

EAGCS Phase 1 Growth Area Investment Proposals and Process and Policy Improvements

Introduction

Calgary's established areas are vibrant places to live, work, and play. These communities have been growing and changing for decades, and are expected to continue to evolve. The goal of the Established Area Growth and Change Strategy (the "Strategy") has been to enable vibrant, livable, resilient communities and businesses in the established area, as envisioned in the Municipal Development Plan and Calgary Transportation Plan. A clear strategy for growth that is aligned to policy, supported by market trends, and is financially sustainable will help guide growth and reinvestment in the short and long term.

To support these goals and objectives, **growth area investment proposals** outlining opportunities for growth and change have been prepared for four areas in the established area. This is complementary to the work of the New Community Growth Strategy, where business cases were prepared to highlight growth opportunities in new community areas. For each proposal, the case is made for growth and reinvestment at the multi community level, based on an assessment of opportunities (e.g., market, demographic, leveraging of infrastructure, aligning to other City initiatives) and identified needs (e.g., feedback from community representatives, City needs assessments).

The proposals are followed by a suite of **process and policy improvements** that are expected to benefit growth and development across the established area.

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Growth Area Investment Proposals

What geography are the proposal areas based on?

In order to align with the emerging and well-supported multi community Local Area Plan framework, the proposal areas follow local area plan boundaries (as of Fall 2019) rather than individual communities. This also allows benefit to be considered over a wider area.

How were the four Phase 1 proposal areas determined?

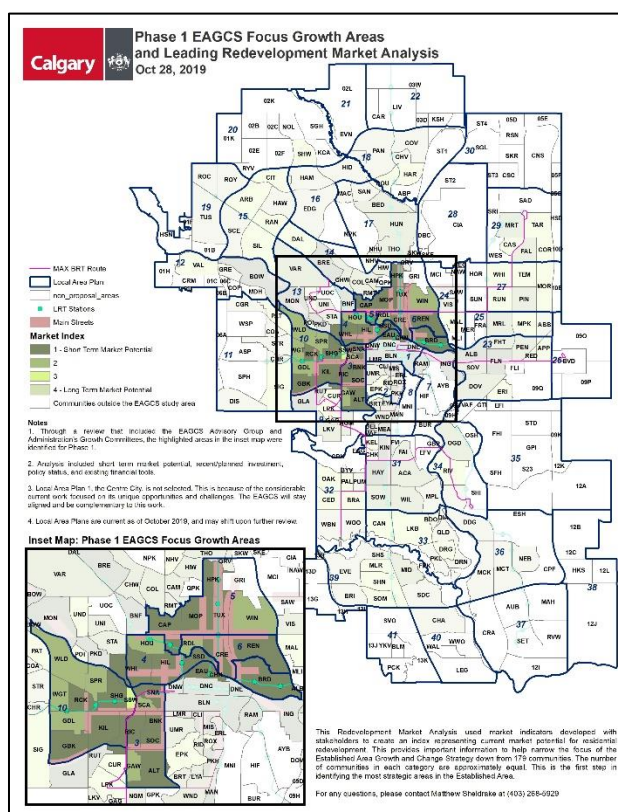
A key goal of the EAGCS is to work within market trends to identify investment opportunities that will lead to increased growth and economic activity. Phase 1 was defined as an opportunity to prove the concept of the benefits of strategic growth and reinvestment in established areas. It was important to manage scope and expectations ahead of the development of more permanent tools and processes in Phase 2. Future phases of this work will provide an opportunity to expand beyond the Phase 1 areas.

The four proposal areas emerged as the top areas in an evaluation that included a short term market potential analysis completed in early 2019. The analysis relied upon seven factors and over 20 variables (e.g., development activity, housing stock change, policy status, amenities, housing prices, demographics, community lifecycle) to help identify areas with the strongest market potential. The methodology for this market-based analysis was reviewed with industry stakeholders to ensure it fairly represented market expectations.

The four Phase 1 growth area investment proposals are for:

1. West Elbow Communities Local Area Plan (Area 3 Only)
2. Riley Communities Local Area Plan (Area 4)
3. North Hill Communities Local Area Plan (Areas 5 & 6)*
4. Westbrook Communities Local Area Plan (Area 10)

**The North Hill Communities plan does not currently include the community of Bridgeland/Riverside. However, the community was within the boundary of Area 6 at the time of consideration and exhibits strong market potential, and is therefore included in this proposal.*



What does each proposal include?

- Contextual information about the communities within each area, including growth and demographic characteristics, and leading indicators of market demand;
- A summary of the existing transportation and utility context;
- Recommended investment opportunities that support growth and change; and
- Status of financial tools specific to the area.

Why invest in these proposal areas?

As growth occurs, communities often experience challenges such as additional pedestrian, cycling and vehicle use, greater usage of public facilities, parks and open spaces. Public realm and utility investments are required to address two challenges:

1. Upgrading and updating the public realm so it better aligns with the needs of existing and future residents and businesses, improving local quality of life in growing established communities, and delivering new amenities to support changing demographics
2. Upgrading utility and public realm infrastructure to improve infrastructure capacity for growth, and to provide amenity as communities accept growth.

How were public realm investments in these areas identified and prioritized?

To identify growth-related public realm projects that would meet the Strategy goals, a comprehensive and multi-stakeholder discussion in the Public Environment Working Group helped identify the types of public realm elements that were important to sustain in communities that are growing and changing. Utilizing that, three parameters were used to help focus on potential capital projects. These parameters recognize existing constraints on available funding, an interest in accelerated project delivery, and on addressing growth-related needs through enhancement of existing amenities and infrastructure. The parameters identified projects:

- With an estimated cost of less than \$1 million (recognizing constraints on The City's available capital funding);
- That could be delivered within 1-3 years (reflecting a short term focus that aligns with the time remaining in the current budget cycle); and
- That address growth-related pressures such as transportation and pedestrian movement, the use of public spaces, or services relied on by a changing demographic.

Administration compiled a list of potential public realm projects through stakeholder input from:

- Members of all 30 Community Associations and Business Improvement Areas within the Phase 1 growth areas;
- Capital planners from Parks, Recreation and Livable Streets;
- Recent engagement summaries, including for Local Area Plans, Green Line, and Main Streets; and
- Councillors and Councillors' Office staff.

Administration then validated the projects using the following questions:

- Is there enough information to create a Class 5 cost estimate?
- Is there an existing program that can deliver the project?
- Does the project conflict with already funded and planned work?
- Does the project directly respond to a growth-induced challenge, and is not solely for the purpose of lifecycle or maintenance?

- Are there any complexities to the project that would hinder a 1-3 year delivery time frame?

