferred credit policy alternative: Public Information Centre in Kitchener and Waterloo - November 2011
7. Council approval of proposed policy (December 2011)

The Options

There are a number of options and combinations that could be used to arrive at an appropriate incentive program for community members. In addition, the option of not introducing an incentive program will also be evaluated.

The following alternatives are being considered:

Alternative 1: Do nothing

Alternative 2: Multi-residential & non-residential credits

Alternative 3: Residential credits

Alternative 4: Residential rebate program

Alternative 5: Combination of alternatives

Alternative #1 - Do nothing

- Maintain the status quo.
- No credit policy would be created.
- No incentive for private property owners to implement stormwater management best practices.
- No incentive for private property owners to maintain their private stormwater infrastructure.
- No opportunity for property owners to reduce their stormwater management fee.



Alternative #2 – Multi-residential & non-residential credits

The focus of this alternative is to offer incentives to the groups who place the most strain on stormwater system and who also pay the highest stormwater rates.

- Multi-residential and non-residential customers would qualify for stormwater rate credits if they can demonstrate that their existing or proposed stormwater facilities or best management practices reduces the amount of stormwater runoff that goes into the municipal stormwater system. The municipal stormwater system includes such infrastructure as gutters, storm drains, drainage ditches, creeks and rivers.
- Reduced use of the municipal stormwater system would be reflected in a lower fee for this service.
- The credit for each property will be determined based on the stormwater controls present.
- The amount of the credit would be based upon a formula that takes into consideration the following factors:
 - Reduction of volume
 - Quality control
 - Changes in behaviour or education efforts

Who could this potentially benefit?

- This could affect approximately 3000 properties in Kitchener and approximately 1500 properties in Waterloo.

Alternative #2 - Description of each credit factor

1. Stormwater Volume Control Credit

Stormwater volume control best management practices can be achieved through infiltration and extended detention by the following mechanisms:

- Orifice control / super pipe storage
- Roof top storage
- Infiltration gallery
- Ponds for quantity and/or quality control
- Parking lot storage
- Rainwater cistern

If flows generated on-site and/or from upstream areas are directed through best management practices (BMP) such as the mechanisms listed above, or are controlled with on-site vegetated open spaces, then a site would be eligible for a credit. Credits for stormwater volume controls would be based upon hydrologic data, water quantity data, design specifications, and other pertinent data supplied by qualified professionals.

Alternative #2 - Description of each credit factor

2. Stormwater Quality Control Credit

Stormwater quality control best management practices as identified in the Ministry of the Environment Stormwater Management Planning and Design Manual and the Credit Valley Conservation Area Low Impact Development Stormwater Management Manual would be eligible for a credit. The credit would be based upon hydrologic data, water quality data, design specifications, and other pertinent data supplied by qualified professionals on behalf of property owners. Examples include:

- Green roof/filter strip
- Oil and grit separator
- Snout
- Goss trap



Alternative #2 - Description of each credit factor

3. Non-structural BMPs and Education Credit

Credits may be issued for a site with ongoing implementation of an integrated set of non-structural BMPs that will help the municipality meet its stormwater management objectives. To receive a credit adjustment, documentation would need to be provided to verify that the non-structural best management practices and/or education program have occurred. Examples include:

- Paved area sweeping program
- Storm drain stencil program
- School education program
- Salt management plan



Alternative #3 – Residential credits

For residential land uses, a credit calculation could be based solely on the private on-site management of stormwater discharged from roof areas. For example,

- A credit could be applied if all roof drainage is fully retained on the property;
- A credit could be applied when private on-site stormwater management such as rainbarrels detains or partially retains stormwater discharges from roof areas; and,
- A supplemental credit could be applied if there are 4 or more trees on private property taller than 4.5 metres. This award would not apply to street trees such as those planted in an adjacent right-of-way.

The overall credit possible would be determined by the municipality on a case-by-case basis.

Who could this potentially benefit?

A residential credit program could affect about 65,000 residential property owners in Kitchener and approximately 26,000 residential properties in Waterloo.

Alternative #4 – Residential rebate program

A rebate program could be implemented similar to a grant program that would fund the one-time investment in stormwater controls. A rebate program could fund things like rain barrels and other rainwater harvesting devices. This program could be administered via:

- A grant program that provides one-time funds to assist residents with costs to purchase an approved stormwater control device;
- Subsidized programs run through other organizations to enable enhancement of the program such as the Region of Waterloo's rain barrel program; and,
- Funding demonstration projects that could be used as examples of best management practices for the broader community.



Alternative #5 - Combination of alternatives

This alternative would be a combination of alternatives 2, 3 and 4 in order to look at options that address both non-residential and residential customers. These combinations include:

- Multi-residential and non-residential credits + Residential credits
- Multi-residential and non-residential credits + Residential rebate



We will know the incentive program is successful when...

- Stormwater will be diverted, resulting in long-term improvements in surface water quality;
- Existing privately owned stormwater best management infrastructure (such as oil and grit separators) will be required to be maintained as a result of ongoing follow-up on credits and incentives;
- Property owners implement best management practices and make choices that benefit the environment;
- The community will be engaged and will have the opportunity to demonstrate ownership over greening their neighborhoods;
- The cities of Waterloo and Kitchener will demonstrate continued cooperation on the shared initiative to address water quality; and,
- The public's general knowledge of stormwater issues will be increased.

How the preferred alternative will be selected...

The following factors will be considered in the evaluation of each of the alternatives:

Technical

- Ease of Implementation
- Flood Protection / Erosion Control
- Beneficial Gain (ie. stormwater quality & quantity)

Natural

- Water Quality / Pollution Levels
- Aquatic Habitat / Fisheries
- Stream Geomorphology
- Terrestrial Resources, Vegetation and Wildlife
- Groundwater Resources

Economic

- Capital Costs
- Operations and Maintenance Costs
- Resource Requirements

Social

- Public Awareness Opportunity (Community engaged through meetings, open houses, social media, public education)
- Recreational Opportunities
- Visual Aesthetics

Next Steps

- Receive public comments by October 17, 2011
- Conduct impact analysis of options
- Evaluate credit policy alternatives
- Present preferred credit policy alternative
- Public Information Centre in November 2011
- Council approval of proposed policy (December 2011)



Your input is important!

Please tell us what option you would prefer to see implemented in your community.

Please complete a comment sheet and return to the city no later than October 17, 2011:

City of Kitchener

- By mail: Mr. Nick Gollan, Manager of Stormwater Utility, City Hall, 200 King St. W., 9th Floor, PO Box 1118, Kitchener ON, N2G 4G7
- By phone: 519.741.2422
- By e-mail to nick.gollan@kitchener.ca

City of Waterloo

- By mail: Ms. Nancy Corbett, Project Manager Capital Projects and Services, City of Waterloo, 100 Regina St. S., Waterloo, ON N2J 4A8
- By phone: 519.747.8509
- By e-mail to nancy.corbett@waterloo.ca

Thank you for your participation.



Stormwater Credit and Rebate Policy

Public Information Centre #1

There are a number of things citizens can do to reduce the amount of stormwater runoff and pollutants produced by their property. Therefore, the Cities of Kitchener and Waterloo are currently exploring options that would provide an incentive to individuals to utilize a method of reducing stormwater. Various programs can be explored, including the following:

- A *credit* program - gives users who reduce their stormwater runoff a regular credit that lowers the amount they pay on a monthly basis for stormwater management.
- A *rebate* program - offers a single lump sum payment to implement stormwater management best management practices. Users would see no change to their monthly stormwater utility fee. A rebate program could fund things like rain barrels and other rainwater harvesting devices.

Policy Development Process

1. Review and collect background information
2. Develop stormwater credit policy alternatives
3. Present credit and rebate policy alternatives
 - Public Information Centre on September 29, 2011 for City of Kitchener and October 4, 2011 for City of Waterloo
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7. Council approval of proposed policy (December 2011)

The Options

There are a number of options and combinations that could be used to arrive at an appropriate incentive program for community members. In addition, the option of not introducing an incentive program will also be evaluated.

The following alternatives are being considered:

Alternative 1: Do nothing

Alternative 2: Multi-residential & non-residential credits



Alternative 3: Residential credits

Alternative 4: Residential rebate program

Alternative 5: Combination of alternatives

Alternative #1: Do Nothing

- Maintain the status quo.
- No credit policy would be created.
- No incentive for private property owners to implement stormwater management best practices.
- No incentive for private property owners to maintain their private stormwater infrastructure.
- No opportunity for property owners to reduce their stormwater management fee.

Alternative #2: Multi-Residential and Non-Residential Credits

The focus of this alternative is to offer incentives to the groups who place the most strain on stormwater system and who also pay the highest stormwater rates.

- Multi-residential and non-residential customers would qualify for stormwater rate credits if they can demonstrate that their existing or proposed stormwater facilities or best management practices reduces the amount of stormwater runoff that goes into the municipal stormwater system. The municipal stormwater system includes such infrastructure as gutters, storm drains, drainage ditches, creeks and rivers.
- Reduced use of the municipal stormwater system would be reflected in a lower fee for this service.
- The credit for each property will be determined based on the stormwater controls present.
- The amount of the credit would be based upon a formula that takes into consideration the following factors:
 - Reduction of volume
 - Quality control
 - Changes in behaviour or education efforts

Who could this potentially benefit?

This could affect approximately 3000 properties in Kitchener and approximately 1500 properties in Waterloo.



Description of Alternative 2 Credit Factors

1. Stormwater Volume Control Credit

Stormwater volume control best management practices can be achieved through infiltration and extended detention by the following mechanisms:

- o Orifice control / super pipe storage
- o Roof top storage
- o Infiltration gallery
- o Ponds for quantity and/or quality control
- o Parking lot storage
- o Rainwater cistern

If flows generated onsite and/or from upstream areas are directed through best management practices such as the mechanisms listed above, or are controlled with onsite vegetated open spaces, then a site would be eligible for a credit. Credits for stormwater volume controls would be based upon hydrologic data, water quantity data, design specifications, and other pertinent data supplied by qualified professionals.

2. Stormwater Quality Control Credit


Stormwater quality control best management practices as identified in the Ministry of the Environment Stormwater Management Planning and Design Manual and the Credit Valley Conservation Area Low Impact Development Stormwater Management Manual would be eligible for a credit. The credit would be based upon hydrologic data, water quality data, design specifications, and other pertinent data supplied by qualified professionals on behalf of property owners.

Examples of quality control best management practices include:

- o Green roof/filter strip
- o Oil and grit separator
- o Snout
- o Goss trap

3. Non-structural BMPs and Education Credit

Credits may be issued for a site with ongoing implementation of an integrated set of non-structural BMPs that will help the municipality meet its stormwater management objectives. To receive a credit adjustment, documentation would need to be provided to verify that the non-structural best management practices and/or education program have occurred. Examples include:

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- o Paved area sweeping program
 - o Storm drain stencil program
 - o Salt management plan
 - o School education program

Alternative #3: Residential Credits

For residential land uses, a credit calculation could be based solely on the private on-site management of stormwater discharged from roof areas. For example,

- A credit could be applied if all roof drainage is fully retained on the property;
- A credit could be applied when private on-site stormwater management such as rainbarrels detains or partially retains stormwater discharges from roof areas; and,
- A supplemental credit could be applied if there are 4 or more trees on private property taller than 4.5 metres. This award would not apply to street trees such as those planted in an adjacent right-of-way.

The overall credit possible would be determined by the municipality on a case-by-case basis.

Who could this potentially benefit?

This could affect approximately 65,000 properties in Kitchener and approximately 26,000 properties in Waterloo.

Alternative #4: Residential Rebate Program

A rebate program could be implemented similar to a grant program that would fund the one-time investment in stormwater controls. A rebate program could fund things like rain barrels and other rainwater harvesting devices. This program could be administered via:

- A grant program that provides one-time funds to assist residents with costs to purchase an approved stormwater control device;
- Subsidized programs run through other organizations to enable enhancement of the program such as the Region of Waterloo's rain barrel program; and,
- Funding demonstration projects that could be used as examples of best management practices for the broader community.

Who could this potentially benefit?

This could affect approximately 65,000 properties in Kitchener and approximately 26,000 properties in Waterloo.



Alternative #5: Combination of Alternatives

This alternative would be a combination of alternatives 2, 3 and 4 in order to look at options that address both non-residential and residential customers. These combinations include:

- Multi-residential and non-residential credits + Residential credits
- Multi-residential and non-residential credits + Residential rebate

Who could this potentially benefit?

