

April 21, 2015

Mayor John Tory and Members of the Toronto Executive Committee  
City of Toronto  
10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON  
M5H 2N2

**RE: April 22<sup>nd</sup> Executive Committee Meeting, Agenda Item EX 5.1 Development Charges  
By-law Amendment Scarborough Subway Extension**

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Dear Mayor Tory and members of the Toronto Executive Committee,

Thank you for the opportunity to submit comments with respect to the City of Toronto's proposed Development Charges By-law Amendment for the Scarborough Subway Extension.

We recognize that this proposal may increase the development charges by an additional 10% for residential and 11% for non-residential development. This proposal is concerning to the industry because it adds additional and unaccounted costs onto the new homeowners and future residents of Toronto.

It is imperative to note that our industry is 100% committed and legislated to paying its fair share of growth. This includes critical infrastructure such as subways. In this case, the industry share of the costs are \$451.6 million.

The industry does not challenge these needs, however the industry does challenge the fairness of this proposal and is concerned by the speed at which, it has made its way to committee. Especially, given the fact that this proposal is expeditiously being brought forward while the industry is still operating in the negotiated transition period from the previous by-law review.

In order to comprehensively review the proposed Amendment, BILD retained IBI Group to assist in its technical analysis. IBI Group has identified issues with the proposed methodology, as it relates to the ridership assumptions. This issue resulted in a greater proportion of the costs being attributed to new development, rather than a benefit to the existing population. In IBI Group's analysis this issue results in an additional \$700 charge for a two-bedroom unit.

The industry would encourage the City to consider the ramifications of these increases and the analysis of our technical consultant when this proposal is brought forward to the April 22, 2015 Executive Committee meeting.

It is for these reasons that we recommend the following:

**We recommend that the proposed Amendment, if adopted, be implemented to align with the City's final phase of its current city-wide by-law, which would take effect in February 2016.**

Thank you for the opportunity to submit these comments and for your commitment to consult with BILD on matters that affect our industry. As partners in building complete communities, BILD looks forward to further dialogue and consultation with the City. Please feel free to contact the undersigned if you have any questions.

Best regards,

A handwritten signature in black ink, appearing to read "Steve Deveaux". The signature is fluid and cursive, with a large initial "S" and "D".

Steve Deveaux  
BILD Chairman

Cc: Rob Hatton, Director, Strategic Initiatives & Intergovernmental Finance, City of Toronto  
Chris Phibbs, Senior Advisor, Office of Mayor John Tory, City of Toronto  
Gary Switzer, Toronto Chapter Chair  
Danielle Chin, Senior Planner, BILD