Similar or related project suggestions were grouped together by a common location, corridor or type to allow for cost estimates to be developed and to align with how public realm work is typically delivered, called 'clusters'. These clusters of projects were labelled and scaled against the \$30 million of funding for public realm improvements in the established area, approved by Council on 2020 February 3 through Notice of Motion PFC2020-0131, to arrive at an appropriate recommendation for Phase 1. Each project cluster contains smaller projects delivered by different service lines within a coordinated vision. The results are outlined as a recommended portfolio of investments for Phase 1 (Attachment 1).

How will these investments benefit current and future residents and businesses?

By linking growth and investment, communities can address the challenges of growth while becoming more vibrant, sustainable and attractive places. New residents and businesses in established communities help create a more compact urban form, better utilization of existing infrastructure, greater private investment opportunities, and more resilient communities.

Growth and Utility Infrastructure – General Comments Applicable to all Proposals

The Proposals should be read with the following comments on utility infrastructure:

For each community, the existing utility networks (water, sanitary, storm, electricity and gas) generally reflect the age of when each community was developed. These original utility networks were designed with capacity to adequately service the built form of development at the time, with localized improvements occurring as necessary. The existing utility networks meet the needs of existing customers, and in some instances, may accommodate incremental growth.

While there is generally good information on the condition and performance of existing utility networks, it is challenging to forecast how the system will meet growth needs because redevelopment is highly variable and difficult to predict. The accurate identification of upgrades requires detailed development timing, density, and form information as determined through development applications. Utility systems function best, both technically and financially, when tailored to the development they service.

To support planning initiatives, upgrades to the existing utility networks can be pursued based on forecasted growth, however, advancing proactive utility upgrades prematurely comes with risk. Oversized utilities can result in higher operations and maintenance costs and pipe replacements done too soon will not maximize the full lifespan or value of the asset. Decisions towards proactive investments may not always prove correct if growth does not advance as expected. For this reason, prudent timing and coordination with development is important to support redevelopment.

Water and Sanitary

For larger water and sanitary pipes that The City typically upgrades (also known as capital-size pipes) that service multiple communities, Municipal Development Plan growth projections help The City assess their capacity for growth. For smaller pipes that developers typically upgrade (also known as local-size pipes), local growth projections conducted through local area planning are required because they service smaller areas. Local Area Plans do not provide the detailed development data required to identify the precise extents and timing of upgrades. However, local area planning utility analyses can provide a sense of the scale of upgrades required to accommodate the ultimate identified build-out of projected growth.

Utility analyses conducted as part of the local area planning process may help identify opportunities for proactive upgrades to align with other strategic projects, like Main Streets. When identifying proactive upgrades, Water Resources evaluates the urgency to support imminent growth as well as the opportunity to minimize disruption and realize efficiencies when aligning construction timing while minimizing the financial and performance costs associated with a premature upgrade. In conclusion, the level of analysis undertaken as part of local area planning does provide a preliminary understanding of the servicing needs for growth in the area; however, the timing, order, density and final form of development, as determined through the application process, confirms the final extent and timing of most upgrades.

Stormwater

For each community, the stormwater network reflects the stormwater management design principles applied at the time when the community was developed. Stormwater servicing is impacted by the location and size of existing infrastructure, the ability of the land to absorb water (permeability), and the size and nature of the overall servicing catchment and receiving waterbody. Redevelopment often results in decreased permeability that, in turn, increases stormwater flow overland and into the piped system, which places a greater demand on the existing stormwater infrastructure.

The City studies and improves the stormwater systems in established areas via investment programs like the Community Drainage Improvement (CDI) Program or in support of other City infrastructure projects. Most redevelopment projects (with greater than three units) are also required to incorporate on-site stormwater measures. Together, public and private investment help manage the stormwater impacts associated with growth.

Electrical and Gas

Upgrades to electrical and gas networks to service redevelopment growth may be required, and the timing and extents will be variable since redevelopment is variable. Generally, the servicing evaluation is completed on an individual project basis to meet the needs of the customers. There is an opportunity to evaluate broader servicing area needs in collaboration with local area planning.

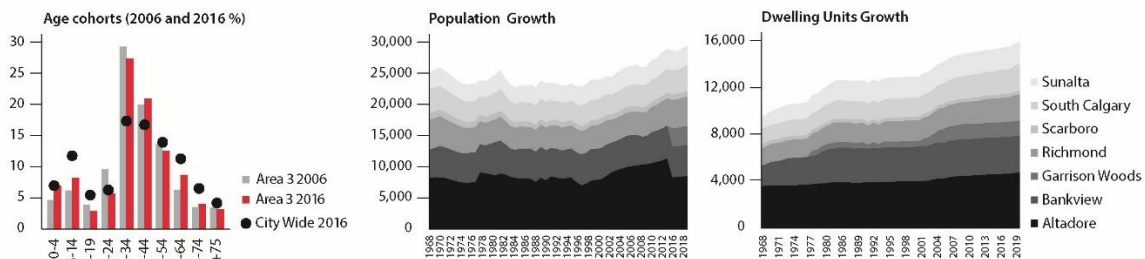
West Elbow Communities Local Area Plan (Area 3 Only)

Located southwest of downtown, the communities in Area 3 of the West Elbow Communities Local Area Plan offer a diverse mix of housing and retail that has attracted new residents and businesses. The earliest communities were built out in the early twentieth century and since the redevelopment of Garrison Woods in 2004, communities from north to south have intensified, with a growing number of new homes in various forms.



The proposal areas follow local area plan boundaries as of Fall 2019.

