



CITY OF HAMILTON
PLANNING AND ECONOMIC DEVELOPMENT DEPARTMENT
Economic Development Division

TO:	Mayor and Members General Issues Committee
COMMITTEE DATE:	April 19, 2023
SUBJECT/REPORT NO:	Five-Year Review of the Environmental Remediation and Site Enhancement (ERASE) Community Improvement Plan and Associated Financial Assistance Programs (PED23076) (City Wide)
WARD(S) AFFECTED:	City Wide
PREPARED BY:	Phil Caldwell (905) 546-2424 Ext. 2359
SUBMITTED BY:	Norm Schleeahn Director, Economic Development, Planning and Economic Development Department
SIGNATURE:	

RECOMMENDATION

- (a) That staff be directed to bring forward to the Planning Committee for a statutory public meeting, in accordance with Section 17(15)(d) of the *Planning Act*, the following:
- (i) Appendix “A” to Report PED23076, respecting a proposed updated Environmental Remediation and Site Enhancement (ERASE) Community Improvement Plan;
 - (ii) Appendix “B” to Report PED23076, respecting a proposed updated ERASE Community Improvement Project Area;
- (b) That staff be directed to bring forward to the Planning Committee the following proposed new/updated implementing Environmental Remediation and Site Enhancement (ERASE) Program descriptions for consideration in conjunction with the proposed ERASE Community Improvement Plan and ERASE Community Improvement Project Area By-laws:

OUR Vision: To be the best place to raise a child and age successfully.

OUR Mission: To provide high quality cost conscious public services that contribute to a healthy, safe and prosperous community, in a sustainable manner.

OUR Culture: Collective Ownership, Steadfast Integrity, Courageous Change, Sensational Service, Engaged Empowered Employees.

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- (i) Appendix “C” to Report PED23076, respecting the ERASE Study Grant Program;
 - (ii) Appendix “D” to Report PED23076, respecting the ERASE Redevelopment Grant Program;
 - (iii) Appendix “E” to Report PED23076, respecting the ERASE Tax Assistance Program;
 - (iv) Appendix “F” to Report PED23076, respecting the ERASE Commercial Districts Remediation Loan Program (currently the Downtown / West Harbour Remediation Loan Program);
 - (v) Appendix “G” to Report PED23076, respecting a new ERASE Affordable Housing Grant Program;
- (c) That staff be directed to implement necessary administrative processes required to enable the existing Brownfield Pilot Project ID 3621755102 to be utilized for the provision of grants under the proposed new Environmental Remediation and Site Enhancement (ERASE) Affordable Housing Grant Program;
- (d) That funds, in an amount not to exceed \$1,000,000 be transferred, as required, to the Brownfield Pilot Project ID 3621755102 to fund future grants under the proposed Environmental Remediation and Site Enhancement (ERASE) Affordable Housing Grant Program, from available funds currently allocated to the Annual Commercial Property Improvement Grant Program, Project ID 8201703704, to an upset limit of \$500,000 and the Annual Commercial District Revitalization Program, Project ID 8201703703, to an upset limit of \$500,000.

EXECUTIVE SUMMARY

The ERASE Community Improvement Plan (CIP) and the Brownfield Office of the Economic Development Division are part of a long-standing commitment by the City to prioritize and support the remediation and redevelopment of vacant, derelict or under-utilized environmentally contaminated properties in the City; commonly referred to as brownfields. Brownfields have, and continue to be, a challenge for the City as Hamilton’s long history as an industrial and commercial hub have left a legacy of environmental contamination on many properties in the City’s historically developed areas.

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Financial assistance programs provided under the ERASE CIP, including cost-sharing grants for environmental investigations and tax-increment based grants, tax cancellation and/or low-interest loans to support the remediation and redevelopment of brownfields, are provided by the City, and many other southern Ontario municipalities to mitigate added costs, time and risks associated with brownfield redevelopment. These programs and supports work to level the playing field such that contaminated properties can be considered by property owners and developers for redevelopment on an equal footing, financial and otherwise, as non-contaminated properties. These efforts ensure that brownfields are not overlooked for easier development prospects in undeveloped and agricultural greenfield lands, that brownfields can support City goals and policies particularly with respect to the directing of population and employment growth to vacant and under-utilized properties in the existing urban area, reduce urban sprawl, associated costs and environmental impacts to the City.

As the ERASE CIP and its Programs were last comprehensively reviewed in 2018, and in keeping with City practice to review CIPs and Programs every five years, staff undertook a review that would serve as a check-in that provides an opportunity for staff to evaluate the ERASE CIP and Programs in terms of addressing their intended goals and to propose amendments, as required. Staff's review included extensive stakeholder and community engagement and reporting of program outcomes and successes achieved to-date.

Staff's review confirms the significant positive impact the ERASE CIP and Programs have had to-date on generating new assessment and municipal tax growth from under-utilized and vacant brownfields support the programs have provided to supporting key City goals and policies respecting housing and population growth in existing urban areas. Specifically, since 2001, the ERASE Programs have leveraged approximately \$18.00 in private sector investment for every \$1.00 provided in financial assistance towards site remediation and resulted in the creation of over 3,300 new residential units and over 1,900,000 sq. ft (176,000 sq. m.) of Industrial/Commercial/Institutional floor area on brownfield sites. In addition, new property assessment realized through the ERASE assisted developments is currently generating over \$11,000,000 annually in new municipal property tax revenue and growing.

Notwithstanding the above, staff have identified proposed amendments which are intended to further support remediation and redevelopment opportunities in the City, align with changes in provincial legislation and City policies, respond to public and internal/external stakeholder feedback and ensure programs are responsive to additional community and City Council priorities including:

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- Better incentivizing environmentally sustainable, climate friendly developments and remediation practices;
- Providing greater financial assistance towards not-for-profit housing developments on brownfields; and,
- Promoting the incorporation of affordable housing in private-sector market developments.

