INFORMATION ITEMS

Week Ending February 1, 2019

REPORTS

1. Business Service Review Q4 2018 Progress Update
2. Property Tax Receivables and Collections

INTERGOVERNMENTAL CONSULTATIONS

1. Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017
2. Ontario Tourism Strategy

CORRESPONDENCE

1. Comments on Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan
2. City of Guelph Comments on the Increasing Housing Supply in Ontario Consultation
3. Letter to MMAH on Housing Supply Action Plan
4. January 25, 2019 Letter to the Province: Development Charges and Housing Affordability
5. City of Burlington: Bill 66 – An Act to restore Ontario’s competitiveness by amending or repealing certain Acts

BOARDS & COMMITTEES

1. None

ITEMS AVAILABLE IN THE CLERK’S OFFICE

1. None

Information Report

Service Area	Office of the Chief Administrative Officer
Date	Friday, February 1, 2019
Subject	**Business Service Review Q4 2018 Progress Update**
Report Number	CAO-2019-06

Executive Summary

Purpose of Report

To provide quarterly progress updates of the active business service reviews.

Key Findings

- The City is currently conducting a business service review of Transit services.
- The quarterly reports providing high-level status, as of the end of Q4 2018, are attached.
- A brief status explanation of the review is provided within this report.
- Multi-year work planning is under development for business service reviews.

Financial Implications

Third party support is being utilized to support the Transit review, funded from the Business Process Management approved operating budget, not to exceed $86,000.

Engagement and communications expenditures for the Transit review were approximately $10,000.

These costs are fully funded from the Business Process Management approved 2018 operating budget.

Report

This report is to provide a quarterly status update of the business service review program to Council.

Transit Services

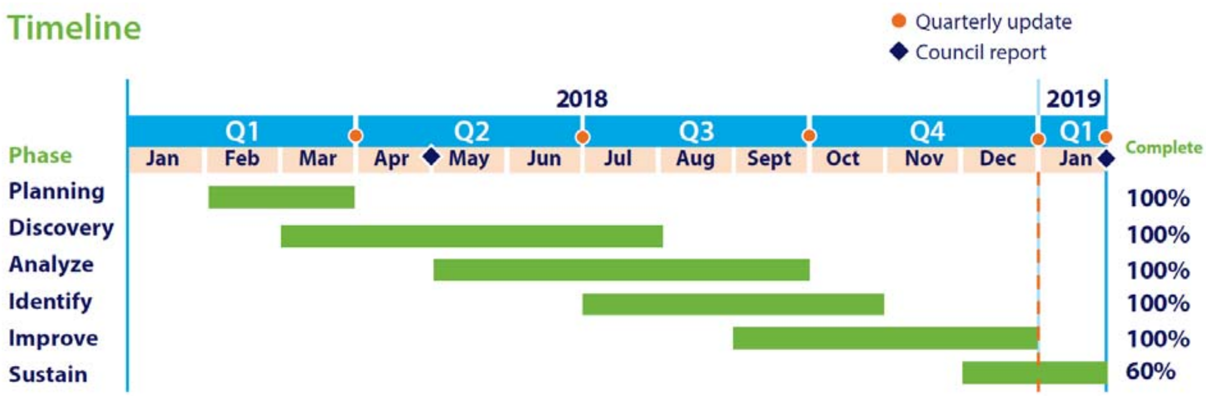
Review scope:
The specific Transit services that are being reviewed are listed in the attachment. For more details of what is in and out of scope for this review, refer to April 3, 2018 Transit Business Service Review Overview Report (report PS-2018.10).

Current status:
This review is currently in the improve and sustain stages. Activities completed and underway include:

- Current state or "as-is" analysis complete;
- Benchmarking analysis complete;
- Community engagement complete ;
- Performance data analysis complete;
- Recommendations developed; and
- Final reporting underway
  - Final report is scheduled for Council on January 29, 2019

The City of Guelph worked in partnership with Dillon consulting — an impartial, technical expert — to conduct the benchmarking and data analysis in support of the Transit business service review.

Review timeline:



Next Steps

The Business Service Review Framework Implementation report (CS-2016-82) identified three pilot services for review. A pilot is designed to test methodologies, processes and logistics while gathering information. Pilots help define the best methods and tools and help identify resource and timing needs. Pilots allow staff to spot issues and risks so mitigating activities can be defined for future reviews. Pilots also provide lessons learned to determine what should be repeated as well as what did not work well and needs to be refined or altered to correct.

The three identified pilots (Solid Waste Resources, Boulevard Maintenance and Transit Services) will be completed in Q1-2019. Lessons learned, outcomes and process changes will be identified, analyzed and reported to Council in Q2-2019.

A multi-year work plan is under development for business service reviews, including the identification of resourcing needs for implementation. This plan is being developed through the service inventory and prioritization activities currently underway and in conjunction with the corporate Levels of Service project, Enterprise Risk Management and Business continuity work.

Financial Implications

Third party support is being utilized to support the Transit review, funded from the Business Process Management approved operating budget, not to exceed $86,000. Engagement and communications expenditures for the Transit review were approximately $10,000.
These costs are fully funded from the Business Process Management approved 2018 operating budget.

Consultations

Staff from the following divisions were consulted for this report: Corporate Communications, Transit Services, and Finance.

Corporate Administrative Plan

Overarching Goals
Service Excellence

Service Area Operational Work Plans
Our Services - Municipal services that make lives better

Attachments

ATT-1 Guelph Transit Business Service Review Quarterly Update – Q4 2018

Report Author
Katherine Gray, Program Manager, Business Process Management

____
Approved and Recommended By
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Chief Administrative Officer
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Business Service Review quarterly update

Q4

December 2018

Guelph Transit

Review sponsor	Colleen Clack, Deputy Chief Administrative Officer, Public Services
Review lead	Katherine Gray, Program Manager, Business Process Management
Review champion	Robin Gerus, General Manager, Guelph Transit
Current phase	Improve and Sustain

Purpose

To review Guelph Transit business services and processes to inform options for the most effective and efficient service provision.

Scope

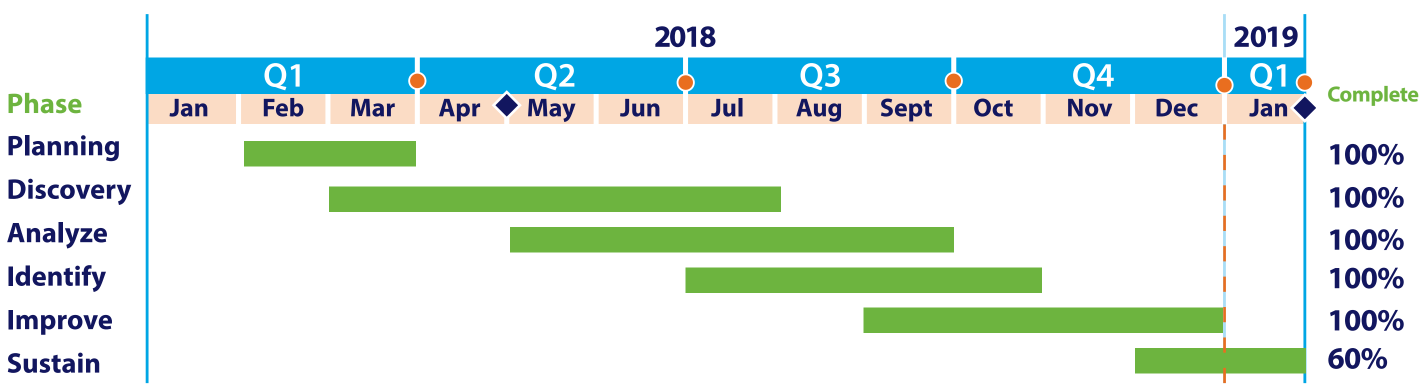
- **Transit service**—service operations for conventional, mobility and specialized
- **Administration**—administration processes as they relate to planning and scheduling, customer service, and the processes for conducting fare and route reviews

Deliverables

- Process maps for all processes in the service
- Cost and impact analysis around service delivery options
- Final report which provides recommendations for improvement
- Proposed implementation plan for recommendations

Timeline

Quarterly update
Council report



Status

95% of review **complete**

Milestones

Discovery phase complete	**Analysis phase** complete	**Identify phase** complete	**Improve phase** complete	**Sustain (control) phase** underway

Information Report

Service Area	Corporate Services
Date	Friday, February 1, 2019
Subject	**Property Tax Receivables and Collections**
Report Number	CS-2019-04

Executive Summary

Purpose of Report

As per the City of Guelph's Tax Billing and Collection Policy, annually staff provide Council with an analysis on the current state of tax collections and arrears.

This report provides information as at December 31, 2018.

Key Findings

Property tax receivables as a percentage of taxes levied annually is 1.81 per cent as at December 31, 2018 (2017–2.27 per cent) and continues to remain lower than the 2017 Ontario municipal average of 6.0 per cent as reported in the 2018 BMA Management Consulting Inc. Study. The total 2018 tax arrears as a percentage of taxes levied is 2.25 per cent (2017–2.76 per cent). As the number of properties in Guelph has increased from 41,232 in 2011 to 45,936 in 2018, we experience a consistent low level of tax receivables and tax arrears that are reflective of the strong economic and financial health of Guelph as well as the staff resources allocated to the collection of arrears. Enhanced payment options such as multiple pre-authorized debit plans, and the ability to pay at any Canadian financial institution or by credit card also contribute to the low tax receivables.

Financial Implications

Tax arrears as a percentage of taxes levied is an important financial indicator of municipal economic health and is considered by Standard and Poor's in their determination of a credit rating. The low percentage of tax arrears is a favourable factor to the City's credit rating.

Interest and penalty income from unpaid taxes directly relates to the amount of arrears outstanding on a monthly basis. As arrears are declining, so too is the interest and penalty income earned on these arrears.

Report

Definition of Terms

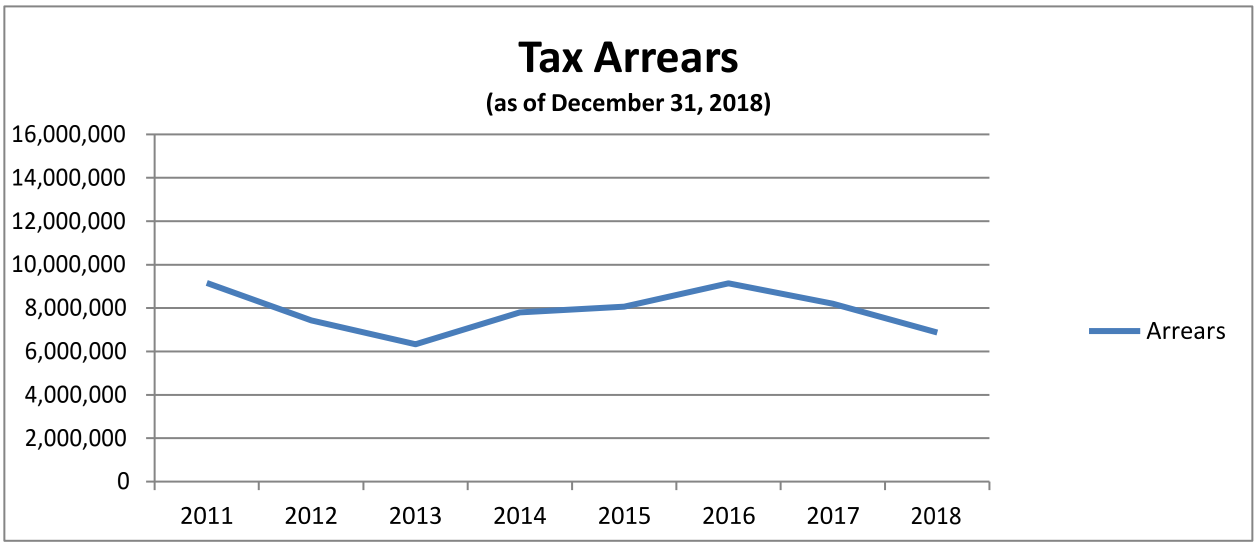
Tax arrears – the amount of taxes outstanding on all accounts.

