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Our File No.: 212977

**Via Email**

Mayor and Member of Council  
City of Burlington  
426 Brant Street  
Burlington, ON L7R 3Z6

Dear Mayor and Member of Council:

**Re: City of Burlington Development Charge By-law Review**

We are lawyers for the Building Industry and Land Development Association (“BILD”) in respect of the City’s ongoing update of its development charge by-law.

We have been retained, together with urbanMetrics Inc. and BA Group, to undertake a more detailed review of the materials the City has provided in support of its development charge update. While our review of the materials is ongoing, the consulting team has identified a number of questions and preliminary concerns which are set out in detail in the attached correspondence from urbanMetrics Inc. (February 17, 2022) and BA Group (February 28, 2022). We note that the January 21, 2022 Background Study by Watson and Associates prepared for the City (the “2022 DC Study”) proposes an increase in total residential development charges of almost 25%, even though a small decrease in the Transportation development charge is proposed. The significant increase in “soft” service development charges is very concerning to the development industry. Moreover, we continue to have questions regarding the Transportation development charge.

**Industrial Employment Density**

The industrial employment density (of 800 square feet per employee) assumed in the 2022 DC Study is the lowest among Halton Region municipalities, and Halton Region itself (1,390 square feet per employee). We would like to understand the basis for this discrepancy, which could have the effect of inflating the non-residential development charge.

**Treatment of Non-Statutory Exemptions**

The City’s existing development charge by-law (29-2019) includes non-statutory exemptions for lot coverage relief. BILD wants to ensure that an off-setting adjustment has been made to the



City's development charges reserve fund balances to account for any exemptions that have been provided.

### **Storm Drainage**

We would like the City to provide justification for the 37% benefit to existing allocation made for the Appleby Creek Erosion Control projects. Based on BILD's consultants' review of the Appleby Creek Erosion Control Environmental Assessment (June 1, 2020), the erosion control projects are intended to address existing problems of erosion and flooding in the area, and therefore should not be funded by development charges.

### **Transit**

BILD would like to understand the basis for the capital costs of the Transit Operations Centre, and how the portion attributable to the development charge was determined.

Likewise, we would like to understand the basis for the calculation of the capital costs for conventional transit vehicles and bus stop location upgrades.

### **Parks and Recreation**

We have several question regarding the calculation of the Parks and Recreation development charges in the 2022 DC Study, including:

- Why do the capital costs of the City View Park and City View Park – Sportsfields Development exceed the costs included in the City's approved capital budget?
- What is the basis for the capital cost assumption for the Skyway Redevelopment?
- What is the basis for the benefit to existing allocation for the purchase of lands for a community centre at the former Robert Bateman High School; are any other uses co-locating with this facility; and have the costs be appropriately deflated (to 2019 dollars)?

### **Library**

With respect to the Southeast Library Expansion (New Appleby), we would like to understand why the capital costs of this project exceed the City's approved capital budget, and confirm the costs have been appropriately deflated (to 2019 dollars). We would also like to understand the rationale for the benefit to existing and post period benefit allocations for this facility.



## Transportation

We have a number of detailed questions regarding the proposed Transportation development charge, including the following:

1. King Road Bridge Project - Further detail is required regarding the King Road Bridge project as set out in the BA memorandum. Given the nature of this project, we do not understand how it is reasonable that there is no benefit to existing development or post period benefit allocations.
2. Mainway Grade Separation Project - Further detail is required regarding the Mainway Grade Separation project as set out in the BA memorandum. Given the nature of this project, we do not understand how it is reasonable that there is no benefit to existing development or post period benefit allocations.
3. Railway Crossing Reserve Fund – Additional detail is required regarding the source of funding for the Railway Crossing Reserve Fund, and the nature and type of railway crossing projects that this reserve fund is intended to pay for.
4. Intersection Improvement Projects – Given the significant differences in the range for cost estimates for various Intersection Improvement Projects, additional information is required regarding the scope of work for each. We would also like to understand why only a 5% allocation has been made to benefit to existing development for these projects, and how costs related to engineering, contingencies, design, property and utility costs have been addressed in the benefit to existing allocation.
5. Road Widening Projects – We would like to understand the rationale for the benefit to existing development allocations made for various road projects, including:
  - Walkers Line: Highway 407 to No.1 Side Road (Project #RD-RA-787)
  - Harvester Road Widening: Guelph Line to Walkers Line (Project #RD-RA-1113)
  - Harvester Road Widening: Walkers Line to Appleby Line (Project #RD-RA-1622)
  - Harvester Road Reconstruction & Widening: Appleby Line to Century Drive (Project #RD-RA-1250)
6. Road Reconstruction Projects – We would like to understand the discrepancies in the estimated capital costs of the King Road Rehabilitation – King Forest Court to Top of Escarpment (Project # RD-RA-1108) from various sources, and the basis for the benefit to existing development allocation made for this project in the 2022 DC Study.
7. New Construction Road Projects - We would like to understand the discrepancies in the estimated capital costs of the South Service Road – Aldershot GO to King Road (Project #