Key amendments being proposed by staff include:

- The creation of a new ERASE Affordable Housing Grant (EAHG) Program to provide grants towards site remediation for not-for-profit housing developments on brownfields;
- Increasing the maximum grant amount provided for environmental studies on sites being investigated for potential not-for-profit housing developments;
- Expansion of ERASE Program availability to Rural Settlement Areas;
- Modifying the grant amounts provided under the ERASE Redevelopment Grant (ERG) Program to leverage the achievement of additional community/City Council priorities respecting housing affordability and/or environmental sustainability and climate change goals in brownfield developments;
- A reduction in the eligibility of 'dig and dump' remediation costs towards ERG grants in order to incentivize the use of remediation practices and methods which reduce or eliminate the need for disposal of contaminated soil at landfills;
- Expansion of the existing Remediation Loan Program to support remediation in additional strategic urban commercial districts and corridors; and,
- Various technical refinements and updates to improve clarity, consistency and administration of all programs.

At the outset of this review, staff established a first principle that any proposed program amendments do not require any increase in the current Capital or Operating Budget allocated to the Economic Development Division for the provision and administration of the ERASE financial assistance programs. As such, no additional funding is required to implement any of the recommendations in this Report.

Alternatives for Consideration – See Page 26

FINANCIAL – STAFFING – LEGAL IMPLICATIONS

Financial: At the outset of this review, staff established a first principle that any proposed program amendments arising from this review should not require any increase in the current Capital or Operating Budget allocated to the Economic Development Division for the provision and administration of the ERASE financial assistance programs. As such, no additional funding is required to implement any of the recommendations in this Report.

With respect to the proposed creation of an EAHG Program further discussed in the Analysis and Rationale for Recommendation(s) section of this Report, no increase to the tax levy for the administration or provision of grants under this new program are required. Grants are proposed to be funded directly from the existing Brownfield Pilot Project ID 3621755102 which receives the 20% increase in annual municipal taxes generated by projects approved under the ERG or ERASE Tax Assistance (ETA) programs that is not otherwise provided to the property owner/developer. This existing Project ID currently funds City Council approved/directed strategic brownfield acquisitions and public-private partnerships involving contaminated properties authorized under the ERASE Municipal Acquisition and Partnership (EMAP) Program of the ERASE CIP.

As the Brownfield Pilot Project account is funded directly through municipal tax increment generated as a result of ERG/ETA approvals, approvals which vary year-over-year in terms of duration and value, the availability of funds from which the EAHG Program could draw upon, will vary overtime. As such, staff are recommending a one-time transfer of, \$1,000,000, as required, to this Project ID to provide a consistent level of base funding to provide grants from over the foreseeable future in order to assist with remediation costs on sites being developed for not-for-profit housing.

These funds are proposed to be reallocated from existing, non-affordable housing focused incentive programs provided under the Revitalizing Hamilton's Commercial Districts Community Improvement Plan (RHCD CIP). The RHCD CIP provides grant and loan incentive programs intended to support the revitalization of strategic urban commercial districts throughout the City by minimizing financial barriers to, and stimulating new private sector investment in, the development of under-utilized properties and/or improve the appearance, functionality, marketability, usability and/or safety of existing

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buildings in these areas. The current availability of funds which staff are proposing to be reallocated is as a result of lower than average applications under these Programs between 2020 and 2022. Staff's assessment is that this reduction in applications is as a result of uncertainty brought by the COVID-19 pandemic and subsequent fluctuations in construction costs and supply chain impacts which have led property owners to cancel or defer planned property improvements and developments supported by the programs authorized under the RHCD CIP.

Staffing: The ERASE CIP and associated Programs are administered by staff from the Commercial Districts and Small Business (CDSB) Section of the Economic Development Division and supported by staff from various City departments including Building, Taxation/Finance, Legal Services, Housing Services and Planning Divisions.

There are no new staffing requirements as a result of the recommendations of this Report.

Legal: The proposed ERASE CIP and associated program descriptions contained in Appendices, Appendix "A" to PED23076 through to Appendix "G" to PED23076 of this Report have been reviewed by the Legal Services Division.

Subject to City Council's endorsement of this Report, the Legal Services Division will be required to undertake various updates to the applicable legal agreements applicants enter in to with the City to receive grants/loans as a result of staff's proposals. The Legal Services Division will undertake such updates prior to staff bringing forward the implementing By-laws, subject to City Council's approval of this Report's recommendations, tentatively planned for May 2023 so that agreements are ready to be implemented at such time as the updated ERASE CIP and associated program would come into effect.

HISTORICAL BACKGROUND

The ERASE CIP and its financial assistance programs were first established in 2001 as part of a long-standing commitment by the City to prioritize and support the remediation and redevelopment of vacant, derelict or under-utilized environmentally contaminated properties in the City; properties also commonly referred to as brownfields.

Brownfields have, and continue to be, a challenge for the City as Hamilton's long history as an industrial and commercial hub have left a legacy of environmental contamination on many properties in the City's historically developed areas.

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When the ERASE CIP was first introduced, financial assistance programs were initially focused on overcoming financial barriers to remediation and redevelopment within older current and former industrial areas of Hamilton, including the Bayfront Industrial Area, the West Hamilton Innovation District/McMaster Innovation Park and West Harbour Community north of downtown. This focus arose out a need to address legacy environmental contamination in this area from historic industrial uses while also supporting new economic development opportunities in an area which had seen a decline in jobs and assessment growth as a result of broader systemic changes in manufacturing and other industry sectors prevalent in these areas.

In April 2005, the ERASE CIP and its programs were expanded to encompass the full limits of the City's urban area existing at this time. This marked a significant broadening of the Plan's focus which was in response to:

- A growing recognition that historical environmental contamination in the City was not limited to older industrial areas; and,
- The increased importance and priority given to directing future population and employment growth to existing urban areas through intensification and revitalization and the need to minimize financial barriers and other challenges which may exist to the redevelopment of properties in support of these goals, including potential environmental contamination.

