



May 7, 2025

Trevor Moningka
Long Range Engineer, Planning and Development
Beaumont Administration Office
5600 – 49 Street
Beaumont, AB T4X 1A1

Dear Mr. Moningka,

RE: Proposed Off-Site Levies

BILD Edmonton Metro is a non-profit organization representing over 500 companies in the building and development industry. Our members are committed, and recognize their role, in partnership with the municipality, to shaping our region and developing lands in ways that create beautiful neighborhoods where more people and businesses choose to live, invest, and thrive. The members of BILD Edmonton Metro appreciate the opportunity to provide feedback about changes to Beaumont's off-site levies.

After reviewing the proposed changes, BILD Edmonton has some general feedback as well as concerns regarding levy amounts relating to sanitary infrastructure, water infrastructure, and fire stations.

General

- BILD Edmonton Metro is surprised, despite previous communication with administration, at the amount of the proposed increase. We are further concerned because information related to stormwater infrastructure is not included and is anticipated to add significantly to the proposed levies.
- The City has added an annual inflation rate of 2% to the base construction amount. It is not appropriate to begin collecting levies with inflation that reflect unknown and unpredictable construction costs, for projects that may not begin for up to 20 years. Rates should reflect what is known today, with adjustments taking place over time when cost certainty is better understood and can be shared transparently per the Municipal Government Act (MGA). Interest costs cannot be used to cover operating or maintenance requirements.
 - The interest costs seem excessive, and a clearer understanding of how these figures were derived is necessary for proper evaluation. BILD Edmonton Metro requests a detailed cash flow analysis for each proposed infrastructure project
 - According to the MGA, levy calculations must be clear, understandable, and reproducible. As it stands, we are unable to reconcile or reproduce the current levy figures. Clarification and full transparency in the methodology is needed – particularly with the borrowing costs calculation for Water and Fire Services.



Sanitary

- Basin area #1 encompasses too large of area and the included infrastructure costs – such as those associated for lift stations – do not directly benefit all lands within the basin. This approach effectively allocates costs to lands that receive no proportional service benefit, which is inconsistent with the principles outlined in the MGA. Basins must be divided into smaller, more targeted collection areas to ensure that infrastructure costs are assigned fairly and in direct relation to the benefit received.

Water

- The proposed levy does not reflect the already installed 400mm water main in Le Reve, which should be added as an overall water network improvement.
- BILD has identified three concerns related to the water reservoir and pump house:
 - These items are assigned as 100% benefit for new development, but the construction also improves the overall network. It is unfair to assign these costs entirely to new development and none to existing development.
 - Our experience building similar infrastructure suggests that construction estimates are high and unrealistic. BILD requests a detailed breakdown of cost estimates, staging and planned upgrades associated with the water reservoirs; further feedback may be provided upon receipt of detailed cost information.
 - BILD is unclear on the methodology for arriving at \$158 million in borrowing costs. Please provide more detail on this amount for review.

Fire Stations

- BILD Edmonton is fortunate to have experience with the adoption of levies for this infrastructure category.
- We require clarity about the methodology used to identify what portion of each fire hall's cost is attributable to existing development versus new growth. Please provide a detailed explanation of how the percentage allocations for benefiting areas were determined. As proposed, the catchment areas and benefit attributed to new growth are not rationalized.
- The projected costs for the fire halls are higher than expected. A detailed breakdown of costs is requested to understand the rationale behind these figures and to ensure they align with industry benchmarks (application of inflation may have caused some of the discrepancy). In addition, a review and rationalization of the borrowing cost of \$122 is required.
- From an operational and financial standpoint, it would be prudent to evaluate whether two facilities could meet the city's current and future needs effectively. Please provide a copy of the needs assessment and detailed response time maps that led to the catchment areas for each of the proposed fire stations.
- If the City intends to proceed with decommissioning the existing fire hall, then it is reasonable and appropriate for the City to assume full financial responsibility for the replacement of that facility.



BILD Edmonton Metro acknowledges and thanks the City of Beaumont for the time and effort invested in updating the off-site levies for 2025. It is in everyone's best interest to ensure that the rates are calculated and applied according to the legislation in the MGA to support the long-term viability of future development.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Butterfield".

Lindsey Butterfield, RPP
VP, Government Relations and Policy
BILD Edmonton Metro

CC: Kendra Raymond, Director Planning and Development
Kalen Anderson, CEO, BILD Edmonton Metro
Reanna Rehman, Chair, BILD Edmonton Metro Regional Committee
Dustin Berube, Chair, Beaumont Regional Subcommittee