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# Small Business Sustainment Grants & Mid- Term Outlook

Property Tax Impacts & Distribution

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*Solutions that Work*

## ***Business & Real Estate Stakeholder Engagement<sup>1</sup>***

### ***What we've done in response to Administration's direction***

To gain stakeholders' perspectives regarding the proposed Small Business Sustainment Grant and mid-term outlook for tax shift, HCA engaged a cross-section of the business and real estate communities in Calgary, seeking input on two topics:

1. **2019 – 2020:** concerns about and criteria for the proposed Small Business Sustainment (SBS) grant program<sup>2</sup> ([PART 1](#))
2. **Mid-term (3 – 4 years out)** perspective: concerns and ideas regarding tax sharing between Residential and Non-Residential property classes<sup>3</sup> ([PART 2](#))
3. **Cross-Canada Review:** Regarding SBS grants, HCA also conducted a cross-Canada review to identify the experience of other jurisdictions with grants or other direct aid to business by municipalities. Our findings on comparative jurisdictions are reported in **Appendix 3**.

Through phone discussions, in-person meetings, an electronic survey and an interactive workshop on April 29, HCA heard concerns and ideas from Calgary's business and real estate communities related to the Small Business Sustainment grant program (2019) and regarding tax share direction over the next 3 – 4 years. In this process we were careful not to revisit decisions already taken by Council.

Responses from the business community confirm their earlier preferences for a tax system that provides:

- Fairness and equity in taxation
- Transparency and accountability, and
- Certainty and simplicity.

## **PART 1. 2019 – 2020 Small Business Sustainment (SBS) Grant**

The purpose of the *Small Business Sustainment Grant*, intended as a two-year program, is to support those Calgary businesses most severely affected by the economic downturn and negatively impacted by the effect of the non-residential property tax redistribution.

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<sup>1</sup> Calgary Economic Development and Calgary Chamber of Commerce have been tremendously supportive in our outreach to stakeholders.

<sup>2</sup> Council direction from April 1, 2019: "...develop criteria and process for a Small Business Sustainment Grant to a maximum of \$70.9 million of one-time funding (\$44 million from Fiscal Stability reserve, and \$26.9 million from the 2017 and 2018 Phased Tax Program funding not required due to appeal resolutions), returning to the Priorities and Finance Committee on May 14, 2019.

<sup>3</sup> Council direction from November 14, 2018: "Meet with the Chamber of Commerce, Commercial Real Estate Advisory Committee of Calgary, Economic Development and other interested stakeholders by the end of April 2019, to share ideas and options generated through the tax shift work undertaken in point 3 above. Following this engagement, bring a joint Administration / Business Community presentation to the Priorities and Finance Committee on May 14, 2019."

HCA engaged stakeholders to identify their concerns and ideas regarding the SBS grant program. We also undertook cross-Canada research to determine whether other jurisdictions have experience with such programs (*reported in Attachment 3*).

Through phone discussions, meetings and an interactive workshop on April 29<sup>th</sup>, stakeholders provided their views of possible advantages, disadvantages and risks associated with the proposed SBS grant program. In short, stakeholders were asked, given the purpose of the SBS grants program, whether they viewed it as a workable, beneficial short-term solution.

Although small businesses would welcome support, the majority of stakeholders felt that the SBS grant program is not workable and is unlikely to meet its objective of supporting struggling businesses.

It is seen as another ‘band-aid’ solution that does not address the underlying requirement for shift in Non-Residential / Residential tax share. In the words of one stakeholder: *‘Like the PTP, it is another band-aid where surgery is needed.’*

In the April 29<sup>th</sup> workshop, stakeholders were asked to identify perceived advantages and disadvantages / risks associated with the proposed SBS grants program:

#### **ADVANTAGES OF SBS**

- Business community stakeholders felt that the primary advantage is political. Taxpayers might believe that the City was listening and acting upon their concerns.
- A two-year program, if successful, might provide time for economic recovery and diminish or eliminate the need for a substantial tax share shift from Non-Residential to Residential.
  - As a counter point, stakeholders felt that future uncertainty due to restructuring of the oil & gas industry is unlikely to restore the historic relationships between Non-Residential and Residential.