Contamination of properties is a real and significant barrier to the redevelopment and intensification of historically developed areas of the City as the presence of contamination requires property owners/developers to remediate the site to meet applicable Provincial site condition standards where a change to a more sensitive land use is proposed (such as commercial to residential/parkland/institutional). A site must also comply with various other environmental regulations contained under Ontario Regulation 153/04 including that the owner successfully file a Record of Site Condition (RSC) with the Province confirming the site's condition post-remediation prior to, or in conjunction with, a site's redevelopment. These requirements are important to ensuring risks associated with contamination are mitigated in the community and do not pose a future health hazard. However, they also add significant costs, time and risk to those attempting to redevelop contaminated sites.

These challenges, left unaddressed and unmitigated, can lead to properties being overlooked for easier development prospects in undeveloped and agricultural greenfield areas which do not face the same challenges. This can exacerbate urban sprawl, reduce investment/tax generation within historically developed areas of the City and,

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over-time, result in the deterioration and exodus of residents and jobs from areas which were once the centre of Hamilton's economic and community prosperity.

The ERASE CIP and the Brownfield Office of the Economic Development Division work to mitigate these challenges by providing one-on-one support/guidance to property owners and developers and administer the City Council approved ERASE financial assistance programs. Together, these supports help to level the playing field such that contaminated properties can be considered by property owners and developers for redevelopment on an equal footing, financial and otherwise, as non-contaminated properties and further the achievement of City goals and policies.

Financial Assistance Programs currently authorized under the ERASE CIP and which were the focus of staff's five-year comprehensive review include the following:

- ERASE Study Grant (ESG) Program - A cost-sharing Program intended to support the undertaking of environmental studies on known or suspected brownfield sites to confirm and describe potential on-site contamination or develop a plan to remove, treat, or otherwise manage the contamination in support of site redevelopment/reuse. Eligible studies under the Program include Phase II Environmental Site Assessments (ESA), Remedial Action Plans and Risk Assessments (among others). Grants provided are equal to 50% of the Cost Study/Plan, to a maximum of \$20,000 and a maximum combined grant of \$35,000 for two studies;
- ERASE Redevelopment Grant (ERG) Program - Provides tax increment-based grants towards costs required to remediate historical environmental contamination on brownfield sites in support of their redevelopment/reuse. By providing grants to mitigate these financial impediments, the program enables brownfield sites to be viable candidates for redevelopment relative to non-contaminated sites, supports the intensification/infill of existing vacant and underutilized sites, reduces the need for greenfield lands to accommodate future population and employment growth, and generates new municipal property tax revenue through increased property assessments. Grants under this program are provided annually after development completion and reassessment in an amount equal to 80% of the increase in municipal taxes generated as a result of remediation and redevelopment and provided annually for a maximum of 10 annual payments or until eligible remediation costs have been recovered, whichever comes first. The remaining 20% of new municipal tax increment generated and not provided to the owner/developer is directed to a City Brownfield Pilot Project fund which supports City Council approved strategic City acquisitions of brownfields and/or private-

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sector partnerships supporting the remediation of contaminated properties under the EMAP program;

- ERASE Tax Assistance (ETA) Program - Reduces the Municipal portion of the tax increase resulting from the remediation and redevelopment of a brownfield site in order to mitigate costs required to remediate historical environmental contamination on brownfield sites in support of their redevelopment/reuse. The ETA Program is intended to be utilized in conjunction with the Province of Ontario's Brownfield Tax Incentive Program (BFTIP) whereby the Province will freeze the education portion of taxes. Currently, both the City and Province's tax cancellation is equal to 80% of the increase in the respective Municipal and education portion of tax increases resulting from the remediation and redevelopment of a brownfield for a period up to three years; and,
- Downtown/West Harbour Remediation Loan Program (RLP) - Provides low-interest loans which are intended to overcome barriers owners/developers may face obtaining traditional financing to fund the remediation of historical environmental contamination on brownfield sites. Under this Program loans are currently provided at 0% interest for up to 80% of eligible remediation costs to a maximum of \$400,000. Eligibility under this Program is contingent on the site and applicant receiving City Council approval under the ERG program or Revitalizing Hamilton Tax Increment Grant (RHTIG) Program (available in strategic commercial corridors and districts and authorized under the RHCD CIP) such that grant payments provided under either Program can be directly applied toward repaying the loan principle.

In addition to the above programs, the City employs an additional initiative respecting Development Charges (DC)s on brownfields. It is recognized that the payment of DCs as a condition of development can be a significant factor in the feasibility of remediating and redeveloping brownfields as DCs are required to be paid early in the development process at the same time as costs will be required to be incurred to remediate site contamination in preparation for site development. To help mitigate the impacts on project feasibility and cash flow, the City may provide ERASE specific deferrals of DCs. ERASE DC deferrals do not change the amount of DCs required to be paid, but rather enables a City Council approved ERG Program applicant to defer the payment of DCs at 0% interest until such time as ERG payments commence. At this time, ERG Program Grant Payments are directed to fulfilling the property owner/developers outstanding DC obligation on their behalf, instead of being provided directly to them.

Since ERASE CIPs creation in 2001, the CIP and the Community Improvement Project Area (CIPA) and its programs have been the subject of comprehensive reviews and

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updates in 2005, 2010, 2014 and 2018. Details of specific updates and amendments undertaken at these times are described in Section 4.1 of the draft ERASE CIP contained in Appendix “A” to Report PED23076.

The findings of staff’s current comprehensive review and associated proposed amendments are discussed in the Analysis and Rationale for Recommendation(s) section of this Report.

POLICY IMPLICATIONS AND LEGISLATED REQUIREMENTS

Under Section 28 of the *Planning Act*, municipalities with enabling policies in their Official Plans may adopt a CIP for the purposes of providing grants and/or loans to property owners or tenants to support physical improvements within specific geographic areas (CIPAs) that City Council has deemed appropriate.

