

2025-10-21  
Project: (230694)

Katy Macpherson, Dipl.M.A  
Deputy City Clerk  
City of Belleville  
169 Front Street  
Belleville ON K8N 2Y8

Dear Ms Macpherson:

**RE: (230694) BELLEVILLE PARKING STUDY  
ASSESSMENT OF FREE DOWNTOWN PARKING MOTION**

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At the Council meeting on September 8, 2025 City Council approved a motion to direct staff to report back to Council on the costs and impacts of offering free downtown parking. Our assessment of this request has been structured in three parts. Part 1 details the change in revenues and costs compared to the 2024 actual cost for the parking operation, based on the draft 2025 budget documents. Part 2 of the assessment outlines some additional operational considerations associated with the change to free downtown parking, and Part 3 summarizes the implications of this change on the various recommendations presented in the Comprehensive Parking Study Report.

### **Part 1 Change to Current Revenues and Costs (2024)**

The assessment of changes to the existing parking operation assesses the implications of free downtown parking on the current costs of operating the parking operation and the revenues collected from parking.

To support the assessment the following assumptions have been made:

- Services supporting ongoing maintenance of existing lots would continue (snow removal, other repairs, line painting, etc.)
- There would be some reduced costs for maintenance of Pay and Display machines and meters (as units would still be required at the boat launches) and reduced costs for HotSpot transactions
- There would be a reduction in annual charitable contributions for the December Free Parking promotion, or these donations would need to be funded from other sources.

- There would be no significant changes to enforcement costs as the focus of existing resources would be reallocated to enforce parking time limits and parking infractions in other areas of the city
- There would be reduced revenue from elimination of parking fees in lots and on-street – for hourly and permit parking in the core area of downtown. Paid parking in the Courthouse Lots and on street outside the downtown core would continue.
- There would be reduced fine revenue from parking infractions related to paid parking (however there would be continued enforcement of time limits and other parking related infractions).

## Change to Current Revenues

Based on the 2025 draft budget documents the City reported actual revenues of \$902,223.89 from the parking operation. This was comprised of \$313,471.71 from parking meters, \$193,768.58 from sales of daytime parking permits at downtown lots, \$394,557.80 in fines from parking violations and \$425.80 in miscellaneous revenues.

If the City were to implement free parking in the downtown, a number of these revenue sources would be impacted to various degrees. The following assumptions were used in estimating the potential changes in current revenues:

- Free parking would apply to downtown parking lots only, excluding the two Courthouse Lots on the west side of the river and parking in the lot at the George Street boat launch (revenues for this lot are allocated to the Community Services Department).
- Free parking would apply to downtown on-street parking on streets east of the river including Pinanncle Street, Bridge Street, Church Street and Campbell Street.
- Existing on-street parking on Coleman Street would continue in operation, along with on street parking around the Courthouse.
- Daytime permit parking in downtown lots would be discontinued.
- Existing time limits for on street parking would remain as they are today. Overnight parking restrictions in lots would continue as per the existing by-law.

**Table 1** summarizes the anticipated revenue changes associated with offering free parking in the downtown.



**TABLE 1 – CHANGE IN 2024 REVENUES WITH FREE DOWNTOWN PARKING**

<b>Revenue Item</b>	<b>2024 Actual</b>	<b>Estimated Revenue – With Free Downtown Parking</b>	<b>Change</b>
Parking Meters	\$313,471.71	\$24,535	\$288,936.71
Parking Permits	\$193,768.58	\$28,136	\$165,632.58
Parking Fines	\$394,557.80	\$252,880	\$141,677.80
Miscellaneous	\$425.80	\$425.80	\$0
<b>Total Parking Revenue</b>	<b>\$902,223.89</b>	<b>\$305,976.8</b>	<b>\$596,247.09</b>

In 2024, actual revenues for parking operations totalled \$902,224. With the change to free parking in the downtown total estimated revenues would be about \$305,980, with most of that being comprised of fine revenues from enforcement of various parking and traffic by-law infractions that are not related to paying for parking in the downtown. The revenue estimates are based on the current set fine rates adopted in 2024 and assumes no change to the ratio of revenue to total set fines for infractions (estimated at 75.3% from 2023 actual infraction data used in the parking study report).