#### **DISADVANTAGES / RISKS associated with SBS**

- The repeated message was that a SBS grant program, like its predecessor PTP program, is only a ‘band-aid where surgery is required’.
- SBS grants will potentially defer and complicate the inevitable tax share shift by using funds that might better be used to expedite the tax share shift.
- The SBS will add significant administrative costs at a time when taxpayers are expecting the City to cut municipal expenditures and improve cost management.
- Benefits of the SBS grants will not be distributed equitably. It will be challenging to identify the proportionate need of struggling businesses in different industry sectors. Regardless of administrative criteria, thriving businesses will qualify for grants and poorly managed businesses - likely to fail in any event - will receive public funding.
- The amount of assistance available over two years may well be immaterial where property tax increases are substantial. (For example, assume that 30,000 businesses

qualify for the SBS grant. Given the grant funding of \$70.9 million for two years, the average assistance to business would be approximately \$1,200 per year. Where property taxes have increased perhaps \$10,000 to \$20,000 per year, the SBS grant will provide limited support for struggling business.

- The SBS grants are described as support for small business. Yet larger businesses (more than 50 employees) may be struggling equally. Small business is extremely difficult to define with any accuracy. A thriving business with 49 employees may qualify for the SBS grant, while a struggling firm with 51 employees remains at risk.
- Funding for SBS grants (\$70.9 million) continues to deplete City reserves and potentially limit adoption of more viable longer term solutions.
- Similar businesses in dissimilar locations, in different industries and under various management styles will be impacted differently. SBS grants seem unlikely to recognize various levels or types of business stress, making equitable grant funding or to make funding proportionate to support required.
- Administration of SBS grants (i.e. verification) will require that the applicant submit sensitive business information in competitive markets. Is the risk of information disclosure worth the relatively small grant? Does the City have authority to request information necessary to verification?

### Stakeholders' Idea for Consideration: An Alternative to SBS Grants

Stakeholders suggest that a simpler and more equitable solution is to use the \$70.9 million funding to reduce the Non-Residential tax rate so that **all** businesses receive some benefit.

### CRITERIA FOR ADMINISTERING SBS GRANTS – STAKEHOLDER REVIEW

In the April 29<sup>th</sup> interactive workshop, stakeholders were invited to review '*straw dog*' criteria to assist Administration in enhancing effectiveness and efficiency of the SBS grants program.

Approximately one-third of workshop attendees elected not to participate in evaluating these criteria, as they strongly disagreed with the concept of a SBS grant.

Questions (criteria) that received affirmative results for workshop participants who did evaluate the straw criteria are shown in the graph below:

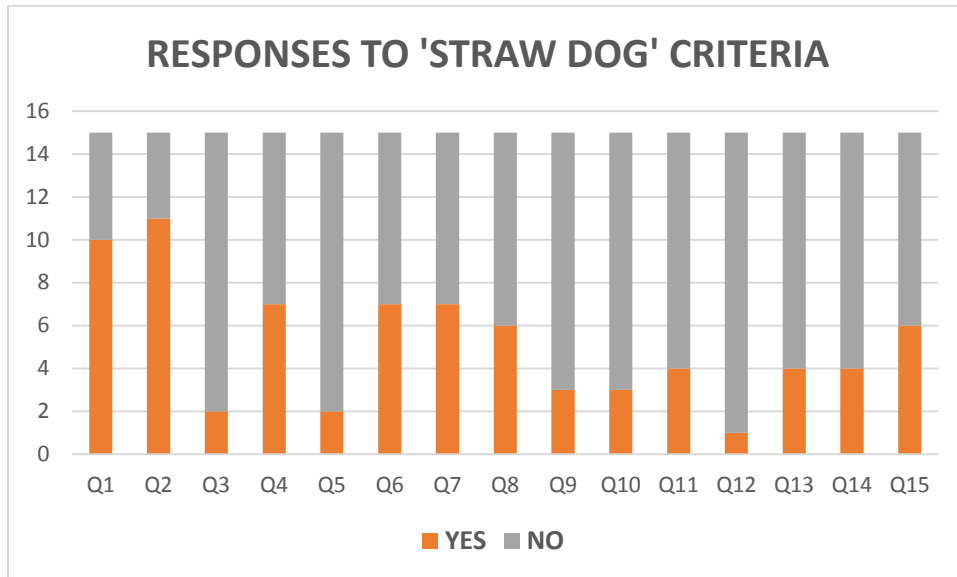


Figure 1: Stakeholder Preferences for Criteria

Q1: Paid property tax in 2019

Q2: Business registered in the City of Calgary

Q3: Meet small business definition: Matters Relating to Assessment Subclass (MRAS) Regulation