The adoption of a CIP and CIPA allows a municipality to provide financial incentives/assistance within identified CIPAs that would otherwise be prohibited under Subsection 106(2) of the *Municipal Act*.

Municipal authorization for the establishment of CIPs are contained in Chapter F, Section 1.15 of the Urban Hamilton Official Plan (UHOP) and Rural Hamilton Official Plan (RHOP) and discussed in greater detail within Section 3.2 of the proposed updated ERASE CIP contained in Appendix “A” to Report PED 23076, this Report.

The adoption of a CIP by a municipality must be conducted in accordance with the applicable policies under Sections 17 and 28 of the *Planning Act* as well as the City’s Public Participation and Notification Policies contained in Chapter F, Section 1.17 of the UHOP and RHOP. These Policies include requirements for stakeholder engagement, public notice and a statutory public meeting.

Should City Council support the proposed modifications contained in this Report, staff will prepare and bring forward for City Council consideration the appropriate By-laws required to implement the proposed CIP and CIPA contained in Appendix “A” to Report PED23076 and Appendix “B” to Report PED23076 of this Report respectively. In accordance with the *Planning Act*, these By-laws would be subject to public notice requirements and brought to Planning Committee for a statutory public meeting. At this time, staff would also bring forward the proposed implementing program descriptions for City Council consideration which contain the specific terms, eligibility criteria and administrative processes required to implement the Programs described in the CIP. These draft Program descriptions are contained in Appendices “C” to Report PED23076 through “G” to Report PED23076 of this Report.

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Public notice regarding the statutory meeting for the recommended CIP and CIPA By-laws would be undertaken in accordance with the requirements of the *Planning Act* and Chapter F, Section 1.17 of the UHOP and RHOP.

CIP and CIPA By-laws and associated implementing program descriptions will come in to effect after the expiration of the required appeal period under the *Planning Act*. At this time, any existing program applications which have not yet been approved by City Council or its designate, will become subject to the new CIP and program descriptions.

RELEVANT CONSULTATION

As part of the ERASE CIP review, staff undertook extensive public and stakeholder engagement. Engagement activities occurred between September and December 2022 and included the following:

- A virtual public workshop held on November 22, 2022 which was open to the general public and attended by representatives from local and regional developers, property owners and environmental consultants;
- A presentation and discussion with the City's Brownfield Subcommittee on November 21, 2022 made up of representatives from the development and environmental consulting industries;
- Creation of a project page on Engage Hamilton which included information about the Review, background materials, engagement summaries and also an opportunity to submit a public survey and a forum where questions and ideas could be submitted to staff;
- Inclusion of information about the Review and engagement opportunities in Economic Development Division newsletters;
- Notices on the Invest in Hamilton and City webpages advising of the Review and how to learn more; and,
- Social media posts providing information about the review and upcoming engagement opportunities on both the Invest in Hamilton and City of Hamilton social media channels including Twitter, Instagram and LinkedIn.

In addition, staff engaged with various City Departments and Divisions, including staff from Building, Taxation/Finance, Legal Services and Planning Divisions, to discuss the review and seek feedback.

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Staff also undertook additional engagement with subject matter experts as the review progressed. This included seeking feedback during the development of proposals contained in this Report from Housing Services staff with respect to housing affordability matters and the Office of Climate Change Initiatives with respect to environmental sustainability and climate change matters.

Based on staff's experience with the Programs, and to assist with defining the scope of staff's review and engagement, the following key questions/topics were identified and were the focus of staffs public and internal/external consultation:

1. Should promoting and supporting the remediation and redevelopment of brownfields financially continue to be a priority for the City?;
2. Do you believe that developments receiving financial assistance through ERASE should be required to address additional community priorities?;
3. Staff are considering establishing a per project dollar cap on tax grants. Are there areas of the City or types of developments/uses where a cap should not be applied?;
4. Are there remediation related costs that should be added/removed from eligibility under the programs?;
5. How could the City better support remediation and redevelopment of potentially contaminated commercial properties like current/former gas stations, dry cleaners etc.?; and,
6. The Remediation Loan Program has not been well utilized. Why? What changes could be made to make it more useful?.

Common themes which emerged from comments and feedback received to these questions included:

- That the remediation and redevelopment of brownfield properties should continue to be a priority of the City;
- Reiteration from the Development Community and stakeholders of the importance of the ERASE programs in facilitating developments that would not have otherwise occurred if not for the City's programs;

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- The City should not consider placing new dollar caps on grants provided under the ERG program in response to rising remediation/construction costs as it would have a negative impact on the financial feasibility of redeveloping brownfields;
- Investigate ways to incentivize more environmentally sustainable means of remediation as opposed to traditional dig and dump remediation where contaminated soil is trucked long distances to landfills;
- That eligibility under ERASE programs should not be contingent on planned developments achieving additional community/City priorities such as affordable housing and environmental sustainability given the existing financial impediment these sites face;
- The City should investigate opportunities to provide additional incentives to achieve affordable housing and/or environmental sustainability in new developments through the ERASE programs including increasing the proportion of Municipal tax increment generated that is returned to the property owner/developer and/or increasing the maximum grant period beyond 10 years in such cases; and,
- That limited uptake of the City's Low-Interest Remediation Loan Program may be attributed to a number of factors including, less cumbersome loan processes available from traditional lenders, the maximum loan amount of \$400,000 being too low relative to current costs for remediation and the recent low-interest rate environment making low/no interest City loan programs less impactful.

Formal written comments received during staff's review are attached in Appendix 'H' to PED23076 for reference.

ANALYSIS AND RATIONALE FOR RECOMMENDATION(S)

The City's practice is to comprehensively review CIPs and associated programs on five-year cycles. This strategy is intended to serve as a 'check-in' that provides an opportunity for staff, stakeholders, the community and City Council to evaluate the CIP and its programs in terms of addressing their intended goals and to make adjustments where required.