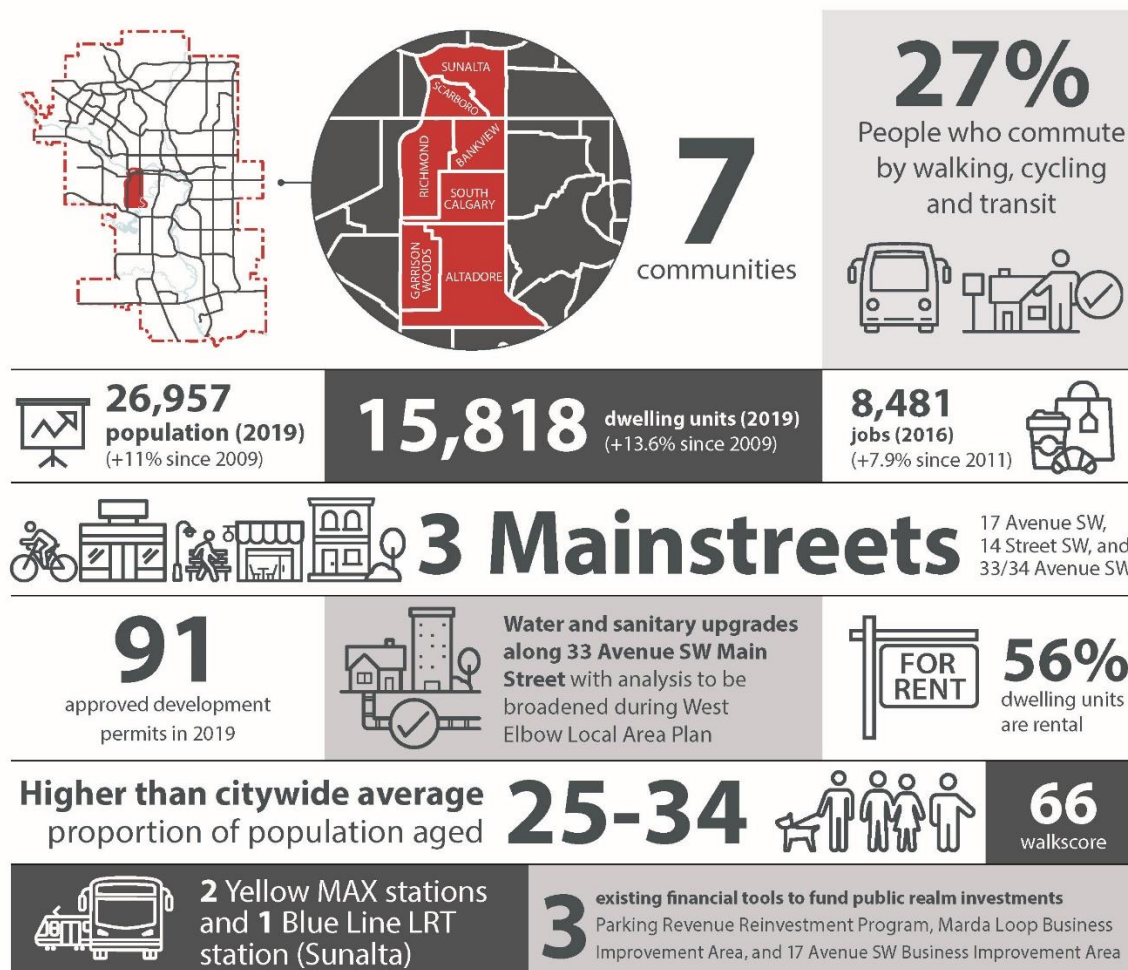
Growth and change at-a-glance



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West Elbow Communities Local Area Plan (Area 3 Only) at-a-glance

To support growth, change and reinvestment, Phase 1 of the Established Area Growth and Change Strategy recommends an \$8.50M investment in the public realm of the Area 3 West Elbow Communities (\$3.25M shared with Westbrook Communities and Riley Communities).

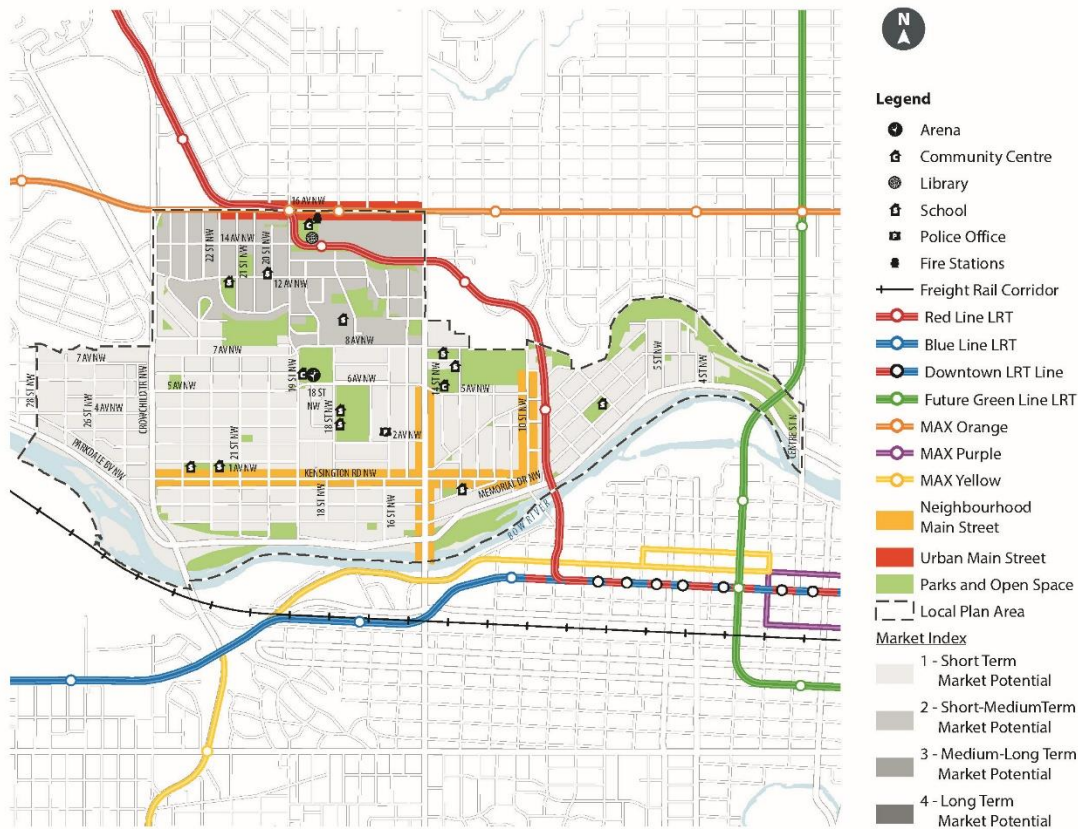


Recommended Investments for Supporting Growth and Change

ID	City Service Line	Investment
5	Sidewalks & Pathways, Parks & Open Spaces, Recreation Opportunities	Buckmaster Park Area Improvements
6	Sidewalks & Pathways, Parks & Open Spaces	Sunalta Community Hub Area Improvements
7	Sidewalks & Pathways, Parks & Open Spaces, Recreation Opportunities	River Park and Sandy Beach Connections
8	Sidewalks & Pathways	26 Avenue SW Corridor Improvements
9	Sidewalks & Pathways, Parks & Open Spaces	Pumphouse Park Improvements

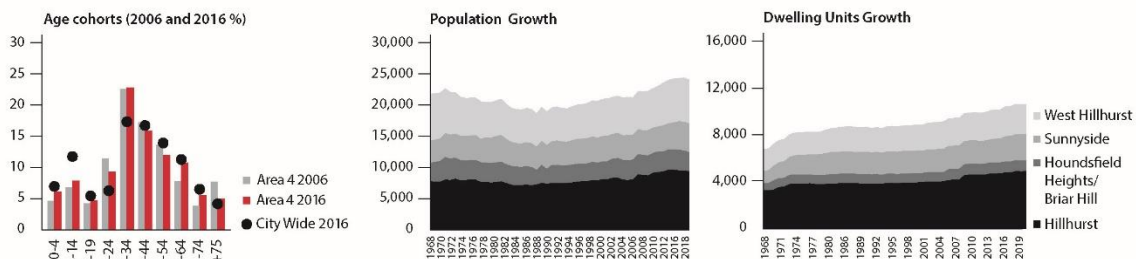
Riley Communities Local Area Plan (Area 4)

Located north of the Bow River and downtown, with many major amenities and destinations adjacent to and within the communities, this area has seen a large increase in population over the past two decades. Building on its vibrant main streets, strategic location and historic character, Riley Communities are poised to leverage investment to enable further growth and benefit existing residents.