Either of these combinations could affect approximately 68,000 properties in Kitchener and approximately 27,500 properties in Waterloo.

Expected Policy Results

- Stormwater will be diverted, resulting in long-term improvements in surface water quality;
- Existing privately owned stormwater best management infrastructure (such as oil and grit separators) will be required to be maintained as a result of ongoing follow-up on credits and incentives.
- Property owners implement best management practices and make choices that benefit the environment;
- The community will be engaged and will have the opportunity to demonstrate ownership over greening their neighborhoods;
- The cities of Waterloo and Kitchener will demonstrate continued cooperation on the shared initiative to address water quality; and,
- General knowledge of stormwater issues by the public will be increased.


Evaluation Criteria to be Used on Alternatives

Technical

- Ease of Implementation
- Flood Protection / Erosion Control
- Beneficial Gain (i.e. stormwater quality and quantity)

Natural

- Water Quality / Pollution Levels
- Aquatic Habitat / Fisheries Resources
- Stream Geomorphology
- Terrestrial Resources, Vegetation and Wildlife
- Groundwater Resources



Economic

- Capital Costs
- Operations and Maintenance Costs
- Resource Requirements

Social

- Public Awareness Opportunity (Community engaged through meetings, open houses, social media, public education)
- Recreational Opportunities
- Visual Aesthetics

Next Steps

- Receive public comments by October 17, 2011
- Conduct impact analysis of options
- Evaluate credit policy alternatives
- Present preferred credit policy alternative
- Public Information Centre in November 2011
- Council approval of proposed policy (December 2011)

Your input is important!

Please tell us what option you would prefer to see implemented in your community and complete the attached comment sheet. To be considered in the evaluation process, comments must be submitted no later than October 17, 2011.

Thank You!

Stormwater Credit and Rebate Policy Development

Comment Sheet

Please take a few minutes to complete this comment sheet based on the panel information provided at the open house. Your contribution at this stage of the Stormwater Credit and Rebate Policy Development Review will assist the project team in determining the recommendations that will be made to City of Kitchener Council.

- 1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?**

Comment: _____

- 2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?**

Comment: _____

- 3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?**

Comment: _____

- 4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.**

Comment: _____



5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.



Comment: _____



6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: _____

Contact Details (Optional):

Name: _____
 Address: _____
 Phone Number: _____
 Email: _____

Note: Personal information requested on this form is collected in accordance with the Municipal Freedom of Information and Protection of Privacy Act. All comments will become part of the public record. If you do not wish to have personal information on this comment form included in the final report, please check the box below:

Please withhold personal information

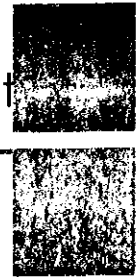
Please return this completed Comment Sheet to the project team. Comments are due on **October 17, 2011**. The Comment sheet may be faxed or mailed to:

Mr. Nick Gollan, C.E.T.
Manager, Stormwater Utility
 Engineering Services Division
 City of Kitchener
 200 King St. W.
 Kitchener, ON N2G 4G7

Phone: 519-741-2422
 Fax: 519-741-2747
 Email: Nick.Gollan@kitchener.ca

Website:
www.kitchener.ca/stormwatercredit

Stormwater Credit and Rebate Policy Development



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5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: _____

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: FOR THE LAST SEVEN YEARS I HAVE SAVED WATER FROM MY ROOF BY INSTALLING TWO 250 GALLON TANKS SEVEN 50 GAL TANKS AND A FRENCH DRAIN ACROSS MY DRIVEWAY THE WATER GOES INTO THE WATER TABLE AS WE KNOW NATURAL GROUND IS THE BEST WAY TO FILTER WATER- IN MY TANK I COLLECT 250 = 500 GAL TOTAL 850 GAL- ALSO 750 GALLON TANK = 350 GAL

Contact Details (Optional):

Name: _____
Address: _____
Phone Number: _____
Email: _____

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Please withhold personal information

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Mr. Nick Gollan, C.E.T.
Manager, Stormwater Utility
Engineering Services Division
City of Kitchener
200 King St. W.
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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: IT WOULD BE A BENEFIT TO ATLEAST PROVIDE A PILOT INCENTIVE PROGRAM TO FIND OUT HOW MUCH INTEREST THERE IS IN IMPLEMENTING STORMWATER BMP. ~~WE~~ NEED TO CONSIDER A MAINTENANCE PROGRAM TO MAKE SURE THE SYSTEM DOESN'T FAIL.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: IT WOULD BE AN OBVIOUS BENEFIT FROM BOTH A COMMERCIAL OWNER + RESIDENT TO IMPLIMENT BMP ON THEIR SITE IF A REBATE PROGRAM IS IMPLIMENTED.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: I AM VERY INTERESTED IN THE OUTCOME OF THE STUDY DUE TO THE POTENTIAL ECONOMIC IMPACT FOR OUR STORMWATER MANAGEMENT PRODUCTS OFFERED.

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: I WOULD LIKE TO KNOW THE AMOUNT OF REBATE FOR EACH CRITERIA



5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: I WOULD LIKE A 25% FOR EACH.

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: WOULD LIKE TO CONSIDER PERMEABLE PAVING AS A BMP FOR STORMWATER RUNOFF / QUALITY & QUANTITY. IN THE CREDIT REBATE POLICY. RESIDENCES CAN UTILIZE AS AN ATTRACTIVE ALTERNATE TO TYPICAL ASPHALT / CONCRETE. UTILIZING PERMEABLE PAVING CAN REDUCE RUNOFF ALMOST 100% IT CAN ALSO BIODEGRADE HEAVY METALS AND HYDROCARBONS AT A 95%+

Contact Details (Optional):

Name: [REDACTED]
 Address: [REDACTED]
 Phone Number: [REDACTED]
 Email: [REDACTED]

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Mr. Nick Gollan, C.E.T.
Manager, Stormwater Utility
 Engineering Services Division
 City of Kitchener
 200 King St. W.
 Kitchener, ON N2G 4G7

Phone: 519-741-2422
 Fax: 519-741-2747
 Email: Nick.Gollan@kitchener.ca

Website:
www.kitchener.ca/stormwatercredit

Stormwater Credit and Rebate Policy Development

Comment Sheet

Please take a few minutes to complete this comment sheet based on the panel information provided at the open house. Your contribution at this stage of the Stormwater Credit and Rebate Policy Development Review will assist the project team in determining the recommendations that will be made to City of Waterloo Council.

1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: I would like to see different rebate levels based on the capacity of stormwater collection.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: Alt. 2 - no support is given to the environment, fisheries will not see any benefits.
Alt 2-5 - Environment and fisheries receive the support they need.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: See my response to question #1

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: In my opinion the most important evaluation criteria is the impact on the natural environment. Benefits should be given to alternatives that are more efficient and sustainable.

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: Technical - 25
Social - 15
Economic - 25
Natural - 35

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment:

An important factor to keep in mind is the durability of the
equipment being used. In the past municipalities have made mistakes
giving away cheap thermo-formed rainbarrels that just break and
increase the strain on the environment.

Contact Details (Optional):

Name: [Redacted]

Address: [Redacted]

Phone Number: [Redacted]

Email: [Redacted]

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Fax: 519-741-2747

Email: Nick.Gollan@kitchener.ca

Website:

www.kitchener.ca/stormwatercredit

[REDACTED]

RECEIVED
OCT 04 2011
DEVELOPMENT & TECHNICAL SERVICES DEPT.
ENGINEERING SERVICES

October 3, 2011

Attention Mr. Nick Gollan, C.E.T
Manager Stormwater Utility

I am writing in regard to the "Stormwater Credit and Rebate Policy Development."

[REDACTED] 300 acres of cash crop. This is grown in a three-year rotation of wheat, corn and soybeans. Because water is a valuable asset the land is covered with either a crop or residue except at planting time. The [REDACTED] also has 40 acres of woodlot. The runoff from the buildings on [REDACTED] drains on this cash crop land. The beef feed lot also has a tank that is 40 ft. x 90ft. x 12ft. deep that takes the run off from the [REDACTED] and concrete yard.

At the [REDACTED] on [REDACTED] there is a [REDACTED] pond that receives any run off from the [REDACTED] on this property. There is grass cover around all of our buildings and pond.

[REDACTED] is part of the solution to water management NOT part of the problem. [REDACTED] Refuses to pay a "user fee" for a service that is not provided.

If this user fee is not rescinded [REDACTED] will be sending the City of Kitchener a bill for the run off that is contaminated by salt that is being drained from city roads onto our [REDACTED]

- [REDACTED] 8.5m x 535m = 4549 sq. m
- [REDACTED] 4.3m x 810m = 3483 sq. m
- [REDACTED] 9.8m x 436m = 4273 sq. m

In addition the City of Kitchener is charging [REDACTED] for storm water that is being drained on land owned by [REDACTED]

Sincerely,

[REDACTED]

Copy sent to Gord Grant OFA rep., Kelly Galloway Alderman

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Stormwater Credit and Rebate Policy Development

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: _____

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: _____

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: _____

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: _____

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment:

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: FOR THE LAST SEVEN YEARS I HAVE SAVED WATER FROM MY ROOF BY INSTALLING TWO 250 GALLON TANKS SEVEN 50 GAL TANKS AND A FRENCH DRAIN ACROSS MY DRIVEWAY THE WATER GOES INTO THE WATER TABLE AS WE KNOW NATURAL GROUND IS THE BEST WAY TO FILTER WATER- IN MY TANK I COLLECT 250 = 500 GAL TOTAL 850 GAL- ALLSO 750 GALLON TANKS = 350 GAL

Contact Details (Optional):

Name:

Address:

Phone Number:

Email:

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: WE ARE FARMING WITHIN CITY OF KITCHENER
DOING AND HAVE DONE BEST CONSERVATION
PRACTICES WE CAN, FEEL THIS IS IMPORTANT FOR
WATER CONSERVATION, HAVE NO CITY SERVICES FOR STORM WATER
- CREDITS MAY BE GOOD, BUT WE SHOULD NOT BE BILLED FOR UTILITIES
WE DON'T HAVE.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: CREDITS & REBATES MAY WORK BUT I THINK ITS
OPENING UP A CAN OF WORMS FOR CITY TO ADMINISTER.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: VERY INTERESTED IN THE STUDY.
FARMERS SHOULD BE EXCEPT WHERE STORM WATER
UTILITIES ARE NOT IN PLACE

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria

Comment: I AM IN FAVOUR TO CONSERVE OUR WATER THE BEST
WAY WE CAN, NOT BY UTILITY BILLING.
IF WE HAVE TO INCREASE TAX BILLS.

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment:

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment:

Contact Details (Optional):

Name: _____
Address: _____
Phone Number: _____
Email: _____

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: _____

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: PUTS CERTAIN RESIDENCES AT A DISADVANTAGE
FOR RAIN BARRELS ROOF STORAGE ETC. DUE TO LOCATIONS
OF PROPERTIES

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: _____

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: _____

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: _____

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: _____

0 WATER COMES OFF MY ROOF INTO THE STORM
SEWERS THEY ARE GATHERED IN RAIN BARREL & DISTRIBUTED
TO LARGE TREES & GARDENS/LAWN.

Contact Details (Optional):

Name: _____
Address: _____
Phone Number: _____
Email: _____

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: _____

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: _____

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: _____

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: _____

→ over

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment:

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment:
*I am having a collecting rain water for the used 27 years ago is used all through house, distilled for consumption,
I am willing to demonstrate my system for watering vegetable beds and flower beds,
I had a trip, developed in Israel.*

Contact Details (Optional):

Name: _____
Address: _____
Phone Number: _____
Email: _____

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: GRAND HILL VILLAGE DOES NOT RECEIVE STORM WATER SERVICES FROM THE CITY. THESE PROPERTIES ARE LARGE PROPERTIES WITH INDEPENDENT WELLS AND SEWIC SYSTEMS. THEREFOR A REBATE IS INSUFFICIENT, AND PROPERTY OWNERS WITHIN THE VILLAGE SHOULD BE EXERT.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: (GRAND HILL VILLAGE RESIDENTS) ARE BEING CHARGED A FEE FOR A SERVICE THE RESIDENTS DO NOT RECEIVE THEREFOR EXEMPTION, (RATHER THAN REBATES), WOULD BE THE LOGICAL POLICY.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: AS ABOVE.

