

Staff Report



To **City Council**

Service Area Infrastructure, Development and Enterprise Services

Date Monday, April 9, 2018

Subject **Statutory Public Meeting: Brownfield Redevelopment Community Improvement Plan Update**

Report Number IDE-2018-24

Recommendation

That Report #IDE-2018-24 Statutory Public Meeting: Brownfield Redevelopment Community Improvement Plan Update, dated April 9, 2018, be received.

Executive Summary

Purpose of Report

To provide background information and material for the Statutory Public Meeting to be held April 9, 2018 regarding the draft Brownfield Redevelopment Community Improvement Plan (CIP) update.

Key Findings

- The CIP is working well overall.
- Minor changes to the CIP are proposed to assist in administration.
- It is proposed that the CIP be amended to allow for Development Charge (DC) late payments on Brownfield sites to be reimbursed by the Tax Increment Based Grant program. This will better assist development proponents to achieve CIP objectives with no negative financial implications to the City.
- Through the CIP update staff have found that the programs are successful and recommend that they be extended for another five years with minor modifications as discussed in this report.

Financial Implications

Preliminary financial implications of an extended Tax Increment Based Grant (TIBG) program were discussed in [Report #IDE-2018-01](#). Detailed financial implications will be reported at the time of a future Infrastructure, Development and Enterprise recommendation report to Council.

Background

Brownfields are abandoned, idled, or underused properties where expansion or redevelopment is complicated by real or perceived environmental contamination as a result of historical land use practices. These sites can have significant environmental, economic and social impacts on the community. However, remediation and redevelopment can result in improvements to soil and groundwater conditions, lead to job retention and creation, new housing opportunities, improve public safety and security and allow for efficient use of existing hard and soft services.

Legislative Context

Generally, the Municipal Act prohibits municipalities from directly or indirectly assisting any manufacturing business or other industrial or commercial enterprise. An exception is provided for financial incentives under section 28 of the Planning Act that pertains to community improvement.

Section 28 of the Planning Act provides for municipalities to establish a community improvement plan. This legislative framework is further supported through Provincial and City policy including, but not limited to, the Provincial Policy Statement (PPS), the Growth Plan for the Greater Golden Horseshoe, the Official Plan, Secondary Plans and the Downtown CIP. This policy framework encourages the redevelopment of brownfield sites that make efficient use of existing infrastructure, promoting environmental cleanup, economic development and new commercial and housing opportunities. The City's Official Plan contains the necessary enabling provisions and policy basis for the preparation and implementation of community improvement plans.

The purpose of the Brownfield Redevelopment Community Improvement Plan is to facilitate redevelopment of these sites by providing financial incentives that partially offset the cost of environmental investigation and remediation of sites.

History

The City's first Brownfield Redevelopment CIP was approved in 2004 and established the following financial incentives:

- Environmental Study Grant (ESG) program
- Tax Increment-Based Grant (TIBG) program
- Tax Assistance (TA) programs

A review of the CIP beginning in 2010 resulted in a [new CIP](#) that was adopted in 2012. The 2012 CIP added detail and clarification to the existing programs but did not change them fundamentally.

The CIP includes provisions to monitor the outcomes of the programs and to review and update the CIP as necessary every five years.

[Report #IDE-2018-01](#) entitled Downtown, Brownfield and Heritage Grant

Performance Monitoring: 2012-2017 and Potential CIP Review Directions was presented to council on February 12, 2018. That report:

- evaluated the performance of the Brownfield Redevelopment CIP
- presented draft directions for potential revisions to the CIP
- Presented potential updates to the City's financial approach to tax increment based grants that are used by the Brownfield, Downtown and Heritage grant programs.

Report

Staff undertook a review of the Brownfield Redevelopment CIP in conjunction with the Downtown CIP and the updated financial framework for Tax Increment Based Grants.

Beginning in the spring of 2017, staff initiated a review of the Brownfield Redevelopment CIP. This review involved:

- collecting and analysing information on the participating brownfield redevelopment projects;
- an evaluation of the performance of the programs;
- a staff led identification of issues with the CIP;
- interviews with past program participants and further refinement of issues;
- interviews with other municipalities with Brownfield CIPs; and
- Reporting to council on CIP performance and introducing potential changes to the CIP for feedback.

Additional details on the study including monitoring of program performance, issues identification and analysis were included as Attachment 2 to [Report #IDE-2018-01](#) dated February 12, 2018.