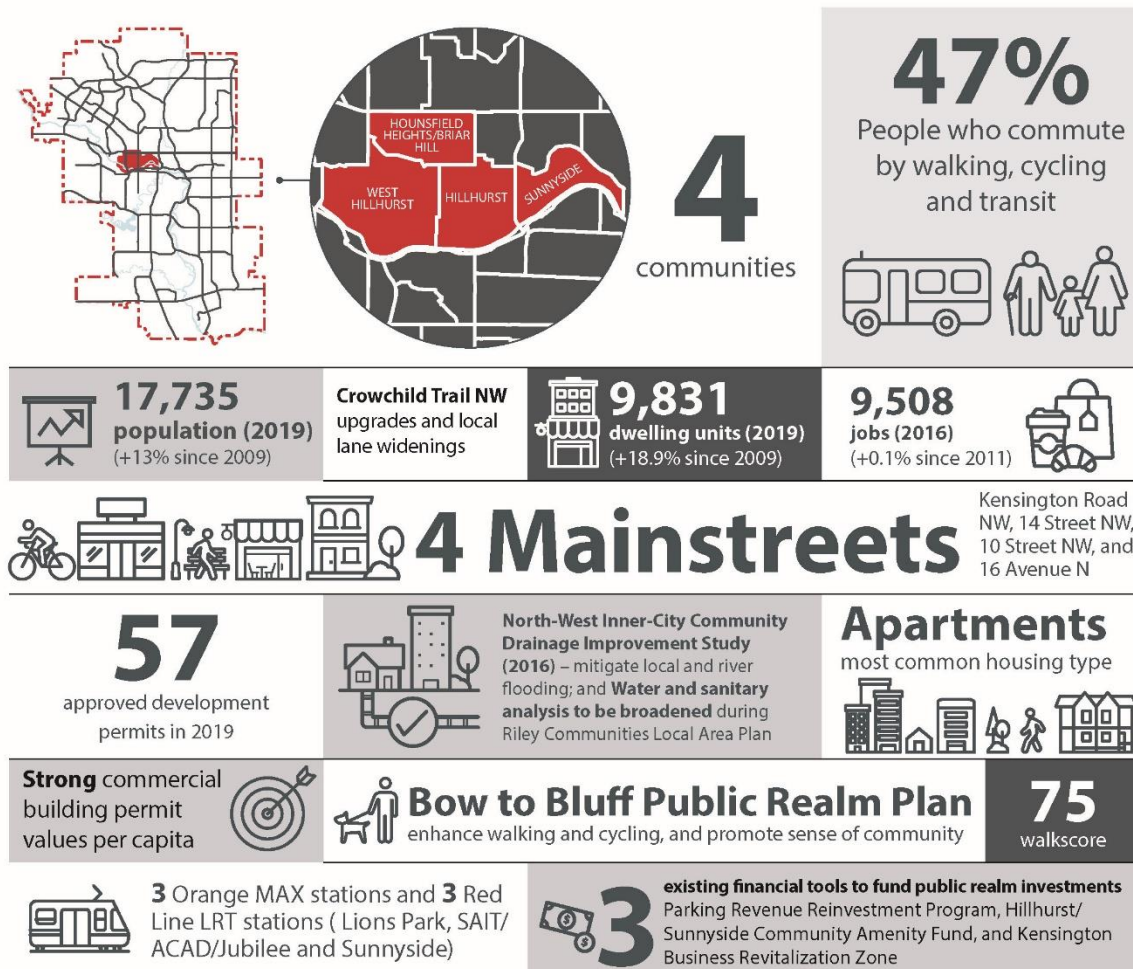
The proposal areas follow local area plan boundaries as of Fall 2019.

Growth and change at-a-glance



Riley Communities Local Area Plan (Area 4) at-a-glance

To support growth, change and reinvestment, Phase 1 of the Established Area Growth and Change Strategy recommends an \$8.50M investment in the public realm of the Riley Communities (\$1.75M shared with the Westbrook Communities and West Elbow Communities).