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment:

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment:

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: THE ORAWO HILL VILLAGE ASSOCIATION HAS SUBMITTED A LETTER TO CITY COUNCIL EXPRESSING ITS VIEWS REGARDING THE INAPPROPRIATENESS OF CHARGING RESIDENTS A FEE FOR A SERVICE THE RESIDENTS DO NOT RECEIVE.

Contact Details (Optional):

Name: [Redacted]
Address: [Redacted]
Phone Number: [Redacted]
Email: [Redacted]

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: THIS MEETING WAS POORLY ADVERTISED - EACH NEIGHBOURHOOD HAS AN ASSOCIATION THAT COULD HAVE ANNOUNCED THIS MEETING. I LIVE IN OBER RIDGE AND WE ALL HAVE AN "INFILTRATION SYSTEM" WHICH WE PAID FOR IN OUR PURCHASE PRICE.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: I AM INTERESTED IN A MONTHLY CREDIT THAT WOULD ULTIMATELY BEA FEE (EXCEPT FOR MY DRIVEWAY)

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: AS MY ROOF RUN-OFF ALL GOES INTO AN "INFILTRATION GALLERY" AS DO ALL OBER RIDGE HOUSES, ONLY MY DRIVEWAY - ONLY IN HEAVY RAIN - RUNS ONTO THE ROAD.

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: WELL DONE.

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: TOO COMPLEX!

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: WOULD OPEN COMMUNICATION TO HOME OWNER AND PROVIDE AN EQUITABLE SOLUTION.

OPTION 3 IS THE PREFERRED SOLUTION

Contact Details (Optional):

Name: [Redacted]
Address: [Redacted]
Phone Number: [Redacted]
Email: [Redacted]

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[Redacted signature]

Stormwater Credit and Rebate Policy Development

Comment Sheet

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: _____ I hope this would also go to the City of Kitchener Council. Why state recommendations would be made to Waterloo Council..??! Obviously a credit system of utilizing rainwater for watering and to not only save it from going down the drains but also to reduce the use of potable water for irrigation is worthwhile. ✓

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: CREDIT SHOULD BE GIVEN FOR "ALL" OR A PORTION OF ROOF WATER THAT IS HARVESTED AND PREVENTED FROM FLOWING THROUGH THE STORM WATER DRAINAGE SYSTEM.

INCIDENTIALLY, THE WATER FROM THE STREETS AND RUNOFF ALSO IS IMPORTANT TO CREEKS, RIVERS AND LAKES TO KEEP THEM REFRESHED AND SUPPLIED WITH RAIN WATER DURING DRY PERIODS AND MAY BE ADDING TO ANOTHER PROBLEM.

A REBATE SHOULD BE GIVEN TO THOSE WHO DO NOT ALLOW RAINWATER, OR MOST OF IT TO RUNOFF THEIR PROPERTY. HOW CAN YOU CHARGE A FEE FOR SERVICES THAT ARE NOT USED? A ONE TIME FEE FOR PURCHASE OF CAPITAL CONTROL DEVICES IS A SEPARATE ISSUE. IF YOU ELIMINATE THE FEE THAT WILL HELP PEOPLE DECIDE TO INVEST. THE RAIN BARREL PROGRAM IS A SUCCESS NOW. THE FEE FOR RUNOFF AND THE SAVINGS ON THE COST OF WATER IS ALSO AN INCENTIVE. MATURE TREES WILL REQUIRE AND UTILIZE HUGE VOLUMES OF WATER, BUT THE FLOW OVER SATURATED SOILS IS A KEY CRITERIA SO SLOPE OF LAWNS IS ALSO IMPORTANT.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: I WANT THE FEE REDUCED OR ELMINATED FROM OUR PROPERTY. WE HAVE AN 800 GALLON RAINWATER HARVESTING SYSTEM AND TWO 45 GALLON RAIN BARRELS THAT CATCHES 95% OF

OUR ROOF WATER. OUR REAR YARD DRAINAGE FLOWS TO THE BACK INTO A FORESTED AREA ON A SLOPE AND NOT TO A STREET STORM WATER SYSTEM. WE MANAGE AN EFFICIENT IRRIGATION SYSTEM WHICH SUPPLIES OUR PLANTS AND TURF WITH THE PROPER AMOUNT OF WATER AT THE RIGHT TIMES AT THE RIGHT AMOUNTS ACCORDING TO WHAT ALSO FALLS IN A WEEKLY PERIOD. THIS MEETS OUR TOTAL WEEKLY NEEDS.

BECAUSE WE ARE AT THE TOP OF THE GRAVITY FLOW ON OUR STREET WE DO NOT HAVE STORM WATER DRAINS OR SYSTEM IN FRONT OF OUR LOT.

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: YOU MISSED THE BOAT! THE VICTORIA LAKE SILT HAS BEEN AN ONGOING ISSUE SINCE THE LAKE WAS DREDGED ORIGINALLY. EVERY RAIN BRINGS IN FOREST HEIGHTS CLAY SILT AND IT SETTLES IN THE LAKE. THAT SHOULD HAVE BEEN A ROUTINE MAINTENANCE ITEM FOR A CAPITAL PROJECT EVERY 10 - 15 YEARS NOT THE BASIS FOR A NEW RAINWATER TAX SYSTEM. IT WAS DREDGED 3 TIMES IN THE PAST 20 + YEARS BY THE PUBLIC WORKS DEPARTMENT. THE FACT THAT YOU DID NOT TEST THE MATERIAL PRIOR TO SETTING UP THIS ELABORATE SYSTEM AND THEN FOUND OUT IT DID NOT CONTAIN HAZARDOUS WASTE MATERIALS SO COULD BE UTILIZED LOCALLY AS IT WAS THE PREVIOUS THREE TIMES WAS A BACKWARD PROCESS. THAT SHOULD HAVE BEEN DONE FIRST.

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: EVALUATION FOR WHAT? IF YOU USE THE SYSTEM YOU PAY AND IF YOU DON'T OR ONLY PARTIALLY USE IT YOU PAY ACCORDINGLY. THE METHODS WILL VARY. YOUR MAINTENANCE AND IMPLEMENTATION COSTS SHOULD NOT BE OUR CONCERN.

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: THIS SYSTEM WILL NOT PREVENT YOUR MAINTENANCE OF CATCH BASINS AS THE RAIN WILL STILL WASH SANDING, SALTING AND OIL SEDIMENTS INTO THE BASINS.

THE ONLY SAVINGS MAY BE IN NEW SUBDIVISIONS WHERE YOU MIGHT NOT COSTRUCT AS MANY DETENTION PONDS...BUT SAVE A LITTLE OR SAVE A LOT THE CHECKING AND MAINTENANCE WILL LIKELY REMAIN THE SAME OR SIMILAR.

PLEASE REPLY TO THESE COMMENTS SO I KNOW THAT THEY WERE RECEIVED AND CONSIDERED.

SEND SOMEONE TO OUR HOUSE AND WE CAN SHOW WHAT DOES AND DOES NOT GO INTO THE STORM SYSTEM IN FIVE MINUTES.

THEN PROVIDE A 95% REBATE OR REDUCTION OF THE FEE TO SAVE MORE ADMIN TIME.

I DID NOT SEE ANY COMMENTS BY THE GRAND RIVER CONSERVATION AUTHORITY AS THEY MUST HAVE BEEN INVOLVED PRIOR TO THE DEVELOPMENT OF THIS AND THE FORMER POLICIES, I WAS SURPRISED AT THEIR LACK OF COMMENTS.

Contact Details (Optional):

Name: [REDACTED]
Address: [REDACTED]
Phone Number: [REDACTED]
Email: [REDACTED]

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Website: www.kitchener.ca/stormwatercredit

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Stormwater Credit and Rebate Policy Development

Comment Sheet

Please take a few minutes to complete this comment sheet based on the panel information provided at the open house. Your contribution at this stage of the Stormwater Credit and Rebate Policy Development Review will assist the project team in determining the recommendations that will be made to City of Waterloo Council.

1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: I SPENT \$10,000.00 ON MY
BASEMENT IN SEPT. 2001
IT WAS ALSO VERY
STRESSFUL

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: I would like a
Rebate

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: YES! NO STORMWATER
PROTECTION FOR ME

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: I HAVE RECEIPTS
IF YOU WOULD LIKE TO
SEE THEM

Nb Address

Stormwater Credit and Rebate Policy Development

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: BASE CREDIT & REBATE POLICY TO THE EXTENT OF
STORMWATER MANAGEMENT PROCEDURES IN PLACE AT
EACH INDIVIDUAL PROPERTIES (WORKING, AND RECOGNIZED)

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: PROMOTE SELF STORMWATER MANAGEMENT PROCEDURES THERE-B
REDUCING TAX BURDEN.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: EXTREMELY INTERESTED BASED ON MY OWN COSTS INCURRED
PROVIDING STORMWATER MANAGEMENT \$65,000, THEN BEING
TAXED UPON JUST AS IF NO \$ WAS SPENT.

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: _____

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: 25% EACH

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: SEE ATTACHED SITE PLAN W/ COSTS INCURRED

Contact Details (Optional):

Name:

Address:

Phone Number:

Email:

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Please withhold personal information

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Mr. Nick Gollan, C.E.T.
Manager, Stormwater Utility
Engineering Services Division
City of Kitchener
200 King St. W.
Kitchener, ON N2G 4G7

Phone: 519-741-2422

Fax: 519-741-2747

Email: Nick.Gollan@kitchener.ca

Website:

www.kitchener.ca/stormwatercredit

100

~~XXXXXXXXXX~~ ~~XXXXXXXXXX~~

Storm Water Management Costs (YEAR 2000)

incl Pond
" Stormceptor
" Catchbasins, Storm drains
" Infiltration Gallery
" Engineering for above

55,000.

Value of Land displaced by Pond 10,000

65,000

SWM Fees

8 months to AUG 31 2011

1,111.57

PROPERTY TAXES

YEAR 2011

17,246.10

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: NO.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: I DON'T SEE WHERE HOMEOWNERS LIKE US ARE CONSIDERED IN THIS POLICY. OUR HOME WAS CONSTRUCTED SUCH THAT THE LEAVESTROUGHS AROUND THE HOME ALL CONNECT DOWN TO THE FOUNDATION WEEPING TILE WHICH THEN DRAINS

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: SEE ANSWER TO # 2.

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment:

#2
(CONT'D) INTO A ^{ROCK} DRY BED SOME NINE FEET BELOW GRADE IN OUR BACKYARD. WHY ARE WE BEING CHARGED A MONTHLY STORM WATER CHARGE?

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: _____

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: _____

PRIMARY CONCERN WAS OUTLINED IN ANSWER TO QUESTION #2. WE WOULD APPRECIATE A RESPONSE AS TO HOW INDIVIDUALS IMPACTED IN THIS WAY LIKE US WILL BE COMPENSATED FOR INAPPROPRIATE BILLING? A COMBINATION OF REBATE AND CREDIT?

Contact Details (Optional):

Name: _____
Address: _____
Phone Number: _____
Email: _____

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Phone: 519-741-2422
Fax: 519-741-2747
Email: Nick.Gollan@kitchener.ca

Website:
www.kitchener.ca/stormwatercredit

PLEASE INCLUDE US ON THE 'STAKEHOLDER LIST'.

Thank you.

Stormwater Credit and Rebate Policy Development

Comment Sheet

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment:

If you implement a Stormwater Credit/Rebate Program, and you should, the program should be available to all commercial property owners and all residential property owners, both single family and multi-unit residential owners. The program should encourage diversion and/or treatment of the stormwater at source.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment:

The advantage of option 2, 3 and 5 is, or should be, that they generate on-going credits that reduce the burden of the stormwater monthly charge. The stormwater monthly charge is "the stick". The credit programs are "the carrot". Implementing these options generates on-going incentive to maintain and improve diversion/treatment projects at source and alternative 3 has the greatest chance of success.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment:

I am an owner of a single family dwelling in Deer Ridge and I have the possibility of controlling the water from my roof. I would make the investment to reduce/eliminate my stormwater charges.

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment:

I also believe that incidental factors of geography and geology should be considered in the calculation of the credit.

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment:

The weighting scheme should be related to the percentage of the stormwater diverted or treated. This will encourage users to address the issue(s) with the greatest impact not simply the easiest issue to address. Equal treatment will encourage only the least cost solutions to be done, but weighting by percentage of water addressed, estimated by the relative percentage of the area addressed by the control implemented, will encourage people to tackle the optimal sources for stormwater diversion or treatment.