Q4: Business operating at application (some respondents struck "solvent" as a requirement)

Q5: Business with no tax arrears; no contravention of City regulation

Q6: Grants limited to 'for profit' businesses

Q7: Must complete application; provide all required information

Q8: Must allow verification of all application information

Q9: Must provide information to City regarding use of the grant

Q10: Business with no tax arrears; no contravention of City regulation

Q11: SBS grant threshold set at \_\_\_\_\_%, (e.g., 10% above previous year's tax)

Q12: SBS grant has ceiling of \_\_\_\_\_ (e.g., where profitability ratio reaches industry benchmark)

Q13: No SBS grant if tax due to new construction & development

Q14: Eligible for small business income tax rate (< 100 employees)

Q15: Business location leased for minimum 1 remaining year

Presuming that the SBS grant program proceeded despite reservations, those attendees that did review the draft criteria agreed with their general intent. Examples of questions that arose included:

- How do you prove a startup business to be solvent? A struggling business might be becoming insolvent due to the property tax increase. Businesses are reluctant to open their books should that be required for verification.

- Definition of a small business in the MRAS Regulation is unrealistic and unworkable? (e.g., 50 FTE's is 'way too high')
- Why just focus on small business? Medium and big business have more impact (e.g., in the workshop, it was stated that a local business has just announced that it was closing (400 jobs lost) and moving to Saskatoon.
- Why include a requirement for 'no tax arrears' in a support program? The reason they are in arrears may be *due* to the property tax increase.
- The Executive Director for Kensington BRZ was unable to attend the April 29 workshop but provided a comprehensive list of concerns and ideas regarding administration of the SBS grant program. Her email comments are attached as *Appendix 2 (below)*.

#### CRITERIA MOST QUESTIONED BY WORKSHOP PARTICIPANTS:

Having reviewed the criteria, workshop participants were asked (in team exercises) to identify those criteria most questionable or with which they disagreed most. They were also invited to add criteria if they felt any were missing:

1. Do not require the criterion: *"business with no tax arrears; no contravention of City regulation"*. This criterion is too broad and contrary to the spirit of the SBS grant program of supporting struggling business.
2. Do not require the criterion: *"Business location leased for a minimum of 1 remaining year."* (Note: this contradicts the replies of electronic survey respondents who identified this criterion as one they favoured)
3. Need to introduce an effective / accelerated tax shift program (added by stakeholders under 'Other Criteria' and received a large number of 'dot' votes)

#### Electronic Survey Results

Stakeholder responses to an electronic survey provided further feedback.

Electronic survey respondents primarily represented small business (i.e. less than 50 employees):

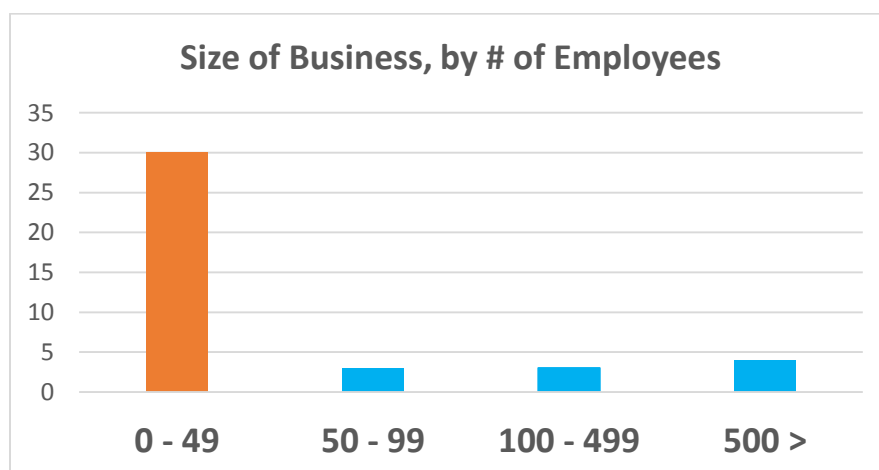


Figure 2: Survey Respondents' Business Size (FTEs)