Tax credits – credits on the tax account which occur due to pre-payments by the property owner, assessment reductions, vacancy rebates, or Municipal Act dictated tax adjustments applied to the account.

Tax receivables – the net amount of taxes owing to the City (tax arrears less tax credits).

Tax arrears

From 2011 through 2018 tax arrears have fluctuated as illustrated in the chart below. A decrease occurred in 2013 relating to the timing of a supplementary billing.



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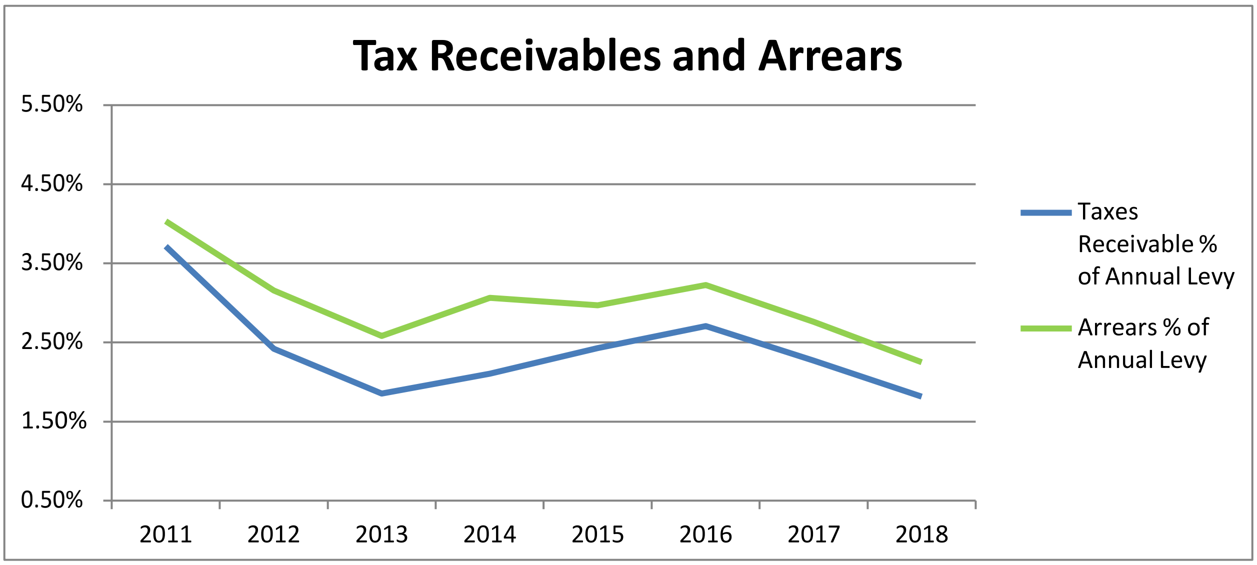
Tax receivables and arrears

The low tax receivables and tax arrears reflect the City's strong economic health, the willingness of the taxpayers to meet their financial obligations and the allocation of staff resources to the collection of arrears. The availability of payment options and the application of the Tax Billing and Collection Policy also contribute to keeping arrears as low as possible. The City's tax receivables as a percentage of taxes annually levied is 1.81 per cent in 2018 (2017–2.27 per cent) and continues to remain much lower than the Ontario 2017 municipal average of 6.0 per cent as reported in the 2018 BMA Management Consulting Inc. Study. The overall tax arrears as a percentage of taxes annually levied is also significantly lower than 6.0 per cent sitting at 2.25 per cent in 2018 (2017–2.76 per cent).



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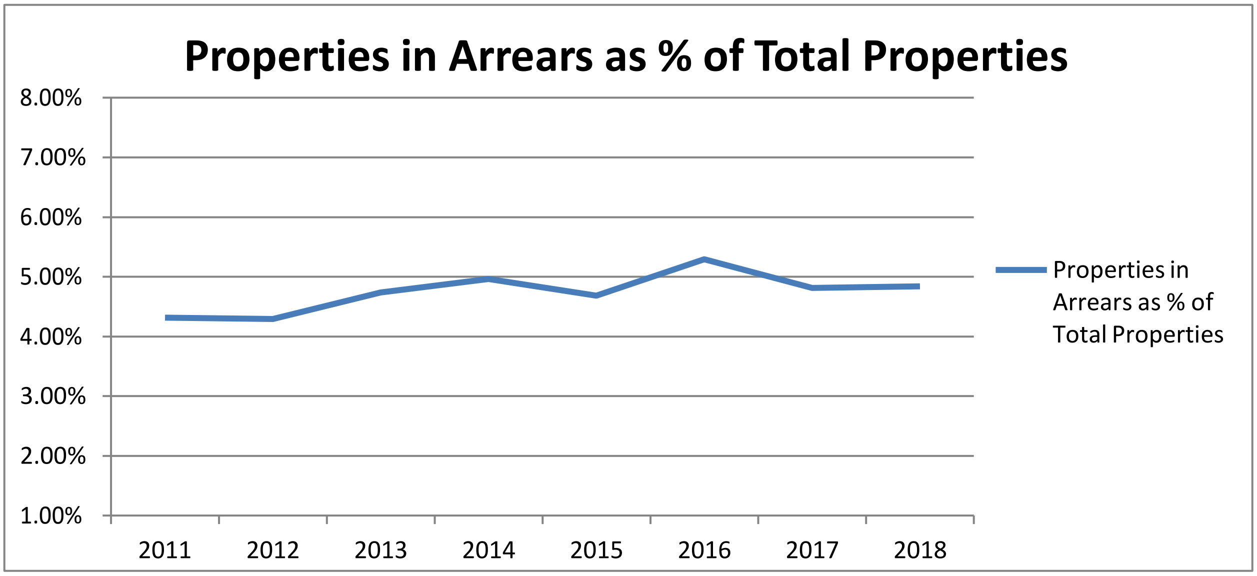
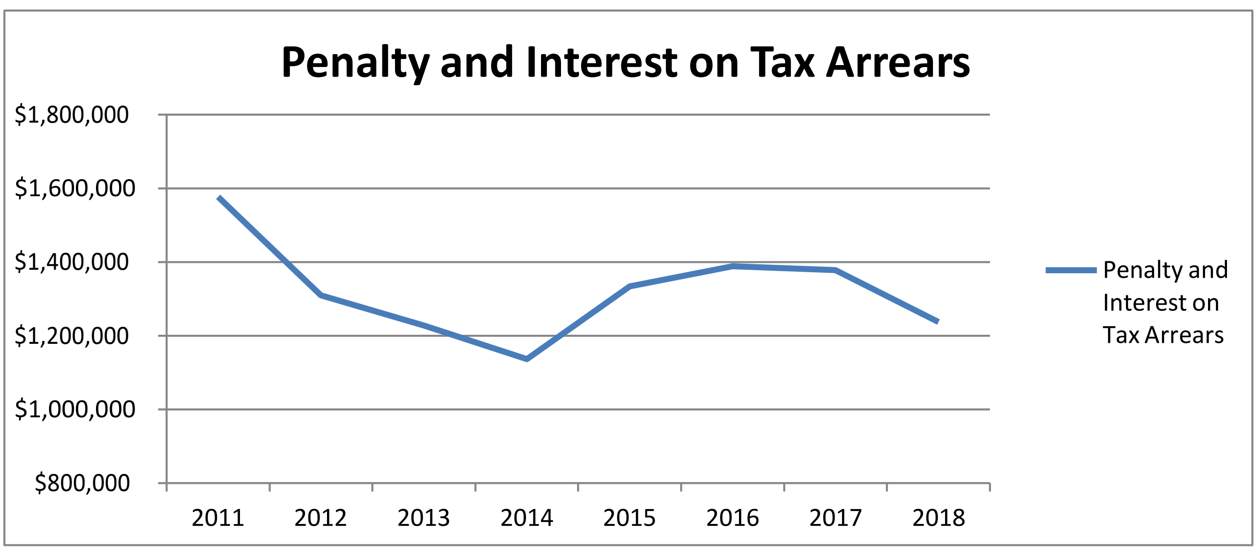
Properties in arrears

At the end of 2018 there were 2,223 properties in arrears, representing 4.84 per cent of all properties compared to 2,178 properties or 4.81 per cent in 2017.



Penalty and interest on tax arrears

Penalty and interest revenue decreased in 2018 to $1,237,634 from $1,378,419 in 2017 as a result of legislative changes to the tax sale registration process as outlined in staff report CS-2017-76. Properties two years in arrears are now registered for tax sale instead of the previous three years in arrears, thus reducing the time period that interest and penalties are collected on arrears properties. The eight-year trend is shown below.



Payment plans

As at December 31, 2018, the City had 12,118 properties enrolled in one of the monthly pre-authorized debit plans (PAD) and 3,627 properties enrolled in the due date PAD. The number of properties enrolled in a PAD increased by 1,085 in 2018. This translates to an overall increase in enrollment of seven per cent, with total enrolled representing 34 per cent of all properties in Guelph.

Increased enrollment for PAD programs is a successful efficiency initiative that enables the City tax department to process a large number of tax payments without manual entry, provides a stable cash flow throughout the calendar year and allows taxpayers an opportunity to spread their payments out on a monthly basis.

Collection procedures

On an annual basis, if arrears two years and greater are not paid by January 31, the City will commence tax sale registration. From commencement of the tax sale registration process, many property owners will pay their outstanding property taxes prior to actual registration occurring later in the year. Once registration takes place, the effected taxpayers have one year from the date of registration to pay all taxes and associated costs including penalties and interest. If the taxes remain unpaid at the end of the one-year period, the property will be sold by the City to recoup the taxes outstanding.

At the end of 2018 there were 313 properties eligible for tax sale registration compared to 509 at the end of 2017. As a result of a legislative change, 2018 was the first year where all properties two years in arrears were eligible to be registered for tax sale. This legislative change has created an environment where the individual arrears are not as significant and may be less onerous for property owners to work out payment plans with the City.

The City did not conduct any tax sales in 2018 as the arrears on every property eligible for tax sale were paid. At the end of 2018, of the 44 properties that were registered in the year, 35 remained unpaid. If these 35 remain unpaid, they will be eligible for tax sale in the fourth quarter of 2019. As at December 31, 2018, there are no properties registered for tax sale that are eligible to be advertised for tax sale.

Financial Implications

Tax arrears is an important indicator of municipal economic health and is considered by Standard and Poor’s in their determination of a credit rating. The low percentage of tax arrears is a favourable factor to the City’s credit rating.