Diversions should be rewarded with a larger benefit than treatment since diversions will eliminate the need for the municipality to provide treatment.

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment:

Further to question 5:

Example: a multi-unit residence generates 30% of its runoff from its roof, 50% from the parking lot and 20% from its driveway. Addressing the runoff from the roof would result in a 30% reduction of the monthly stormwater charge, addressing the runoff from the parking lot would result in a 50% reduction and addressing the driveway would result in a 20% reduction.

Assuming that the roof runoff is diverted then the full 30% should be reduced from the monthly charge. If the parking lot runoff has its quality improved but is not diverted then the 50% should be subjected to an additional factor say 50% so the effective reduction would be 25%.

Contact Details (Optional):	
Name:	
Address:	
Phone Number:	
Email:	

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Please withhold personal information

RECEIVED

OCT 12 2011

DEVELOPMENT & TECHNICAL SERVICES DEPT.
ENGINEERING SERVICES

Stormwater Credit and Rebate Policy Development

Comment Sheet

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: THE CONCEPT DOES NOT RECOGNIZE THOSE WHO MANAGE ALL THEIR STORMWATER RUNOFF WITHOUT CITY SERVICE OR INFRASTRUCTURE.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: A REBATE OR CREDIT OF ALL TAXES / FEES CHARGED AND PAID BY PROPERTY OWNERS WHO DO NOT AND HAVE NEVER AVAILED THEMSELVES OF CITY MANAGED STORM WATER SYSTEMS. ADVANTAGEOUS + JUSTIFIABLY APPROPRIATE.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: BEFORE ALL + SUNDRY ARE REBATED FOR RAIN BARRELS ETC. SERIOUS CONSIDERATION FOR THOSE OF US WHO DO NOT CONTRIBUTE TO THE CITY MANAGED STORMWATER SHOULD BE A PRIORITY!

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: THE STUDY SCOPE OR EVALUATION CRITERIA DOES NOT APPEAR TO ADDRESS THE SITUATION WHERE BY ALL STORMWATER IS MANAGED SOLELY BY THE PROPERTY OWNERS ON BEHALF OF OR IN LIEU OF THE CITY OR REGION.

(TAXED + NOW FEE FOR SERVICE, BUT THERE IS NOT (AND HAS NEVER BEEN) OR NEED FOR, OR DESIRED. A MANAGED SYSTEM.

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: THE EVALUATION CRITERIA MAY NOT APPLY TO THOSE OF US WHO DO NOT AVAIL THEMSELVES OF ANY SERVICES.

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: CONSIDERATION MUST BE GIVEN TO THOSE WHO MANAGE THEIR OWN STORMWATER.

CONSIDERATION OF CREDIT / REBATE OF RWH TAXES OR FEES CHARGED NOW AND OVER THE PAST 40/50 YEARS WITHOUT SERVICE PROVIDED BY CITY OR REGION. REDRESS OF THIS SITUATION SHOULD COMMENCE POST-HASTE!

Contact Details (Optional):

Name: _____

Address: _____

Phone Number: _____

Email: _____

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www.kitchener.ca/stormwatercredit

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: Anyone who redirects the roof drains so they do not go to the street should be paying the lower rate.

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: If you can get more poeple to use there rain water off the roof for there watering of flowers and etc. there will be a lot less need for larger storm sewers, so your capital costs would be a lot less.

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: If you don,t give the property owners an incentive to save momey by useing the storm water most will say why should they.

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: It would have been much more simple to just add 1/4 % to the tax bill than go to all this extra work.



5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: My evaluation would be Technical 10% , Natural 50%, Social 10%, Economic 30%.

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: I am enclosing six pictures to show you that I have no storm water off my roof going to the street.

I am at present being billed as light Commercial, Why I do not know. I would hope to be in the lowest class for billing since I really do not use the storm sewers for any of my roof water.

Contact Details (Optional):

Name: _____

Address: _____

Phone Number: _____

Email: _____

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: _____

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: _____

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: _____

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: _____



5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: _____

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: _____

For 27 years we have been collecting and saving rain water, to water our trees, vegetable garden and flower beds, and to use it throughout the house. In 1989 we planted two Maple in our front to shade the area, Rain water comes to us from Heaven clean never used before, there is nothing added. For consumption we distill

Can I be exempted from a stormwater fee?

My concern? Why not give people an incentive (taxes) to get water collected in a bigger better way than barrels

Name: _____
Address: _____
Phone Number: _____
Email: _____

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Email: Nick.Gollan@kitchener.ca

Website:
www.kitchener.ca/stormwatercredit

RECEIVED
OCT 05 2011
DEVELOPMENT & TECHNICAL SERVICES DEPT.
ENGINEERING SERVICES

Stormwater Credit and Rebate Policy Development

Comment Sheet

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1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?

Comment: alternative #2 + 3 makes the most sense to me
#4 part of it is already in place and funding demonstration
projects could become a cash cow for someone

2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?

Comment: _____

3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?

Comment: I live in Grand Hill Village. We are on septic tanks
therefore we have esp. Trace lots. lots of grassland +
mature trees and not a storm sewer in sight. Water percolates
into the ground. Therefore we would like an exemption on
stormwater management fees

4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.

Comment: _____

5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.

Comment: _____

6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.

Comment: *Rebates + credits projects can be withdrawn at any time at council. Is there a political will to see it through?*

please come out and view the set up in Grand Hill village.

Contact Details (Optional)

Name: _____
Address: _____
Phone Number: _____
Email: _____

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Email: Nick.Gollan@kitchener.ca

Website:
www.kitchener.ca/stormwatercredit



Grand Hill Village Association Executive
54 Grand Hill Drive
Kitchener, Ontario N2P 2E4
October 24, 2011

Attention: Mr. Nick Gollan
Copies to: Mayor Carl Zehr
Councillor John Gazzola

RE: City of Kitchener Storm water Fee/Credit and Rebate Policy

Dear Sir,

The Grand Hill Village Assoc. Executive, representing 38 homeowners in the Grand Hill Community of Southwest Kitchener, requests an exemption from the storm water management fees charged our property owners. Grand Hill Village homes and properties receive no City of Kitchener storm water services, and produce no runoff onto any City of Kitchener lands. Therefore, it is invalid and inappropriate to apply this fee to Grand Hill properties.

Grand Hill Village is unique in Kitchener; properties are large, typically ½ to 1 acre, with a high proportion of mature trees and natural surface area relative to impervious surfaces, so all runoff is commonly absorbed. Grand Hill Village residents jointly own an additional 18 ½ acres of wooded land and wetlands, which also absorb runoff in the unlikely event that it was not absorbed by residential properties. Finally, Grand River Conservation Authority property (NOT City property) is located adjacent to our personal and shared properties, and GRCA lands would potentially receive our runoff before it enters the Grand River.

Grand Hill Village has no City water services or storm water infrastructure. The City of Kitchener report 'DTS-10- 94' to address "stormwater rate-by-law and utility implementation" states that

"Under the authority of sections 9 10 and 11 and part XII of the Municipal Act 2001 ... a user fee may be charged to cover the cost of a service and a key component is to ensure that there is a nexus between the amount of the user fee and the cost of the service being provided."

The complete lack of storm water services for Grand Hill Village residents nullifies the legitimacy of charging a user fee for such services.

Furthermore, credits or rebates are not applicable in our situation due to the ongoing lack of services and runoff in our neighbourhood. We believe the Engineering Firm 'Aecom' may have erred with regards to assuming that all Kitchener properties benefit from city water services and therefore fall under the same fee requirements. Please advise us when the erroneous billing for these fees to Grand Hill Village residents will be addressed and resolved.

We appreciate your attention to this matter.

Regards,



Grand Hill Village Association Executive

(Jennifer Sinclair, Secretary)

(Doug Brunton, Treasurer)

(Bob Hanna, Director)

(Richard Nash, Director)

(Andreas Van Gastel, Director)



Kitchener Waterloo Stormwater Credit and Rebate Policy Development

Cadillac Fairview's Comments

Cadillac Fairview Corporation Limited owns Fairview Park Shopping Centre and 225 Fairway Road in Kitchener.

Cadillac Fairview attended the public information session of September 29, 2011 and would like to respond to the request for input. We have reviewed the five alternatives for stormwater credits/rebates as set out in the Stormwater Credit and Rebate Policy information document.

In keeping with the self-funding nature of the new stormwater rate, it is our belief that any rebate or credit program will be funded from within the operating budget and paid for by all properties liable for the stormwater charge.

While we support the efficient and effective management of stormwater quality and quantity, we are opposed to the current and proposed determination and distribution of the charge based on impervious area.

Specifically Cadillac Fairview and all other non-residential properties bear a disproportionate share of stormwater costs for common areas used equally by all taxpayers such as roads, municipal facilities, parks etc. These common areas contribute greatly to stormwater runoff costs and those costs should be allocated to all property owners based on gross lot size and not just impervious area.

For the same reason, any rebate/credit scheme funded within the stormwater program would increase the stormwater rate and be borne disproportionately by the non-residential class.

While we encourage stormwater management practices, we cannot support any proposal to provide credits/rebates to 65,000 residential properties for downspout diversion, rain barrels, dry wells, tree planting etc. This type of program while politically popular will be very expensive, particularly if subsidies are provided. Administration costs to monitor compliance and process rebates would also increase. These costs would also significantly increase the stormwater rate which is borne disproportionately by the non-residential class.

Any proposed credits/rebates for non-residential property would have to be significant in order to be an incentive to property owners to construct stormwater management facilities. Unfortunately, those subsidies will be primarily funded by properties which by virtue of age or type of construction cannot economically retrofit their own property and would not be eligible for credits as the cost would be prohibitive.

In addition, for existing non-residential properties, retrofit mitigation measures will be extremely costly to employ compared with greenfield developments who can build-in stormwater volume and quality control measures at a more reasonable cost. If credits/rebates are provided to both new and retrofit properties on the same basis, that program will benefit greenfield properties at the expense of retrofit properties that cannot make a business case for the expenditure.

Cadillac Fairview supports initiatives that will promote compliance with water quality standards and supports all taxpayer efforts at reducing stormwater flow rates, however, due to the current punitive rate structure established by the City of Kitchener based on impervious area we cannot support any rebate/credit program which will result in increasing our costs for the benefit of other taxpayers.

Cadillac Fairview would be pleased to actively participate in meaningful dialogue surrounding the current stormwater rate methodology in order to address our concerns respecting sharing of costs.



Waterloo Federation of Agriculture

c/o Richard Cressman
151 Shade St
New Hamburg, ON N3A 4J2

October 17, 2011

Mr. Nick Gollan, C.E.T.
Manager, Stormwater Utility
Engineering Services Division
City of Kitchener
200 King St. W.
Kitchener, ON N2G 4G7

Ms. Nancy Corbett, P.Eng.
Project Manager
Capital Projects and Services
City of Waterloo
100 Regina St. S.,
Waterloo, ON N2J 4A8

The Waterloo Federation of Agriculture represents nearly 700 farm members in the Region of Waterloo. As the Region's largest farm organization, we endeavour to act on behalf of the entire farm community. The WFA appreciates the opportunity to express its concerns on stormwater management and the system of fees used to undertake important public works that lessen environmental impacts.

Recommendation for Farmland: The Waterloo Federation of Agriculture recommends that farm properties within the urban envelope of the Region of Waterloo, specifically the City of Kitchener and the City of Waterloo be exempted from stormwater management fees.

Rationale:

- The act of farming maintains soils in a state far more permeable than other urban land uses. In most situations the area in crops or pasture greatly exceeds the area of farm buildings therefore resulting in a net positive impact on stormwater management
- Those few farms caught within the urban boundaries are one of the few areas left where natural recharge of the groundwater supply can occur on the Waterloo Moraine and these are already recognized as recharge areas with the Regional Official Plan.
- Overall, the farmers in the Region are actively participating in enhancing and improving water quality formally, through programs like the Rural Quality program and the Environmental Farm Plan and informally, by providing unpaid eco-services.
- Qualifying for an exemption is a simple matter of verifying that the land is zoned agricultural and that the property role number is associated with an active Farm Business Registration number. This is information already available to municipalities in the Region and is simple to verify.
- The net financial impact will be limited given the few actively farmed parcels within the urban envelope.