Figure 3 (below) shows that 50% of survey respondents preferred that the SBS grant amount should be based on the increase in property tax over the past year. However, a large proportion (40%) of respondents preferred that grants be quantified based on the impact on net profitability ratio of the increase in property tax. *(Note: Administration of the former may be complicated for multi-tenant properties; varying lease terms and conditions, etc.)*

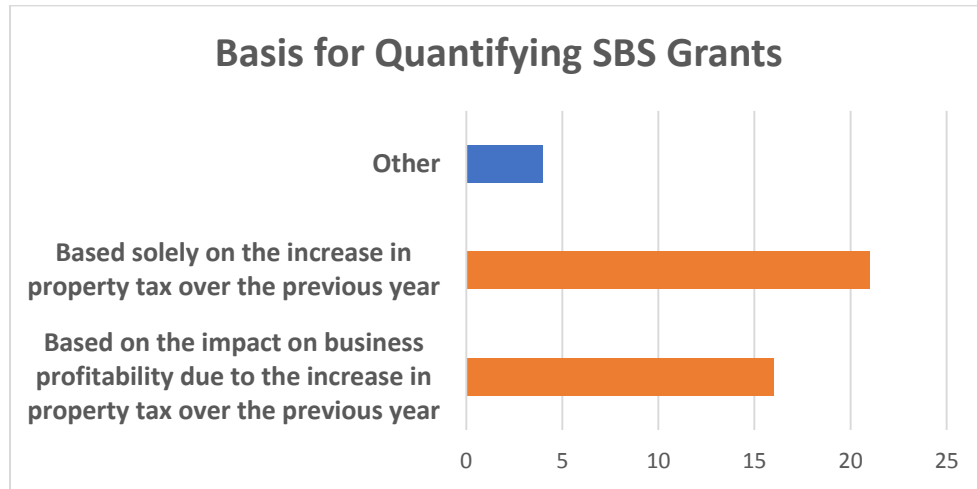


Figure 3: Basis for Quantifying SBS Grants

Figure 4 indicates stakeholders' preference for qualifying thresholds for SBS grants. While the second preference (*% property tax increase*) may be simpler, the highest ranked option (*impact on net profitability ratio*) may help measure the level of business need and help avoid grants to thriving businesses.

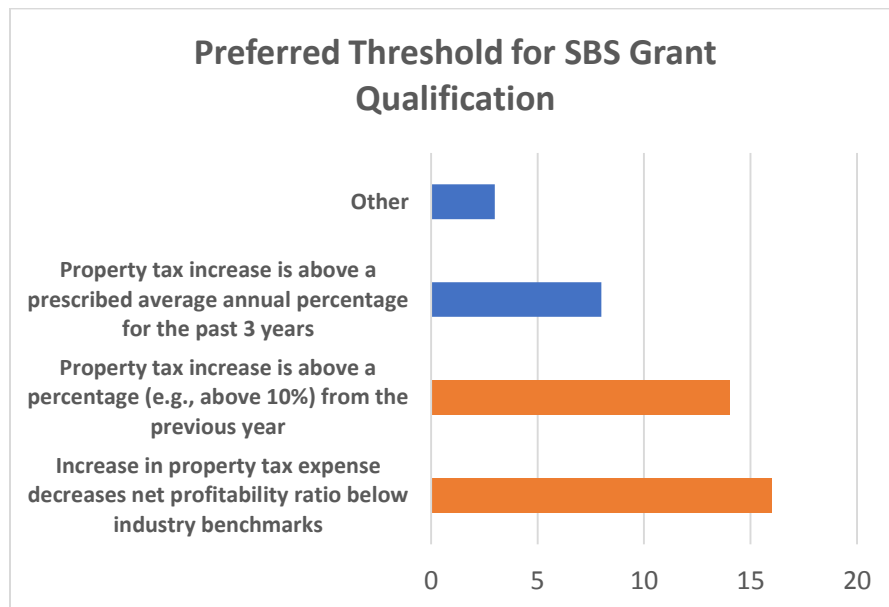


Figure 4: Preferred basis for determining qualifying grant threshold

Stakeholders preferred that the ceiling for SBS grants be based on percentage impact on net profitability ratios – compared to same industry benchmarks – caused by the increase in property tax. Whilst conceptually sound as it places the SBS grant ceiling at the businesses' breakeven point, this criterion would require significant administration and that each business open its books for the City's verification process.