In addition to community consultation, staff's analysis through these Reviews include a comprehensive reporting of Program outcomes and successes achieved to-date as well as a best practise Review of how Hamilton's programs compare to those provided for brownfields by other Southern Ontario municipalities. A summary of these findings are provided below:

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ERASE Outcomes and Successes

Since 2001 the ERASE programs have had a significant impact on assessment and Municipal tax growth in the City and have proven to be a major contributor to facilitating industrial and commercial economic development opportunities and achieving key City goals respecting housing and population growth in existing urban areas. Specifically, since 2001, the ERASE programs have collectively:

- Leveraged approximately \$18 in private sector investment for every \$1 provided in financial assistance towards site remediation;
- Supported the environmental remediation of over 206 acres (83 hectares) of contaminated land;
- Resulted in the creation of over 3,300 new residential units and over 1,900,000 sq. ft (176,000 sq. m.) of Industrial/Commercial/Institutional floor area on brownfield sites within existing urban areas; and,
- Assisted with facilitating redevelopment that has generated over \$1 Billion in new property assessment and which as of year-end 2022, is currently and collectively generating over \$11,000,000 annually in new municipal property tax revenue and growing.

Municipal Comparison of Brownfield Assistance Programs

Staff undertook a best practice Review of currently active brownfield focused CIPs and assistance programs offered by other comparable municipalities in Southern Ontario. Municipalities reviewed by staff included those in the Greater Toronto Area (GTA), Niagara and Southwestern Ontario which met one or more characteristics relative to the City of Hamilton for comparison purposes including population size, geographic proximity/economic competitiveness and/or development history. Specific Municipalities reviewed included Brantford, Burlington, Guelph, London, Oakville, Oshawa, St. Catharine's, Toronto and the Region of Waterloo (Kitchener/Waterloo/Cambridge).

The following is a summary of staff's findings:

- All municipalities reviewed had brownfield-focused CIPs and associated Financial Assistance Programs;
- Generally, each municipalities' brownfield CIP and Programs were found to be consistent in terms of the nature and scope of financial assistance provided;

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- All 10 municipalities provide tax increment grant/tax cancellation Programs to support remediation and redevelopment of brownfields;
- Four municipalities (Guelph, London, Region of Waterloo (ending July 2024) and Windsor) offer development charge reduction/deferrals for brownfield redevelopment;
- Programs supporting the undertaking of environmental studies were found to be very consistent with all requiring a 50-50 cost sharing with maximum grants ranging between \$10,000 and \$40,000 compared to Hamilton's \$20,000 (\$35,000 for two studies);
- The City of Burlington was the only other Municipality which had the potential to offer a Financial Loan Program for remediation costs; and,
- The majority of tax increment grant Programs provide grants at a value equal to 80% of the Municipal tax increment uplift generated for a maximum period of 10 annual payments, similar to Hamilton's current ERG program. However, four Municipalities were found to have incorporated a scoring/evaluation system which varies the value and length of grant payments based on how the project achieves additional community/City Council priorities. Specifically, Burlington and Oakville had grant periods ranging from between 6 and 12 years while priorities identified across the Municipalities required to achieve increased grants and grant payment periods included: whether the project achieved environmental sustainability certification; the achievement of minimum employment densities; whether the project was located in a priority intensification area; or if affordable housing units were included.

Continuation of ERASE Programs and Proposed Changes

Based on the above, staff find that the City's ERASE CIP and Financial Assistance Programs remain well positioned and competitive when compared to comparable Municipalities and continue to be an important and successful tool in terms of leveraging significant financial benefits to the City and supporting key City policy objectives including:

- Improving environmental conditions within our communities and reducing future health risks;
- Increasing new assessment and Municipal property taxes in support of broader tax reliant services and initiatives;

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- Directing population and employment growth to existing urban areas through the intensification of vacant and under-utilized properties thereby reducing the need for greenfield/agricultural lands to accommodate growth;
- More efficiently utilizing existing infrastructure and reducing related costs;
- Supporting the achievement of Provincial/City residential unit/jobs density targets, where applicable;
- Increasing the supply of new housing in existing urban areas in existing urban areas;
- Further supporting population and employment concentrations that support existing transit and generate new demand supporting future opportunities for higher-order forms of transit;
- Enabling new economic development opportunities; and,
- Improving the aesthetics of derelict and vacant private properties to create an attractive public realm in support of broader revitalization of existing urban areas.

In addition, staff further note that the ERASE Programs directly align with, and supports, the City Council approved Hamilton's Climate Action Strategy (HCAS) with the target to achieve net-zero greenhouse gas (GHG) emissions by 2050. Specifically, the Programs support the achievement of "Low-Carbon Transformation #5: Growing Green", through the remediation and redevelopment/reuse of sites in a manner that reduces urban sprawl.

Notwithstanding the above, staff have identified proposed amendments to the existing ERASE CIP, CIPA and suite of financial assistance Programs which are intended to further support remediation and redevelopment opportunities in the City, align with changes in Provincial legislation and City policies, respond to public and internal/external stakeholder feedback and ensure programs are responsive to additional community and City Council priorities including better supporting environmentally sustainable developments, not-for-profit housing developments on brownfields and the incorporation of affordable housing in private sector market developments.

Key amendments being proposed by staff are summarized below and are reflected within the proposed CIP, CIPA (mapping) and program descriptions contained in Appendices "A" to Report PED23076 through Appendix "G" to Report PED23076.

ERASE CIP (Appendix “A” to Report PED23076)

- Updated references to Provincial and City Plans and Policies that the CIP and its programs/strategies support including those contained in the Provincial Policy Statement, A Place to Grow, the UHOP, RHOP and applicable Secondary Plans, the 2021-2025 Economic Development Action Plan and Bayfront Industrial Strategy, among others;
- Updated language regarding the applicability of programs to legally non-conforming uses. Language adds additional transparency by identifying the tests presently used by staff to determine if a legally non-conforming use may be eligible under a program;
- Modifications respecting ERASE DC Deferrals to identify this as strategy of the City wholly contained and implemented via the DC By-law as opposed to its current representation as an independent Program of the ERASE CIP; and,
- Refined language to clarify that properties not located within a defined CIPA but forming part of a comprehensive development that encompasses properties within a CIPA may be considered as forming part of the same CIPA for the purposes of providing assistance in respect of the proposed Brownfield Redevelopment.