While the central point of a system of credits and rebates is to encourage activity that reduces surface runoff we submit that farmland should be exempt. Agriculture by its very nature is the one land use that attempts to maximize the retention of rainwater and hold it for crop growth. On the lighter ground of the Waterloo Moraine most of excess rainfall percolates down through the soil and recharges our groundwater supply. A fair accounting of net discharge from farmland will show the area of buildings that are found on agricultural properties are small compared to the total area of the parcel that remains available to handle excess rainfall. For this reason alone active farm properties should be exempt and should not be subjected to fees.

The Waterloo Federation of Agriculture (WFA) has been an important partner with the Grand River Conservation Authority (GRCA) and the Region of Waterloo in the effort to enhance the positive effects of agriculture on the environment. The most notable example is the Rural Water Quality program. Municipalities along the watershed have been generous contributing about \$7 million to the program. Landowners (mostly farmers) have added an additional \$14 million towards projects. GRCA estimates that these projects have kept 56, 500 kg of phosphorus on the land and out of watercourses; kept over 10,000 head of livestock away from over 116 kilometers of streams and returned some 400 hectares of fragile land to natural vegetation. The WFA has been a proud supporter of this program including helping GRCA in the original design and continuing to provide the farm perspective that has been the foundation of its success.

But the environmental initiatives of Ontario farmers did not start with the Rural Water Quality program. A key milestone was the creation of the Environmental Farm Plan (EFP) in 1993 as directed by the Ontario Farm Environmental Coalition. The EFP has become the template for other farmer-driven environmental programs across Canada, North America and around the world. The EFP involves a detailed review by each participating farmer of 23 different aspects that may have environmental consequences on their farm. After the review the farmer completes an action plan for review by EFP staff. The farmer is then eligible to participate in the Canada-Ontario Farm Stewardship Program (COFSP.) COFSP provides shared funding for projects identified and pre-approved in that farmer's EFP Action Plan. It is conservatively estimated that over 70% of farmers have participated in EFP and more than \$600 million has been invested by farmers in environmental improvements over the nearly 20 years that EFP has been a reality in Ontario.

The positive contributions of agriculture to the environment do not begin and end with formal programs. *Ontario's Wealth, Canada's Future: Appreciating the Value of the Greenbelt's Eco-Services* was published by the David Suzuki Foundation in September 2008. This report attempted to estimate the natural capital found within the GTA Greenbelt. Wetlands, woodlands and farmlands were all found to provide "eco-services" like carbon sequestration, pollinator habitats, soil formation, and nutrient cycling. The attempt to attribute exact dollar values to eco-services is fraught with complexity and subject to much debate, but this report does provide a rough indicator of the value of unpaid contributions of natural and agricultural ecosystems to the environment.

Transposing the values established in the Eco-Services report onto census data for Waterloo provides a rough indicator for the value that the Region's farmers provide annually in the form of unpaid, agri-ecosystem services including woodland and wetland areas currently managed by those farmers.

Unpaid Value of the Region's Agri-Ecosystem Services

	\$/ha/yr	ha	Total
Crop land	\$477	74,996	\$35,773,092
Idle land	\$1,667	3,236	\$5,394,412
Woodlands / wetlands	\$5,414	9,213	\$49,879,182
Total			\$91,046,686

Note: Woodland and wetlands are combined in the agricultural census, so the much lower value for woodland eco-services was applied.

Sources:

2006 Census of Agriculture as reported by OMAFRA, Jan 2010

Ontario's Wealth, Canada's Future: Appreciating the Value of the Greenbelt's Eco-Services, September 2008, David Suzuki Foundation

So, farmers in the Region generate over \$91 M in agri-ecosystem services every year. Services we all enjoy. Services that are a free to the community as a direct result of agricultural activities. Agriculture has a clearly positive impact on the environmental balance sheet in the Region of Waterloo. This in addition to providing the scenic backdrop that brings so many tourists to the Region. This in addition to delivering some of the safest, most nutritious and most affordable food in the world.

So to be clear the WFA is proud of the contributions of the Region's farmers in protecting and enhancing the environment. We believe that the community should be aware of these contributions and equally proud of their part through contributions to the Rural Water Quality Program and through the simple act of buying local food.

The Waterloo Federation of Agriculture looks forward to collaborating with the City of Kitchener and the City of Waterloo on developing a system of stormwater management that is fair and equitable and that recognizes the good work done that makes the Region of Waterloo a better place to live for all its citizens. An exemption for farmland is recognition that farming is part of the solution towards better stormwater management. Thank you for the opportunity to express our concerns.

Respectfully,

Mark Reusser, Vice President
Waterloo Federation of Agriculture



Stormwater Credit and Rebate Policy Development- Feedback

October 13, 2011.

REEP Green Solutions and Green Communities Canada fully support the use of targeted credits and rebates in order to motivate action to reduce stormwater impacts on the Grand River Watershed. To summarize, we recommend that a credit and rebate policy be in place for commercial properties. We recommend that only a residential rebate program be implemented because carrying out a residential credit program would be cost prohibitive.

Commercial Property Recommendations

Commercial Credits

We would like to recommend that credits should issued be for permanent reductions in volume, with 3 conditions to maintain your credit. These conditions would be met on an annual basis:

1. Meet or exceed prescribed pollution control measures (varying requirements depending on the industry and size of the property).
2. Meet or exceed maintenance requirements as prescribed (varying requirements depending on the industry and size of the property).
3. Participation of designated representatives in educational sessions.

Commercial Rebates

We would like to recommend that rebates should be available for pollution control measures.

An example of a commercially appropriate rebate is creating a demonstration project.

We would recommend that funds be provided based on the following criteria:

1. Rebates should be given for demonstration projects at institutions only eg churches, prisons, hospitals and schools. Public access to these sites should be a heavily weighted grant eligibility criterion. Maximizing learning opportunities for the public should be at the core of these grants.
2. Provide seed money for doing projects, with grant amounts based on proposed size and volume of water to be managed.
3. Once the demonstration project is completed, the rebate will be granted. The project will then qualify for the ongoing credit for reduced volume.
4. The credit conditions listed above would need to be met by these projects on an annual basis to qualify for ongoing credit.

To provide scaled rebates for projects based on volume of stormwater displacement, break down the multi-residential sector into different categories. For example, differentiate between small buildings (eg single home divided into 3 units) that should be considered residential and the larger ones. Treat divided homes as a single dwelling. Above a certain number of units would fall into the commercial sector. Perhaps this designation exists already.

Residential Property Recommendations

Residential Rebates

We would like to recommend the implementation of residential one-time rebates as a cost-effective way to motivate and reward action.

We support the seamless integration of existing services by working with the Region of Waterloo on existing programs such as rain barrel distribution/sales and the encouragement of new initiatives such as building a rain garden, infiltration gallery, green roof and the installation of permeable paving driveways.

Regarding trees, we would like to encourage rebates for tree planting to motivate action. We do not recommend credits/rebates for full grown trees as they are already in place.

Residential Credits

An ongoing credit system does not appear to be economically feasible when residential property owners are only paying approximately \$100/year. Increasing fees to cover cost would likely not be popular with the public as it would likely mean a significant increase.

We recommend that demonstration projects should be for the institutional sector only, not the residential sector. Limited public access, visibility and signage minimize the potential for broad public education opportunities with these sites.

Communications Recommendations

We recommend that the city consider engaging communications and marketing expertise from REEP and other qualified organizations and companies to assist in communicating the policies, practices and programs to the public.



Working together for healthier homes and sustainable communities

Communicating complex ecological and engineering concepts to the general public represents a significant challenge. We would like to recommend that engineering terms such as 'orifice control' and 'snout' be accompanied by simple explanations in parentheses to increase public comfort level with these terms. Utilizing many images is also a wonderful way to convey complex messages effectively.

Finally, we would like to recommend including the big picture goals when communicating with the public to encourage buy-in. A phrase that might be effective would be "improving the water quality of the Grand River and its tributaries for today and for future generations."

Contact Information

Thank you for the opportunity to provide feedback about this important and innovative policy.

If you have further questions or concerns please do not hesitate to contact us.

Sincerely,

Mary Jane Patterson, Executive Director, REEP Green Solutions
mjpatterson@reepgreen.ca, 519-744-6584 ext. 229

Cheryl Evans, Water Education and Event Coordinator, REEP Green Solutions
cevans@reepgreen.ca, 519-603-0323

Sharyn Inward, Green Communities Canada
sharyn@greencommunitiescanada.org, 705 745-7479, ext. 113





Stormwater Credit and Rebate Policy Development

Input Submitted on Behalf of the Waterloo Region District School Board October 2011

TO: Mr. Nick Gollan
Engineering Services Division
City of Kitchener
299 King St. W
Kitchener, ON N2G 4G7

Ms. Nancy Corbett
Capital Projects and Services
City of Waterloo
100 Regina St. S.
Waterloo, ON N2J 4A8

In June 2010, the Cities of Kitchener and Waterloo approved implementation of a stormwater rate charge for all property owners based on their property's impervious area.

The Waterloo Region District School Board had previously made its objection to the charge known to the municipalities based on Section 58(1) Municipal Charges of the Education Act which states:

“Despite sections 9, 10 and 11 and Part XII of the *Municipal Act, 2001* and sections 7 and 8 and Part IX of the *City of Toronto Act, 2006* but subject to subsection (3), a by-law imposing fees and charges passed under those provisions does not apply to a board.”

At the May 17, 2010 meeting of the Finance and Corporate Services Committee of the City of Kitchener, Stormwater Management Utility and Rate Implementation was discussed (DTS-10-100).

A request was made “that through the Association of Municipalities of Ontario (AMO) an appeal be made to the Government of Ontario to address the discrepancy between the Municipal Act and the Education Act regarding the City's authority to apply the proposed SWM rate to local school boards.”

Our sources at the Ministry of Education advise that this issue has not yet been resolved.

Therefore we reiterate our position that the Waterloo Region District School Board opposes the legality of the SWM charge as it transfers municipal costs for stormwater from its current general tax based financing to a charge for the Waterloo Region District School Board which is property tax exempt.

The Waterloo Region District School Board is exempt from the charge on the basis of section 58(1) of the Education Act.

The Waterloo Region District School Board further responds that it complies with all stormwater management requirements imposed by municipalities on its sites. The school property owned by the school board is public property and contributes to the benefit and enjoyment of the municipal residents both during and after school hours.

The imposition of the stormwater charge in Kitchener and Waterloo (at the current rate) for a school board will add approximately \$250,000 annually to the Waterloo Region District School Board expenditures. School boards do not receive specific funding for this type of charge so reductions will need to be made to programs and services for the students of Waterloo Region schools. This will be detrimental to the learning and achievement of our youngest community members.

We believe that the intent of Section 58(1) of the Education Act is to ensure that municipal expenditures for items such as stormwater management are absorbed by the residential, commercial and industrial tax base which benefits from the education of students within their community.

Submitted By:

Marilyn Marklevitz,
Executive Superintendent of Business and Financial Services
Waterloo Region District School Board
51 Ardel Avenue
Kitchener, ON N2C 2R5
519-570-0003, Ext. 4321

Sent via email

Nick Gollan

From: Les Misch [Lmisch@aet-consultants.com]
Sent: Friday, September 16, 2011 2:05 PM
To: Nancy Corbett
Cc: Nick Gollan
Subject: Stormwater Credit and Rebate Policy Development
Attachments: image001.jpg; image006.png

Hello Nancy,

I will try to make it to the public consultations regarding the stormwater policy development, however, should I not be able to attend, please except the following as my initial comments.

I am glad to see that the Kitchener and Waterloo is implementing this program. As a resident and business owner in Kitchener-Waterloo, it gives me pride to know that I am part of a community with decision-makers that embrace ideas that lead to a sustainable environmental, social and economic future and that understand the principle of a preventative approach ("spend a dollar now and save one hundred dollars down the road") while rewarding those that choose to be smart.

I would hope that the policy allows for participants of the program to be able to implement grey water recycling. I know that building departments of some municipalities have raised concerns with rain water harvesting and grey water use due to potential health concerns from roof-top water mixed with bird feces. One of our principles have run into this problem when he integrated a rainwater harvest system in to this new house. However, there is great merit rain water harvesting and with proper designs controls and fail-proof systems, it can work.

Also with respect to rainwater harvesting, I recall an article in one of the local newspapers (Waterloo Region) about a year or two back that a resident who had a relatively large rainwater harvest system (several large above ground water storage vessels I believe) was penalized by the local municipality by means of hiked taxes or something to that effect. I am uncertain of the details of the article but I would hope nonetheless that this issue would be addressed and resolved as part of the stormwater program.