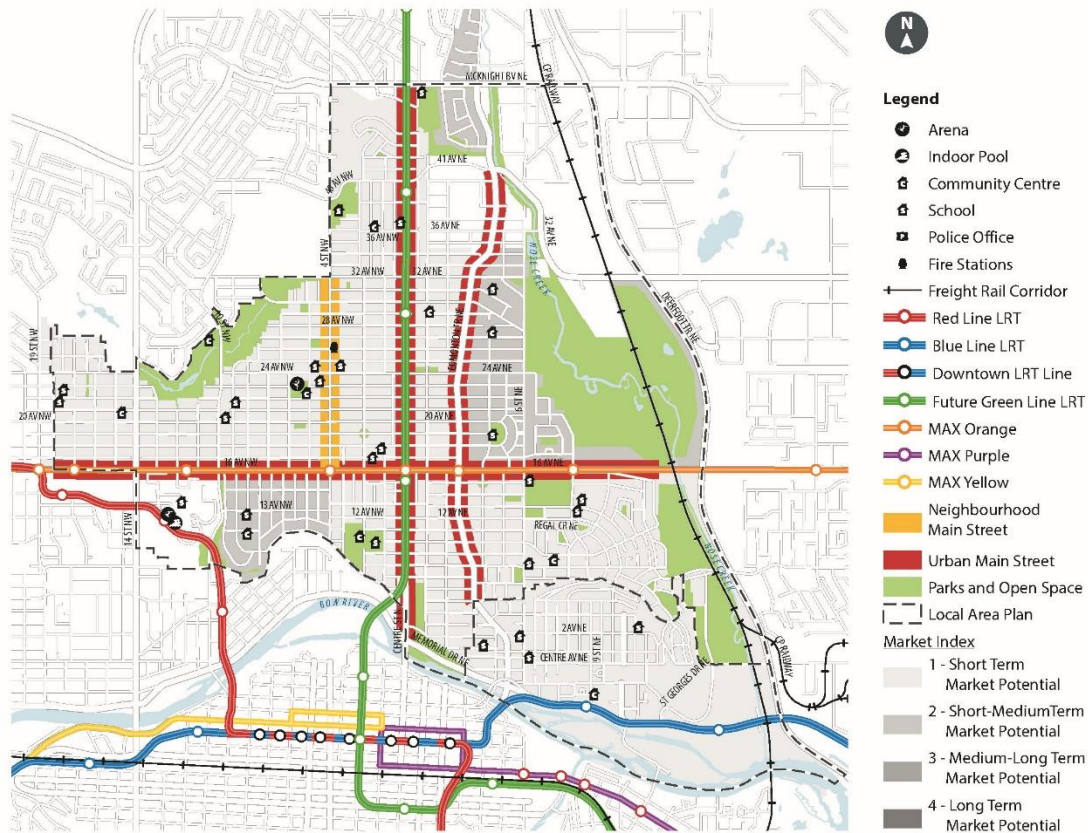


Recommended Investments for Supporting Growth and Change

ID	City Service Line	Investment
9	Sidewalks & Pathways, Parks & Open Spaces	Pumphouse Park Improvements
10	Sidewalks & Pathways, Parks & Open Spaces, Urban Forestry	Kensington Plaza Area and TOD Improvements
11	Sidewalks & Pathways, Parks & Open Spaces, Recreation Opportunities	Hillhurst Sunnyside Hub Area Improvements
12	Sidewalks & Pathways, Urban Forestry	19 Street NW Area Improvements

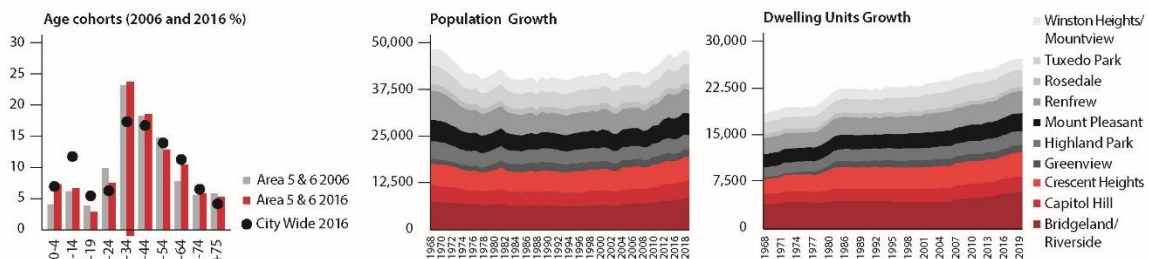
North Hill Local Area Plan (Area 5 & 6) and Bridgeland/Riverside

Located just north of the Bow River and Downtown, communities in the North Hill Communities Local Area Plan are a mix of historical and contemporary design and development. Initially built out over seventy years beginning in the early twentieth century, the area is now bustling with redevelopment opportunities, taking advantage of several iconic streets and avenues.



The proposal areas follow local area plan boundaries as of Fall 2019.

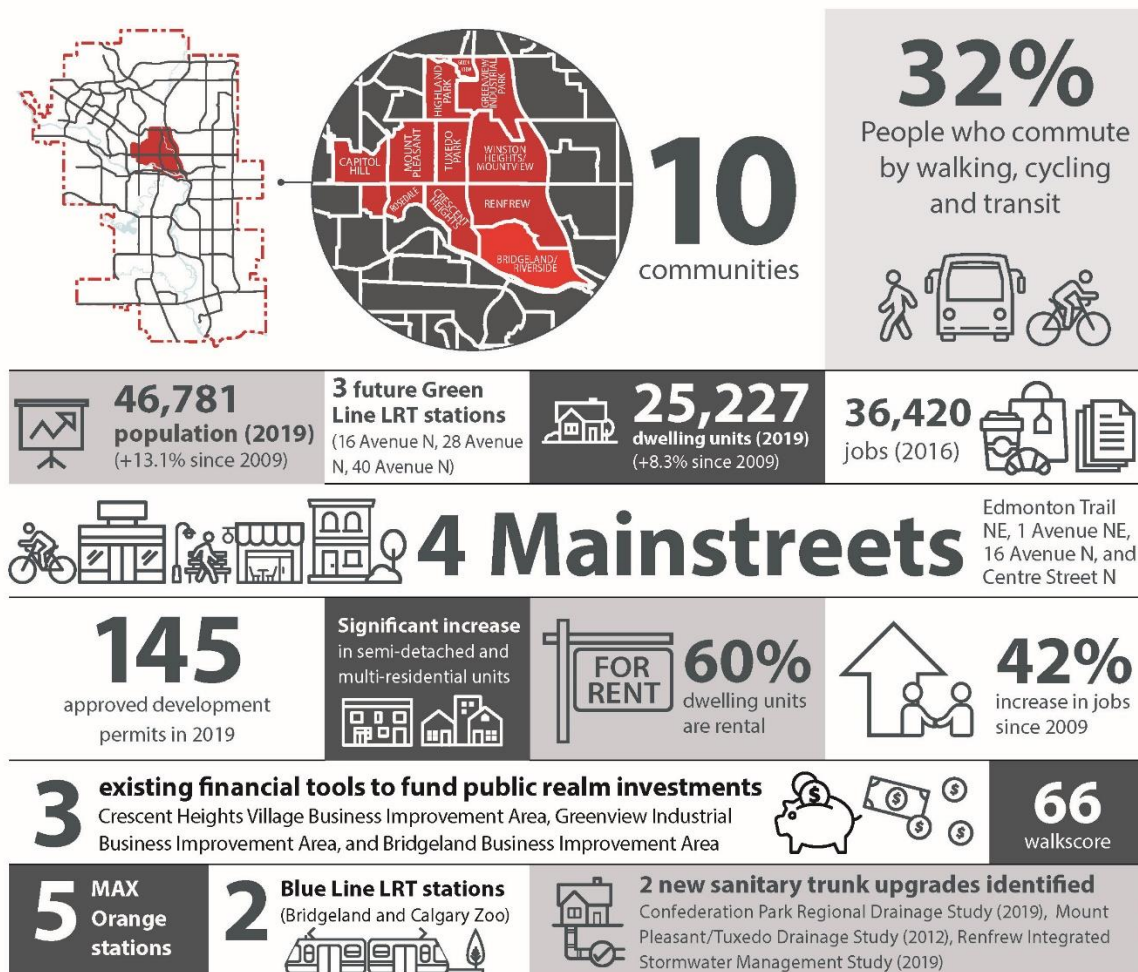
Growth and change at-a-glance



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North Hill Local Area Plan (Area 5 & 6) and Bridgeland/Riverside at-a-glance

To support growth, change and reinvestment, Phase 1 of the Established Area Growth and Change Strategy recommends an \$5.75M investment in the public realm of the North Hill Communities, and \$3.0M in the community of Bridgeland/Riverside.