Interest income from unpaid taxes is directly related to the amount of arrears on a monthly basis.

Consultations

None.

Corporate Administrative Plan

Overarching Goals
Financial Stability

Service Area Operational Work Plans
Our Resources - A solid foundation for a growing city

Attachments

None.

Departmental Approval

James Krauter
Deputy Treasurer / Manager of Taxation and Revenue

Report Author

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Supervisor, Property Tax

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Provincial / Federal Consultation Alert							
Title	**Ministry**	**Consultation Deadline**	**Summary**	**Proposed Form of Input**	**Rationale**	**Lead**	**Link to Ministry Website**
Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017 Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans) made under the Places to Grow Act, 2005 Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plan Amendments) made under the Planning Proposed Framework for Provincially Significant Employment Zones	Ministry of Municipal Affairs and Housing	February 28, 2019	The province is currently consulting on proposed amendment #1 to the Growth Plan for the Greater Golden Horseshoe (2017) including modifications to regulations related to the Growth Plan and the introduction of provincially significant employment zones. The Ministry states that the proposed changes address implementation challenges with the Plan that were identified by the municipal and development sectors and other stakeholders. These changes are intended to provide greater flexibility and address barriers to building homes, creating jobs, attracting investments and putting in place the right infrastructure while protecting the environment. The proposed changes respect the ability of local governments to make decisions about how they grow. These changes would apply across six categories: Employment; Settlement Area Boundary Expansions; Small Rural Settlements; Natural Heritage and Agricultural Systems; Intensification and Density Targets; and Major Transit Station Areas. The timeline for municipal conformity to the Growth Plan remains July 1, 2022. The Province has also introduced a framework for provincially significant employment zones which includes the designation of lands within the south area of Guelph along HWY 6.	Staff will prepare draft comments and seek Council input and endorsement of the comments at the February 25 council meeting. Following Council endorsement, the comments will be submitted to the Minister through the online Environmental Registry of Ontario (ERO).	A coordinated response including Council feedback/comments on the proposed amendment will provide a holistic response on the effects of the plan on Guelph.	Policy Planning and Urban Design staff, Planning and Building Services	https://ero.ontario.ca/notice/013-4504 https://ero.ontario.ca/notice/013-4505 https://ero.ontario.ca/notice/013-4506 https://ero.ontario.ca/notice/013-4507

Provincial / Federal Consultation Alert							
Title	**Ministry**	**Consultation Deadline**	**Summary**	**Proposed Form of Input**	**Rationale**	**Lead**	**Link to Ministry Website**
Ontario Tourism Strategy	Culture, Tourism and Sport	28/02/2019	Visitor, student or tourism operator/stakeholder input in developing a new Ontario Tourism Strategy. Collected information will be used to inform the following areas: • embrace a visitor-first approach • improve the business climate • improve sector alignment • provincial interests and role in tourism • support business and community development While Ontario has seen recent increases in tourism visits, there is an opportunity for Ontario to capture a larger share of international tourism growth. A new strategy will support a positive business environment that enables tourism businesses and operators to succeed while meeting consumer needs and expectations.	Online survey	The corporation delivers tourism services in Guelph with a focus on: • Developing and promoting Guelph as a destination • Modelling the highest standard for visitor services • Fostering collaboration and information sharing among industry stakeholders • Supporting business development through partnerships and activations that focus on visitors • Measure and communicate economic impact As the destination development leader in Guelph with a focus on growing tourism, it is important for the corporation to provide feedback to the province as it develops a new tourism strategy. The feedback will potentially validate input from comparable municipalities and inform direction to better support tourism growth in the province.	Stacey Dunnigan, Manager Culture and Tourism	https://www.ontario.ca/page/ministry-tourism-culture-and-sport

January 25, 2019

Nathaniel Aguda
Environmental Policy Branch
40 St. Clair Avenue West
10th floor
Toronto ON M4V 1M2
Canada

Dear Mr. Aguda,

RE: **Comments on Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan**

Thank you for the opportunity for the City of Guelph (the City) to provide comments on the Province's *Made in Ontario Environment Plan*. The City looks forward to working with the Province in the future to implement the various programs identified in the Plan.

<u>Comments from City of Guelph</u>

The City of Guelph is seeking innovative approaches to renewing key infrastructure that supports smart growth, the economy and the environmental prosperity of our community. The City is experiencing the effects of climate change on our environment first hand. For example, more frequent instances of heavy, sustained rainfall places significant strain on City stormwater infrastructure and increases the likelihood of overland and riverine flooding. Further, there are now more extreme heat days in summer, requiring action to protect vulnerable populations such as the elderly and low-income families.

The Province's new Environment Plan outlines a number of programs that support the mitigation and adaptation of the effects of climate change. The City of Guelph is pleased that the Province's Environment Plan supports the climate change activities taking place at the City.

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A Circular Food Economy

The Province's investment in programs supporting food and waste diversion is directly aligned to our work on the Smart Cities Challenge, which seeks to create Canada's first circular food economy. Instead of a "linear" economic model of "take-make-dispose", a circular approach was envisioned that is economically, socially and environmentally sustainable. The model includes the goal to increase circular economic revenues by 50% - recognizing the value of waste as a resource.

Energy Planning

The City has also taken proactive measures to develop climate and energy plans to support our climate resilience. Through the development of the Corporate Energy Management Plan and the Community Energy Initiative, the City is working to address climate change locally. The City is pleased the provincial government is supporting municipalities to build similar plans to develop climate resilience. Further, the Province's recommendation to review land use planning policies and laws to update policy direction on climate resilience directly aligns with the energy efficiency retrofit program that was proposed in the May 2018 update to the Community Energy Initiative. This program seeks to use efficiency to provide all of the energy needed to support the growth in residential, commercial, and institutional sectors.

Clean Technology

The commitment to encouraging private investment in clean technology and green infrastructure is also welcomed by the City of Guelph and is aligned with current initiatives. As a way to foster innovative thinking and implement renewable energy technology, the City in partnership with Alectra Inc. is undertaking the creation of the Green Energy and Technology (GRE&T) Centre. The proposed GRE&T Centre seeks to be a centre of excellence where new green solutions will be tried, tested and readied for broader deployment. The GRE&T Centre will focus on engaging and building capacity for its customers, and supporting businesses in bringing green technologies to market. The Centre will support entrepreneurship, job growth and attraction, as well as enhancing Guelph's reputation as a clean tech economy. The provincial government's investment and programs that encourage private investment helps to support the success of the GRE&T Centre.

The City, however, does have concerns regarding the provincial government's commitment to streamlining environmental approvals for business that use low-carbon technology. In establishing programs associated with low carbon technology, the City would like additional details as to the implementation plan for these programs. A better understanding of the provincial strategy for low carbon programs would assist municipalities in assessing how these programs will support local clean technology initiatives.

Measuring Impacts of Extreme Weather Events
The City believes that the commitment to consult on tax policy options to support homeowners in adopting measures to protect their homes against extreme weather events, such as ice and wind storms and home flooding is extremely beneficial to municipalities. Further, based on our understanding of the initiative, this program aligns with the City's proposed energy efficiency retrofit program Guelph Energy Efficiency Retrofit Strategy (GEERS).

<u>Opportunities for Enhancement</u>
While the Plan sets directions for the Province to take action towards protecting the environment, it does not provide detailed information about the action items that will achieve the Plan. In considering the strengths of the proposed plan, there are also some areas in which the City of Guelph would encourage the Provincial government to provide greater attention to assessing future programming and policy decisions.

Air Quality
In the provincial commitment to address air quality challenges in Ontario, the City of Guelph proposes that the government consider further investment in active transportation infrastructure, as well as two-way-all-day-GO service in Guelph. Guelph is a net-inbound commuter community, and was recently identified as having the lowest unemployment rate in Canada. Enhanced and affordable public transit will help those employees get to work. These investments will support both air quality and increasing access to transportation options for residents, supporting healthy and well connected communities.

Further, the proposed high-level actions are focused on transportation, industry and urbanized communities to reduce carbon dioxide. However, the degradation of air quality by methane and its repercussions is not acknowledged. City of Guelph staff recommends the Province consider methane impacts to air quality in future actions related to clean air. City staff also recommends that the Province considers the potential impacts to clean air from things such as geoengineering (e.g., solar radiation management).

Reducing Emissions
In addressing financial support for municipalities to more effectively reduce emissions and build resilience, it is suggested the province consider a way in which municipalities could leverage private capital to support their green infrastructure needs. Creating an arm's length government body that allows

municipalities to pool similar green infrastructure projects to attract private investment would help to generate private capital to support vital green infrastructure projects. Further, programs such as the Greenhouse Gas Challenge Fund provide much needed infrastructure investment dollars in order to both address climate change and the infrastructure gap. By enabling these programs, the province can support the reduction of emissions at the local level.

Preserving Water Quality

The City of Guelph is also encouraged by the province's commitment to addressing water quality issues, as well as extending the moratorium on water bottling permits.

Further, to ensure availability of clean water in Ontario's communities it is suggested that the Ministry of the Environment, Conservation and Parks use its powers under the Environmental Protection Act to initiate action and force proponents to remediate contaminated sites. This action is of particular importance in areas where there are known impacts to groundwater for local drinking water supplies.

Lastly, Source Water Protection Plans implemented by Conservation Authorities and/or Municipalities cannot alone ensure sustainable water resources resulting from water takings, but would also require the Provincial Government's leadership to develop policies, programs, and enforcement to manage water takings. Staff recommends the Province consider reviewing its water taking programs to ensure the sustainability of clean water resources.

Addressing the Impacts of Climate Change

Climate change has presented itself as one of the most pressing policy issues of a generation. A recent United Nations report states if greenhouse gas emissions continue at the current rate, the atmosphere will warm up by as much as 2.7 degrees Fahrenheit (1.5 degrees Celsius) above preindustrial levels by 2040, flooding coastlines and intensifying droughts and poverty. Although City of Guelph is pleased that the province is addressing climate change in its new plan, staff would like to highlight ways in which the provincial environment plan could be enhanced.

Transportation policy directions under-represent the magnitude of impact that investments and policy supporting reducing vehicle ownership and emissions. Staff recommends that the Province considers expanding transportation policies to include support for local public transit integration with regional transit, enhanced regional transit services, first-mile/last-mile provisions and support for shared vehicle services (car share, bike share, shared scooters) to provide a robust, meaningful impact to emissions from the transportation sector. Further, it is recommended additional guidance on how electric vehicles will be supported. It is also recommended including support or guidance on expanding the electric vehicle (EV) charging network, innovation in EV technologies.

The City of Guelph has worked as both an organization and as a community to proactively adapt (increasing resilience to climate effects that cannot be reversed) to and mitigate (reducing GHGs) the effects of climate change. For example, the City has undertaken a Community Energy Initiative (CEI) (Council resolution IDE-2018.56) which has resulted in a number of positive environmental, economic and social benefits for the City.