Proposed changes to the CIP build on the directions from the February Report and Council feedback. The majority of Council feedback was related to the Downtown CIP, and this will be summarized and addressed in the future Downtown CIP Public Meeting Report. One area of concern expressed by some Councillors that relates to both CIPs was regarding the potential financial implications of the DC late payment proposal. Additional details on the DC late payment proposal, including financial implications, are addressed in this report.

Key issues, analysis and recommendations are summarized below. Additional analysis on the issues and recommendations are considered in Attachment 1 (Issue Analysis). The details of the proposed amendment to the CIP are included as Attachment 2 (Proposed Amendment to the CIP) and Attachment 3 (Proposed CIP with "track changes").

Allowing for development charges to be deferred and paid by the TIBG grant stream will make City investments more impactful.

A key limitation the Brownfield Redevelopment CIP identified through stakeholder consultations is the timing of Tax Increment Based Grants. A grant that is paid

earlier in a project would better assist challenging brownfield projects, than TIBGs that are paid starting several years after remediation has occurred and building construction is completed with payments extended over many years.

To address this, staff propose to allow TIBG grant recipients to have all or part of their Development Charges (DCs) deferred up to estimated program eligible costs or 80% of the estimated tax increment for 10 years, whichever is less. DCs would be recovered with interest through the TIBG grant payments. Put another way, developers would borrow against their TIBG agreement to make DC payments. It is recommended that the City charge an interest rate that reflects current market rates, plus a small premium, to ensure the DC reserve funds are compensated for lost interest revenue, or added interest expense the City will incur as a result of the delayed revenue. This would reduce the potential negative financial implications for the City and help enable investment in growth related infrastructure. This program will still be beneficial to developers because of their typically high finance rates for construction and bridge loans. Although this approach would rely on DC late payment agreements enabled by the *Development Charges Act 1997*, an amendment to the CIP is proposed to provide policy direction regarding this form of incentive. Council authorization is required to enter into each DC late payment agreement. An example of this approach is included in Attachment 1.

Minor changes to the program will provide clarity, ease administration and further the goals of the CIP

As a result of the CIP review, staff recommend the following changes to the CIP to assist in CIP administration, and to assist developers in achieving the CIP objectives in a financially prudent manner. These changes are generally minor and administrative in nature, and are needed to reflect changes in the policy context since 2012.

- Currently, the Environmental Study Grant (ESG) program requires applicants to submit an application, including a study cost estimate, to the City, and requires City approval of the application prior to any works being undertaken. If costs are incurred after submission of the application, but prior to its approval they are ineligible for reimbursement. This has led to timing problems with the grant where work needs to be completed during tight real estate transaction due diligence periods and is undertaken before City approval of the application. To provide some reasonable flexibility, it is proposed that the ESG terms be amended to allow for the reimbursement of costs incurred after the date of application and prior to City approval, provided such costs are ultimately determined to be eligible through the City's subsequent approval. Initiating work prior to City approval will be entirely at the applicant's own risk, and if the City subsequently determines certain costs to be ineligible, they will not be reimbursed.
- The cost of conducting environmental studies is high and increasing as described in Attachment 2. The study requirements can be different in Guelph because the entire City is considered a source for municipal drinking

water. Maintaining the maximum grant amount per property at \$30,000, and eliminating the per study maximum of \$15,000, will provide additional flexibility to help offset environmental study costs that are key to determining project viability and understanding risks to human health and the environment.

- The CIP's current requirement for a Record of Site Condition (RSC) under the TIBG program is no longer necessary since Council endorsed the City's streamlined approach to environmental review in the [Contaminated Sites Guidelines](#). This requirement is proposed to be eliminated.
- Language restricting grants to those who knowingly polluted their properties should be clarified and made internally consistent by restricting grants to anyone who polluted the property, whether knowingly or not.
- The programs are working well and the duration of each should be extended for five years.
- The policy context section of the plan is recommended to be updated to reflect changes since the CIP was approved in 2012.

Attachment 2 shows how these proposed changes would be implemented in a formal amendment format. Attachment 3 includes the existing CIP with the same proposed amendments shown in a "track changes" format.

Next Steps

Staff will consider any feedback received from Council and the public at this meeting. Once these matters are addressed, a report from Infrastructure, Development and Enterprise with a recommendation will be considered at a future meeting of Council.