RD-RA-964) from various sources, the scope of the project, and the rationale for allocating no portion of the project to benefit to existing development or post period benefit, given the nature of this project.

8. Active Transportation Projects – As set out in the BA memo, given the nature of the following active transportation projects, the proposed allocations to benefit to existing development and post period benefit in the 2022 DC Study do not seem reasonable, and we are requesting that a justification be provided:
- Cumberland Avenue: Pedestrian Railway Underpass (Project #RD-RA-681)
  - Eastport Drive Cycling Improvements (Project #RD-SW-1285)
  - Harvester Road Sidewalk Projects - Walkers Line to Appleby Line, North Side (Project #RD-SW-261) and South Service Road to Century Drive (Project #RD-SW-1879)
  - Highway 407 Bridge Sidewalk (Project #RD-SW-262)

### **Conclusion**

The Burlington development industry, as represented by BILD, wants to work with the City to ensure that growth fairly pays for growth, in accordance with the applicable legislative requirements. However, additional information is required to ensure that the proposed development charges achieve this result. BILD would like to work with City staff to ensure that we have obtained the necessary information, and to have our issues addressed prior to the update to the City's development charge by-law being enacted. To that end, we are requesting that the requested information be provided and City staff meet with BILD's consulting team as soon as possible, and that no development charge by-law be enacted until this dialogue is complete.

BILD looks forward to continuing to work with the City.

Yours truly,

**Goodmans LLP**

A handwritten signature in blue ink, appearing to read "R. Howe", written over a light blue horizontal line.

Robert Howe

encl

cc: client

7250659



February 17, 2022

Ann Marie Coulson  
Manager of Financial Planning and Taxation, Finance Department  
City of Burlington  
426 Brant Street  
Burlington, ON  
L7R 3Z6

Dear Ms. Coulson:

**RE: City of Burlington Development Charge Background Study Update**

urbanMetrics inc. has been retained by BILD to review the City of Burlington 2022 Development Charge Background Study Update (“2022 DC Study”) and other supporting materials. The following letter provides comments and questions stemming from our review of these documents.

## **Industrial Employment Density**

1. Industrial Employment Density - Please provide evidence to support the assumed industrial density of 800 square feet per employee. As shown in the table below, the industrial employment density assumed in the 2022 DC Study is the lowest among Halton Region municipalities and Halton Region overall, which assumes a density of 1,390 square feet per employee.

	<u>Industrial Employment Density</u>
Halton Hills	1,415 sq.ft. per employee
Milton	
<i>Prestige Industrial</i>	900 sq.ft. per employee
<i>Industrial</i>	1,750 sq.ft. per employee
Oakville	1,200 sq.ft. per employee
<b>Burlington</b>	<b>800 sq.ft. per employee</b>
Halton Region	1,390 sq.ft. per employee

## Reserve Funds

2. **Non-Statutory Exemptions** – The Burlington Development Charges by-law 29-2019 includes non-statutory exemptions for lot coverage relief. We have identified developments in Burlington that may have applied for this non-statutory exemption during the period of the DC By-law. Please provide evidence that an off-setting deposit has been made to the DC reserve funds for this non-statutory exemptions.

## Transportation

3. **King Road Bridge** – Why is there no allocation of capital costs to benefit to existing (“BTE”) for the King Road bridge over Highway 403, as this project includes the widening of King Road between North Service Road and the future South Service Road? Also, why has a post period benefit (“PPB”) not been allocated to this project, which is scheduled for completion at the end of the forecast period, in 2028?
4. **Mainway Grade Separation** – Please provide justification for the 24% BTE allocation for the Mainway Grade Separation. The 2021 Approved Operating and Capital Budget and 2022-2030 Capital Forecast states:

*There are significant delays to vehicles using Mainway due to the existing CNR crossing ... The removal of the current at grade crossing will eliminate potential car/rail conflicts as well as greatly improve emergency response in this area.*

This suggests that the BTE allocation should be higher than 24%, as the construction of the grade separation will benefit existing users of the roadway.