> **Environmental Benefits**: 2012-2013 emissions dropped by 17 per cent and energy use by 25 per cent based on 2006 levels, reduced water consumption by six million litres of water per day and reduced related energy costs for water heating
>
> **Economic**: Canadian Solar Solutions Inc., one of the world's largest solar panel manufacturers, is NOW based in Guelph, which created approximately 400 new jobs and is supported through synergies provided by the CEI
>
> **Social:** Partnerships with local companies, cooperatives and community groups foster ongoing public engagement

Despite the work taking place at the City of Guelph to support innovative projects that address climate change, a comprehensive provincially-led climate change strategy is needed to support work underway at the municipal level. Investment in municipal systems such as stormwater management, transit and innovative renewable technologies can help to grow the economy, while preserving our environment and the communities we live in at a cost that is affordable to Ontarians.

<u>**Request for Consideration**</u>**: As the provincial government begins to develop the programs and regulations announced in their Environment Plan, the City of Guelph requests the province consider Guelph as a partner in the stakeholder engagement process.**

The City further requests the provincial government provide clarification as to the process for implementation of policies and programs.

Thank you again for the opportunity to comment on this regulatory proposal. Overall, City of Guelph staff are in support of the elements of the Plan that seek to protect our environment and address climate change. As specific action items are identified, staff encourages the Province to continue work with industry and municipal partners for input. We encourage the Province to ensure appropriate metrics are developed to track progress for the forthcoming initiatives. As previously identified, we look forward to an opportunity to engage with your government in the implementation of the Plan.

Please do not hesitate to contact me if you have any questions regarding the City of Guelph’s feedback.

Sincerely,

Scott Stewart
Deputy CAO - Infrastructure, Development and Enterprise

T 519-822-1260 x 3445
E scott.stewart@guelph.ca

cc

Barbara Swartzentruber - Executive Director, Intergovernmental Relations and Strategy

Antti Vilkko - General Manager, Facilities Management

Tara Baker - City Treasurer/ General Manager, Finance

Kealy Dedman - City Engineer/General Manager, Engineering and Transportation Services

January 25, 2019

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RE: City of Guelph comments on the Increasing Housing Supply in Ontario Consultation

The City of Guelph appreciates the opportunity to provide comments on the development of a provincial Housing Supply Action Plan.

Recently, City Council approved the City of Guelph Affordable Housing Strategy which addressed issues related to affordability and the supply of affordable units (mainly primary rental housing) to meet the needs of low income and smaller households. Through our strategy, it was recognized that a key action to address the supply of affordable housing is financial incentives. The City of Guelph plans for housing supply and meets or exceeds the requirements of the Provincial Policy Statement for the supply of readily available, serviced and zoned land for residential units. Further, through our Official Plan, lands are designated to provide for a full range and mix of housing. We appreciate that the Housing Supply Action Plan may be focused on how to make affordable housing a reality.

As outlined in our attached comments, the City of Guelph is requesting that solutions and options for addressing housing affordability and housing supply do not create additional burden on the municipal budget.

Please find attached the City of Guelph staff level comments on the Increasing Housing Supply in Ontario consultation.

Sincerely,

Melissa Aldunate

Melissa Aldunate, Manager, Policy Planning and Urban Design
Planning and Building Services, Infrastructure, Development and Enterprise
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Increasing Housing Supply in Ontario – City of Guelph staff comments

1. **Speed: How can we streamline development approval processes, while balancing competing interests and the broader public interest?**

Tools are already available to municipalities such as zoning, community planning permits, etc. to assist with streamlining development approvals.

Through zoning, municipalities can broaden zoning categories to permit a wider range of housing types and forms. Municipalities can also prezone properties to align with Official Plan policies to allow for an expedited development process.

The recent changes to the Planning Act have not been in place long enough to assess whether the revised timelines and changes to the LPAT will result in a more streamlined process. We suggest that the revisions to the Planning Act and LPAT be reviewed once they have been in place for one to two years to better understand if the prescribed timelines are an issue. At this time, it is felt that the current timeframes for development review as set out in the Planning Act are appropriate to allow for a public process and necessary reviews while providing greater certainty to applicants on timing.

The community planning permit tool could be reviewed to ensure that it is more attractive and easier to implement for municipalities to assist with streamlining development approvals.

2. **Housing Mix**

The planning and development system includes a number of planning tools (such as inclusionary zoning and height and density bonusing) that could be better leveraged to make the system more effective and incorporate a greater mix of housing types and forms.

To support a mix of housing in appropriate areas (such as transit hubs, urban growth centres, strategic growth areas), the provision of supports, guidelines or incentives by the Province would be useful.

Through long range planning, Growth Plan conformity and Official Plan policies, the City of Guelph is well positioned to provide a range and mix of housing that is both responsive to the market and reflective of the needs of our community. Planning studies and policies also ensure an appropriate supply of land for long term employment, residential and commercial needs to create complete communities.

The changes to appeals made through the creation of Local Planning Appeal Tribunal has not been in effect long enough to ascertain whether it will have an effect on the timing or the ability to bring new housing into existing neighbourhoods. Neighbourhood opposition is a factor in creating new housing and while planning policies and regulations may support it, the appeals process can impact the ability to provide housing.

3. Cost

Through long range planning and servicing master plans the City of Guelph has planned for the provision of serviced land in a logical and economical manner. The City manages the rate and timing of growth to ensure that the appropriate range and mix of housing is designated and available and appropriately serviced in line with our population projections and housing forecast.

The "Increasing Housing Supply in Ontario" discussion paper has raised a number of concerns for municipal financial management in terms of funding the cost of services required to support a growing community. The City of Guelph fully supports the position of the MFOA Technical Response to: Increasing Housing Supply in Ontario, A Consultation Document. A few of the most critical positions that should be considered are as follows:

- "with respect to social and affordable housing, senior governments must commit to "dedicated, permanent, predictable and sustainable funding" Municipalities do not have the financial resources to carry the burden of social and affordable housing costs alone. Ontario is the only province where municipalities have significant social housing responsibilities and costs.
- It is unwise to focus on any one single element of housing demand when trying to explain rapid price growth. Rather, it helps to remember the fundamentals which include population growth, income growth, housing supply and interest rates. It has been suggested that Development Charges (DC's) are a primary reason for housing unaffordability when these account for only approximately 5-7% of the price of a single family home in the GTA and Ottawa.
- Reducing DC's will not lower housing prices nor increase land supply – it will likely have the opposite effect as the City will lose a revenue stream to build the infrastructure required to service the new growth.
- Reducing DC's does not lower the cost of growth, it just shifts what revenue source the cost will be funded from. A decrease in DC's will mean an equal increase in the amount to be collected from property taxes and user fees – making owning a house unaffordable as people will not be able to afford paying their monthly bills.

- Eliminating DC's for key services such as water and wastewater will reduce the supply of serviced land and it is unfair to existing homeowners and businesses to bear the increased user rates that would ultimately pay this price. Specifically for the City of Guelph, this change would increase water and waster user rates by 55%. Transitional issues related to debt issued on these services that was to be paid for from future DC's is also a significant concern.
- Mandatory exemptions to the DC Act to promote planning objectives merely reduces revenues but not growth-related costs. This again only shifts the cost burden to the property tax and rate payers.

The City of Guelph has an infrastructure deficit in 2019 of approximately $500 million that will continue to grow until 2027 when the city forecasts that funding sustainability will be achieved as a result of a 10-year plan to increase property taxes. At that point, our Asset Management data is showing that approximately 30% of the City's assets will be in a poor or very poor condition with no funding to address these concerns. Further, the City of Guelph, has just completed its updated DC Background Study, and similar to other municipalities in Ontario, have determined that DC's are only recoverable for approximately 80% of the total cost of growth-capital infrastructure. This equates to approximately $122 million of capital costs over the next 10 years that will also have to be borne by the property tax and rate payers.

Before concluding, The City of Guelph would like to reinforce the MFOA Technical Response and position on Development Charges:

- Growth should pay for growth
- There should be no ineligible services under the DCA
- There should be no service reductions / discounts
- Service levels should be forward looking and not based on historical service averages
- There should be no new mandatory development charge exemptions

The City of Guelph is requesting that solutions and options for addressing housing affordability and housing supply do not create additional burden on the municipal budget. Affordability of growth is already a concern and reducing a revenue stream that municipalities have depended upon for decades would have significant, negative impacts for the Province in reaching its housing and growth goals.

Ministry of Municipal Affairs and Housing
Office of the Minister
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

January 25, 2019

Dear Minister Clark,

Thank you for the opportunity to provide input to the Housing Supply consultation. We are writing this letter on behalf of two organizations: The Municipal Finance Officers' Association of Ontario (MFOA) and the Ontario Regional and Single Tier Treasurers group (ORSTT). Our organizations represent the chief financial officers of the largest municipalities in Ontario and a broad spectrum of municipal finance professionals throughout Ontario. This letter follows MFOA and ORSTT's joint communication on December 7, 2018 responding to a recent proposal to eliminate water and wastewater development charges coming from a C.D Howe report titled *Hosing Homebuyers: Why Cities Should Not Pay for Water and Wastewater Infrastructure with Development Charges*.

Municipalities and the Province share a common goal of ensuring that Ontario has the right housing in the right places with the necessary infrastructure. We support efforts to better coordinate and streamline approvals, however, we do not support reducing or eliminating municipal approval powers with respect to development or restrictions on revenue raising capacity to finance housing and infrastructure.

Municipalities must have the powers and tools to ensure sound development and growth in their own communities. We have only three revenue sources to fund not just infrastructure, but everything that we do: property taxes, user fees and development charges.

We are deeply concerned that attempts to address housing supply and affordability by restricting municipal use of development charges (DCs) will only make it more difficult for municipalities to emplace the needed capital works to support housing. Restrictions on DCs can, and will, have major implications for housing supply if the required infrastructure cannot be emplaced.

Background

Prior to the first Development Charges Act many large water, wastewater and transportation infrastructure projects were fully or significantly funded by the Province. Over time, the capacity created by the projects was used up. The province subsequently ended its practice of providing such capital funding.

The first Development Charges Act (DCA) in Ontario came into force in 1989. It set out rules to enable municipalities to collect DCs to fund growth-related capital costs relating to new development. The Act did not permit the recovery of operating costs or rehabilitation or replacement costs for assets. This legislation was very broad and allowed municipalities to recover 100% of growth-related capital costs.

The Act was amended in 1997, and a number of provisions were introduced that resulted in lower levels of cost recovery for municipalities, which significantly shifted growth-related costs from the development that created the costs to existing property tax and ratepayers. This places a burden on existing ratepayers that is not only inequitable, but also leads "to inefficiently low municipal service levels and other related problems for municipalities and the development industry."[1] In 2016, the Province conducted a review of the DCA. Generally speaking, input from municipalities was consistent with respect to the basic principles that growth should pay for growth, that there should be no ineligible services or cost "discounts", that service levels should be forward looking and not based on historic service averages, and that there should be no further mandatory exemptions.

Today, DCs are a major source of revenue to fund the infrastructure needed for Ontario's communities, both large and small, to grow. The timing difference between growth and the emplacement of growth-related infrastructure can be overcome "equitably when DCs are levied in conjunction with well structured user fees and property taxes".[2]

Increasing Housing Supply Consultation

The Province's December 2018 discussion paper presents five broadly themed barriers to new housing supply: speed, mix, cost, rent, and innovation. We would like to speak to each of these, but will focus mainly on cost.