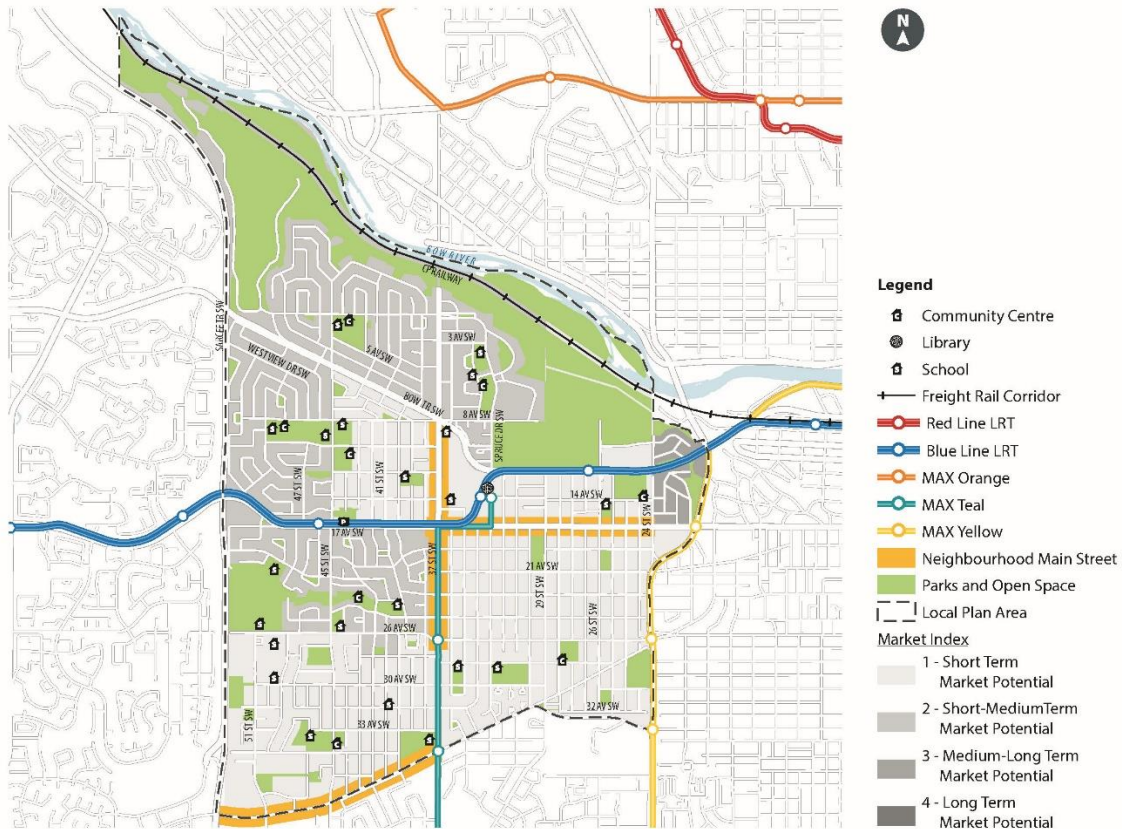


Recommended Investments for Supporting Growth and Change

ID	City Service Line	Investment
1	Sidewalks & Pathways, Parks & Open Spaces, Urban Forestry	Balmoral Circus Improvements
2	Parks & Open Spaces, Sidewalks & Pathways	North Mount Pleasant Arts Centre Area Improvements
3	Sidewalks & Pathways, Parks & Open Spaces, Recreation Opportunities	40 Avenue N Placemaking and Pedestrian Improvements
4	Sidewalks & Pathways, Parks & Open Spaces	Bridgeland Transit Oriented Development Active Modes Improvements

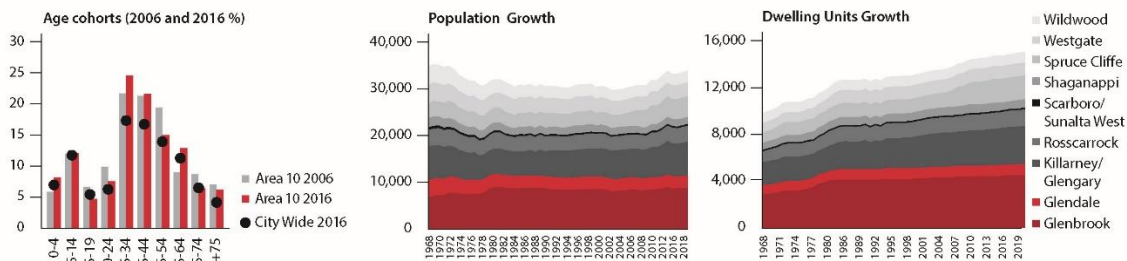
Westbrook Communities Local Area Plan (Area 10)

Located west of downtown between Crowchild and Sarcee Trails and the Bow River valley and Richmond Road SW, the Westbrook Local Area Plan contains a mix of historical and contemporary development as it was developed and redeveloped over the past 75 years. The area continues to see significant redevelopment, taking advantage of several main streets and great access to transit, amenities, and jobs.



The proposal areas follow local area plan boundaries as of Fall 2019.