I like the credit system. There is a direct relationship between implementation (or existing) stormwater BMP's and stormwater management fees. The rebate system is attractive as well for those who can't put up the upfront costs for implementing BMP's. I would imagine the recipient of the rebate would also be eligible for the credits once the BMP's are implemented? This is not clear in the introduction information provided in the email below.

As for homeowners, I am curious to know what BMP's would be eligible for credit and rebate (e.g. xeroscaping, rain barrels, grey-water harvesting via underground storage tank, etc.?)

Good luck and don't be deterred by narrow-minded opponents or the self-interested minority. It's a great program and in fact should be used as a model for implementing other similar credit/rebate programs that will help us build a truly sustainable, cost-saving and prosperous community (e.g. credit/rebate for integrating native trees and other natural vegetation into existing and planned urban development's – cooler ambient temperatures – better air quality – lower energy consumption – improved health and lower costs, etc.).

Les Misch
Principal
Senior Ecologist

AET Consultants
531 Wellington Street North
Kitchener, ON N2H 5L6
T 519.576.9723 ext. 306
F 519.570.9589

www.aet-consultants.com

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From: Nancy Corbett [mailto:Nancy.Corbett@waterloo.ca]
Sent: Thursday, September 15, 2011 4:53 PM
To: Nancy Corbett
Subject: RE: Public Notice - Stormwater Credit and Rebate Policy Development



PUBLIC NOTICE

STORMWATER CREDIT AND REBATE POLICY DEVELOPMENT

THE STUDY:

The Cities of Kitchener and Waterloo are working together on developing a stormwater credit and rebate policy. A stormwater credit and rebate policy provides financial incentive for properties to provide on-site controls that reduce their individual contributions of stormwater runoff and pollutant loading to the municipal stormwater management system. A credit and rebate policy would also recognize those existing properties with stormwater controls or stormwater best practices already in place. A credit program would give users who reduce their stormwater runoff a regular credit that lowers the amount they pay for stormwater management on a monthly basis. A rebate program would provide a single lump sum payment to implement stormwater best management practices, and users would see no change to their monthly stormwater utility fee.

The Cities of Kitchener and Waterloo are looking for public input into what this program should look like. Information gathered from the public consultation process will be an important part in the development of the policy. Stormwater Credit and Rebate Policy recommendations will be presented to both Councils at the end of 2011.

BACKGROUND:

What is stormwater and how does it impact us?

Stormwater is water that flows across the land and is routed into drainage systems and ultimately into our natural areas such as creeks, lakes and wetlands. Stormwater is not limited to precipitation, but may also come from watering the lawn, washing the car and many other sources. As our landscape changes from undeveloped, natural areas to cities with houses, businesses, roads and parking lots, the amount of permeable area is being reduced and replaced with hard impermeable surfaces that don't absorb stormwater. In other words, these hard impermeable surfaces would generate excessive surface runoff that could turn into potential flood or erosion hazards if not managed.

What is a stormwater management system?

To avoid flooding, erosion, and water quality impairment, we need to put in place measures and tools to manage the runoff in the form of a stormwater management program. Stormwater management is planning for and controlling stormwater runoff from rain and melted snow, to reduce downstream erosion, water quality degradation and flooding. It also reduces the impact of changes in land use on the aquatic environment.

How do the cities manage stormwater?

The Cities are responsible for managing all aspects of stormwater within their jurisdiction. The Cities operate and maintain drainage facilities that are located within the public right-of-way limits or public easements.

In June 2010, the City of Kitchener and the City of Waterloo Council approved the implementation of "tiered flat fee" stormwater rate structures based largely upon a property's impervious area. The rate methodology provides for a fair and equitable approach allocating costs associated with stormwater management to all property owners, instead of basing it on property value.

As a component of the stormwater rate implementation, both municipal Councils requested that staff report back on a recommended credit and/or rebate policy to reward customers that have reduced their stormwater contribution to the municipal stormwater system through on-site stormwater controls.

THE PROCESS:

The Cities of Kitchener and Waterloo are working together on developing the Stormwater Credit and Rebate Policy to realize efficiencies in the development efforts and to be consistent where possible in the policy framework.

Alternatives for a credit and rebate policy will be fully explored and follow a process similar to an environmental assessment to arrive at a preferred policy alternative. This process generally includes the following steps:

- Identification of a problem or opportunity;
- Identification, assessment of impacts, and evaluation of alternative solutions;
- Selection of a preferred solution; and,
- Preparation of the policy.

Public consultation will be integrated into this process and will include at least two (2) public information centers at which the public will have opportunity to provide input and feedback.

PUBLIC INFORMATION CENTRE:

We would like your input on the alternatives being considered and the evaluation criteria being used.

Public information centres will be held at the following locations:

<p>City of Kitchener consultation:</p> <p>Sept. 29, 2011, 6 to 8 p.m. Downtown Community Centre Multipurpose Room 35 Weber St. W.</p>	<p>City of Waterloo consultation:</p> <p>Oct. 4, 2011, 6 to 8 p.m. RIM Park Manulife Financial Sportsplex & Healthy Living Centre 2001 University Avenue East, Waterloo Forbes Room, 2nd Floor</p>
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COMMENTS:

We are interested in hearing any comments that you may have

about the study. City of Kitchener and City of Waterloo staff will be present to discuss elements of the project and to answer questions. With the exception of personal information, all comments will become part of the public record. The information will also be available on the City of Kitchener and City of Waterloo websites.

If you are unable to attend and would like to provide input into the study, please address your comments to either of the Project Team members below:

Mr. Nick Gollan, C.E.T.
Manager, Stormwater Utility
 Engineering Services Division
 City of Kitchener
 200 King St. W.
 Kitchener, ON N2G 4G7

Phone: 519-741-2422
 Fax: 519-741-2747
 Email: Nick.Gollan@kitchener.ca

Ms. Nancy Corbett, P.Eng.
Project Manager
 Capital Projects and Services
 City of Waterloo
 100 Regina St. S.,
 Waterloo, ON N2J 4A8

Phone: 519-747-8509
 Fax: 519-747-8646
 Email: nancy.corbett@waterloo.ca

Website:
www.kitchener.ca/stormwatercredit

Website:
www.waterloo.ca/stormwater

Nancy Corbett, P.Eng.
 Project Manager - Capital Projects and Services
 City of Waterloo
 T: 519-747-8509
nancy.corbett@waterloo.ca

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Nick Gollan

From:

Sent: Monday, September 19, 2011 5:09 PM

To: Nick Gollan

Subject: Stormwater fee credit

Hi Nick,

This is good news! Your following through with a stormwater fee credit to home owners review is a great idea. Here at [redacted] we have rainbarrels to catch the water from all eavestroughs, weather permitting. We have 4, at times. Then my clever husband pumps the water back to two stacked large tanks. Each holds 360 gallons . I can fill my watering cans at either source, or the water can be pumped back into the barrels as needed, and used to fill our small pond as well. We can also use a soaker hose from this source to do our veggie/fruit garden. I am so proud of his system and I think that conservation is it's own reward, as well. We try to conserve and are constantly reviewing our own use of resources. Thanks again for asking, Nick!

Nick Gollan

From:
Sent: Thursday, September 22, 2011 8:56 AM
To: Nick Gollan
Subject: Stormwater Credit

Sir:
Our House is on _____ in Kitchener. We collect 1200L of Rainwater in our Rainbarrels.
There is no water running in the drain. We should be compensated in some way. There are people in our street to empty their Pool water on the street, which runs into the drain. These people should pay.
To mention if the Rainbarrels are full, the overflow of water runs on the grass in the backyard.
We like to be compensated in some way, that we have no water running into the Stormwater System

Nick Gollan

From: Stuebing, Devin P. (Navastone) NA [Devin.Stuebing@hanson.biz]
Sent: Tuesday, September 27, 2011 10:44 AM
To: Nick Gollan
Subject: Permeable Paving System Credit Option

Nick,

We have noticed the Stormwater Management credit/rebate program consultation on September 29, 2011.

We at Hanson Building Products offer several stormwater management solutions suitable for both new construction and retrofit projects. Our solutions include Stormceptor oil and grit separators, Jellyfish membrane filtration system, Stormtrap underground stormwater detention system and AquaPave Permeable Paving System.

Stormceptor, Jellyfish and StormTrap are typically utilized in commercial or industrial applications. AquaPave, however, would be a suitable option for both commercial and residential property owners to take advantage of the proposed credit/rebate program. In addition to eliminating run-off, the unique AquaPave sub-base includes a layer of Inbitex geotextile which removes hydrocarbons and heavy metals from stormwater before releasing into the groundwater system.

For more information about the AquaPave Permeable Paving System, please visit us online.

<http://www.hansonhardscapes.com/site/sub/aquapave/overview.php?region=1>

It is our hope that you would consider including permeable pavements such as AquaPave as an acceptable stormwater management solution in your credit/rebate program.

If you would like to discuss this further, please do not hesitate to contact me.

Regards,

Devin P. Stuebing, C.E.T.
Stormwater Specialist

Hanson Building Products
1081 Rife Road
Cambridge, Ontario
Canada
N1R 5S3

Office Phone:
519 740-6000 ext. 322
800 265-6496 ext. 322

Cell:
647 938-1656

Office Fax:
519 740-2543
800 276-3091

devin.stuebing@hanson.com
www.hansonhardscapes.com

Nick Gollan

From

Sent: Thursday, September 29, 2011 4:22 PM

To: Nick Gollan

Subject: Re: Stormwater Credit and Rebate Policy Development

Hello Nick:

My comments about a stormwater and rebate policy are as follows:

I suggest that a regular credit that lowers the amount that is paid for stormwater management on a monthly basis is the most fair method that provides the maximum incentive to property owners to provide on-site controls. A one time rebate simply does not provide a long-time incentive.

I would suggest that hard surface percent calculations be maintained, but that a points system be implemented based on a standard check list of appropriate on-site storm water reduction methods and the number of discharge points from roof surfaces. The more items checked, the bigger the rebate. Some check list items would score a higher value because of the greater reduction of storm water runoff. Suggest each point represents one dollar up to a maximum of the property fee. In other words if you reduce your stormwater discharge to zero, then your fee would be zero.

Suggested suitable check list items and their value would include:

1. Downspout Discharge -

- onto hard surfaces; rebate nothing
- onto maintained grass turf areas; one point
- onto shrub, perennial and treed planting beds; two points
- into rain water reservoirs (including rain barrels) for further use on-site; five points
- into stormsewer connection; a penalty of 10 points

2. Driveways, Parking Areas, and other Hard Surfaces

- discharge from concrete, asphalt and hard packed soil and aggregate; no rebate
- certified permeable pavements including 'green pavements' with well-sorted aggregate sub-bases; five to ten points depending on percent cover

If you would like further explanations and rational about these thoughts please contact me.

----- Original Message -----

From: Nick.Gollan@kitchener.ca

To: Nick.Gollan@kitchener.ca

Sent: Monday, September 19, 2011 4:02 PM

Subject: Stormwater Credit and Rebate Policy Development

Nick Gollan

From: Eric Nadeau [enadeau@rtscompaniesinc.com]
Sent: Thursday, September 29, 2011 8:34 PM
To: Nick Gollan
Cc: Ian Black; Graham Lobban; Janet Elliott
Subject: Re: Stormwater Credit and Rebate Policy Meeting

Hello Nick,

As we discussed at the meeting I am sending you a few links to the large capacity Rainwater Harvesting Systems I showed you earlier. We also manufacture a variety of rotationally molded rain barrels that would be a great long term solution should you decide to provide the rain barrels through the City. We have a lot of experience in Rainwater Harvesting Systems at both the residential and commercial level. Ian Black who is cc'd in this email is experienced in rainwater harvesting systems from residential and commercial systems to high volume systems used in water parks. Ian can be a great resource should have any questions you might have with abilities and applications of many different methods of rainwater harvesting. Below are links to some information on our large Rainwater Collection Systems and I will send you or drop off some soft copies once I am finished up with the course and back in the office on Monday. Let me know if you have any questions.