1. Speed

We agree that the various approvals processes can be time consuming, difficult to navigate and involve significant compliance costs. And we support efforts to streamline development approvals processes. However, changes to development approval processes must be made with the agreement of municipal planning staff and building officials to ensure that municipalities retain the authority to ensure that development plans conform to local standards.

We are of the view that the issues related to the speed of development approvals need to be considered more broadly. Development approval timelines are overly lengthy, but so too are various infrastructure approvals that municipalities must obtain. In cases where approvals are required for critical infrastructure, such as water or wastewater services, the lack of an approval, or a delay of an approval, can bring development to a virtual halt with obvious housing supply implications.

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[1] Found, Adam. *Development Charges in Ontario: Is growth paying for growth?* Institute on Municipal Finance and Governance: (p. 2).
[2] Found, Adam. *Development Charges in Ontario: Is growth paying for growth?* Institute on Municipal Finance and Governance: (p. 9).

Top-down changes that do not consider the “on the ground” reality of municipal planning, building and/or other municipal officials and councils risk significant implementation challenges and, more importantly, risk departing from sound and accepted planning principles and locally determined planning priorities.

2. Mix

The complex interaction of housing markets, provincial policies, local planning priorities and a myriad of other factors all play a part in determining the location and types of housing and the types and location of public infrastructure to service the development.

It is unlikely that attempts to streamline complex processes will result in short-term solutions to housing supply issues or price challenges faced by many in the GTHA. We would caution against quick fixes that might seem to make the development process more effective but actually run the risk of unintended consequences and create new problems or exacerbate existing ones.

Housing affordability is, in part, the result of a number of supply and demand considerations. As noted by the Fraser Institute, when explaining house prices it is:

> …unwise to focus on any single element of housing demand when trying to explain rapid price growth. Rather, it helps to remember the fundamentals, which include population growth, income growth, housing supply and—of course—interest rates.

Numerous factors are relevant in any discussion of housing affordability, though they are not the focus of the Province’s discussion paper. Many of these factors are beyond the control of municipalities or even the Province (e.g. interest rates).

3. Cost

The discussion paper claims that development costs in Ontario are too high because of high land prices and government-imposed fees and charges.

Development charges, in particular, are identified as a “government-imposed fee that increases the costs of serviced land and housing." This is a significant concern for us, as our view is that this claim is based on inaccurate assumptions. Even as the housing market has undergone rapid changes, DCs continue to represent approximately 5-7% of the price of a new single-family home in the GTA and Ottawa. A recent study by the Royal Bank and Pembina Institute that examined the factors affecting home prices in the GTA concluded that, with respect to DCs, “the increase in these charges accounts for only a small fraction of the increase in home prices.”

It has been suggested that lowering DCs would make housing more affordable. We do not share this view. Reducing DCs will not lower housing prices nor increase land supply. Reducing DCs may actually result in complexities that could further exacerbate housing issues and create significant challenges to long term municipal financial sustainability.

We are of the view that reducing DCs would be:

A) Counterproductive: Reducing or further restricting development charges would reduce housing supply, not increase it. Less funding from DCs means growth related projects would face more competition from other demands on property taxes and user rates. Municipalities may not have the funds available to put the infrastructure in place needed for development to occur in a timely way.

B) Inefficient: We are not aware of any evidence that shows reductions in DCs would be passed from developers directly to homebuyers through a reduction in new house prices.

C) Ineffective: Existing taxpayers and ratepayers would have to fund the cost of infrastructure not recovered through DCs. This would result in higher property taxes and utility rates in growing municipalities and create a disincentive for residents to support new housing.

D) Expensive: Reducing DCs does not decrease the cost of growth-related infrastructure. Instead it transfers the cost to existing homeowners, which includes low income families and seniors. Significant increases in the whole cost of housing would be unaffordable for many.

Our belief is that development charges are not a root cause of the affordable housing and supply challenge. Accordingly, reducing the development charge would not help lower housing prices. If more municipal operating revenues are needed to cover the cost of growth, it will be at the expense of maintaining existing capital assets, services, or current property tax and user rates (Refer to Table 1). Shortchanging the public services that the people of Ontario depend on is no way to build the communities people want to live in. Nor is further exacerbating the inequity between new and existing ratepayers by further undermining the DCA.[3] Development charges are the right tool to fund the services and growth in Ontario.

Water and wastewater infrastructure must be emplaced prior to development taking place. While some would suggest that DCs should not be used to recover growth-related capital costs associated with water and wastewater infrastructure, we believe that the elimination of water and wastewater DCs would have the following impacts:

- It will reduce a municipality's ability to finance the essential infrastructure needed for growth to occur;
- It will reduce the supply of serviced land;
- It will unfairly impact existing homeowners, who would see large increases in their water

[3] According to Watson & Associates' 2010 study, "*Long-term Fiscal Impact Assessment of Growth: 2011-2021*," for the Town of Milton, DCs only paid for approximately 75% of the cost of growth-related capital due to the various DC restrictions introduced in the 1997 Act. While existing ratepayers shouldered part of the costs, voluntary payments were necessary for development to proceed without increasing debt capacity to 55% accompanied by 10-11% property tax increases. The use of voluntary payments was eliminated in the 2016 DCA review.

and wastewater rates to pay for infrastructure that does not benefit them;
- It will likely compromise municipal governments' efforts to properly fund their asset management plans, as the rate increases necessary for both growth and asset management would likely be unacceptable;
- It may increase opposition to growth as homeowners become aware that growth is causing increases in their water rates;
- There would be significant transitional issues as many municipalities have issued debt that is funded by future development charge revenue; and
- Higher water rates would reduce affordability for the people of Ontario, including seniors and lower income residents.

Finally, many municipalities make use of DC credit (sometimes referred to as 'front ending') agreements. These arrangements benefit both municipalities and developers. Developers achieve control of when the infrastructure is built; municipalities achieve freedom from budgetary scheduling constraints and price certainty. DC credit agreements can only be approved for eligible services. Existing agreements (of which there are many) could be problematic to unwind.

Table 1: Highlights of the impact of undermining DCs on property tax and ratepayers

Municipality	Impact of undermining DCs on Property tax and Ratepayers
Durham Region	• A sanitary sewer user rate increase of approximately 13% will be required to fund ongoing debt obligations if DC funding is not available. • A property tax increase of nearly 6% will be required to fund the growth-related capital program for roads or projects will have to be deferred if DC funding is not available.
Peel Region	• The elimination of water and wastewater DCs would increase user rates by approximately \$500 (73%) per household and property tax rates by \$200 - \$300 per household. • The top 5 business water accounts will face a \$800,000 to \$2.5M annual provincial infrastructure tax if water and wastewater DC's are eliminated.
City of Markham	The elimination of water and wastewater DCs would increase user rates by approximately \$700 per household.

4. Rent

We support creative housing solutions and a range of housing options that can include legal second units on or in existing properties. Municipalities must, however, be provided with enough flexibility to mitigate potentially adverse financial impacts of these new initiatives. Municipalities should be encouraged to work with various groups to see if such housing is workable in their communities. However, second units must not by-pass Building Code requirements and municipal by-laws intended to provide for the health and safety of tenants. Any efforts to streamline the process of creating second units should not be done by reducing the review and approval powers of municipal planning staff or building officials. Second units should also not be exempt from DCs since second unit occupants generate growth-related capital needs.

5. Innovation

As Treasurers and CFOs, we generally defer to others on matters such as building industry innovation, new ownership forms, and the like. Our view is that the most significant innovations will be in the development of creative housing strategies that specifically address issues of housing mix, location and affordability for all incomes and housing needs. These strategies emphasize partnerships and working with development industry leaders to expedite new approaches to the provision of housing and more efficient use of existing infrastructure.

Concluding Comments

The DC in Ontario is a highly regulated, highly prescriptive cost recovery mechanism, with detailed accountability and reporting requirements. It is the only revenue source available other than property taxes and user rates to recover the cost of infrastructure needed to support the development of new housing and employment lands. Further, it allows municipalities the flexibility to address the full cost of housing by enabling municipalities to recover growth-related costs in a way that maintains user fees and property taxes at *appropriate* levels based on local circumstances.[4] Development charges do not drive house prices, and therefore, reducing DCs will not reduce house prices. Reducing DCs will:

- reduce municipal revenues;
- negatively impact a municipality’s ability to finance growth-related capital works;
- negatively affect municipal long-term sustainability; and
- result in immediate and in many cases significant user rate and property tax increases.

A reduced ability to finance growth-related works and increased opposition to growth will only serve to delay or halt development and exacerbate housing supply problems.

We conclude by repeating our position on DCs:

- Growth should pay for growth;
- There should be no ineligible services under the DCA;
- There should be no service “discounts”;
- Service levels should be forward looking and not based on historic service averages; and
- There should be no new mandatory development charge exemptions.

In addition, should the Province choose to put measures in place that will reduce municipal

[4] Found, Adam. *Development Charges in Ontario: Is growth paying for growth?* Institute on Municipal Finance and Governance

DC revenues to fund growth-related infrastructure, the Province should replace the lost revenue with sustainable, predictable capital grants in order to not unduly burden existing residents.

Our role is to work with you in partnership to build the kind of communities that will help make this province prosper now and in the future.

We look forward to working with you on solutions that balance efforts to increase affordable housing with efficient and effective delivery of municipal services. MFOA and ORSTT would be pleased to elaborate on any of the issues included in this letter. Should Ministry staff wish to follow up, please contact MFOA's Executive Director, Donna Herridge, by phone (416-362-9001 ext. 233) or by email (donna@mfoa.on.ca).

Yours truly,

Julie Stevens
President
Municipal Finance Officers' Association of Ontario

Stephen VanOfwegen
Chair
Ontario Regional and Single Tier Treasurers

January 25, 2019

Ms. Rachel Simeon
Director, Market Housing Branch
Ministry of Municipal Affairs and Housing
14th Floor, 777 Bay Street
Toronto, Ontario
M5G 2E5

Dear Ms. Simeon:

Re: Development Charges and Housing Affordability

At the outset, we would like to thank the Ministry for the invitation to participate in the "Development Charges and Housing Affordability Technical Consultations" undertaken as part of the Province's Housing Supply Action Plan. The undersigned participated in both the Municipal Consultation held on January 9, 2019 and the Municipal/Developer Technical Consultation Wrap-up held on January 21, 2019. We would, by way of this letter, summarize our perspectives advanced during those discussions.

Watson & Associates Economists Ltd.

Watson & Associates Economists Ltd. is a firm of municipal economists, planners and accountants which has been in operation since 1982. With a municipal client base of more than 250 Ontario municipalities and utility commissions, the firm is recognized as a leader in the municipal finance/local government field. The firm's Directors have participated extensively as expert witnesses on development charge (D.C.) and municipal finance matters at the LPAT/O.M.B. for over 37 years.

Our background in D.C.s is unprecedented including:

- Having undertaken over one-half of the consulting work completed in Ontario in the D.C. field during the past decade; and
- Provided submissions and undertook discussions with the Province when the *Development Charges Act* (D.C.A.) was first introduced in 1989 and with each of the amendments undertaken in 1997 and 2015.