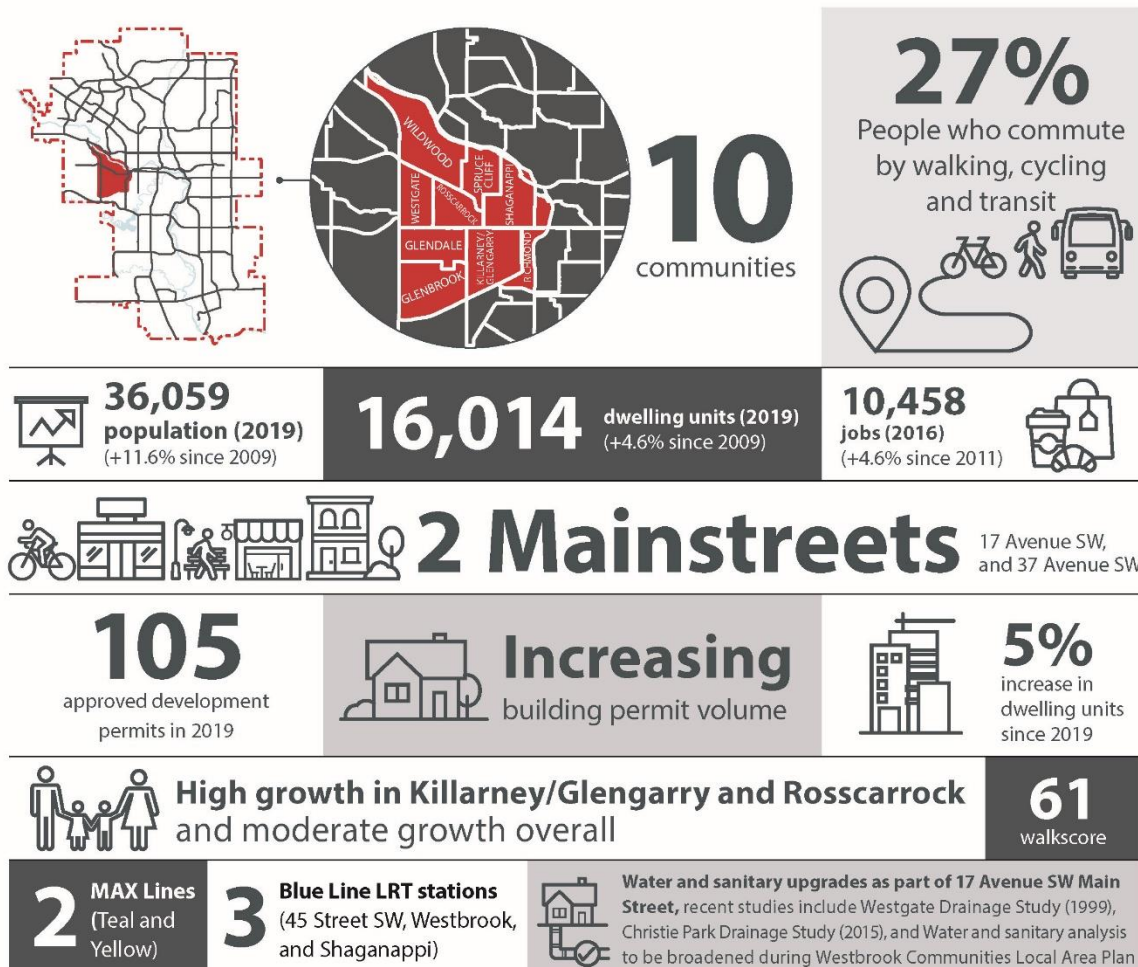
Growth and change at-a-glance



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Westbrook Communities Local Area Plan (Area 10) at-a-glance

To support growth, change and reinvestment, Phase 1 of the Established Area Growth and Change Strategy recommends a \$3.25M investment in the public realm of the Westbrook Communities (shared with the West Elbow and Riley Communities).



Recommended Investments for Supporting Growth and Change

ID	City Service Line	Investment
8	Sidewalks & Pathways	26 Avenue SW Corridor Improvements
9	Sidewalks & Pathways, Parks & Open Spaces	Pumphouse Park Improvements

Phase 1 Process and Policy Improvements (Established Area Wide)

The Strategy explored process and policy improvements that can support growing communities and redevelopment. These were identified through the work of the four working groups, seeking to address key issues:

- Public realm investment in growing established communities;
- A simplified policy environment linked to implementation; and
- Addressing redevelopment topics related to utilities.

These actions do not require Council approval to implement, unless they have been identified within the recommendations of this report. Many actions have therefore already been, or are in the process of being, implemented through the Strategy.

Actions Supporting Public Realm Investment in Growing Established Communities

1. Redevelopment Market Analysis

A key factor in the City-wide Growth Strategy work has been to consider market demand, so that City investment and efforts can be directed towards the highest potential growth areas. Development of a data-based approach to evaluating market potential in established communities was required to capture market trends. From 2018 Q3 to 2019 Q1, Administration and members of the Established Areas Working Group worked together to develop an approach. Key indicators and associated data were identified that could represent these trends. As a result, seven factors comprised of 20 indicators were identified that helped rank the short-term growth potential across all 179 established area communities. Indicators included development activity, housing stock change, policy status, amenities, housing prices, demographics, and community lifecycle. This ranking approach helped inform the priority growth areas for Phase 1 of the Strategy.

This data-based approach is a process improvement, as it can be used to match areas with market potential with identified growth-related investments and tools, leading to strategic, sustainable growth in established areas. Each time it is used to inform decisions, the approach should be updated and reviewed with stakeholders to ensure it continues to accurately reflect market trends.

2. Development of a Decision Framework for Prioritizing Growth-Related Capital Investments

The project team gathered input to create a list of capital projects that will help address growth pressures within Phase 1 growth areas. A decision framework was developed that refined the list of projects to those that met the goals of the Strategy, as well as some fundamental criteria for Phase 1. Documenting this decision framework is important to help create a repeatable decision-making framework for public realm investments, and is expected to be used as part of the 2023-2026 business plans and budget cycle. This framework will continue to evolve in Phase 2.

3. Initiating a Review of Existing Bonus Density Programs

A comprehensive review of density bonusing in Calgary has been one of the desired long-term tasks for the Strategy. Density bonusing is a planning and financial tool that has been used since the 1970s in downtown Calgary and since 2006 or later in other established areas of Calgary. Bonusing leverages development beyond a set density threshold in order to provide public realm enhancements and amenities. A summary of its application to heritage

conservation was provided as Attachment 9 in the Heritage Conservation Tools and Incentives Report (PUD2020-0259).

Given the broad spectrum of perspectives and expectations of the role of density bonusing as a public realm investment tool, Phase 1 included a review of existing bonusing programs to evaluate their past performance. The fundamental questions explored were:

- (1) What has been the value of density bonusing programs in Calgary in supporting public realm amenities; and*
- (2) Is density bonusing a tool that should continue to be used in Calgary, and if so, under what circumstances?*

Phase 1 work did not progress as far as was originally anticipated due to team resources; however, it is important to recognize the time and effort contributed by stakeholders into this discussion in Phase 1. Further work and discussions are required on these questions to achieve consensus among all stakeholders, particularly for question 2. The multi-stakeholder approach of the Strategy is an appropriate place for this conversation to continue. Therefore, the Phase 2 work plan identifies further work on the future use of density bonusing programs to support public realm investment in existing communities (Attachment 7). This tool is one of several options that may be considered to facilitate a contribution from industry for public realm enhancements.

4. Reflections on Main Streets Planning and Project Delivery

The Main Streets program is a valuable investment strategy for the central commercial streets within established communities. Work has been ongoing since 2014 to prioritize areas, identify investments in streetscape improvements, and work with communities to design the project details. Council has thus far provided \$60 million of funding for the purpose of realizing the first set of streetscape upgrades in the prioritized areas. These investments are helping advance the goals of the Municipal Development Plan in supporting compact urban form and vibrant communities.

Through the program approach of phasing work into Strategize, Plan, Design, Build and Live for the first set of Main Streets, the program team has identified opportunities to learn from and improve the delivery of the next set of Main Streets.

There is benefit to having a complete program strategy from planning to construction and subsequent community animation. This reduces the risk of setting false expectations on project timing or anticipated improvements with the community and increases the ability to realize physical change within the means of the program. This builds trust in the program with citizens, businesses and industry.