ERASE CIPA Mapping (Appendix “B” to Report PED23076)

- Introducing an expansion of the existing CIPA area in which ERASE programs may be provided to include Rural Settlement Areas as geographically defined under the Rural Hamilton Official Plan’s Schedule D – Rural Land Use Designation. This proposed expansion is in response to internal stakeholder feedback which noted the potential for contamination on historic commercial/industrial properties in rural areas of Hamilton which have never previously been eligible under the ERASE programs. Staff’s review identified the Rural Settlement Areas as being focus areas for ERASE program expansion as these areas had the greatest historical concentration of past commercial and industrial activities in the rural area;
- Renumbering of sub-areas which are delineated for the purposes of providing additional programs and/or varying eligible costs required to address area specific development challenges and needs; and,
- Replacing the existing Area 3 - West Harbour, and Area 4 - Downtown Hamilton sub-area, into a new modified and expanded Sub-Area 2: Strategic Commercial Districts and Corridors, for the purposes of facilitating a proposed expanded area

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of eligibility for the existing Downtown and West Harbour Remediations Loan Program discussed later in this section.

In addition to the above noted amendments to the CIPA mapping, staff further note that since 2005, the ERASE CIPA within which ERASE programs may be provided, has aligned with the City's urban boundary as established through the Urban Hamilton Official Plan. In light of recent directions from the Province respecting the inclusion of additional lands into the City's urban boundary, staff have undertaken a preliminary assessment of these additional lands with respect to their appropriateness for inclusion in the ERASE CIPA given the purpose and goals of the ERASE CIP to support the remediation of contamination arising from previous development and uses. Staff's findings are that the subject lands are primarily undeveloped and of an agricultural land use. As such, staff are of the opinion that these lands do not align with the purpose and goals of the ERASE CIP and are therefore not proposed by staff to be included in the ERASE CIPA.

ERASE Study Grant Program (Appendix "C" to Report PED23076)

- Increasing the maximum grant amount provided for environmental studies being undertaken for sites being investigated for potential not-for-profit housing developments. For such sites, grants would increase from the current 50% of study cost to 100% with a corresponding increase to the maximum grant amount from \$20,000 to \$40,000 for a single environmental study and from \$35,000 to \$70,000 for two studies;
- Expanding eligibility of grants for Designated Substances and Hazardous Materials (DSHM) Surveys to include any site being investigated for the purposes of a not-for-profit housing development; and,
- Deletion of the existing static provision prohibiting reapplication to the ESG Program for sites which had been provided two grants for environmental studies prior to July 1, 2011 and replaced with a rolling five-year prohibition such that reapplications to the ESG Program are prohibited in the preceding five years since the last ESG application approval was provided. This amendment is intended to reflect the fact that if remediation and redevelopment has not occurred in the preceding five years, the project has likely stalled and the environmental studies which had been previously supported will have become stale-dated and no longer usable to facilitate the sites redevelopment.

ERASE Redevelopment Grant Program (Appendix “D” to Report PED23076)

- A reduction in the eligibility of dig and dump remediation costs; a common remediation method whereby contaminated soil is excavated and transported potentially long-distances to licensed landfills located elsewhere in the Province or United States. This form of remediation, while efficient for property owners/developers, can itself have broader negative environmental impacts as a result of the emissions from long-haul transporting of soil, use of landfill capacity and impacts over-time on Municipal and Provincial infrastructure, such as streets and highways. As such, staff are proposing that the transportation and disposal of contaminated soil which will be disposed of at a licensed landfill be reduced from the current 100% of costs to 80% in order to incentivize the use of remediation practices and methods, such as Risk Assessments and associated risk mitigation measures, and in-situ remediation methods which could reduce or eliminate the need for disposal of contaminated soil at landfills. Where soil is planned to be transported to a facility where soil will undergo treatment enabling its potential future reuse, such costs would continue to be eligible at 100% in recognition of the important environmental benefit of soil reuse;
- The removal of industrial manufacturing and transportation relocation/removal costs as eligible towards a grant due to limited utilization of such eligibility by applicants to-date and feedback from internal stakeholders that eligibility of such costs could run counter to the potential desire to retain industrial attributes for the purposes of placemaking goals promoted through the City Council approved Bayfront Industrial Area Strategy;
- Clarification that the eligibility of on-site infrastructure removal and upgrade costs for water, sanitary and stormwater services undertaken in conjunction with site remediation within the older industrial areas is limited to industrial/commercial developments and not intended to apply to any residential development which may occur within this area; and,
- Introduction of changes to program structure, grant parameters and eligible costs in order to collectively better incentivize and enable environmentally sustainable developments and remediation practices and/or support the inclusion of affordable housing units within otherwise market-based developments occurring on brownfields.

The leveraging of existing City incentive/assistance Programs to achieve additional community priorities, similar to that observed and discussed in the Municipal Comparison of Brownfield Assistance Programs section of this Report, has been an on-

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going focus for Economic Development Division staff through comprehensive CIP reviews commencing with the 2021 review of the RHCD CIP and associated incentive Programs for the City's Strategic Commercial Districts and Corridors. Through that review, City Council approved key staff recommendations which altered the structure and value of grants provided under the RHTIG Program which included introducing an Enhanced Revitalization Project stream whereby projects that achieved environmental sustainability certification, district energy readiness or incorporated affordable housing would receive increased tax grants, while projects that did not achieve any of these priorities would receive reduced grants.

In keeping with this focus, staff's review has identified opportunities for similar amendments to the ERG Program. Specifically, staff are proposing that the ERG Program be modified so as to provide two streams of grants each with differing parameters, in terms of grant value and duration, based on a projects ability to meet specific achievements supporting environmental sustainability and/or affordable housing priorities of the City.