Development Charges and Land Supply

Within the provincial consultation document "Increasing Housing Supply in Ontario," the Province has identified five broad-themed barriers to new housing supply. The third barrier, “Costs: Development Costs are Too High Because of High Land Prices and Government Imposed Fees and Charges,” presents that:

- New housing development requires access to serviced land;
- Land prices are driven up by lack of serviced land available for development; and
- Government-imposed fees and D.C.s make it expensive to develop new housing.

The following provides our comments and perspectives on these matters.

D.C. Rates in Ontario

As a starting point, we would provide a summary of the municipal and education D.C.s across Ontario as of late 2018 (Appendix A). Based on this data, the following summary is provided:

Table 1 - Development Charges in Ontario

Development Charge for Single Detached House[1]			
Area of Ontario	High	Median	Low
GTA	$113,600	$68,200	$42,700
Central	$66,800	$25,700	$11,200
Western	$36,300	$12,000	$300
Eastern	$37,200	$7,200	$1,000

[1] Rounded

Table 2 - Development Charges - Number of Municipalities in Each Range

Development Charge for Single Detached House						
Area of Ontario	100,000 +	80,000 - 100,000	60,000 - 80,000	40,000 - 60,000	20,000 - 40,000	0 - 20,000
GTA	1	9	4	11	-	-
Central	-	-	2	2	24	16
Western	-	-	-	-	19	42
Eastern	-	-	-	-	4	46

From the above data, the G.T.A. has the highest rates with the combined charges ranging from $42,700 to $113,600 and a median charge of $68,200. All other areas in the Province have charges under $40,000 with the exception of Central Ontario which has four municipalities in the $40,000 to $80,000 range.

Development Charges as a Source of Revenue

Appendix B provides the total municipal D.C. collections by service years (2013 to 2017). The following summarizes the total collections by category along with an averaged annual collection amount.

Table 3 - Development Charge Collections - 2013 to 2017

Service Category	Total Collections 2013 - 2017	Annual Average Collections	Percentage of Total
Water, Wastewater & Stormwater	3,890,337,560	778,067,512	38.8%
Roads & Transit	3,870,082,284	774,016,457	38.6%
Fire, Police & EMS	239,969,124	47,993,825	2.4%
Parks, Recreation & Library	1,305,415,069	261,083,014	13.0%
Provincial - Go Transit	47,415,065	9,483,013	0.5%
All Other	683,259,230	136,651,846	6.8%
Total	**10,036,478,333**	**2,007,295,667**	**100.0%**

As presented:

- Water, wastewater and stormwater services account for 39% of the D.C. funds collected. These services are essential to the creation of serviced land for housing and employment;
- Roads and Transit account for another 39% of the D.C. collections. These services are essential to goods movement and for employment; and
- The remaining collections go towards protection, health and well-being. Note that the Province receives 0.5% of the total municipal collections for GO Transit service.

Development Charges as a Percentage of House Prices

Over the past five years, infrastructure costs have risen. Factors that have influenced these increases include:

- Increases in tender prices to construct infrastructure;
- Increased regulatory requirements (e.g. increased quality treatment for water/wastewater, enhanced technology requirements);
- Increased land prices; and
- Enhanced approval process (environmental assessments, public engagement, etc.).

While the D.C. rates have increased, housing prices have increased as well. The following information was presented by BILD in their 2013 and 2018 documents "Government Charges and Fees on New Homes in the Greater Toronto Area."

Table 4 - Summary of Development Charges for Selected G.G.H. Municipalities - 2013

Item	Town of Oakville	City of Brampton	City of Markham	Town of Bradford West Gwillimbury	Town of Ajax	City of Toronto
Average New Home Price 36' lot	$590,000	$490,000	$600,000	$410,000	$460,000	$540,000
Lower-Tier/Single-Tier D.C.s	$18,957	$25,351	$19,950	$29,024	$12,020	$19,412
Upper-Tier D.C.s	$35,275	$35,532	$40,107	$6,172	$20,940	
Education D.C.s	$3,665	$2,146	$2,020	$1,088	$1,964	$544
Total Municipal D.C.s	$54,232	$60,883	$60,057	$35,196	$32,960	$19,412
Total D.C.s	$57,897	$63,029	$62,077	$36,284	$34,924	$19,956
D.C.s as a % of Housing Price	**9.8%**	**12.9%**	**10.3%**	**8.8%**	**7.6%**	**3.7%**

Source: Government Charges and Fees on New Homes in the Greater Toronto Area, Revised Final Report, July 23, 2013. Altus Group.

Table 5 - Summary of Development Charges for Selected G.G.H. Municipalities - 2018

Item	Town of Oakville	City of Brampton	City of Markham	Town of Bradford West Gwillimbury	Town of Ajax	City of Toronto
Average New Home Price 36' lot	$1,200,000	$655,000	$1,200,000	$570,000	$600,000	$930,000
Lower-Tier/Single-Tier D.C.s	$33,688	$29,417	$33,687	$25,106	$16,087	$60,739
Upper-Tier D.C.s	$40,277	$52,407	$48,330	$8,983	$28,360	n/a
Education D.C.s	$6,633	$4,567	$6,407	$1,759	$2,735	$1,493
Total Municipal D.C.s	$73,965	$81,824	$82,017	$34,089	$44,447	$60,739
Total D.C.s	$80,598	$86,391	$88,424	$35,848	$47,182	$62,232
D.C.s as a % of Housing Price	**6.7%**	**13.2%**	**7.4%**	**6.3%**	**7.9%**	**6.7%**

Source: Government Charges and Fees on New Homes in the Greater Toronto Area. May 2, 2018. Altus Group.

As presented, over the past five years D.C.s as a % of average new house prices have decreased in Oakville, Markham and Bradford West Gwillimbury, increased marginally (.3%) in Brampton and Ajax and significantly (3%) in Toronto.

Tables 6 and 7 present the increases in housing prices and D.C.s over the five-year period.

Table 6 - Summary of Housing Price Increase for New Homes for Selected G.G.H. Municipalities

	Town of Oakville	City of Brampton	City of Markham	Town of Bradford West Gwillimbury	Town of Ajax	City of Toronto
Average New Home Price 36' lot (Percentage Increase)	**103%**	**34%**	**100%**	**39%**	**30%**	**72%**

Source: Government Charges and Fees on New Homes in the Greater Toronto Area. Altus Group - 2013 vs. 2018

Table 7 - Summary of Municipal and Education Development Charge Increase for New Homes for Selected G.G.H. Municipalities

Item	Town of Oakville	City of Brampton	City of Markham	Town of Bradford West Gwillimbury	Town of Ajax	City of Toronto
Municipal D.C.s	36%	34%	37%	-3%	35%	213%
Education D.C.s	81%	113%	217%	62%	39%	174%
Total D.C.s	**39%**	**37%**	**42%**	**-1%**	**35%**	**212%**

Source: Government Charges and Fees on New Homes in the Greater Toronto Area. Altus Group - 2013 vs. 2018

In other jurisdictions, D.C.s as a percentage of new home prices are lower than the G.T.A.:

Table 8 - Development Charges as a Percentage of New Home Prices for Selected Municipalities - 2018

Item	City of Barrie	City of Hamilton	City of Kitchener	City of Windsor	City of Kingston	City of Ottawa
Average New Home Price	$778,715	$770,212	$714,253	$550,110	$454,755	$562,898
Total Municipal D.C.s	$49,184	$36,769	$33,041	$22,358	$18,468	$35,047
Education D.C.s	$1,759	$1,924	$1,691	$305	$124	$2,157
Total D.C.s	$50,943	$38,693	$34,732	$22,663	$18,592	$37,204
D.C.s as a % of Housing Price	**6.5%**	**5.0%**	**4.9%**	**4.1%**	**4.1%**	**6.6%**

Source: House Prices - CMHC Market Absorption Survey

Impacts of Loss of Development Charges on the Tax and Rate Payers

The revenue sources available to municipalities to fund capital infrastructure are limited.

- **External sources** – Includes D.C. contributions, grants, *Planning Act* contributions (parkland dedications, section 37 contributions) and donations.
- **Financing** – Debt and P3 (public/private partnerships) are financing tools and assist in spreading the burden over periods of time; however, the payments are ultimately made by the tax/rate payer.
- **Internal** – Property taxes, water/wastewater/stormwater rates, user fees, reserves (note that these funds are accumulated from past taxes and rates).

As noted in Table 3, removal of D.C. revenues would have a direct and immediate impact on property taxes and user rates to fund the $2 billion annual loss. Water and wastewater alone accounts for 39% of the collections and is crucial to the creation of serviced land to supply housing and employment. A recent report released by the CD Howe Institute (dated August 14, 2018) recommended the removal of the water and wastewater D.C.s. This loss of over $780 million per year in external funding would have a major impact on water and wastewater customers. Ottawa, Peel and York Region considered the impacts of this recommendation and identified the following immediate impacts on their water/wastewater customers:

Table 9 - Impact on Water/Wastewater Bills Due to Loss of Development Charges

Municipality	Average Household Bill			User Rate Percentage Increase
	Bill Before Change	Bill After Loss of D.C. Revenue	Increase to Bill	
City of Ottawa	$826	$1,693	$837	106%
Region of Peel	$691	$1,206	$515	72%
Region of York[1]	$888	$1,417	$529	85%

[1] Includes the impact on the Region's bill only - does not include lower tier's component

The above impact on rates must be considered in conjunction with potential added capital expenditures arising from the mandatory asset management requirements of the *Infrastructure for Jobs and Prosperity Act*. Under this legislation, municipalities have four years to comply in implementing long-term capital plans for rehabbing or replacing existing assets. Given that most Ontario municipalities have existing water/wastewater capital investments per customer of $25,000-$35,000, the ability to absorb the added costs for new infrastructure without D.C. revenue would be financially unaffordable for most municipalities.

The Cost of Growth

The impact of development on a municipality is not often understood clearly. Appendix C provides a schematic overview of the different components of the municipal finance regime and how development impacts property taxes (and rates). On average, residential development creates more expenditures than it does revenue, placing upward pressure on taxes. As noted in the schematic, the purple boxes denote the need for infrastructure and the (partial) recovery from D.C.s leaving a net financial impact on the municipality. Should D.C.s be further reduced, there is a further and direct impact on taxes and rates.

Fiscal Impact Case Studies – Milton and Barrie

Our firm has undertaken numerous fiscal impact assessments to evaluate the overall impact of growth on municipalities. Most often, these are undertaken as part of an Official Plan Review in order to provide direction on the timing and phasing of development (from an affordability perspective) along with financial policies to manage the financing of the infrastructure. Two examples of the impacts of growth are provided below:

Town of Milton – Located in the G.T.A. West, it is identified as a key growth area. In 2000, it had a population of 31,500 and was “planned” to grow to approximately 175,000. The early building projections were to grow at about 1,000 units per year which has increased significantly, reaching well over 2,000 units per year for a number of years. At present, the Town's population is approximately 130,000. Planning for this municipality to grow almost six times its size required significant investment in both infrastructure and operating costs. From the fiscal impacts undertaken for each secondary plan, growth was deemed unaffordable. Observations arising from the studies included:

- D.C.s only contributed to about 75% of the growth-related costs (due to mandatory exemptions, reductions, deductions and averaging of historical service standards;
- Debt capacity would exceed 50% placing it well above the provincial limit of 25%; and
- Tax rate increases averaging approximately 10% per year were anticipated over the planning period.