<http://rtscompaniesinc.com/RainwaterComplete.pdf>
http://rtscompaniesinc.com/homeaccents_rainharvest.html

Thank you,

Eric Nadeau - Sales Coordinator
RTS Companies Inc.
1027 Industrial Place, P.O. Box 179
St. Clements, Ontario
Tel: 519-699-0022 ext. 261
Tel: 1-800-663-2803 ext. 261
Cell: 519-503-6364
Fax: 519-699-0027
enadeau@rtscompaniesinc.com

Nick Gollan

From: Denise McGoldrick [Denise.McGoldrick@waterloo.ca]
Sent: Monday, October 03, 2011 12:28 PM
To: Gregory, Mike (Canada)
Cc: Nancy Corbett; Nick Gollan
Subject: RE: comments from Kitchener PIC

Thanks Mike, I really appreciate your feedback. I have cc'd Nancy & Nick so that they can capture this feedback as part of the comments.

Thanks,
Denise

From: Gregory, Mike (Canada) [mailto:Mike.Gregory@aecom.com]
Sent: Monday, October 03, 2011 10:17 AM
To: Denise McGoldrick
Subject: comments from Kitchener PIC

Hi Denise. I can't make it to your PIC tomorrow nite, but I wanted to relay some comments from the Kitchener PIC. I know I should just fill out the comment sheet and send it in, but that doesn't feel right since I don't own property in either K or W.

Rewards Program

I mentioned my suggestion at the PIC about the selecting the best stormwater management from the credit applications you receive, choosing one per year from each category (residential, commercial, industrial, institutional). You can call it a BMP award (Best Managed Property) and use those as showcase examples of how property owners are making an effort to improve water quality in the region. Property owners might be proud to display "BMP of the Year" signs, receive free utility fees for a year (for residents that is, maybe give extra credit bonus for the other categories) and use that as educational opportunity to demonstrate the benefits of implementing stormwater BMPs, source controls, LID, etc.

Targeting Excessive Pollutant Sources

There was a comment from an Ag-equipment store owner on Huron Road regarding his agriculture-zoned neighbors & customers who may have potentially hazardous materials on site. A number of stormwater utilities in the U.S. have investigated the use of a "rate surcharge", effectively the opposite of a credit/rebate that would add to their base charge according to severity of excessive pollutant loading. I'm not sure if anyone has actually implemented this yet, as the TMDL process (which assigns loading targets for specific pollutants on a watershed basis) is being held up in the courts. Once resolved, the basis for credit/surcharge would logically be tied to TMDL. My suggestion is to continue to monitor TMDLs & rate surcharge examples in the U.S., thinking of ways these could be applied to K-W.

Regarding the agricultural zoning of properties, it is common in the U.S. to assign any Ag-zoned properties that have feedlots or other commercial operations as Commercial and charged accordingly.

Regards,
mike g.

Michael A. Gregory, M.Sc., P.Eng.
Senior Project Manager - Water Resources, Water
D 519.650.8697 C 519.501.7410 mike.gregory@aecom.com

AECOM

50 Sportsworld Crossing Road, Unit 290, Kitchener, ON N2P 0A4
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Hatch Mott
MacDonald

15 Allstate Parkway, Suite 300
Markham, ON, L3R 5B4

www.hatchmott.com

Prj No:

September 30, 2011

Catherine Jefferson, Executive Director
Water Environment Association of Ontario
P.O. Box 176, Milton, Ontario L9T 4N9

RE: City of Kitchener Stormwater Credit and Rebate Public Meeting

Dear Catherine:

It was my pleasure to attend the City's public meeting on WEAO's behalf last night and the following presents my experience with the City's meeting.

There were about 50 people attending the meeting in addition to the City of Kitchener and Waterloo's staff. The City had a series of posters arranged to explain the concept of a Stormwater credit and/or rebate program that are being considered using the Environmental Assessment methodology of options that includes the "do nothing" option.

The City introduced a stormwater utility fee based on a rate assessed for the amount of impervious area of a property. This was approved by council and the first bills were distributed in February of this year. Mr. Grant Murphy indicated that in his view, the successful introduction of the SWM utility fee was attributed to council having an appreciation of the need to address stormwater capital programs.

The success was made evident through the City's Victoria Park Lake project as council was able to directly connect the need, (\$16M capital funding) to the public benefit, (improved water quality and environmental protection). The link between the Victoria Park Lake improvement project and long term SWM funding was the impetus for achieving approval of the fee in the face of public opposition.

Mr. Grant Murphy explained at the time of implementing the SWM rate, both councils realized the importance of having a policy to provide credits to property owners, but due to timing and coordination issues, policy development is taking place in 2011. The focus of the credit and rebate program is to provide property owners with an incentive for good stormwater management practices. Where property owners demonstrate and achieve stormwater successes through the introduction of Best Management Practices such as:

- Inlet Orifice control,
- Roof top storage,



Hatch Mott MacDonald

- Infiltration gallery,
- Quality and/or quantity ponds,
- Parking lot storage,
- Cisterns,
- Oil and grit separators, (OGS)
- Green roofs and filter strips,
- Snouts and Goss traps,
- And other measures as verified by a qualified person.

These measures are split into volume control credits and quality control credits proposed for implementation. There is additionally a distinction made between residential credits and multi-residential and non-residential credits. An example of a non-residential credit would be SWM practices adopted by a shopping mall to improve stormwater quality and quantity from their property.

There is also a proposed program for residential rebates, which would provide a one time payment for the introduction of a stormwater improvement but no reduction in utility fee for service.

From the meeting, (and my own personal experiences) it was clear that the public struggles with understanding stormwater best management practices. This is evidenced by sentiments expressed during the meeting and reveals a lack of understanding of the accepted fundamental aspects of stormwater. The public needs to understand the public benefit of stormwater as a real physical municipal service to be paid for and valued along with water, wastewater and other utilities.

The following are some general observations made from my participation in this event.

1. The Cities of Kitchener and Waterloo are to be commended for this initiative and for the success that they have already achieved. This is a practice that should be adopted and implemented by all municipalities, (as a stormwater engineer I may have some bias in favour of this practice).
2. There is a need for public education around the entire concept of stormwater service delivery and stormwater management practices. The use of terms, such as "infiltration gallery", are not an easily understood concept by the general public without additional aids and information. I spoke about this with Kitchener staff and they have recognized the issue and have prepared additional materials for distribution to the public, which are accessible from their website.
3. The use of a "wedge" or "lightning" issue was a key aspect of the implementation of this utility service fee through council. In the case of the City of Kitchener, the use of the plight of the Victoria Park lake was that issue through which council could see and rationalize a benefit for the public at large in the face of negative public reaction. The public at large are opposed to a new fee or tax. In this case, the rate is for a service but many of the general public are opposed to any new fee payable to local government.



Hatch Mott
MacDonald

4. The City staff enlisted several interest groups to ensure that the benefit of saving Victoria Park lake was understood and talked about by the general public and that council members heard from people that were in favour of this outcome and that there was general support for the benefits accrued from the stormwater utility fee. This ensured that council heard positive support for the fee in addition to the normal cacophony of people that oppose any government fee or initiative.

It was my pleasure to have this opportunity to participate on WEAO's behalf at this interesting meeting and to have the opportunity to renew old acquaintances.

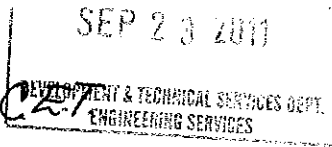
Very truly yours,

A handwritten signature in black ink, appearing to read "Paul Marsh". The signature is fluid and cursive.

Paul C. Marsh, P.Eng. PMP
Principal Project Manager, Markham Office Manager
paul.marsh@hatchmott.com
Hatch Mott MacDonald

Copy to: C.Bodimeade

DEAR: NICK GOLLEN



N2R1RS
SEPT. 20/11

WE RECEIVED YOUR LETTER TO-DAY ON STORM WATER MANAGEMENT, AND ARE GLAD YOU ARE CONSIDERING A CREDIT REBATE POLICY. I AM ONE THAT HAS REFUSED TO PAY THE UTILITY BILL FOR STORMWATER MANAGEMENT, TILL FURTHER STUDY HAS BEEN DONE.

WE ARE THE LAST OF A HANDFUL OF FARMERS IN THE SOUTH WEST CORNER OF KITCHENER. OVER THE YEARS WE HAVE BEEN VERY CONCERNED ABOUT GOOD CONSERVATION PRACTICES, AND MANAGEMENT OF SURFACE WATER, PARTICULARLY IN THE SPRING OF THE YEAR.

WE HAVE SPENT A LOT OF MONEY IN THE PAST FEW YEARS, TO HELP CONTROL WATER AND MANURE RUN OFF ON OUR FARMS. MOST OF OUR BARN ROOF AND YARD WATER IS COLLECTED IN A LARGE UNDER GROUND STORAGE TANK AND IS PUMPED OUT ON THE LANDS IN THE FORM OF LIQUID MANURE. WE HAVE INSTALLED MUCH FIELD TILE DRAINS, TO DRAIN OUR FIELDS IN THE SPRING, TO GET ON OUR LANDS EARLIER. MOST OF THE DRAINAGE TILES, FEED INTO PERMANENT PONDS, OR LOW LYING SWAMP LAND, ENHANCING WILD LIFE.

WE ALSO TAKE A LOT OF THE WATER WHICH RUNS DOWN THE ROAD'S, INTO THE DITCHES AND INTO OUR FIELDS, PLUS THE SALT THAT IS USED IN THE WINTER. WE ALSO MANAGE 40 ACERS OF BUSHLAND TO

ROOF WATER GOES INTO A CISTERN, AND WE USE THIS WATER FOR SHOWERING & LAUNDRY.

AS OF LAST YEAR OUR FARMS HAVE BEEN ZONED PROTECTED COUNTRYSIDE, SO IN THE NEXT FEW YEARS NO POSSIBILITY FOR DEVELOPMENT.

WE DO NOT HAVE ANY CITY STORM OR SANITARY SEWERS SERVICING OUR AREA OF THE CITY, AND NO CITY WATER. WE HAVE TO SUPPLY & SERVICE OUR OWN GROUND WATER WELLS.

THESE ARE SOME OF THE REASONS I HAVE REFUSED TO PAY THIS FEE IN OUR PARTICULAR AREA OF THE CITY. IN FACT I THINK WE SHOULD BE EXEMPT, OR GIVEN SOME COMPENSATION FOR OUR CONSERVATION AND WATER MANAGEMENT, ON OUR PROPERTIES IN THE SOUTH WEST CORNER OF KITCHENER. I PLAN ON ATTENDING YOUR MEETING SEPT. 29

P.S. ALL OUR WATER THAT DOESN'T FILTER INTO OUR SOIL WOULD RUN TO THE NITH WATER SHED, NOT THE GRAND RIVER SHED, WHICH THE CITY IS SO CONCERNED ABOUT.

YOURS TRULY.

U
v

000

Stormwater Management credit/rebate program

At _____ for the last 27 years we have been collecting and saving rain water and we use the rain waters through the house and in the Vegetable Garden. We have outside the foundation of the house, in two underground reservoirs, to collect through the eaves trough from our roof areas to store rainwater. # One tank holds 22,707 litres # two tank holds 32,922 litres. This rainwater is used year round through the house, for washing Clothes, Baths, Dishwasher, for consumption we Distill. There is hardly enough for watering the vegetable garden, lawn watering is out the question. To prove this look at our monthly water bill.

My request is a full credit for our effort to collect and save rainwater for the last twenty seven years.

Yours truly



Infrastructure Services Department
City of Kitchener
200 King St. West
Kitchener, ON
N2G 4G7

26 September 2011

Attention: Mr. Nick Gollan, Manager

Dear Sir:

This letter is a response to your solicitation for public input for the development of amendments for the SWM Policy.

While this submission is public, it also speaks to the inability of the City of Kitchener policy to address the unique characteristics of various properties across the City including the specific property identified herein.

It has already been acknowledged that the existing policy as implemented is flawed in as much as it is not able to address the specifics of properties such as RiverEdge that do not fit into the general policy framework. I have been led to believe by the City of Kitchener political administration that these shortcomings will be addressed through these intended policy modifications and then on a case-by-case basis if necessary as outlined by the City of Kitchener consultant AECOM. Through the development of these amendments, the following issues require consideration.

- 1. First and foremost, there must be a recognition that the fees attributable to this program are a fee for a demonstrable service.**

The City of Kitchener, through its staff and consultant AECOM, has already taken a very strong position that the new system is a user-fee program. The City of Kitchener report No. DTS-10-100 states that "A user fee may be charged to cover the cost of a service...provided that there is a nexus between the amount of the user fee and the cost of the service being provided". The RiverEdge Golf Club property because of its location on the floodplain, does not use the City of Kitchener system so there are at this time no services provided.