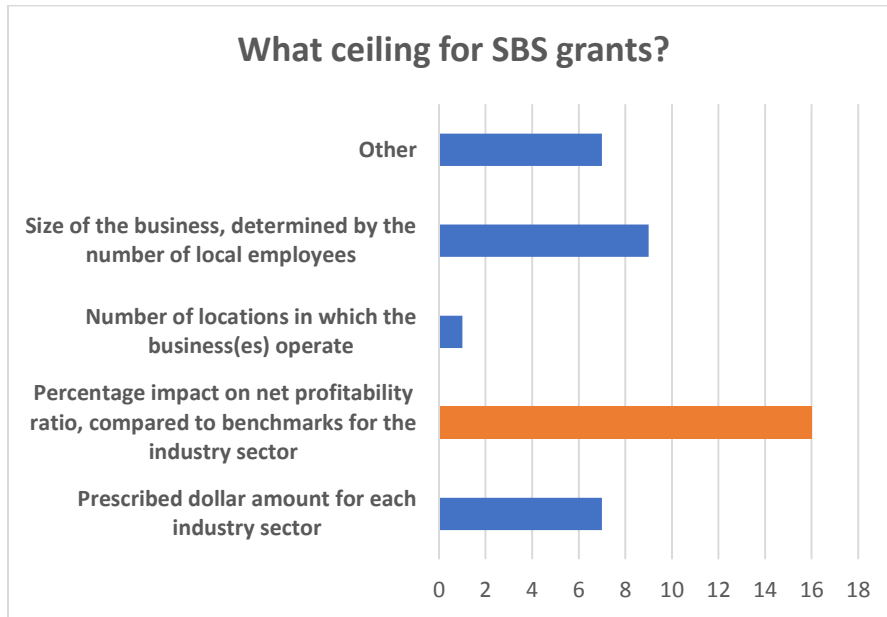


Figure 5: Preferred ceiling for SBS grants

Early findings regarding stakeholder concerns and expectations are summarized in bullet form below:

### Stakeholders' Ideas for Consideration:

- Expedite the tax share shift from Non-Residential to Residential to occur in one year with offsetting mitigation (e.g., rebates or circuit breakers) for vulnerable taxpayers.
- Business (especially small business) is struggling. Recognize that small business is the primary engine of job creation which provide employees with the funds to pay their residential taxes and mortgages. Make this a key message to increase taxpayer understanding of the imperative to shift tax share.
- The City's accountability is neither obvious, nor transparent. Stakeholders suggest the following topics for increased taxpayer information:
  - Educate / inform taxpayers, with focus on why it is necessary and beneficial to **all** taxpayers to shift tax load from Non-Residential to Residential
  - Explain why it is necessary to use property tax policy to fix a budget issue. That is, what percentage of the budget gap (lost revenue from downtown) is filled with tax revenue vs cost savings



- Explain what lies behind the City's decision not to proceed with expedited tax share shifts from Non-Residential to Residential
- Explain risks to all taxpayers. For one example: Show how business margins are reduced by increasing property tax loads (and other government tax increases). Enhance homeowners' understanding of the impact on them – i.e. as small business jobs disappear - *housing demand decreases and with it the equity (wealth) that residents have in their homes.*
- Explain why discretionary spending cannot be deferred for 2 – 3 years until the local economy improves and the City is better positioned to proceed with large projects.

### Business community stakeholders - we are in this together:

- Continue outreach through Chamber of Commerce; Calgary Economic Development and Business Improvement Areas (BIA)
- Extend that outreach to groups of small business owners who may be neither Chamber members nor belong to a BIA/BRZ.

## PART 2. Mid-term Perspective (3 – 4 years out)

### Tax share shift from Non-Residential to Residential – How Far? How Fast?

Workshop participants considered the relative merits of a gradual vs expedited transfer of property tax burden from Non-Residential to Residential.

#### 1. How Far? (What rational basis for tax share?)

Observing the City's discussions about percentage tax share distributions between Non-Residential and Residential classes, stakeholders fail to understand the underlying rationale for determining present tax share.