5. **Harvester Road Intersection Improvements** – Please explain the significant difference in costs for the three Harvester Road intersection improvements? The intersection improvement at Appleby Line are estimated at \$12.1 million, while Walker’s Line is estimated at \$5.8 million and Guelph Line is estimated at \$2.0 million.

6. **Cumberland Avenue Pedestrian – Railway Underpass** – Please provide an explanation for why only 5% of this project has been attributed to BTE when it is located in an existing residential neighbourhood.
7. **Harvester Road Sidewalk (Walkers Line to Appleby Line, North Side) & Harvester Road Sidewalk (South Service Road to Century Drive)** – Please provide an explanation for why only 10% of these projects have been attributed to BTE when it is located in an existing employment area.
8. **Contribution to Railway Crossing Reserve Fund** – What railway crossing is this reserve fund intended to fund? Is there any overlap between this project in the capital program and the other rail grade separations included in the DC capital program?

## Storm Drainage

9. **Appleby Creek Erosion Control** – Please provide justification for the 37% BTE allocated to the Appleby Creek Erosion Control projects. Will these projects enable growth in the surrounding area, or will they address existing deficiencies? Based on our review of the Appleby Creek Erosion Control Environmental Assessment (June 1, 2020), the erosion control projects are intended to address existing problems of erosion and flooding in the area.

## Transit

10. **Transit Operation Centre** - Can you please confirm if the revised capital costs for the Burlington Transit Operations Expansion (\$34.9 million) included in the capital program have been deflated to 2019 dollars. Further the cost included in the capital program significantly exceeds the project costs contained in City's 2021 Capital Budget and Forecast. Can you please explain the difference?
11. **DC Recoverable Portion of Transit Operations Centre** – Can you please explain why the DC recoverable portion of the Transit Operations Centre has increased from 4.1% of gross capital costs in the 2019 DC Study to 8.2% of gross capital costs in the 2022 DC Study, while the PPB and BTE portions have remained constant?
12. **Expansion Conventional Transit Vehicles / Bus Stop Location Upgrades** – We have three questions related to the increased capital costs for the expansion of conventional transit vehicles and bus stop location upgrades:
  - a. The capital costs for the expansion of conventional transit vehicles increased from \$14.6 million in the 2019 DC Study to \$19.8 million in the 2022 DC Study. Is this related to the purchase of additional transit vehicles? If so, how many additional vehicles are

being purchased and are these additional vehicles warranted based on the planned level of service calculations included in the 2019 DC Study?

- b. Similarly, the costs for bus stop location upgrades increased from \$1.1 million in the 2019 DC Study to \$2.4 million in the 2022 DC Study. What is the basis for this increase?
- c. Can you confirm that the costs for the expansion of conventional transit vehicles and bus stop location upgrades included in the capital program in the 2022 DC Study are in 2019 dollars?

## Parks and Recreation

13. **City View Park and Sportsfield Development** – Why do the capital costs for PO-PD-115 (City View Park and City View Park – Sportsfields Development) exceed the costs included in the City’s approved capital budget?
14. **Skyway Redevelopment** – Can you please confirm that the capital costs for the Skyway Redevelopment (\$22.9 million) included in the capital program have been deflated to 2019 dollars, as this is a new project included in the capital program as part of the 2022 DC Study.
15. **Community Centre at Bateman** – We have three questions related to the purchase of lands for a community centre at the former Robert Bateman Highschool:
  - a. Please provide justification for the 5% BTE, as lands are located in an established neighbourhood outside of the City’s growth areas.
  - b. Please confirm that the entirety of these lands will be used as a community centre and no other community facilities (i.e library) will co-locate on these lands.
  - c. Please confirm that the capital costs included in the 2022 DC Study have been deflated to 2019 dollars and how much they have been deflated.

## Library

16. **Library (New Appleby) – Southeast Library Expansion** – Please provide an explanation for why the capital costs included in the capital program for FB-LB-1921 (\$3.066 million) exceed the costs included in the 2021 capital budget (\$1.235 million)? Also, please confirm that the costs in the capital program have been deflated to 2019 dollars and how much they have been deflated. Further, please provide justification for the BTE and PPB allocations.

As the City anticipates passing the proposed DC By-law on March 22, 2022, we would appreciate an opportunity to meet with staff from the City and Watson & Associates Economists Ltd. over the coming weeks to discuss our questions and findings.