Revenues from parking meters under a free parking scenario is estimated at \$24,535, down from 2024 actual revenues of \$313,472. This would be comprised of approximately \$13,660 in hourly parking in the Courthouse lots and \$10,875 in on street parking revenue on Coleman Street and James Street.

Permit parking revenues under a free parking scenario are estimated at \$28,136, compared to \$193,769 in 2024. These revenues are based on existing permit sales for the two Courthouse Lots, which have been assumed to continue.

The revenue estimates for paid parking do not account for the potential that some users could choose to park in the free Riverside Lots and walk across the bridge to the Courthouse area to save in parking costs. At a distance of just over 260 m, some users may choose to make the 3.5 minutes walk instead of paying for parking, which would further reduce the potential revenues from the Courthouse lots.

The total revenue loss associated free downtown parking is estimated at **\$596,247** compared to the 2024 actual parking revenue.



## Change to Current Costs

Based on the 2025 draft budget documents the City reported actual costs in 2024 of \$902,223.89 to operate the parking system for the City. This includes the maintaining and enforcing the downtown parking lots and on street spaces, plus ongoing enforcement of parking rules and restrictions across the entire City.

Many of these costs will continue to be incurred as part of managing the parking operation, dealing with customer concerns, co-ordinating and undertaking enforcement activities across the City and managing and maintaining the existing parking assets.

If the City were to implement free parking in the downtown, some cost items could be reduced to various degrees. The following assumptions were used in estimating the potential changes in current operating costs:

- Existing parking meters in the downtown would be maintained in place for an initial period however the machines would be bagged. If the City chose to maintain free parking on a permanent basis there would be additional costs to remove existing parking meter equipment (which has not been included in this assessment).
- There would be no change to staffing costs as the existing parking staff would continue to be required to manage the existing parking assets, provide customer service, and manage enforcement activities.
- There would likely be some reduced costs related to charges from external service providers related to maintenance of existing parking meters, bank charges for cash handling and transaction processing, and costs for administration of the permit parking in downtown public lots. Costs for processing the permits for staff parking in the municipal lot would continue. Changes to the cost for bank service charges have been estimated based in proportion to reduced revenues.
- Advertising costs could be expected to increase in the first year of free downtown parking to inform users of the changes. This would include signage in lots, signage on existing downtown meters, and advertisements in media and on the radio to provide general awareness of the changes. We have estimated this would add an additional \$1,000 in general advertising costs to promote and inform residents of the change to free parking, \$18,000 in one time costs to replace signage in 12 downtown lots (\$1,500 per lot), plus \$4,000 in one time costs to add signage to existing on street pay and display machines and meters.
- Costs for enforcement through the current external service provider would not change with the implementation of free downtown parking, as existing parking time limits would still require downtown patrols to enforce compliance. Parking enforcement in other areas of the City would also continue unchanged. Actual costs of \$184,800 from 2024 have been used in this assessment, however it is noted that the 2025 approved budget estimated the cost for enforcement to increase to \$221,000, which incorporates service level and rate increases negotiated in the latest contract. The additional \$36,200 in costs budgeted for 2025 would still be required if free parking is approved, so these would represent additional costs associated with the change.



- There would still be a need to make annual contributions to the parking reserve to fund future replacement and maintenance of the downtown parking assets.
  - In the Parking Study Report (Section 7.2.2) it was noted that the City’s Asset Management Plan identified the need for \$230,000 in annual funding for parking asset renewal plus an additional \$100,000 annually for future growth of the City. The asset renewal costs represent the funding needed to maintain the existing parking assets (which include parking spaces, pay and display machines, meters, and parking lot signage and lighting). Eliminating the need for most of the parking meters could reduce the amount needed to fund future replacement assuming the free parking program was continued on a permanent basis. Based on the existing inventory, approximately \$25,000 could be reduced from the overall reserve fund contributions with elimination of the parking meter and pay and display machines in the downtown. The \$330,000 reserve fund contribution recommended in the Asset Management Plan (and Parking Study Report) could be reduced by \$25,000 resulting in a requirement for \$305,000 in reserve fund contributions.