Financial Implications

Preliminary financial implications of an extended Tax Increment Based Grant (TIBG) program were discussed in Report # IDE-2018-01. Detailed financial implications will be reported at the time of a future Infrastructure, Development and Enterprise recommendation report to Council. Proceeding with this Statutory Public Meeting does not commit Council to future financial decisions related to this CIP update.

Consultations

Because of the generally minor and technical nature of anticipated changes to the CIP, the community engagement approach was scoped to interviews with key stakeholders who have had direct experience with the programs. They are in a good position to evaluate the programs' strengths and weaknesses. Staff solicited 11 stakeholders for interviews including developers, environmental consultants and Ministry of the Environment and Climate Change (MOECC) staff. Six interviews were conducted and two emails were received.

The project team also interviewed other staff involved in the administration of the CIP programs from the following departments:

- Engineering and Capital Infrastructure Services
- Finance, Client Services
- Finance, Taxation and Revenue
- Business Development and Enterprise
- Legal, Realty and Risk Services

Additional details on these consultations were included in [Attachment 2 to report #IDE-2018-01](#). The issues identified in these discussions formed the basis of issues that were analysed through the review, and are discussed further in Attachment 1 to this report.

Notice of Public Meeting was mailed on March 19, 2018 to local boards and agencies, City service areas and the stakeholders described above. The Public Meeting was also advertised in the Guelph Tribune on March 15, 2018, on social media, the Mind your Business e-newsletter, and on guelph.ca/brownfields.

Corporate Administrative Plan

Overarching Goals

Financial Stability
Innovation

Attachments

ATT-1 Issue Analysis
ATT-2 Proposed Amendment #1 to the Brownfield Redevelopment CIP
ATT-3 [Brownfield Redevelopment CIP showing proposed changes](#)

Departmental Approval

James Krauter, Deputy Treasurer/Manager of Taxation and Revenue
Terry Gayman, Manager of Development and Environmental Engineering

Report Author

Tim Donegani
Policy Planner

Approved By

Melissa Aldunate
Manager of Policy Planning and Urban Design

Approved By

Todd Salter
General Manager
Planning, Urban Design and
Building Services
519-822-1260 x2395
todd.salter@guelph.ca

Recommended By

Scott Stewart
Deputy CAO
Infrastructure, Development and Enterprise
519-822-1260 x3445
scott.stewart@guelph.ca

Attachment 1 – Issue Analysis

Beginning in the spring of 2017, staff initiated a review of the Brownfield Redevelopment CIP. This review involved:

- collecting and analysing information on the participating brownfield redevelopment projects;
- an evaluation of the performance of the programs;
- identification of issues with the CIP by staff;
- interviews with past program participants and further refinement of issues;
- interviews with other municipalities with Brownfield CIPs; and
- reporting to council on CIP performance and introducing potential changes to the CIP for feedback.

Additional details on the study including monitoring of program performance, issues identification and analysis were included as Attachment 2 to [report #IDE-2018-01](#) dated February 12, 2018.

Because of the generally minor and technical nature of anticipated changes to the CIP, the community engagement approach was scoped to interviews with key stakeholders who have had direct experience with the programs. They are in a good position to evaluate the programs' strengths and weaknesses. Staff solicited 11 stakeholders for interviews including developers, environmental consultants and Ministry of the Environment and Climate Change (MOECC) staff. Six interviews were conducted and two emails were received.

The project team also interviewed other staff involved in the administration of the CIP programs from the following departments:

- Engineering and Capital Infrastructure Services
- Finance, Client Services
- Finance, Taxation and Revenue
- Business Development and Enterprise
- Legal, Realty and Risk Services

The issues identified in these discussions formed the basis of the issues, analysis and recommendations presented here.

1. Timing of Incentives

A common theme identified through development industry stakeholder interviews is the timing of incentives. Timing of funds is extremely important to project viability. Property developers indicated that incentives provided earlier in the project are more valuable than those that occur later. Typically the most financially difficult time in the project is when Development Charges (DCs) are paid and building permits are issued. Financing terms tend to be better once a project is underway and better still once a project is complete. Payments under the TIBG program (the City's most valuable program) occur after a project has been developed and re-assessed, and taxes paid for one year. In the case of residential condominium developments, the developer who is receiving the grant no longer owns the site by the time the grant is paid. For these reasons, developer stakeholders said that the

impact for TIBGs was relatively small given the scale of the City investment when compared to incentives provided earlier in the project.