We trust that you will find all in order, however, if you have any questions or require additional information, please contact the undersigned at your earliest convenience.

Yours truly,

urbanMetrics inc.

A handwritten signature in black ink, appearing to read "Craig Ferguson". The signature is fluid and cursive, with a large initial "C" and "F".

Craig Ferguson

Partner

[cferguson@urbanMetrics.ca](mailto:cferguson@urbanMetrics.ca)

# Memorandum

**TO:**

**Ann Marie Coulson**

Manager of Financial Planning and Taxation,  
Finance Department  
City of Burlington

**FROM:**

BILD Representatives

**PROJECT:**

7162-15  
City of Burlington 2022 DC By-law

**DATE:**

February 28, 2022

**SUBJECT: REQUEST FOR ADDITIONAL INFORMATION**

We have reviewed the January 21, 2022 City of Burlington Development Charges Update Study (“the 2022 DC Update Study”) and the 2014 Development Charges Transportation Report prepared by Cole Engineering (“the 2014 Cole Report”).

This memorandum summarizes, for purposes of discussion, several areas where we require further information and clarification.

It would be greatly appreciated if our team could meet with the City at your earliest convenience to discuss these items in more detail.

## 1.0 ROAD GRADE SEPARATIONS

### King Road Bridge (Project# RD-RA-776)

1. King Road Bridge (Future South Service Road to North Service Road) is listed as a bridge/grade separation project in Table 3-1 of the 2022 DC Update Study with a total cost of \$18.28 million.
2. Please confirm that this project includes both the widening of the existing bridge over Highway 403, as well as the widening of King Road, between Future South Service Road and North Service Road. If so, please confirm that the \$18.28 million cost estimate includes the widening of King Road.

3. Please confirm the nature of this bridge widening in relation to the following:
  - a. Is the project a new bridge (twinning) or widening of the existing bridge?
  - b. Is the existing bridge being reconstructed or rehabilitated as part of the project?
  - c. Are the lanes on the existing bridge being resurfaced?
  - d. How has usage by heavy trucks been taken into consideration?
  - e. Have active transportation facilities been included in the new works?
  
4. Please confirm the nature of the road widening along King Road. Are the existing lanes being resurfaced?
5. Please provide the rationale for the allocation of 0% BTE for the entire project.
6. Please provide the rationale for the allocation of a 0% PPB for the project in relation to the following:
  - a. This is a significant bridge widening project that will benefit existing residents and employees of the area;
  - b. This project is scheduled to be completed in 2028, towards the end of the growth period in 2031;
  - c. In Table 5 of the 2014 Cole Report, the traffic analysis of Screenline #26 which is known as “CNR (Waterdown Road to King Road)” should include consideration for the additional capacity provided by the widening of King Road/twinning of the bridge over Highway 403. As shown in Table 5, the existing v/c ratios across the screenline are 0.63 for northbound vehicles and 0.59 for southbound vehicles. The widening of King Road/twinning of the bridge over Highway 403 results in future v/c ratios across the screenline in 2031 that range from 0.50 to 0.53 for northbound vehicles and 0.64 for southbound vehicles. The widening of King Road/twinning of the bridge over Highway 403 results in lower v/c’s for northbound traffic by 2031, when compared to existing v/c’s across the screenline.
  
7. Since the screenline is well below capacity and below the City’s v/c threshold of 0.90, what is the rationale for not allocating a PPB to this project?
8. Section 5.2 (Page 19) of the 2014 Cole Report states:
  - a. *“The traffic forecasts for the 2031 horizon results in volume to capacity ratios that are higher than in existing conditions. This indicates that excess capacity has not been provided under the 2031 future condition.”*
  
9. Please explain the rationale for the above statement and how it relates to the allocation of a PPB of 0% for the King Road project.