**Table 2** summarizes the anticipated changes in costs associated with offering free parking in the downtown.

**TABLE 2– CHANGE IN 2024 COSTS WITH FREE DOWNTOWN PARKING**

<b>Revenue Item</b>	<b>2024 Actual</b>	<b>Estimated Costs – With Free Downtown Parking</b>	<b>Change</b>
Staffing	\$107,328.78	\$107,328.78	\$0
Enforcement Services	\$184,783.57	\$184,783.57 ((\$221,000) 2025)	\$0 ((\$36,200))
Other Operating Costs	\$524,928.73	\$479,206.15	- \$45,722.58
Contribution to Parking Reserve	\$85,182.81	\$305,000.00	\$219,817.19
<b>Total Parking Costs</b>	<b>\$902,223.89</b>	<b>\$1,076,318.50</b> <b>(\$1,112,518.50)</b>	<b>\$174,094.61</b> <b>(\$210,294.61)</b>

As summarized in **Table 2**, the introduction of free downtown parking would not generate any savings in City staffing costs nor in the cost for enforcement services, as these functions would continue to be required. Additional costs for enforcement in the 2025 operating budget would



be incurred but are show separately. With the change to free downtown parking the City could realize a savings of \$45,722 in annual operating costs, primarily due to reduced costs for external services to maintain parking meters and bank service charges due to less cash handling and transaction processing.

In **Table 2**, additional costs of \$219,817 have been identified for contributions to the parking reserve fund to reflect the recommendations from the City approved Asset Management Plan and the Parking Study Report. In the past, the contribution to the parking reserve has not been a fixed annual cost. The amount directed to the reserve each year has varied based on the overall position of the entire parking budget at year end, with any revenues over and above operating costs directed to the reserve. In years where revenues were lower than costs, draws from the reserve fund have been used to stabilize the parking budget. In the Parking Study Report it was recommended that the City change this model and adopt a consistent reserve fund contribution amount (based on the Asset Management Plan), plus an additional amount for revenue stabilization purposes.

The additional costs related to the reserve contributions are not directly related to the decision to offer free downtown parking, but they are additional annual costs that should be included in the overall parking budget regardless of the decision about charging for parking in the downtown. If the City were to offer free downtown parking on a permanent basis, the reserve contribution could be reduced by approximately \$25,000 annually as there would be no need to plan for parking meter and pay and display machine replacements.

### **Overall Assessment of Costs and Revenues**

Combining the reduced revenues and changes to operating costs from **Table 1** and **Table 2**, allows for the assessment of the potential financial implications related to offering free downtown parking, as summarized in **Table 3**.



**TABLE 3– FINANCIAL IMPLICATIONS OF FREE DOWNTOWN PARKING**

<b>Item</b>	<b>2024 Actual</b>	<b>Estimated Costs – With Free Downtown Parking</b>	<b>Change</b>
Total Revenues 2024	\$902,223.89	\$305,976.80	\$596,247.09
Total Costs 2024 (2025)	\$902,223.89	\$1,076,318.50 (\$1,112,518.50)	\$174,094.61 (\$210,294.61)
<b>Net Requirement</b>	<b>\$0</b>	<b>\$770,341.70</b> <b>(\$806,541.70)</b>	<b>\$770,341.70</b> <b>(\$806,541.70)</b>
Net Requirement / (Surplus) without reserve contribution	(\$85,182.81)	\$465,364.69 (\$501,541.70)	\$219,817.19 (\$256,017.19)

If the City were to proceed with the free downtown parking program, total costs for the parking program would exceed the available revenues by \$806,541.70 in the first full year of operation, after accounting for increased enforcement costs in the 2025 budget. Annual costs would be approximately \$780,000 after one-time costs for additional advertising and signage are removed for future years. This additional cost would represent a net requirement for the parking program that would need to be funded from general City revenues.

The City could reduce the net requirement to \$501,541.70 by eliminating the reserve contribution, although this would eventually drain the available funding in the reserve fund meaning that future capital needs for the parking program would also have to be funded from general City revenues, reducing available funding for other program areas.

## **Part 2 Operational Considerations with Free Downtown Parking**

In addition to the cost implications of moving to free parking in the downtown there are also some additional operational implications that need to be taken into consideration.

### **Lot Capacity and Enforcement Considerations**

With the removal of paid parking in downtown lots and on street, there is the potential for an increase in parking time limit violations as users would no longer be concerned about the parking meter expiring before returning to their vehicle. The data collected during the parking study occupancy surveys revealed that the average length of stay for on street spaces on a typical Saturday (when parking is already free) is slightly longer than on a typical weekday.