Based upon the above challenges facing the Town, the growth would have to be slowed to approximately 30% of the growth targets in order to maintain financial affordability. The municipality, however, was able to negotiate with the development community to assist in mitigating the impacts. By agreement, capital contributions (in addition to the D.C. payments) were made to reduce the debt borrowing requirements (thus reducing the debt to below the capacity limits) along with the direct impact on property taxes.

City of Barrie – Located north of the G.T.A., Barrie also achieved rapid growth in the 1990s and subsequently sustained moderate growth thereafter. In 2010, the City had annexed 5,700 acres of land from Innisfil which was targeted primarily for residential development. Within the City's existing built boundary, there was significant residential lands along with employment lands to be developed. The landowners within the annexed area wished to proceed with the Secondary Plan process and potentially proceed to advance the development of the area. In addition to the financial costs of providing infrastructure to the existing built boundary area, the City was facing significant financial challenges to address replacement of aging water, wastewater, roads and other infrastructure. In attempting to address the financial infrastructure requirements within the existing built boundary along with layering the growth within the annexation lands, the City would have to consider the following impacts:

- D.C.s only contributed to about 75% of the growth-related costs (due to mandatory exemptions, reductions, deductions and averaging of historical service standards;
- Debt capacity would exceed 46% placing it well above the provincial limit of 25%; and
- Tax rate increases averaging 6% per year.

Similar to Milton, the City negotiated capital contributions to assist with reducing the debt capacity below the mandatory limit and the direct impact on property taxes (4% per year).

Note that the capital contributions mentioned for Milton and Barrie were to directly fund growth-related capital costs which were not D.C. recoverable as a result of the reductions, deductions and limitations set out in the D.C.A. Without these contributions, housing supply would have been reduced and staged to maintain affordability and sustainability. Note that with the changes imposed through the *Smart Growth for Our Communities Act, 2015* (Bill 73), the Province has sought to provide limitations in this area.

Housing Affordability in Ontario and the G.T.H.A.

Housing costs are typically the most significant household expenditure and the costs associated with housing relative to household income can have a significant impact on household well-being. Measuring affordability typically involves comparing housing costs to household income.

"Affordability," as defined in this context, is continually changing and is based on a number of parameters, including the dynamics of the housing market (supply and demand), mortgage costs (determined by interest rates), operating costs, characteristics of households (household income, position in life cycle, lifestyle choices) and government policy. Affordable housing includes both low-cost market housing for homeowners and renters, as well as non-market housing available at subsidized rates.

An analysis is provided in Appendix D. The analysis presented therein suggests that over the 2006 to 2016 period, erosion in housing affordability has been largely in the rental market, and not in the owner-occupied segment.

While new home prices have risen over the period, there are a number of factors that help explain why housing affordability in the ownership market has remained relatively steady over the period:

- The decline in interest rates over the period, which has reduced borrowing costs for mortgages and helped manage carrying costs;
- A significant shift in new housing mix to more affordable housing products – increasing absorption of townhouse and condo units as a share of total; and
- An increase in multi-generational living and other non-traditional living arrangements (largely occurring in the G.T.H.A.).

Meeting the needs of rental and affordable housing requires a significant emphasis to be placed on expanding the purpose-built rental inventory to meet growing market demand. While the secondary market and non-profit housing continue to be important suppliers of rental housing in the market, it is recognized that to significantly increase the supply of rental housing will likely require greater participation by the private-sector development community to construct purpose-built rental housing.

Conclusions/Observations

From the discussion session undertaken with members of the development/building community, and the review provided herein, it is acknowledged that there are challenges for the development/building community to address the housing needs for certain sectors of the housing market. Rental housing is one example of an area where the low profit margins and high risks may limit participation by developer/builders; however, there clearly does not appear to be a Province-wide concern with D.C. rates which would warrant a wholesale reduction/elimination of D.C.s for any particular service.

As identified by Ottawa, Peel and York, the elimination of water/and wastewater D.C.s could have a very significant impact on annual customer billings impacting existing low-income households and affecting their ability to continue to afford their present homes. It would be short-sighted to eliminate D.C.s in order to stimulate a marginal increase in housing for potential new residents while possibly causing many marginal income homeowners to lose their homes due to the increased tax/rate charges. As well, the loss of this external funding source would reduce the creation of serviced lands for housing and employment.

To best address the Province's objectives, select segments of the housing market should be considered for assistance. Aid to the developer/builder should be performance-based in order to ensure that the desired actions for that housing market segment are carried out. Assistance could come in the form of grants funded by provincial/municipal funding sources. Other forms of assistance could be considered as well (low/no interest loans, delayed payments for municipal and senior level government fees and charges).

Yours very truly,

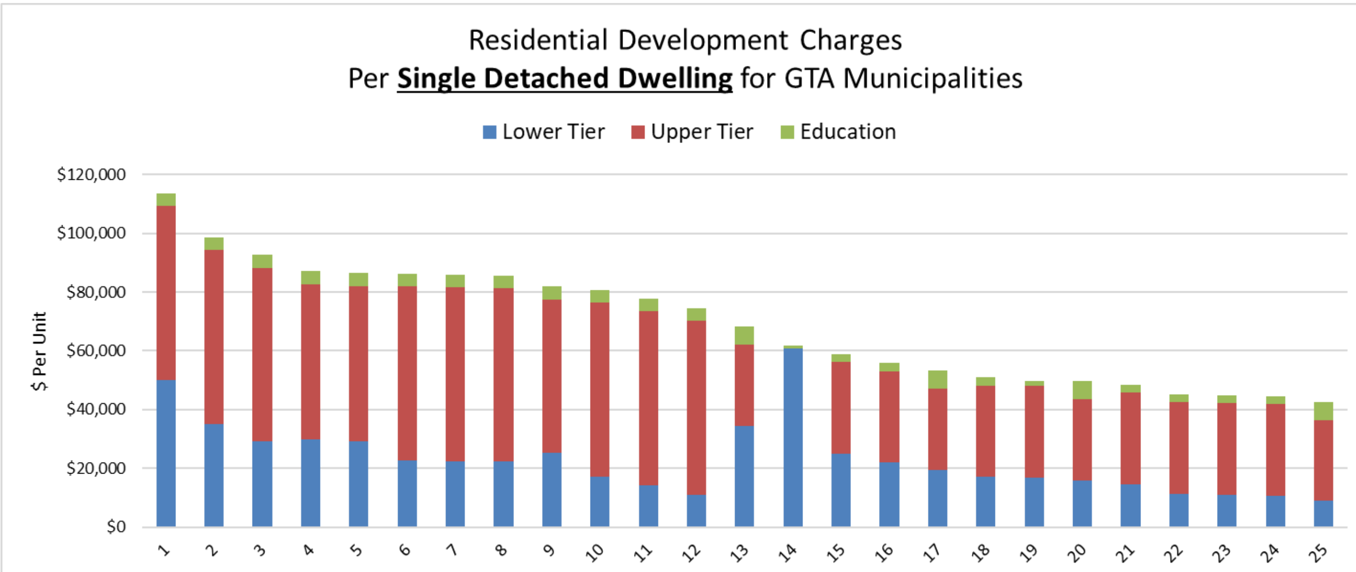
WATSON & ASSOCIATES ECONOMISTS LTD.