The key advantage of TIBGs, and reason for their popularity across Ontario, is their low risk to the Municipality. There is no grant until the redevelopment has occurred, and the amount of the grant is directly tied the increased taxes being collected. However, their key disadvantage is the limited impact on project viability per dollar invested because they occur so late in the project. TIBGs provide the most benefit to the developers that can already manage the financial strain and risk of a brownfield project, but may not be as helpful at bringing a project to fruition that is not quite viable. Under the current structure, a TIBG may primarily benefit developers that can self-finance and rely less on traditional lending.

DC exemptions and reductions are a form of brownfield redevelopment incentive used in many other municipalities. DCs are payable prior to building permit issuance, much earlier in a project lifecycle than a TIBG. Exempting or reducing DCs is more impactful, per dollar, than TIBGs. However, staff do not recommend, exempting or reducing DCs for brownfield projects.

Instead, staff propose that TIBG grant recipients have all or a part of their (DCs) deferred up to the lesser of program eligible costs or a conservative estimate of 80% of the 10-year tax increment. DCs would be recovered with interest through TIBG payments. The interest rate would reflect the City's cost of borrowing plus a risk or administrative adjustment. This approach would rely on a DC late payment agreement that is enabled by the Development Charges Act. The TIBG program descriptions in the CIP are proposed to be amended to provide policy direction on entering into DC late payment agreements for TIBG projects.

As an example, consider a brownfield redevelopment project with eligible remediation costs of \$500,000. The municipal taxes before the project are \$10,000. The taxes after the project are \$110,000 yielding a \$100,000 tax increment. The maximum grant payable every year is 80% of the increment or \$80,000. Under the current TIBG program the grant payments would be as follows:

Table 1 – Example of TIBG payments under existing CIP

Year	Grant to applicant	DC payment to City
-2		\$200,000
-1		
0		
1	\$80,000	
2	\$80,000	
3	\$80,000	
4	\$80,000	
5	\$80,000	
6	\$80,000	
7	\$20,000	
Total	\$500,000	\$200,000

As an example under the proposed approach, assume that \$200,000 in DCs are payable for this site, and the interest rate charged by the City is 4% compounded annually. Also assume, based on experience, that the first TIBG grant payment will be made 3 years after building permit issuance, the time when DCs are due. TIBG grant payments will initially be directed to recovering DCs. Once these are fully repaid, the remnant TIBG payments will be made to the owner.

Table 2 – Example of Proposed TIBG payments with DC late payment agreement

Year	TIBG Grant Payment towards to DC reserve	Interest	Outstanding DC balance	TIBG Payment Grant to Owner	Total TIBG
-2			200,000		
-1		8,000	208,000		
0		8,320	216,320		
1	80,000	8,653	144,973		
2	80,000	5,799	70,772		
3	73,603	2,831	0	6,397	
4				80,000	
5				80,000	
6				80,000	
7				20,000	
Total	233,603	33,603		266,397	500,000

Under the proposed approach the total incentive to the developer would be \$466,397. That is based on the \$500,000 in eligible cost, minus interest of \$33,603. This approach benefits the developer, including those developers using traditional financing, by assisting with project cash flow and financing without negative financial implications for the City.

Recommendation 1 – That the TIBG program include a description of the availability of DC late payment agreements, with DCs to be recovered through the TIBG payments.

2. Environmental Study Grant (ESG) – Timing of Eligible Costs

The ESG is a 50% matching program for environmental studies including:

- Phase II Environmental Site Assessments;
- designated substances and hazardous materials surveys;
- remedial work plans; and
- risk assessments.

One key provision of all the CIP programs is that the grant must be approved by the City prior to the applicant starting any work that is to be funded. The 2012 CIP update recognized that the ESG was beneficial for studies to support due diligence for real estate transactions. The requirement for a quick turnaround to approve ESGs informed Council's decision to delegate approval authority for ESGs to staff. Since then, typical approval times have been reduced from 2-3 months to 1-2 weeks (see Table 1 in Attachment 2 in [Report #IDE-2018-01](#)).

Nevertheless, in one case further described in [IDE report # 16-46](#) (pg. 152), the applicant could not wait on staff approval prior to starting work during the real estate transaction due diligence period. Allowing funding of work that occurred after the date of ESG application, but prior to City approval would help prevent this problem. The work would be at the applicant's risk in the event that the application was not approved.