The length of stay in lots was longer during the weekdays, but this is primarily related to the use of lots for all day employee parking rather than the requirement to pay for parking on weekdays.

With the potential for longer parking durations under a free parking scenario, there is potential that this could result in capacity issues for certain high demand on street parking areas and require additional enforcement effort to ensure that adequate turnover of the on street parking spaces can be maintained.

The change to free parking in surface lots in the downtown could also encourage users to increase their length of stay. In some of the more popular lots, this could create the potential for capacity issues during certain periods of the day in peak seasons.

The Front Street Lot and the Riverside South lots both had peak occupancy rates of over 75% for one of the weekday parking survey days in April. After adjusting for peak seasonal demands, the Parking Study found that the Riverside South lot and the Market Square lots were forecast to have demands in excess of their available capacity during peak periods of the day. The Front Street lot still had some reserve capacity with the seasonal adjustment in place. Any change to the length of stay for parking users in these lots would increase the demand during peak periods and exceed the target occupancy level of 95% - meaning that users could have difficulty finding a spot to park during peak periods.

Without the ability to adjust parking rates to manage demand and increase lot turnover during these peak periods, the City may need to consider enhanced enforcement or the introduction of time limits for parking in downtown lots. This could introduce issues with users who require all day parking for work and may require the introduction of a free all day parking permit program combined with parking time limits for other users to promote turnover and manage the available capacity. This type of program would require enhanced enforcement to monitor usage of the downtown lots and issue infractions of time limits for non permit holders. Additional administrative costs could also be expected to manage the free permit parking program. The additional enforcement and administrative costs have not been estimated as part of this review.

## **Transit Ridership**

Paid parking programs are a proven method of managing travel demand and encouraging users to consider non-auto forms of travel for some of their daily trip making. In the Parking Study Report, this was one of the reasons leading to the recommendation to increase the cost of all day permit parking in the downtown so that it would exceed the cost of a monthly transit pass - as a way to manage parking demand and encourage some users to choose transit over driving their car every day to work. The introduction of free parking in the downtown would act in the reverse, and could result in higher rates of auto travel to downtown workplaces, putting additional pressure on parking capacity but also reducing transit ridership in the City.

Estimating the potential change free parking would have on transit ridership in Belleville would require more detailed information on the travel behaviours of local residents, however various



published research studies have found that a 10% increase in auto operating costs can result in a 2 to 4% increase in transit ridership, and the reverse would be true for reductions in costs – with a 10% reduction in auto operating costs reducing transit ridership by 2-4%.<sup>1</sup> These studies also note that parking prices and fuel prices are two of the most influential cost items in the overall cost of auto travel, as these represent out of pocket costs paid directly by the user when making a trip by car, as opposed to the general costs of owning and operating a car (like insurance, car payments, etc.).

To illustrate how this could apply to the free parking initiative, we have considered an average commuter to downtown Belleville making 20 work trips (each way) per month, driving approximately 7 km each way, and paying an average of \$65 per month for a daytime parking permit and estimated that they would spend about \$266.60 per month commuting to work<sup>2</sup>. Removing the cost of parking would reduce the monthly cost of commuting to work by about 32%. Based on the above relationships, this could result in approximately 10% of transit users who are currently travelling to the downtown for work switching to driving.

As previously noted, estimating the overall impact on transit ridership would require more detailed information on the number of daily riders using transit to travel into the downtown core for work, and the number of riders that have access to a vehicle to make their trip, however the illustration is useful to demonstrate how the introduction of free parking could have a noticeable impact on transit ridership.

### **Part 3      Impacts to Parking Study Recommendations**

The introduction of free downtown parking in municipal lots and on street would have a number of implications on the recommendations presented in Section 7 of the Comprehensive Parking Study Report. The key implications are summarized in the following points and are organized based on the 8 key objectives outlined in the parking management framework discussed in the report:

- **Section 7.1 - Meet or Exceed Accessible Parking Standards** – The introduction of free downtown parking does not impact any of the recommendations in Section 7.1 of the report. The recommendation to modify the existing parking and signage in many downtown lots to add new accessible spaces and to add new on street accessible spaces is still valid and would require \$136,000 in operational funding for implementation. This would add to the net requirement associated with the introduction of free parking, summarized in Part 1 of this memo.
- **Section 7.2 – Treat Parking as an Asset** – The introduction of free downtown parking would result in a number of changes to recommendations presented in this section of the Parking Study Report. In addition to the impacts to the recommended changes to