The addition of design, build and live phases in 2018 provided a clear goal to drive outcomes which also shaped the design and construction of the actual Main Streets. Success of the program is when the community is able to sustain and activate the Main Street to support a healthy and vibrant community.

Elements of this program that have been successful to date include:

- a. Examining the 24 MDP main streets in more detailed sections (35 segments) gave more clarity and transparency with the prioritization of the main street areas. Prioritization was key to optimizing city resources for delivering new land use regulation and defining the first segments for streetscape master plans.

- b. Changing the driver of streetscape projects from the skills and interest of the project team to instead be driven by a public realm program vision and goals shaped by the unique elements of a community through a program focused delivery model.
- c. Creating a toolkit/resource for all projects to help internal and external teams deliver the best technical solutions for all the Main Streets communities.
- d. Utilizing the understanding of the subsequent phases of the project to inform the best solution at the current stage of the project. For example, designing a streetscape that supports how the community can and will actually program the space based through hands on engagement and workshopping during the design, build and live phases. Working towards empowering the community to understand what they are resourced to execute and provide options for possible future funding mechanisms.
- e. Creating streamlined contracting mechanisms such as a standing offer of prequalified consultants and contractors to improve timelines of project delivery.

There are reflections on this program that can help identify future improvements, including:

- a. There is some perception that the delivery of Main Streets public realm improvements has been slow, when in fact timelines are typical for a redevelopment project. Some education of the timeline to deliver a project from design to construction would help support the reputation of the program. Streamlined contracting mechanisms have been created and the project teams need to be adequately resourced for successful delivery. The program team has prepared new communication material and engaged with various stakeholders on this process and ongoing work.
- b. The process moving through concept-design-build requires a robust technical review process that requires time and dedicated staff commitment. To be resilient, preparing a shovel ready list of projects can benefit from a reliable base budget to continue the development of projects that are ready to deploy when future budgets become available. A base budget can also support the alignment of Main Streets work with city policy work, capital and maintenance improvements along a Main Street.
- c. Main Streets design requires non-standard finishes and maintenance. Therefore, long-term operation and maintenance requires funding to sustain the improved standard built within the Main Street that will support the increase density in these areas.
- d. Many Main Streets do not have the same level of finish or design as our new communities, which include curbs, street trees or contiguous sidewalks, therefore the Main Streets projects are looking to add these elements during the upgrades.

Actions Supporting a Simplified Policy Environment Linked to Implementation

5. Informing the Next Areas for Multi-Community Local Area Policy Work

The new approach to local area planning initiatives began in 2019 with the North Hill, Westbrook and Heritage groups of communities. The next areas identified for policy updates have been informed by the short term market potential analysis, given the logic to undertake policy work in areas where growth through redevelopment is anticipated, and communities indicate a readiness for change. A modernized policy environment helps mitigate challenges of outdated policy language and goals within these communities.

6. Creating Policy that Links Plans with Implementation

Attachment 6 outlines the Next Generation Planning System, a suite of programs underway to support established communities through growth and change. This suite of programs includes a balance of both policy and investment work. The Strategy integrated with two ongoing policy development initiatives (Guidebook for Great Communities, North Hill Communities Local Area Plan) to inform, and be informed by, the planning vision and investment needs identified through those initiatives. Specifically in the North Hill plan, engagement with stakeholders generated ideas for public realm investments that were considered in the Strategy.

As the Strategy moves into Phase 2, planning policies such as these can be updated to reflect the best practices identified in the Strategy. Local Area Plans subsequent to North Hill are also anticipated to include appropriate policy to link to implementation actions and considerations, and will have clear investments needs that can be evaluated at budget time.

Actions Addressing Redevelopment Topics Related to Utilities

7. Increasing Access to Timely Information for Redevelopment Applications

The Utility Working Group identified a common challenge in accessing information in a timely way during an application to help evaluate project feasibility. Specifically, developers can improve their early pro forma estimates with earlier and more detailed information about utility servicing. Additionally, through the Policy and Planning Working Group, the ability to encroach (above, below and at-grade) into transportation setbacks is important for early-stage design considerations. This information is useful during the due diligence stage of a potential project, even before land is purchased, to refine the anticipated project costs.

To help provide early-stage information for deep utilities and encroachment, applicants can leverage the existing pre-application meeting process for more focused conversations related to the water utility and/or transportation (public realm) setbacks to provide early stage analysis and feedback on a potential project. It is important to note that the detail of analysis and feedback from The City is related to the level of development detail available from the applicant, particularly for water and sanitary. It is also important to note that a review of the potential for at-grade encroachments into setbacks may require more robust analysis with input from several departments.

The City will issue communications to industry to reinforce and clarify access to existing tools, processes and information to support their projects in the early stages. The communication will focus on the option for business unit focused discussions, and to clarify what level of information is available from The City based on the level of detail provided by the applicant. For information on the potential for electrical upgrades, the ENMAX Power Corporation can now receive inquiries from applicants (partnerconnect@enmax.com). Information on these elements at the early stage of a potential project can help reduce the financial risk of redevelopment projects. Phase 2 of the Strategy is anticipated to include the continued exploration of improvements to existing processes and opportunities for improved information sharing with development applicants.

8. Evolving the Utility Analyses (Deep and Shallow) to Support New Local Area Plans

With the evolution of local area planning that now considers multiple communities, an associated evolution of the utility analysis and planning work supporting these plans is required. The utility analyses undertaken to support the pilot North Hill Communities Local Area Plan provided an opportunity to evaluate, test and monitor this process to improve growth and infrastructure forecasting. This new approach will continue to evolve and be applied to ongoing

and future local area plans. Information on these elements at the early stage of a potential project can help reduce the financial risk of redevelopment projects.

9. Exploratory Review of Existing Utility Thresholds in the Established Area

As part of Phase 1, the Utility Working Group undertook a review of capital pipe thresholds in established areas. In the established area, pipe size thresholds are defined to delineate between capital-sized pipes (paid for by utility rates) and local-sized pipes (largely paid for by developers). Administration undertook this exploratory work to understand how existing thresholds are working in the established area, whether they should be adjusted, and what the impacts may be if they change.

This work recognized several programs that exist to support the utility network in the established area, and that city-led investment is tied to broader community benefit that aligns with planning policy and Council objectives. City-led utility investment also focuses on asset management and the maintenance of a strong utility network for pipes of all sizes. Review of existing pipe-size thresholds considered the function of the pipe network in the established area and how this function compares to development in new communities, which has the same pipe-size threshold. This review determined that the function of the pipe network is not significantly different between the established and new community areas and the existing pipe-size threshold approach is likely the most equitable way to define funding responsibility. For this reason, this review complements the consideration and exploration of a potential local-sized water and sanitary pipe levy. After reviewing the findings, the Utility Working Group concluded that this exploratory work is completed and that the current threshold works in the established area for the time being.