Other municipalities including Hamilton and Windsor provide for grants for eligible work that is conducted after the date of the application, but before City approval, at the applicant's risk. London and Kingston require that an application be approved prior to the start of eligible work.

Recommendation 2 - That the terms of the ESG program be amended such that work that occurs after the date of application, as confirmed by the City, is eligible for the grant.

3. Environmental Study Grant – Maximum Amount

On an annual basis, the City makes available \$50,000 for ESGs from the redevelopment incentives reserve. Since 2011, a total of \$66,600 in grants have been approved. Of the \$66,500 in approved grants, only \$33,500 has been paid

out. This is because some studies were completed under budget, and the grant payment was reduced as a result. In other cases, the applicant did not complete the studies and the grants were not payable.

Table 3 - Environmental Study Grants in Other Municipalities

Municipality	Number of Grants	Value
Guelph	6	\$66,500
Hamilton	74	\$769,000
Windsor	5	\$67,000
London	5	\$30,000
Waterloo Region	26	?
Kingston	18	\$268,000

Table 3 compares the number and value of environmental study grants in other jurisdictions. The limited program uptake in Guelph is likely due to lack of awareness of the program among developers and environmental consultants. Staff could develop marketing materials to improve awareness of the program to increase uptake. The low value of the grants may also contribute to limited program uptake which will be discussed later on.

Many Brownfield CIPs across Ontario include a 50% matching grant program for environmental studies. Table 4 shows a \$10,000-\$40,000 range in maximum grant amounts. There is also a difference in approach to capping grants per study and per project.

Staff and external stakeholders recommended reviewing the \$15,000 cap for environmental studies. Due to more stringent Provincial environmental standards introduced in 2011, the cost of a Phase II ESA has escalated, especially for large and complex sites. For example, the Phase II ESA at the municipally owned IMICO site at 200 Beverly Street is expected to cost over \$300,000.

Remedial work plans, designated substances and hazardous materials surveys are typically at lower cost in the order of \$5,000-\$15,000. Risk assessments typically range from \$50,000 to over \$200,000. Increasing the maximum amount to \$30,000 per study and retaining the \$30,000 per property/project maximum for all studies would not change the overall potential maximum liability per project, but would allow applicants more flexibility in how to direct the \$30,000. The \$30,000 upper limit is towards the high end of the range of ESG grant maximums in other municipalities, but is not the highest as shown in Table 4.

Table 4 - Environmental Study Grant Maximums in Other Municipalities

Municipality	ESG grant maximum
Guelph	\$15,000 per study; \$30,000 per property
Brockville	\$15,000 per study; \$25,000 per property
Hamilton	\$20,000 per study; 25,000 total per property
Kingston	\$20,000 per property
Niagara Falls	\$12,500 per study; \$20,000 per property
Ottawa	\$15,000 per study; \$25,000 per property
Waterloo Region	\$40,000 (Phase II ESA only)
Windsor	\$15,000 per study; \$25,000 per property
London	\$10,000 per property

Increasing the maximum amount, combined with improved marketing of the programs may increase uptake while still respecting the \$50,000 annual budget.

Recommendation 3 - That the per study maximum grant be removed from the ESG program while retaining the \$30,000 per project maximum.

4. Requirement for a Record of Site Condition (RSC)

The TIBG and Tax Assistance (TA) programs currently require that a Record of Site Condition (RSC) be filed even when a RSC is not otherwise required by Provincial regulation. The RSC provides a comfort that the environmental work has been completed to set standards. However, Provincial review can add unnecessary delay and expense to some projects. Engineering and Capital Infrastructure Services staff have recently taken on additional responsibility in the review of site investigation, remediation and risk assessment through the development approvals process. Accordingly, a RSC is not always necessary to ensure the protection of human health and the environment as outlined in the City's [Guidelines for Development of Contaminated or Potentially Contaminated Sites, 2016](#) (Contaminated Sites Guidelines). Additional rationale for not requiring RSCs, except where they are required under the Environmental Protection Act, is provided in the [July 5, 2016 IDE Report](#) in support of the Guidelines. Given the level of staff expertise and clear processes outlined in that document, a RSC is no longer required to ensure the protection of human health and the environment. Staff recommend that this requirement be removed from the TIBG program. A RSC is a mandatory requirement of the Province's matching of education taxes through the TA program, and the RSC requirement for this program should be retained.