Projects would be identified as either a 'Brownfield Development' or an 'Enhanced Brownfield Development' with Enhanced developments receiving higher potential grant amounts and/or longer grant payment periods relative to non-enhanced developments. For the purposes of the ERG program, an 'Enhanced Brownfield Development' would mean achieving at least one of the following:

- The development has been approved for financial assistance under a Canada Mortgage and Housing Corporation (CMHC), Federal, Provincial or City program for the purposes of creating and incorporating residential rental housing that addresses housing affordability in the City;
- In keeping with a similar requirement in the RHTIG Program, the level of affordability to be achieved would not be established by the ERG program but would rather be set through the requirements and conditions of the prerequisite government funding support required for consideration as an Enhanced Brownfield Project. In this same respect, enforcement of affordability provisions would be undertaken by the provider of the prerequisite Funding Program with ERG grants being cancellable where affordability terms/requirements of the prerequisite funding support are not met;
- The affordable housing achievement as described above was developed in consultation with the Housing Services Division; and,

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- The development achieves one of the following high-performance buildings standards:
 - Achieving certification under any one of the following: Canadian Home Builders Association (CHBA) Net Zero Home Labelling where Net Zero or Net Zero Ready levels of efficiency are achieved; Passive House Canada; Natural Resources Canada (NRCAN) R2000; Built Green to a Gold or higher standard in the Energy and Envelope category; or Leadership in Energy and Environmental Design (LEED) to a Gold or higher standard or Canada Green Building Council (CaGBC) Zero Carbon Building Standards; or,
 - Incorporates building elements required to achieve district energy readiness required to allow for immediate or future connection to a district energy system, where deemed feasible by the City, and consisting of the following: Providing space for the sole purpose of future equipment/thermal piping; securing an easement between the mechanical room and the property line to allow for thermal piping; and including two-way pipes in the building to carry the thermal energy from the district energy network to the section in the building where the future energy transfer station will be located.

The specific enhanced building and district energy readiness requirements to be met as described above have been vetted through the Office of Climate Change Initiatives and support the City Council approved HCAS specifically within the CEEP which comprises the climate mitigation portion of the HCAS, which details Low-Carbon Transformation #2: Transforming Our Buildings, that includes targets to significantly improve energy efficiency in all new buildings across Hamilton. In addition, Low-Carbon Transformation #4: Revolutionizing Renewables provides direction to expand the existing district energy network due to its improved energy efficiency per square foot over traditional space heating and cooling options.

The eligible high-performance building standard certifications and district energy readiness requirements were also previously developed in consultation with the Bay Area Climate Change Council (BACCC) in 2021 as part of the previous RHCD CIP and RHTIG review and update.

Projects which do not achieve an identified priority and thus not considered an Enhanced Brownfield Development would receive a reduced grant relative to the current Program while projects that do could potentially receive a grant greater than that provided under the current Program. Proposed grant amounts as a percentage of the incremental Municipal property taxes generated from the development are provided in Table 1

**Table 1 – Prescribed Grant Parameters:
Brownfield Developments and Enhanced Brownfield Developments**

Grant Parameter		Current Program (all developments)	Proposed Program	
			Brownfield Development	Enhanced Brownfield Development
Maximum Eligible Costs Permitted For:	The transportation and disposal of contaminated soil at a licensed landfill facility.	100%	80%	80%
	In-situ remediation methods or the transportation and treatment of contaminated soil so as to enable reuse.	100%	100%	100%
	All other environmental remediation and DSHM eligible costs unless otherwise specified.	100%	80%	100%
Maximum Potential Annual Grant Payments		10	10*	13*
Maximum Annual Grant as a Percentage of Actual Tax Increment Realized		80%	80%**	100%

* Or until eligible remediation costs have been recovered, whichever comes first.

** The remaining 20% increase in the annual municipal tax increment not provided to the Applicant under the Brownfield Development stream is directed to a City fund for use in the provision of grants and other initiatives under the existing ERASE Municipal Acquisition and Partnership (EMAP) Program and/or proposed ERASE Affordable Housing Grant (EAHG) Program (discussed later in this section) for the duration of the Applicant’s Grant term up to a maximum of 20% of the value of the total Grant to be provided.

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The proposed decrease in the total grant for projects that do not meet the aforementioned priorities is considered by staff to be modest relative to that provided currently and not likely to serve as a deterrent to those applicants seeking to utilize the Program in support of brownfield remediation, which in of itself continues to support key City goals. However, the proposed increase to the maximum grant for projects that do address the identified priorities is considered by staff to be more significant and impactful. The proposed increased Grant amount is intended to both provide an increase meaningful enough for a property owner/developer to explore meeting the identified achievements, help to off-set increased costs to the property owner/developer required to be incurred to achieve an identified priority as well as provide an avenue for a property owner/developer to recoup all eligible remediation costs where not otherwise possible under the Grant parameters being proposed for the non-Enhanced Brownfield Development stream.

Even though staff's proposal could result in some projects receiving a larger grant than that provided currently, this would not require any new budget allocation to the Economic Development Division. Grants under this program are provided directly from the increase in Municipal taxes generated as a result of the property being remediated and redeveloped. This is revenue that would not exist if not for the site being remediated and redeveloped and which the City fully realizes the benefit after the grant period has concluded, and can use towards tax-supported services and initiatives going forward, for the remaining life of the development

ERASE Tax Assistance (ETA) Program (Appendix "E" to Report PED23076)

- Updates to the duration of tax cancellation assistance permitted and associated program terms to align with changes introduced by the Province of Ontario to the related BFTIP Program in November 2021 which extended the maximum period of tax cancellation assistance from three years to six years for commercial developments and 10 years for residential developments; and,
- Added clarity that the ETA Program is only available where the site and applicant have been the subject of an approval under the Province's BFTIP Program and that where no such approval under the BFTIP Program will be sought, that the applicant be directed to apply to the ERG Program.

