

## 3.1 (b)

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**Subject:** The deeply flawed Dillon report comparing Option 1 and Option 2 of the growth strategy

Comments on the growth evaluation report submitted by Dillon:

1. **The conclusion precedes the report in time.** Option 2 outscores Option 1, but that apparently doesn't matter because everything turns on the "conformity" category. Quoting from the report conclusion: "The fundamental difference between the two Growth Options is that Growth Option 2 does not conform to the Province's Land Needs Methodology and is unlikely to produce an outcome where the City is able to achieve its growth forecast allocated under the Growth Plan. Conformity with the Province's Growth Plan policies is a fundamental aspect of the Municipal Comprehensive Review process." No analysis was even conducted on this category. The basic message is that Doug Ford rules and nothing else really counts.
2. **The scoring of the conclusion actually contradicts the report contents.** The conclusion says Option 2 is better for four areas - "natural environment, agriculture, transportation and climate change". But the report itself says it is also better in "growth allocation". So counting correctly Dillon finds Option 2 outscores Option 1 by a margin of 5 to 3 with 3 ties.
3. **The Municipal Finance category is deeply flawed.** It is scored for Option 1, but acknowledges that only a very narrow question was examined. The conclusion reads: "Growth Option 1 more fully addresses the theme of 'Municipal Finance' *as defined by the consideration as the costs to provide new infrastructure in greenfield areas are lower in comparison to existing.*" That leaves out a great deal.
  1. **It doesn't include the value of existing infrastructure.** That's effectively treated as zero. It also doesn't include the requirement that the city continue to maintain the infrastructure inside the boundary irrespective of what growth takes place. Instead that is made an additional cost of not expanding the boundary and only scored as a comparison of the cost of building new roads and pipes in greenfield areas versus the cost of replacing these services inside the boundary.
  2. **It makes a foolish error in pumping and treatment requirements.** The analysis says "There appears to be no difference in pumping and treatment requirements between the two Growth Options." This is not true. The report mistakenly says that Sinkhole Creek is under the HCA. Actually it is under the NPCA and it drains to Niagara. That's a significant error by Dillon because it assumes those lands (much of Elfrida) will drain to Hamilton's water and sewer treatment facilities which is not the case. Much of Elfrida,

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for example, drains away from the city's water and wastewater facilities and thus requires pumping uphill for at least the sewage. In addition, the distance pumped of everything will be less under Option 2.

3. **It forgets that all growth is covered by development charges irrespective of its location**, and only credits these charges to the capital costs for Option 1. In addition the long term maintenance costs for new infrastructure in Option 1 are not mentioned.
4. **Under the transit section it acknowledges higher capital costs but ignores the much higher operating costs.** In contrast on Option 2 the provision of the capital costs of LRT by senior governments is not acknowledged. There's also no admission that transit ridership will be higher under Option 2 thus offsetting more operating costs.
5. **Perhaps most outrageous is the statement that "it is more costly to expand existing roadways across the built up area versus building new roads in new greenfield areas"**. Of course this ignores that we won't be expanding existing roads because there is no room to do so, and falsely assumes no existing roads will be rebuilt even if no new growth occurs. And, there is no mention of the critical measure of taxpayer density paying for repair of existing services.
4. **Two of the ties are actually wins for Option 2** – natural hazards and infrastructure and public service facilities. Two other categories given to option 1 are actually won by option 2.
5. **There is a bizarre understanding of what complete communities means.** Here is the conclusion: "Growth Option 1 more fully addresses the theme of 'Complete Communities' as defined by the considerations as more undeveloped land is available to plan for an appropriate mix of housing and supply of open spaces, parks, trails and recreation facilities." This is not what complete communities means. There is no mention, for example, that the urban expansion areas will have nothing but ground-based housing. There will be no apartments and probably no rental opportunities but these are described as complete communities. They also won't have downtowns or homeless shelters or social services or other central city amenities. On the other hand, if these are limited in some parts of the city, intensification offers a great opportunity to correct those deficiencies. The report also argues Option 1 is better because it reflects market demand for housing while Option 2 doesn't and therefore "could have negative impacts on access to housing choices." Nothing of course about affordable housing – apparently not a feature of 'complete' communities.
6. **Infrastructure and Public Service Facilities is also inappropriately scored for Option 1.** Incredibly it is claimed that the increase in impervious surfaces will be the same in both options. Explain that to the farmers whose fields will be built over. Again there is the false claim that development charges will cover the stuff required for Option 1 but apparently not for Option 2.
7. **The agriculture category is won by Option 2, but is unfairly reduced by reference to urban farming.** This sets 3 acres of urban farm against 3000 acres of lost farmland and effectively counts this difference as a one-quarter shortcoming of Option 2.