Recommendation 4 - That the requirement for a Record of Site Condition (RSC) to receive a TIBG be replaced by a requirement for a RSC or approval by the City Engineer or designate as outlined in the Contaminated Sites Guidelines.

5. Reliance Letters

Environmental studies typically include a proviso that they are only to be relied upon by the client (developer). Part of the rationale for providing grants for Environmental studies is to inform the area wide environmental and source water protection information. Environmental consultants are sometimes asked to provide a 'reliance letter' allowing a third party to rely on the results of study. Reliance letters provide a legal basis for a third party to use information in a study, for example as part of due diligence in a real estate deal or construction contract. Per the Contaminated Sites Guidelines, reliance needs to be provided to the City for all environmental reports that support a development application and direction should be taken from there. No amendment to the CIP is required.

Recommendation 5 – That no change to the CIP be made regarding reliance letters.

6. Clarity on Eligible Costs

The most complex task in administering the CIP is reviewing and approving eligible cost submission for the TA and TIBG programs. The principle of the incentive programs is to level the playing field between brownfield and greenfield development. Some remedial work such as excavation are required to remove contaminated soil, but in the case where the excavation is for a building foundation, it would not be an additional cost incurred because the site is contaminated, and should not be reimbursed by the CIP. However, the cost of disposing of this contaminated fill would be incremental and should be reimbursed. Clarity on this point would assist.

For example, a parking garage is often included as a required risk management measure by the MOECC. Parking garages built in accordance with the Ontario Building Code can isolate the structure above from soil vapours. However, a parking garage is often being planned without the MOECC requirement. Therefore, the construction cost of a parking garage to comply with the Ontario Building Code is not incurred because of contamination and should not be reimbursed.

It is proposed that staff develop additional guidance material to assist applicants in preparing their eligible cost submissions.

Recommendation 6 - That the TA and TIBG program definition of eligible costs be amended to include only those associated with contamination and are above and beyond otherwise required development costs..

7. Eligibility of Taxes

The CIP does not provide clarity on whether sales tax (HST) is eligible for reimbursement. This causes confusion in administration. Studies and remedial work are business inputs and applicants are able to apply to have them reimbursed by the federal and provincial governments. A rebate of HST through the CIP would essentially mean that HST is rebated twice.

Recommendation 7 – That clarification be added to the CIP that HST is not eligible for reimbursement.

8. Grants to Polluting Applicants

The CIP does not allow for grants to applicants who polluted the property in most cases. A general provision of all programs in 6.2 d) is:

With the exception of the Environmental Study Grant Program, owners or applicants who are responsible for **knowingly** polluting their properties will not generally be permitted to make direct application for any of the incentive programs contained in this CIP. However, the City reserves the right to make exceptions to this requirement on a case by case basis where redevelopment benefits to the municipality and community would be very significant. [emphasis added]

Section 6.2 sets out a different approach on grants to polluting applicants for the ESG program:

Properties where a Minister's Order for cleanup has been issued are not eligible to apply for the ESG Program. Polluting applicants may apply for this program only if they can demonstrate that there exists:

- a) an offer of purchase and sale on the property;
- b) a redevelopment proposal for the property; and,
- c) insufficient environmental data to inform the preparation of a Remedial Work Plan, Risk Assessment, or Risk Management Plan

...Where an application is made by an applicant who is responsible for polluting the subject property, the application must be approved by City Council rather than City staff.

The prohibition on grant to applicants who **knowingly** polluted is different between the ESG program and the general requirements. It is recommended that the word knowingly be removed from the general program description for consistency and to reinforce the polluter pays principle.

Recommendation 8 – That the prohibition on grants to those who knowingly polluted their properties be applied consistently to anyone who polluted the property, whether knowingly or not.

9. Program Duration

The 2012 CIP sets recommended durations for the three programs. The ESG extends to 2017 with the option to extend to 2023. The duration of the TA and TIBG programs is until 2023. The intent of the limit on the program duration is to ensure a periodic review of how the programs are meeting the CIP's goals and objectives. Through the CIP update staff have found that the programs are successful and should be extended for another five years with minor modifications as discussed in this report.

Recommendation 9 - That the duration of each of the programs be extended to five years from the date of approval of the CIP update.