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<sup>1</sup> Transit Price Elasticities and Cross-Elasticities,” Journal of Public Transportation, Vol. 7, No. 2, (<https://digitalcommons.usf.edu/jpt/vol7/iss2/3>), 2004, pp. 37-58

<sup>2</sup> Assuming \$0.72 / km cost of driving per Canada Revenue Agency motor vehicle expense rates for 2025.



the way the Parking Reserve is funded and used, this section of the report made recommendations to increase the number of monthly permits made available in downtown lots and introduced a new overnight permit parking program. The introduction of new monthly permits was estimated to generate approximately \$16,000 in new annual parking revenue and the overnight permit parking program was also estimated to generate approximately \$31,000 in new annual revenue for the parking program. The overnight parking program could still be introduced to allow overnight parking in lots, however the move to free parking would eliminate any additional potential revenue associated with this recommendation. Additional costs to administer the overnight permit parking program would still be incurred if the City decided to retain this recommendation. The introduction of free parking would reduce future potential revenues for these recommendations by approximately \$47,000 in the first year. Future amounts would vary based on how many additional spaces the City would release for the permit program and user uptake in demand for overnight parking.

- Section 7.3 – Maintain User Pay Approach to Downtown Parking – Introducing free downtown parking is not consistent with the principle of user pay for use of downtown parking, instead shifting the burden to the city-wide tax base to fund the ongoing operation and maintenance of the downtown parking program. A number of recommendations contained in this section of the report would be impacted or eliminated with the introduction of free downtown parking;
  - The recommended increases to parking infraction set fines was estimated to generate approximately \$111,330 annually in new fine revenue. The introduction of free parking would eliminate all fine revenues associated with infractions related to expired meters or failing to pay for parking and the financial implications of this were addressed in Part 1 of this memo.
  - The recommendation to increase parking rates and fees will be impacted by the introduction of free downtown parking. The report recommended increasing the rate for hourly parking in lots and on street spaces from the current \$1.00 per hr to \$1.50 per hr. The increases were estimated to generate \$120,900 in new parking revenue. With free downtown parking it is assumed that paid parking would only continue for the Courthouse lots and on street parking outside the downtown area. The estimated revenue for the locations where paid parking would still be in place is \$9,700 per year.
  - This section of the report also recommended updating the Cash-in-Lieu of parking rate applied to new developments. This would not be impacted by the decision to implement free parking in the downtown.
  
- Section 7.4 – Managing On Street Parking as a Priority – A number of recommendations in this section of the report would be impacted by the introduction of free downtown parking:
  - The report recommended adding an additional enforcement officer during the weekdays to increase the visibility of enforcement and the timeliness of



- enforcement activities. The move to free parking would allow existing staff to increase enforcement to provide more frequent monitoring of on street time limits, and therefore the \$53,000 cost of this recommendation could be eliminated.
- This section of the report also recommended the reintroduction of paid parking on Front Street and increasing the time limit to 2 hours. The paid parking recommendation would not be applicable in a free parking context. The estimated annual revenues for this were \$166,000. In addition, the cost to install new meters on Front Street were estimated at \$240,000, and the costs of this would also no longer be required. This was assumed to occur in Phase 2 of the implementation program and would not impact year 1 revenues or costs.
  - The recommendation to implement paid parking on Great St. James Street was estimated to generate \$26,700 in new annual revenue and would require an investment of \$45,000 up front for new pay and display parking meters. This was also assumed to be implemented in Year 2 to allow for purchasing new equipment. It is assumed that this initiative could still proceed subject to Council approval, as this location is outside the core downtown area.
- Section 7.5 – Directing Longer Term Parking Durations to Off Street Lots – This section recommended implementing a daily maximum rate of \$10.00 for all downtown parking lots. There was no new revenue anticipated as part of this recommendation, and this would also no longer be required with free downtown parking.
  - Section 7.6 – Incentivizing Parking in Lots – This section of the report features two key recommendations that would no longer be applicable in the context of downtown free parking:
    - Implementing Free 1 Hour parking in downtown lots was estimated to cost \$41,000 annually to be funded from new revenues generated from other recommendations.
    - A Flat Rate charge of \$3.00 for evening parking after 5:00 pm was recommended to be implemented in conjunction with an automated parking control system for the Front Street and Riverside parking lots and was estimated to generate \$81,300 in new annual revenue once implemented.
  - Section 7.7 – Parking Cost Drives User Choices - The main recommendation in this section of the report was to increase the cost of an all day permit parking from the current rate of \$65.00 per month to \$75.00, and to adjust this as required to maintain a \$10 difference between the cost of a monthly parking pass and the cost of a monthly transit pass. This was estimated to generate \$43,500 in annual revenues in year one, and would be eliminated if free downtown parking were to be implemented.