Percentage distributions of tax share (*e.g., whether 47% / 53%; 50% / 50% or 48% / 52%*) appear relatively unimportant in the absence of a logical strategy that is communicated to taxpayers explaining how tax sharing occurs between property classes.

Likewise, a targeted tax rate ratio based on comparison with other jurisdictions is not seen as appropriate since a multitude of interjurisdictional variables impede and make such comparison misleading.

#### 2. How Fast? (gradual or expedited tax share shift?)

Redistribution of tax load from Non-Residential to Residential was a central concern identified in the April 29<sup>th</sup> interactive workshop.

To address this concern, workshop attendees were asked to identify advantages of a *gradual* vs an *expedited* tax share shift. Their consensus view was that there were limited advantages and significant disadvantages to a gradual shift.

***Advantages of a gradual tax share shift:***

- Gradual tax share shift may be politically popular if residential taxpayers see it as Council listening to them / acting on their behalf.
- May be seen by residential taxpayers as maintaining affordability and minimizing impact of tax increases
- Should the local economy rebound in the near future, a gradual shift may allow the option of discontinuing tax share shift to Residential. However this was considered unlikely as indications are that Calgary's future recovery is uncertain, and its restructuring economy will look very different from its past.

***Disadvantages of a gradual tax share shift:***

- Residential taxpayers may perceive the gradual tax shift as a sustained tax increase, year after year.
- There was strong consensus among workshop attendees and in preceding phone interviews that the tax load shift to Residential needs to be expedited, not made gradually. A previous Calgary example of a gradual shift is Business Tax Consolidation (BTC) which occurred gradually over 7 years. Had that shift been completed within a shorter window, BTC would not have exacerbated impacts on tax load redistribution to the same extent that it has. For example, on the need to increase Non-Residential tax rates and the tax rate ratio.
- Making the shift more quickly saves jobs and businesses by helping to arrest the potential for downward spiral driving toward continuing business closures. Stakeholders describe that downward spiral thus: business closures cause increased Non-Residential vacancies which in turn lead to decreasing rents. Lower rents lead to continuing but uneven decline in asset values (and subsequent assessments). The uneven decreases contribute to continuing uncertainty and loss of investor confidence, reducing tax competitiveness and long-run property tax revenue.
- Business revenues are declining (due to the oil & gas slump) even as costs are increasing. Small business owners particularly are struggling. They see government as a major contributor to increasing costs – due to factors such as the carbon tax, pipeline capacity, and minimum wage increases. *Most visible* amongst these is the *increased property tax* which can be expected to elicit a strong reaction.
- The mood of Non-Residential stakeholders in the workshop and in meetings / phone interviews might be characterized as one of frustration and disappointment. The City is felt not to be hearing or responding to the business community's concerns and ideas. There was a common impression that, in making a gradual tax shift, Councillors were catering to residential voters without recognizing that small business is the primary job creation engine – providing residential

voters with the means to pay taxes. In the words of one workshop participant: 'Councillors are keeping the electorate happy to get votes.'

- A gradual tax share shift does not sufficiently offset the changing economic climate necessary to business retention in Calgary. That is, it is ineffective in addressing underlying immediate problems to help struggling business survive and to encourage investment.
- Stakeholders expressed that the City is contributing to a decline in tax competitiveness. They state that this is evident in the City's extensive industrial land holding. Their argument is that the City holds one of the largest industrial land portfolios in North America (totalling approximately 2,000 acres). That controlling market share gives the City the ability to maintain high prices. These and increasing taxes are believed to have led to the loss of 5 million square feet of new development to Rocky View County.

### Ideas for Consideration:

- Regardless whether the above arguments are accurate, they need to be researched and facts communicated to the investment / development community to maintain Calgary's 'business friendly' reputation.
- Business and real estate workshop participants strongly support an expedited transfer of property tax burden from Non-Residential to Residential. In doing so, the City should consider developing a tax share strategy; moving to a basis for tax sharing between the Non-Residential and Residential property classes that reflects One Calgary and that is communicated to all taxpayers.
- That tax sharing strategy should be developed with stakeholders, providing accountability through transparent communication to taxpayers. The strategy could offer opportunities to better:
  - link revenue sources (property tax; user fees; grants) with expenditures and services. The City has already made some progress in this direction through its budgeting process, and
  - clarify *equity* from two perspectives: considering equity both in '*who benefits*' and in terms of '*who pays*'.