All stormwater runoff is collected and self contained in ponds on site. It is recycled numerous times through irrigation, lost to ground water infiltration, lost to evaporation and any surplus flows directly into the Grand River.

AECOM in their report point out that "the city does not maintain facilities that are located on private property or that fall under the jurisdiction of the Grand River Conservation Authority". Indeed, GRCA has advised that the City of Kitchener neither owns nor manages the Grand River. Thus there is acknowledgement that there is no use of the City of Kitchener system by the RiverEdge property, **UNLESS the City is now proposing to take responsibility for periodic flooding of large areas of the golf course, some damage that occurs in varying degrees, and loss of revenues due to increased maintenance and reduced play.** Currently, all costs associated with these challenges are born by RiverEdge.

For these reasons, any "credit or rebate" policy for this property that has any applicable limits is unequivocally unacceptable.

2. This stormwater program rather than punish, needs to consider and recognize the specific contribution made by a property to advance the desired program filtration and infiltration goals. In this specific instance, the RiverEdge property is:

- predominantly grass and trees which play a fundamental role in conservation. The present golf course use of this land envelops the majority of this property and is expected to be its permanent use,
- through the use of sophisticated turf maintenance techniques and riparian vegetation, both slowing and filtering runoff within the property at drainage entry points.
- underlain by a massive soil profile of granular material with a high soil permeability. This provides for maximum groundwater recharge, cooling of water infiltrating to the water table and finally subsurface discharge to the Grand River.
- a part of a provincially significant wetland, which again is a fundamental component of site stormwater management. The wetlands contribute to both recharge of the water table as well as to provide a very important function related to enhancing the quality of surface runoff waters through filtering.



Other Observations

Upon further examination of the AECOM engineering report that appears to be the basis of this new SWM program, there are the following erroneous statements:

It is stated that "the amount of impervious area on a property directly correlates to its contribution of runoff volume and pollutant loading to the city's stormwater management system". This statement provides for no exceptions and the RiverEdge property is clearly an exception.

It is further stated that "all properties generate stormwater runoff that is conveyed, stored, treated and/or discharged by the city". Again, this statement provides for no exceptions and the RiverEdge property is clearly an exception.

It is also stated that "the stormwater rate will be charged based upon the contribution of stormwater runoff". For this RiverEdge property, there is no contribution of stormwater runoff to the city system. Thus, I find it rather astounding that the current SWM model presents a \$5000 annual invoice to RiverEdge when in fact the smallest residential property presents a larger storm runoff contribution.

Possible Resolutions

The simplest manner of speaking to the challenges involved at this property is to amend the SWM policy to exempt all open space lands, including parks, golf courses, forest and turf areas from stormwater fees. In broad terms, this strategy will recognize the value and contribution made to the SWM program and interests by all of these lands without being punitive. It also happens to be the most politically expedient solution as well as the easiest for ongoing management.

In the alternative, a fee structure that truly reflects costs to City of Kitchener could be generated. The City of Kitchener bylaw already recognizes that there is an expectation that any SWM system must be predicated and supportable on a service for fee basis. That would require that the SWM program be modified to permit recognition of extenuating circumstances and be able to adapt its fees accordingly without credit limitations. This would not be nearly as neat a solution as it would require case-by-case analysis rather than be applicable on a broader scale.



Conclusion

My view is that there are ample reasons to make open space lands within the City including golf courses, stormwater tax exempt. These lands provide an enormous contribution to SWM within the municipality. This solution is not only politically expedient but also an extremely simple fix that is readily supportable and can be applied by a broad policy. Under similar circumstances, The City of London has already recognized the justification and accordingly has set this precedent.

For the City to create a much more complicated fee system of SWM cost credit measures without credit limitations, that recognize the benefits that are being provided by RiverEdge and its similar properties would be far more onerous.

Yours truly,

A handwritten signature in black ink that reads "Peter D. Gates". The signature is written in a cursive style with a large, looping initial "P".

Peter D. Gates, P. Eng.
President

Date: September 29 2011

Kitchener Utilities
To: whom may concern

I am writing to you in regards to my Utility Bill. I need some more information on the Storm Water Charge \$9.45. I would like someone to have a meeting with me to discuss this matter. My concerns are how this was introduced to me. I also have some ideas on how to make things better for the future.

I should be rewarded for collecting ran water, and using it for my garden and flowers. I am saving the City water, because less water goes to the Sewer. I look forward to hearing from the proper representative.

Regards,

SEND PACKAGE TO ANTO ABOUT THE
STORMWATER RATE IMPLEMENTATION
Done Oct 2 2011

September 28, 2011

This is to inform you that I have put in place French drain across my driveway. The water goes into a soakaway that goes into a water table. As we know, natural ground is the best filter for water.

I have at this time: 2 250gallon tanks = 500 gallons
7 50 gallon tanks = 350 gallons

Please feel free to contact me for any additional information.

Sincerely,

Nick Gollan

From: Mayne1 Towing [mayne1towing@sympatico.ca]
Sent: Wednesday, October 19, 2011 2:59 PM
To: Nick Gollan
Subject: STORMWATER CREDIT AND REBATE POLICY DEVELOPMENT

**STORMWATER CREDIT AND REBATE POLICY DEVELOPMENT
COMMENT SHEET**

1. The concept of a credit and rebate policy to reduce storm water run off by property owners is obviously a fair solution to the problem. The problem being two fold, maintenance to the city and cost to the home owner.
2. Credit and or Rebate programs. In my opinion it is necessary to offer alternatives to property owners. What is suitable for one property might be impossible for another. Newly developed residential areas would have to wait many years for large trees where as my property exceeds the required number of trees. I could build a pond on my property but a condominium resident would not have the space required.
3. My interest in this study is immense. Specific properties need to be addressed individually based upon their uniqueness. IE. Well, septic, geographical locations and actual usage of storm water drainage.
4. The evaluation criteria can not be disputed as all issues are paramount to the wellness of the community. My concern is that your Economic criteria addresses your Capital, operations and maintenance costs but doesn't address mine!
5. First let me say that all funds previously doled out from city funds and or taxes used for storm water drainage should more than cover any economic strain the city might feel do to implementation of credit or rebate plans. Socially any resident looking for a credit or rebate will acquire the information needed. A pamphlet mailer should do the trick. Environmentally and technically seem to be very close in end result. Water quality being a number one concern. Based on my thoughts Technical, Natural / 60% , Economic 20% and Social 20%.
6. I understand that the city has an immense responsibility to its residences and must find the most fair and economical way to implement any new taxes or fees. That being said many property owners within the region have very unique properties. You have gone to great lengths to call this a user fee. How can you then argue that charges should be based on impervious spaces rather than usage. I would venture a guess that my property retains 80% of the rain water received. It absolutely has no where to go. I am on a well and my own septic which comes with its own headaches that I am responsible for. Every time it rains my sump pump collects water at a steady pace and pumps it into weeping tile in my back yard. With the price of hydro you can guess how happy this makes me. This passed weekend I just replaced my sump pump not surprising with all the rain we've had the pump overheated. A few years back the weeping tile in my front yard had to be replaced in my opinion this was in part due to saturation. My driveway needs to be replaced from erosion due to standing water. All of these are at my expense which I accept responsibility for. I would hope you can understand my frustration at paying a user fee for a service I am not using.
7. Lora Mayne
8. 204 Bleams Rd. Kitchener
9. 519-894-1162
10. mayne1towing@sympatico.ca

10/19/2011

Summary of Comments Received From PIC #1 (Kitchener)

Question	Number of Responses	General Comments and Themes
<p>1. Do you have any comments, questions or concerns with the concept of a Stormwater Credit and Rebate Policy to provide an incentive to property owners to utilize a method of reducing stormwater?</p>	<p>12</p>	<ul style="list-style-type: none"> • Should advertise meetings through neighborhood associations as well as newspapers (1) • Properties such as rural/agricultural with no water/sanitary/storm services should be exempt from the charge (4) • Provide pilot incentive program to determine level of interest (1) • Consider maintenance requirements to ensure the desired benefit is achieved (1) • Have different rebate levels based on capacity to collect (1) • A credit system to reduce potable water use and to water laws with rainwater makes sense (1) • I spent \$10,000 on my basement, it was stressful (1) • Base the policy on the extent to which BMPs are in place, functioning and recognized (1) • Should be available to all sectors and should encourage diversion or treatment of stormwater at-source (1) • Diverted roof leaders should pay a lower rate (1) • Alternative 2 and 3 makes the most sense, alternative 4 could be a cash cow for someone (1)
<p>2. What do you see as the advantages or disadvantages of each of the various Stormwater Credit and/or Rebate program alternatives?</p>	<p>11</p>	<ul style="list-style-type: none"> • Go with a monthly credit that reduces fee for captured stormwater (2) • If services aren't received, should get 100% credit (1) • Not all properties will have the same opportunity to implement BMPs due to layout, etc (1) • Credits/rebates will require significant administration efforts by the City (1) • The benefit is obvious to property owners (4) • Alternative 2 – 5 support fisheries and the environment (1) • Flow of water over saturated soils is an important consideration so grading is also important (1) • Rain barrel program is a success (1) • I want a rebate or credit of 100% if I don't use the City system (2) • The monthly charge is “the stick” and the credit is “the carrot”. A monthly reduction has the greatest advantage to being a long term success (1) • If a lot more people used rain water to water their gardens capital costs would be a lot less (1)
<p>3. How would you describe your interest in this study? Do you have a specific issue or concern related to this study that you would like to see addressed?</p>	<p>12</p>	<ul style="list-style-type: none"> • All roof drainage goes into infiltration gallery, make this infrastructure eligible (2) • If services aren't received/used, should get 100% credit (3) • All roof drainage goes into cistern, make this infrastructure eligible (2) • All roof drainage goes into rain barrel, make this infrastructure eligible (3) • Farmers should be exempt (1) • Would rather support stormwater management through the taxes by raising them as opposed to utility charge (2) • No stormwater protection for me (1) • Spent \$65,000 on SWM BMPs for new development, want compensation for same (1) • I would invest to reduce my stormwater charges (1) • Before this policy is developed serious consideration should be given to those who do not contribute to the City

Question	Number of Responses	General Comments and Themes
		<ul style="list-style-type: none"> managed system (1) • If you don't give property owners an incentive to use their stormwater, most will say "Why should I?" (1)
<p>4. The proposed evaluation criteria address the technical, natural, economic and social environments within the study scope. Please provide your comments, questions, or concerns with the proposed evaluation criteria.</p>	8	<ul style="list-style-type: none"> • Well done (1) • What amount of rebate would be offered for each criterion? (1) • The most efficient and environmentally alternatives should be ranked the highest (1) • Victoria Lake sediment issues should not be the basis for an elaborate new tax system (1) • I have receipts (1) • Incidental factors of geography and geology should be considered in the calculation of the credit (1) • Does not appear to address situations where all stormwater is managed on private property and the City system is not needed (1)
<p>5. The evaluation criteria categories (technical, natural, social and economic) will be given equal weighting in the valuation exercise. Please indicate your preference for an equal weighting (25% each) of evaluation criteria categories and/or provide another weighting scheme.</p>	6	<ul style="list-style-type: none"> • Too complex (1) • For what? Your maintenance and implementation costs shouldn't be our concern (1) • Credits should be based on the amount of water diverted or treated. Diversion should have higher reward as municipality will not need to treat diverted water (1) • Criteria does not apply to those that get no services (1) • Average suggested weighting: (4) • Technical 21 • Social 19 • Economic 26 • Natural 34
<p>6. Please provide any additional comments, concerns, questions, or suggestions related to the Stormwater Credit and Rebate Policy development project.</p>	13	<ul style="list-style-type: none"> • Keep open lines of communication (1) • Option 3 is preferred (1) • If services aren't received, should get 100% credit (2) • Permeable pavement should be an eligible infrastructure type for residential property owners (1) • This program will not reduce maintenance because everything will still wash into catchbasins (1) • The only savings may be in new subdivisions where you could construct less ponds (1) • How will we be compensated for infiltration gallery? (1) • Consideration of credit/rebate of all taxes/fees levied over the past 40/50 years should begin immediately (1) • For 27 years we have collected all our rain water for our gardens and to use in the house. We distill it to drink it. Why not give an incentive for people to collect water in a bigger better way than barrels? (1) • Rebates and credits can be withdrawn anytime by Council. Is there a political will to see it through? (1)