## 2.0 RAILWAY GRADE SEPARATIONS

### Mainway Grade Separation (Project# RD-RA-769)

1. As the benefits of grade separating a railway crossing are related to safety (elimination of train-vehicle collisions) and delay (elimination of vehicle delays related to passing trains) and these benefits are experienced in equal measure by all users of the future roadway, be they 1) members of the existing community, 2) new residents and employees related to in-period growth, or 3) residents and employees related to growth beyond the current DC period (growth beyond 2031), please provide the rationale for the allocation of a BTE of 24% and a PPB of 0%.
2. The 2014 Cole Report states on Page 17, “*delay savings for the rail grade separation is calculated using Synchro traffic operations software and is based on actual observed data for the amount of time that crossing gates were closed during a rail crossing for a typical hour.*”
3. Please provide the delay savings methodology used to determine the proposed BTE of 24%.
4. It was noted in the 2021 Approved Operating and Capital Budget and 2022-2030 Capital Forecast:
  - a. *“There are significant delays to vehicles using Mainway due to the existing CNR crossing...The removal of the current at-grade crossing will eliminate potential car/rail conflicts as well as greatly improve emergency response in this area.”*
5. Please confirm how the rail crossing safety and exposure benefits to all road users derived from the grade separation, as well as the reduction in emergency response times, have been accounted for in determining the allocation of BTE and PPB.

### Contribution to Railway Crossing Reserve Fund (Project# RD-RA-481)

1. Between 2019 and 2031, a total of \$11.8 M has been allocated to the Railway Crossing Reserve Fund. Can you please confirm the nature and type of railway crossing projects that this reserve fund is intended to fund?
2. What is the relationship between the Railway Crossing Reserve Fund and the rail grade separations included within Table 3-1 of the 2022 DC Update Study?

### 3.0 INTERSECTION IMPROVEMENT PROJECTS

1. There are significant differences in the gross cost estimates of the intersection improvement projects listed below. To further our understanding of the costing of these projects, please provide additional information regarding the scope of work for each location.
  - a. Project # RD-RR-167: Appleby Line & Harvester Road (\$12.1 M)
  - b. Project # RD-RA-763: Harvester Road & Guelph Line (\$2.0 M)
  - c. Project # RD-RA-184: Harvester Road & Walker's Line (\$5.8 M)
  - d. Project # RD-RA-1918: Walker's Line & Dundas Street (\$0.6 M)
2. Given the potential for significant benefits to existing traffic related to the intersection improvements, what is the rationale for a BTE allocation of only 5% for each of the projects listed above?
3. Please confirm how costs related to engineering, contingencies, design, property and utility costs have been addressed in the allocation of BTE for each of the intersection improvement projects?

### 4.0 ROAD WIDENINGS

#### Walkers Line: Highway 407 to No.1 Side Road (Project #RD-RA-787)

1. Figure 2 of the 2014 Cole Report identifies Walkers Line (Highway 407 to No.1 Side Road) and in Table 13, as a "reconstruction project" while the 2019 and 2022 DC Update Study identifies this project as a "widening project" with a gross cost estimate of \$1.8 million with a BTE allocation of 80%. Can you please confirm the nature of this project and the rationale for a BTE of 80%?

#### Harvester Road Widening: Guelph Line to Walkers Line (Project #RD-RA-1113) & Harvester Road Widening: Walkers Line to Appleby Line (Project #RD-RA-1622)

1. The Harvester Road Widening project includes the allocation of 5% BTE for the segment between Guelph Line and Walkers Line, while the segment between Walkers Line and Appleby Line includes the allocation of 15% BTE. Please provide the rationale for the BTE allocated to each of these segments.

#### Harvester Road Reconstruction & Widening: Appleby Line to Century Drive (Project #RD-RA-1250)

1. As this project includes a reconstruction and widening, please provide the rationale for the allocation of a BTE of 5%.

**Other Costs**

1. Please confirm how costs related to engineering, contingencies, design, property and utility costs have been addressed in the allocation of BTE for each of the road widening projects?

**5.0 ROAD RECONSTRUCTION PROJECTS**

**King Road Rehabilitation – King Forest Court to Top of Escarpment (Project # RD-RA-1108)**

1. As summarized in Table 1, dependent on the document source, there are differences in the gross cost estimates and limits for this project. Please confirm the project limits and provide the rationale for the differences in the cost estimates for this project.

**TABLE 1 GROSS COST ESTIMATES FOR KING ROAD REHABILITATION (PROJECT # RD-RA-1108)**

Source	Gross Cost Estimate (\$million)	Project Limits
2022 DC Update Study	\$6.9	King Forest Court to Top of Escarpment
2019 DC Study	\$3.7	King Forest Court to Top of Escarpment
2014 Cole Report	\$1.7	North Service Road to Top of Escarpment

2. The 2022 DC Update Study identifies this project as a “reconstruction project” with a gross cost estimate of \$6.9 million with a BTE allocation of 90%. Can you please confirm the rationale for a BTE of 90%?