### Answering tax share shift questions – building a frame for: *How far? How fast?*

To answer these questions, workshop participants discussed the following steps:

1. Investigate and understand the basis for the *current / historical* tax share. Advance Calgary's strategy for linking revenue sources (property tax, user fees, grants) with expenditures.
2. Identify and weight factors that might contribute to tax share distribution. Examples might include the contribution of balanced tax share factors that:
  - a. improves business retention & expansion

- b. maintains Calgary's reputation as business friendly & tax competitive
  - c. attracts / retains skilled labour force
  - d. encourages investment in Calgary
  - e. maintains services & infrastructure that grows residents' wealth (equity value in their homes)
  - f. encourages small business job creation; improving income levels and housing affordability
3. Develop and engage stakeholders in develop and execute a strategy to reach / fund transition to reach targeted tax share base
  4. Adopt metrics (similar to those applied by City of Vancouver) for tracking / measuring changes and updating the basis for future tax share changes

From research of other jurisdictions, we learned that they were hearing the same message we heard from Calgary stakeholders. The expectation is that when taxpayers are struggling, taxing jurisdictions should be:

- focussing their attention on cutting costs and increasing efficiencies
- transparent in communicating where real cost savings are achieved, versus forestalling future cost increases. For example, business community stakeholders understand that there has been a \$250 million property tax redistribution in the City. But, when they hear that the City has realized \$600+ in savings, efficiencies and reductions through intentional management, they have trouble reconciling these facts.

Possible options and actions should be identified and evaluated using criteria that reflect:

- Calgarians' many perspectives
- One Calgary Plans & Budgets
- Principles of a sound property tax system, with emphasis on those identified by stakeholders as most important to them

**Appendix '1': Stakeholder outreach: Calgary Business & Real Estate Communities**

**Appendix '2': SBS administration concerns and ideas: Kensington BRZ**

**For HCA's report on the Jurisdictional Review, see Attachment '3' of main report**

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**Appendix '1'**

<b>Stakeholder Group of Business &amp; Real Estate Communities</b>	<b>Engagement</b>	<b>Contact(s)</b>
BILD	Interactive Workshop / e-Survey	Grace Lui
BOMA / MNP	Interactive Workshop / e-Survey	Giovanni Worseley / Lloyd Suchet
Kensington BRZ	Phone / e-Survey	Annie Mac Innes
Calgary Chamber of Commerce	Interactive Workshop / e-Survey	Duncan Webster
Calgary Economic Development	In-Person; Phone Meeting / e-Survey; Interactive Workshop	Deana Haley; Leslie Shier
Commercial Real Estate Advisory Committee of Calgary	Phone / In-Person Meeting; e-Survey; Interactive Workshop	David Wallach; Hannes Kovac; Richard Morden; Iain McCorkindale; Guy Huntingford
Canadian Federation of Independent Business (CFIB)	Interactive Workshop / e-Survey	Richard Truscott
NAIOP	Phone Meeting / e-Survey	Richard Morden; Guy Huntingford
Tax Agent Community	Interactive Workshop / e-Survey	Kyle Fletcher; Dave Mewha; Giovannie Worseley; Robyn Ferguson
Bentall Kennedy	Interactive Workshop	Art Skow
Oxford Properties Group	Interactive Workshop	Dan Alexander
Chinatown BIA	Interactive Workshop	Terry Wong
17TH AVE RETAIL & ENTERTAINMENT DISTRICT BIA	Interactive Workshop	Esther Kelly

4 <sup>th</sup> Street BIA	Interactive Workshop	Julie O'Donnell
Alberta Storage Place Ltd.	Interactive Workshop	John Milino
Montgomery BIA	Interactive Workshop	Marion Hayes
M3 Development Management	Interactive Workshop	Iain G. McCorkindale
Kensington Auto	Phone interview	Bob Pilser

## Appendix '2': Email submission from Kensington BRZ

Dear gentlemen,

Unfortunately, I am away giving a paper at a conference on Monday so will be unable to attend [*i.e. the April 29<sup>th</sup> stakeholder workshop*].