- Section 7.8 – Use Technology to Improve Customer Service – this section contained a number of recommendations to enhance the customer experience through the use of technology, including
  - Improved lighting and safety measures and enhanced signage in parking lots – this could still be implemented but would need to be funded from the existing parking reserve or the general tax base
  - Implementation of a parking control system in the Front Street and Riverside parking lots – this was intended to allow for reallocation of enforcement resources, reduce revenue loss from nonpayment, and provide real time parking availability information to customers. The cost of a system was estimated to be between \$458,000 and \$527,000 and would be funded from revenues generated by the other recommendations in the study. Free downtown parking would partially eliminate the need for this type of system, although there is still some value in providing real time parking availability information to customers. With no new revenues to fund this type of system the costs would likely not be worth the more limited benefits and the free parking would eliminate the funding needed to pay for such as system.
  - Provision of Electric Vehicle Charging in lots – this recommendation was uncosted and would still be relevant if free parking was provided in the downtown. Depending on the implementation model for this type of program the costs of power use could still be charged to users, otherwise this would be an additional cost to the City.
  - Provision of secure bike parking in lots – this recommendation was also uncosted but could still be implemented regardless of the decision about free downtown parking.
  - Replacement of older style parking meters – this recommendation was estimated to cost approximately \$500,000 and would be implemented in phases using new revenues generated as part of the other recommendations in the study. With free parking this recommendation would no longer be relevant, although as previously noted there would be an additional cost to remove existing meters and pay and display machines if the free parking were to be implemented on a permanent basis.

As summarized above, the decision to implement free parking in the downtown would eliminate the need for many of the recommendations in the Comprehensive Parking Study, reducing future revenues and eliminating some costs associated with providing enhanced services for users.

In year of the recommended phasing program, the recommendations would result in new costs of \$136,000 (excluding the reserve contributions discussed in Part 1) with new revenues of \$306,530 to fund the initiatives. With the introduction of free downtown parking and the elimination of many of the revenue generating recommendations, year one costs of \$136,000 would still be incurred for upgrading accessible parking spaces, with reduced revenues of \$9,700 available to fund these initiatives, requiring an additional net requirement of \$126,300.



## Summary

One of the key findings of the Comprehensive Parking Study was that the status quo was not sustainable from a financial sustainability perspective. To operate the parking system as a self funded operation, where revenues paid for the cost of operating and maintaining the infrastructure and services over the long term, new revenue sources are required. This conclusion was also presented in the City's recent Asset Management Plan.

The potential implementation of free downtown parking in surface lots and downtown parking spaces would fundamentally change the nature of the parking operation in Belleville, from a self funded operation to one requiring ongoing support from municipal taxes to support ongoing operations and future capital improvement needs.

In the short term, the implementation of free downtown parking would represent an additional cost of \$806,541.70 in the first full year of operation, with ongoing annual costs of approximately \$780,000. This additional cost would represent a net requirement for the parking program that would need to be funded from general City revenues.

The City could reduce the net requirement to \$501,541.70 by eliminating the reserve contribution, although this would eventually drain the available funding in the reserve fund meaning that future capital needs for the parking program would also have to be funded from general City revenues, reducing available funding for other program areas.

The introduction of free downtown parking would also eliminate many of the recommendations presented in the Comprehensive Parking Study, which was initiated to address the fiscal shortfall in the overall parking program while exploring opportunities to enhance the customer experience and improve service. With virtually all new revenue opportunities eliminated by the introduction of free downtown parking, no new funding would be available to enhance the existing parking infrastructure, and any potential enhancements discussed in the report would need to be funded through the City-wide tax supported capital program.

Yours very truly,

### PARADIGM TRANSPORTATION SOLUTIONS LIMITED



**Kevin Jones**  
Project Manager  
Public Sector Practice Lead

