



January 29, 2025

Edmonton City Council
1 Winston Churchill Square
Edmonton, AB T5J 2R7

RE: UPEO2761 Bylaw 21017 – Zoning Bylaw Text Amendment to Implement Landscape Securities Process Changes

Dear Edmonton City Council:

BILD Edmonton Metro is a non-profit organization representing over 500 companies in the building and development industry. Our members are committed to shaping our region to ensure more people and businesses choose to live, invest, and thrive here.

Thank you for the opportunity to review and provide feedback on the proposed changes to the landscape securities process outlined in Bylaw 21017. We appreciate the City's efforts to consult and engage industry stakeholders and recognize that much of our feedback to process changes has been positive. That said, we believe there are some concerns and perspectives that merit further consideration to balance the approach.

1. Increased Administrative Burden on Developers and City Staff

Reverting to the pre-2017 process of collecting securities at the development permit approval phase increase administration and holding costs for developers, as Construction Completion/Final Acceptance Certificates (CCC/FAC) inspections and Letters of Credit (LOC) releases could extend up to five years. The City's past challenges in managing LOCs created issues with backlogs and stale-dated securities, requiring significant resources to resolve. A simpler approach could be to define and identify "Class A" developers during the application process, streamlining efforts for both developers and the City.

2. Clarity and Context on Failed Inspection Rates

The report's reference to a 67% non-compliance rate for landscaping inspections lacks context. It is unclear how many failures resulted in LOCs being pulled or whether deficiencies were primarily related to landscaping, lot grading, or other factors. For example, minor issues like tire ruts, which landowners can repair, should not result in inspection failures. Understanding whether failures were concentrated with specific development types, such as multi-family or commercial projects, would help ensure a more targeted approach.



3. **Alternative Solutions**

Instead of reverting to the pre-2017 process, an interim step could be taken to keep the LOC process the same, butt revise inspections to be held against minimum required quantities and not fail developers who exceed the counts. This would reduce failure rates, avoid penalizing developers who exceed requirements, and minimize staffing impacts, benefiting all stakeholders.

BILD Edmonton Metro understands and appreciates the intent behind the proposed amendments; however, there may be more balanced solutions that address compliance without reintroducing the challenges of previous processes and practices. Our members are committed to working collaboratively with the City to achieve outcomes that are both practical and effective for all parties involved.

Thank you for considering our feedback.

Sincerely,



Lindsey Butterfield, RPP
Vice President, Government Relations and Policy
BILD Edmonton Metro

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