I would like to provide the following questions/and thoughts about the tax shift small business grant program:

### What constitutes a small business and who qualifies for a grant?

- Current definition of what constitutes a small business (<50 employees) is not fine grained enough. I think small size stores that are national chains like Starbucks qualify and Starbucks hardly needs rescuing. How do we make sure grants get to small, independent businesses?
- Also not sure how to treat local Calgary chains like Red's Diner?
- Are we constrained legislatively from refining this definition?

### How much should grants be?

- I have no idea but I think we need to come up with a formula with a cap?

### Implementation Ideas

- Is there a way to use the information in the tax rolls to identify 'small businesses'?
- Business taxes are still broken out in the BIAs. Could the business tax rolls be used to identify small businesses?
- Given how similar all the Calgary BIA levy rates are, could the BIA levy amounts, which are being mailed separately this year, be used, at least within the BIAs, to identify everyone below a certain amount? Given the levy is based on occupancy, square footage and main floor/upstairs/downstairs this might be possible way to identify smaller businesses? Say, for example, all businesses paying less than x amount in a levy are obviously small premises businesses although again that probably include the Starbucks type businesses?
- Could 311 be used in some way? Perhaps business owner calls 311, gives their business tax rolls identifying number and then 311 passes on request for grant to be approved or rejected?
- Can the tax rolls or business licenses be used as a way to identify those businesses who qualify.

- Approximately 1/3 of my businesses have no social media presence so there will need to be an old school option for being notified of the grant program and for applying for the grant.
- The BIAs could be a useful resource in this process. The Kensington BIA would participate in early morning sessions (best time to get my owner/operators before they go to work) held in Kensington at modest City expense (coffee and pastries) for my member businesses who would qualify for a grant to come to an information meeting and have City staff help them fill out an application. For some of my member businesses on line applications can be challenging, coming to City hall and paying for parking can be intimidating and time consuming. A couple of one-stop open houses for people to come get help filling out their grant applications would be ideal for small BIAs like Kensington.
- There should be no fee for applying for a grant.
- Efforts should be made to minimize other costs associated with applying for grants. Possible corollary costs might include time away from their business/paying an employee to mind the shop, downtown parking, and help from accountant to collect relevant information to qualify are examples.
- Transparency is a critical element for this grant process. Businesses and the media are already still would up about this process and negative follow up will benefit no one. Here is an example of what not to do! The chart used at Council on April 8 in Option 1 – C2019-0352 #1 shows a 1.77% decrease in non-residential property tax but this is noted as not including the Business Tax Consolidation impact so in fact businesses will NOT see a decrease but in fact will see an increase of about \$320 a year by my, admittedly amateur, calculations. This seems unfortunate (not to have included the business tax consolidation) given my businesses will look at the the total amount collected for municipal taxes and be annoyed to see a decrease claimed by the left hand then nullified by the right hand. This is just the sort of apparent sleight of hand that really frustrates my businesses and makes them mistrustful and angry.

#### Things to consider

- Need for clear criteria for who qualifies for grant and who does not so businesses do not waste time and money applying for grants for which they are not eligible.
- Defining small businesses in a way that allows certainty for applicants but allows for some flexibility for anomalies like small local Calgary franchises like Red's Diner.
- We need to create a really simple and inexpensive process since the process is only planned to be used for two years. We need to try to piggyback on existing City resources rather than reinvent the wheel.
- Do we actually need to have a grant application process or can we define what constitutes a 'small business' sufficiently precisely enough to then simply rebate those business accounts? Then perhaps there is only an application process for those businesses who feel they were unfairly disqualified from receiving a grant and let them make their case?



- A simple rebate to non-residential property tax account rather than issuing a check might save money but this risks landlords pocketing the money and not passing on the rebate as has happened in past two years. If money goes to landlords, not to tenant businesses, how will landlord compliance with passing on rebate to tenants be tracked and enforced?

### Risks

- Negative reaction in the media if grant criteria are not crystal clear and defensible.
- Negative reaction in the media if we don't get small business qualifiers right.
- Negative reaction in the media with regard to transparent, easy to understand process (See the note above about business tax calculation not being included in the calculations indicating that business taxes are going down by 1.77% when actually including the business tax calculation taxes are going up?)
- Negative reaction in the media if information rollout is flawed or parameters/information necessary to qualify are too onerous.
- Negative reaction in the media if the process is too cumbersome and slow and backlogs result.

Annie

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