**6.0 NEW CONSTRUCTION ROAD PROJECTS**

**South Service Road – Aldershot GO to King Road (Project # RD-RA-964)**

1. As summarized in Table 2, dependent on the document source, there are differences in the gross cost estimates and limits for this project. Please confirm the project limits and provide the rationale for the differences in the cost estimates for this project.

**TABLE 2 GROSS COST ESTIMATES FOR SOUTH SERVICE ROAD (PROJECT # RD-RA-964)**

Source	Gross Cost Estimate (\$million)	Project Limits
2022 DC Update Study	\$2.7	Aldershot GO to “Development Boundary”
2019 DC Study	\$1.25	Aldershot GO to “Development Boundary”
2014 Cole Report	\$1.65	Aldershot GO to King Road

- In Figure 2 of the 2014 Cole Report, the map that identifies the location of the construction of South Service Road includes a symbol for a “structure”. Can you please confirm the nature of this structure and whether or not it has been included within the total cost estimate of \$2.7 million (cost from 2022 DC Update Study)?
- In Table 3-1 of the 2022 DC Update Study, the construction of South Service Road has a gross cost estimate of \$2.7 million, with no allocation of BTE or PPB. Is the current methodology to determine the BTE and PPB reasonable, considering that the construction of this roadway would shift existing trips from the congested Highway 403 and provide additional capacity for existing residents and employees of the area? Specifically, what is the rationale for a 0% BTE and 0% PPB in relation to this project?

## 7.0 ACTIVE TRANSPORTATION

### Cumberland Avenue: Pedestrian Railway Underpass (Project #RD-RA-681)

- As this active transportation project is located within a built-up area of the City, please provide the rationale for a BTE of 5% and a PPB of 0% (Table 3-1 in the 2022 DC Update Study), when the project would clearly provide a significant benefit in relation to enhanced connectivity and improved safety to 1) members of the existing community, 2) new residents and employees related to in-period growth, and 3) residents and employees related to growth beyond the current DC period (growth beyond 2031).
- A 2014 presentation by Cole Engineering to Burlington’s City Council dated October 3, 2014 shows that the Cumberland Avenue pedestrian project had a BTE allocation of 50% in 2009 and was **proposed** to be reduced to 10% in 2014. The 2014 DC Background Study includes a BTE of 5% for this project, as does the 2019 DC Background Study, as well as the 2022 DC Update Study. Can you please provide the rationale for the reduction in the BTE from 50% in 2009 to 5% in subsequent years?

### Eastport Drive Cycling Improvements (Project #RD-SW-1285)

1. As this active transportation project (scheduled for completion in 2030) is located within a built-up area of the City and addresses connectivity adjacent to the “Burlington Skyway”, please provide the rationale for the allocation of a BTE of 10% and a PPB of 0%, when the project would clearly provide a significant benefit in relation to enhanced connectivity and improved safety to 1) members of the existing community, 2) new residents and employees related to in-period growth and 3) residents and employees related to growth beyond the current DC period (growth beyond 2031).

### Harvester Road Sidewalk Projects

1. **Walkers Line to Appleby Line, North Side (Project #RD-SW-261):** As this active transportation project is located within a built-up employment area of the City, please provide the rationale for a BTE of 10% and a PPB of 0% (Table 3-1 in the 2022 DC Update Study), when the project would clearly provide a significant benefit in relation to improved safety and enhanced connectivity to 1) members of the existing community, 2) new residents and employees related to in-period growth and 3) residents and employees related to growth beyond the current DC period (growth beyond 2031).
2. **South Service Road to Century Drive (Project #RD-SW-1879):** As this active transportation project is located within a built-up employment area of the City and addresses an existing gap within the sidewalk network, please provide the rationale for a BTE of 10% and a PPB of 0% (Table 3-1 in the 2022 DC Update Study), when the project would clearly provide a significant benefit in relation to improved safety and enhanced connectivity to 1) members of the existing community, 2) new residents and employees related to in-period growth and 3) residents and employees related to growth beyond the current DC period (growth beyond 2031).

### Highway 407 Bridge Sidewalk (Project #RD-SW-262):

1. As this sidewalk project addresses a missing pedestrian link from the south along Appleby Line, please provide the rationale for the allocation of 10% BTE and 0% PPB.

## 8.0 REQUEST FOR INFORMATION

1. Please confirm that the 2014 Cole Report is the most recent transportation study completed in relation to Burlington’s Development Charges Background Study. If a more current transportation report is available, it would be appreciated if we could be provided with a copy.
2. Please provide a copy of the 2009 DC Background Study.