ERASE Commercial Districts Remediation Loan (ECDRL) Program (Currently the Downtown/West Harbour Remediation Loan Program (RLP) (Appendix “F” to Report PED23076)

- Expanding the purpose and availability of the existing Downtown and West Harbour Remediation Loan Program to support remediation and redevelopment of potentially contaminated commercial properties in strategic, historically developed commercial districts and corridors in the existing urban area which have a greater likelihood of having been the location of historic higher-risk commercial uses for contamination including gas/fuel stations, auto mechanic/repair and dry cleaning facilities, among others. This shift in program focus is intended to work in concert with broader efforts to support the revitalization of strategic commercial districts and corridors, including those programs and initiatives established under the RHCD CIP. As a result, the expansion of the ECDRL Program will further support redevelopment and revitalization efforts in additional urban commercial districts and corridors including the Ancaster, Barton Village, Binbrook, Concession Street, Dundas, Locke Street, Ottawa Street, Stoney Creek, Waterdown and Westdale commercial districts, the Mount Hope/Airport Gateway, the Barton Street and Kenilworth Avenue North commercial corridors and other strategic commercial corridors located throughout the City;
- A new program name to is introduced to reflect the updated purpose and expanded eligibility of the Program; and,
- The introduction of delegated authority to approve loan applications of \$200,000 or less to the General Manager of Planning and Economic Development (GM). This proposed delegated authority is consistent with that provided to the GM for other financial loan programs provided by the Economic Development Division and would further expedite approvals in support of environmental remediation.

ERASE Affordable Housing Grant (EAHG) Program (Appendix “G” to Report PED23076)

- The ERASE Affordable Housing Grant Program is a new program being proposed by staff that has not previously existed. This Program would address an existing gap in support whereby affordable, not-for-profit housing developments are not currently able to utilize either the ERG or ETA programs to receive financial assistance towards remediation of on-site contamination as the not-for-profit nature of such developments would not result in new municipal taxes being generated; a necessary prerequisite for eligibility under the ERG/ETA Programs as the increase

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in Municipal taxes generated by the redevelopment is in itself the funding source for the grants or tax cancellation to be provided;

- The proposed EAHG Program would provide grants towards 100% of eligible remediation costs for not-for-profit housing developments up to a maximum of \$200,000 per project. Application approval and grant disbursement are proposed to be delegated to the GM to ensure funds can be provided as expeditiously as possible. Grants under this proposed program would be provided upon completion of on-site remediation in accordance with the proposed program terms contained in Appendix “G” to Report PED23076, this Report and upon completion of a staff-led audit of invoices to confirm actual and final eligible remediation costs;
- Funding for the EAHG is discussed in the Financial Implications section of this Report and is further supported by staff’s recommendation (d) respecting the reallocation of existing funds provided to the Economic Development Division. However, staff further note that the recommended maximum grant of \$200,000 is intended to ensure assistance could be provided to multiple projects over the foreseeable future based on available funds and to provide expedited approvals and grant payments at the maximum amount permitted for delegated approval to the GM; and,
- The provision of grants under the proposed EAHG program have been confirmed by staff as being eligible for consideration as a Municipal Contribution when required as a condition of government affordable housing funding supports.

Proposed Amendments Applicable to Multiple Programs

- That sites where environmental remediation is being undertaken for the purposes of a self-storage facility shall not be eligible for consideration under the ERG, ETA or ECDRL Programs. This proposal is intended to be a reflection of the limited opportunities for employment growth self-storage facilities represent and under-utilization of industrial/commercial lands in terms of their economic development potential; and,
- Updated refined program terms, eligibility criteria and administrative processes across all program descriptions contained in Appendices “C” to Report PED23076 through Appendix “G” to Report PED23076 to improve consistency of language/terminology and program structure undertaken in collaboration with staff from Legal Services and other City Departments/Divisions, where applicable.

ALTERNATIVES FOR CONSIDERATION

The ERASE CIP and associated Programs and Strategies are provided at City Council's discretion. Alternative to staff's recommendations, City Council may direct that the ERASE CIP and Programs continue without any change, be suspended, or be modified in a manner as City Council deems appropriate. These alternative directions are not recommended by staff as the ERASE CIP and its Programs have continually proven to be an important and successful tool in terms of leveraging significant financial benefits and supporting key policy objectives of the City. Furthermore, staff's proposed changes further ensure that the ERASE Programs will be modified so as to better incentivize and support developments which will achieve additional community/Council priorities including environmental sustainability and affordable housing on brownfield lands.

Should City Council elect to explore alternatives to staff's proposals, Council may refer this Report and provide to direction to staff to investigate any such alternative direction including any legal, financial, and economic impacts from such direction.

ALIGNMENT TO THE 2016 – 2025 STRATEGIC PLAN

Community Engagement and Participation

Hamilton has an open, transparent and accessible approach to City government that engages with and empowers all citizens to be involved in their community

Economic Prosperity and Growth

Hamilton has a prosperous and diverse local economy where people have opportunities to grow and develop.

Healthy and Safe Communities

Hamilton is a safe and supportive City where people are active, healthy, and have a high quality of life.

Our People and Performance

Hamiltonians have a high level of trust and confidence in their City government.

APPENDICES AND SCHEDULES ATTACHED

Appendix "A" to Report PED23076 – Hamilton's ERASE Community Improvement Plan
(Draft)

Appendix "B" to Report PED23076 – ERASE CIPA Mapping (Draft)

Appendix "C" to Report PED23076 – ERASE Study Grant Program (Draft)

Appendix "D" to Report PED23076 – ERASE Redevelopment Grant Program (Draft)

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Appendix "E" to Report PED23076 – ERASE Tax Assistance Program (Draft)

Appendix "F" to Report PED23076 – ERASE Commercial District Remediation Loan Program (Draft)

Appendix "G" to Report PED23076 – ERASE Affordable Housing Grant Program (Draft)

Appendix "H" to Report PED23076 – Formal Written Comments Received During Staff's Review