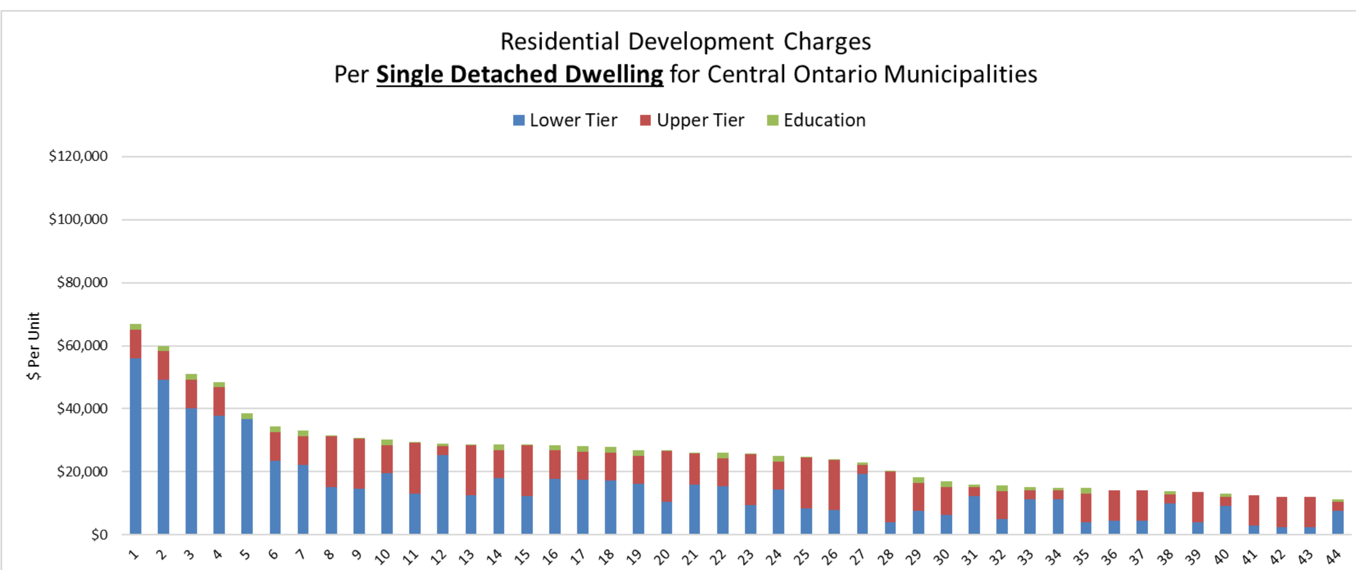
Gary D. Scandlan, B.A., PLE
Director

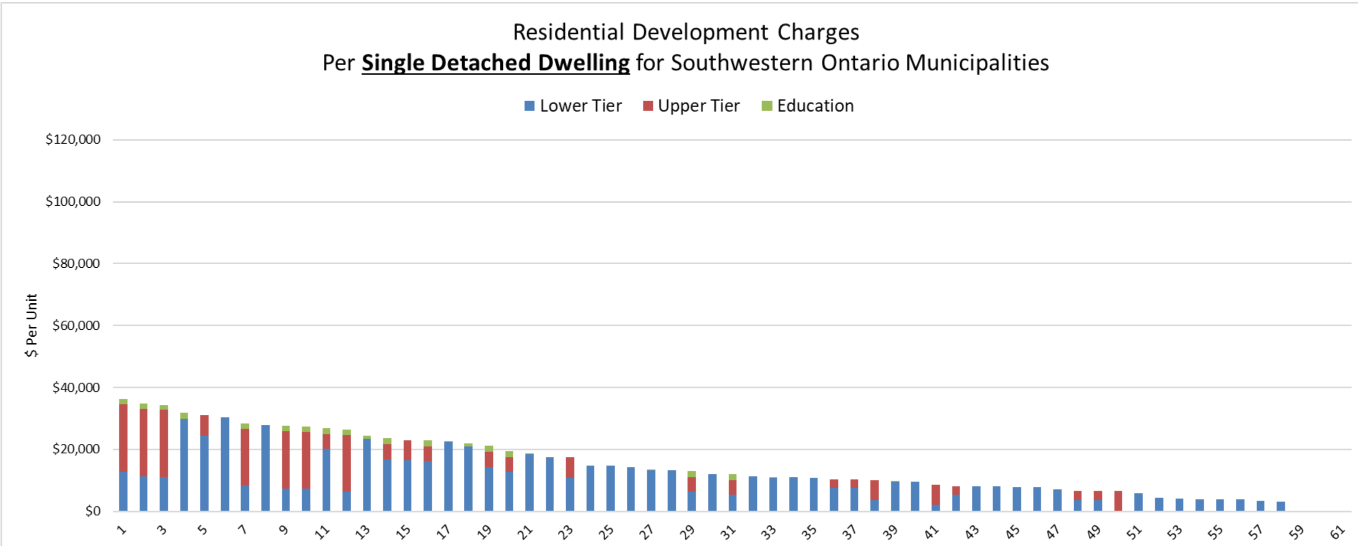
Appendices

Appendix A
Development Charges in Ontario

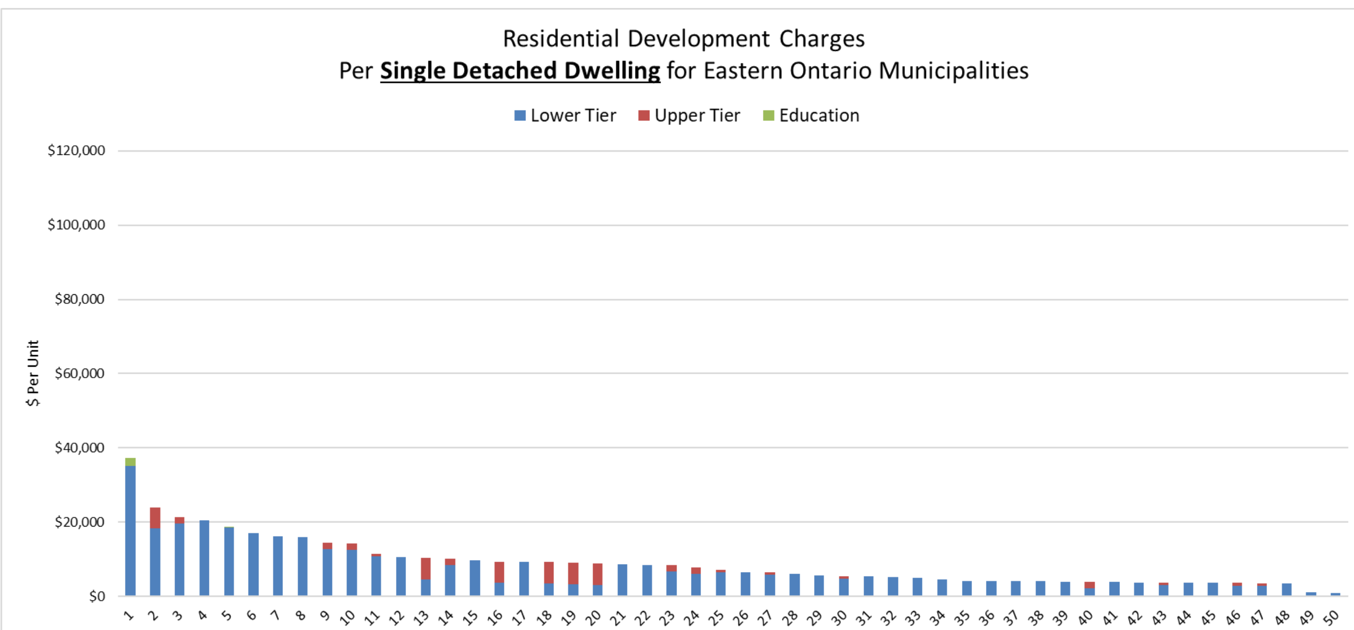
Appendix A: Development Charges in Ontario







Residential Development Charges
Per Single Detached Dwelling for Southwestern Ontario Municipalities
Lower Tier
Upper Tier
Education
$120,000
$100,000
$80,000
$60,000
$40,000
$20,000
$0
$ Per Unit



Residential Development Charges
Per Single Detached Dwelling for Eastern Ontario Municipalities
Lower Tier
Upper Tier
Education
$120,000
$100,000
$80,000
$60,000
$40,000
$20,000
$0
$ Per Unit

Appendix B
Development Charge Collections 2013 to 2017

Appendix B: Development Charge Collections 2013 to 2017

Development Charge Collections - 2013 to 2017

Service	2013	2014	2015	2016	2017	Total	Average Annual
General Government	12,050,045	12,270,754	12,829,713	21,443,520	8,654,142	67,248,174	13,449,635
Fire Protection	19,100,753	23,624,512	24,765,253	27,313,942	26,978,473	121,782,933	24,356,587
Police Protection	16,473,155	18,511,592	20,652,998	18,378,613	20,548,089	94,564,447	18,912,889
Roads and Structures	459,358,776	612,034,803	690,333,195	779,050,973	719,779,061	3,260,556,808	652,111,362
Transit	76,809,022	132,348,600	130,908,057	132,489,696	136,970,102	609,525,477	121,905,095
Wastewater	226,276,592	326,853,930	366,627,394	442,003,774	377,008,100	1,738,769,790	347,753,958
Stormwater	35,407,598	37,192,646	36,127,040	52,679,456	53,577,620	214,984,360	42,996,872
Water	249,052,732	324,843,966	373,922,202	474,822,033	513,942,477	1,936,583,410	387,316,682
Emergency Medical Services	3,112,736	4,765,936	5,128,696	4,840,840	5,773,536	23,621,744	4,724,349
Homes for the Aged	3,073,247	2,939,550	3,743,039	3,595,331	4,297,427	17,648,594	3,529,719
Daycare	2,499,810	3,301,019	3,088,376	1,760,689	2,473,840	13,123,734	2,624,747
Housing	17,947,287	18,658,790	19,786,738	16,116,747	21,684,247	94,193,809	18,838,762
Parkland Development	64,269,835	88,966,081	84,900,635	73,762,908	87,751,688	399,651,147	79,930,229
GO Transit	7,594,651	9,005,572	10,515,931	9,837,550	10,461,361	47,415,065	9,483,013
Library	28,579,595	33,673,639	32,963,569	33,161,869	34,690,844	163,069,516	32,613,903
Recreation	113,885,296	139,822,233	162,878,471	165,794,581	160,313,825	742,694,406	148,538,881
Development Studies	6,785,229	7,539,525	9,634,244	9,536,538	11,607,836	45,103,372	9,020,674
Parking	1,906,154	3,594,036	4,821,705	3,986,887	3,947,438	18,256,220	3,651,244
Animal Control	18,224	16,511	44,952	23,839	15,205	118,731	23,746
Municipal Cemeteries	38,942	69,614	55,007	170,736	108,145	442,444	88,489
Other	100,284,812	88,219,453	84,354,637	82,829,254	71,435,996	427,124,152	85,424,830
Total	**1,444,524,491**	**1,888,252,762**	**2,078,081,852**	**2,353,599,776**	**2,272,019,452**	**10,036,478,333**	**2,007,295,667**

Source: Financial Information Returns - 2013 - 2017

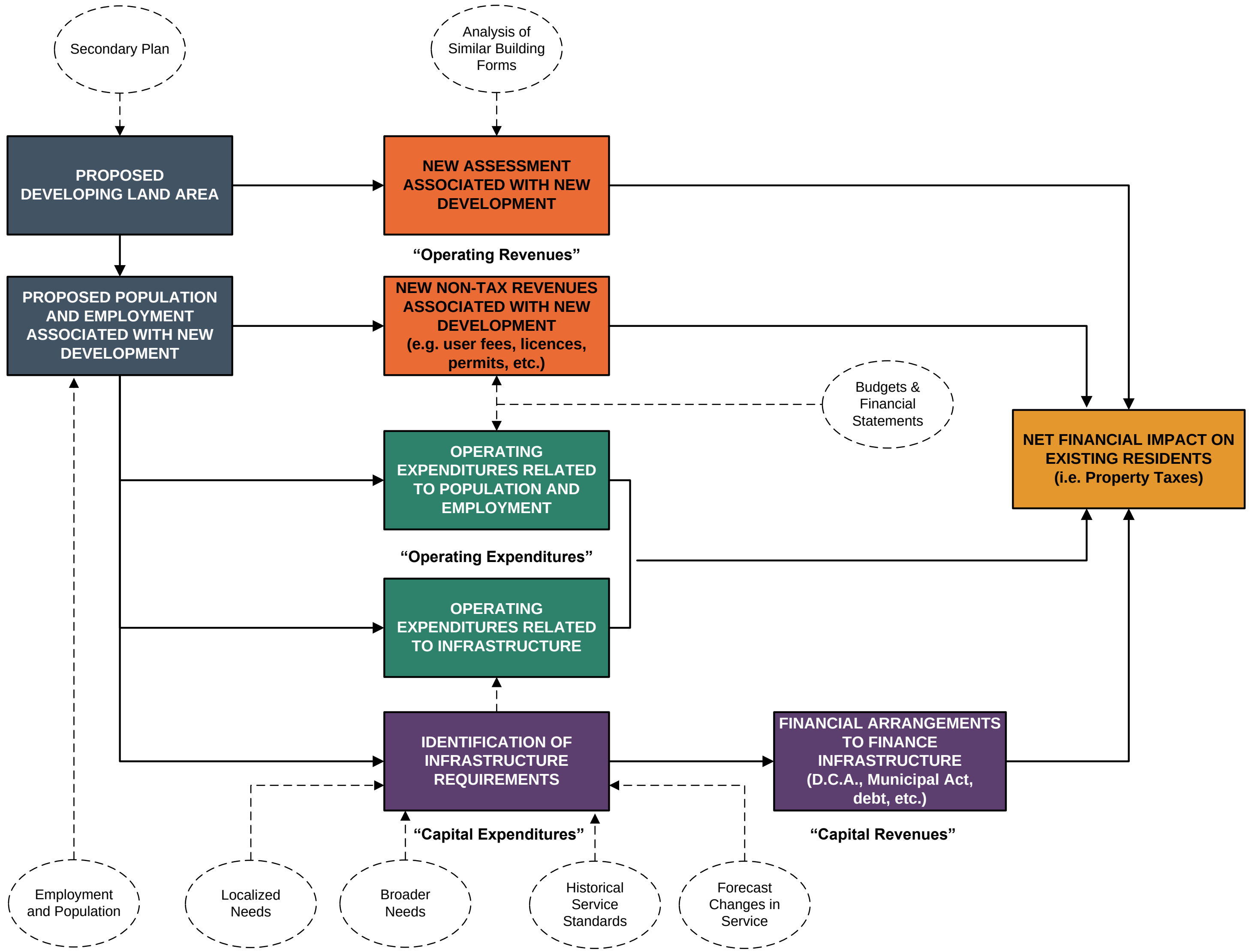
Appendix C
The Cost of Growth

Appendix C: The Cost of Growth

Figure C-1 provides a schematic overview of the impact of growth on capital and operating expenditures and revenues, which is described as follows:

- Pink Boxes – denote the anticipated development within a municipality to their Official Plan buildout.
- Fuchsia Boxes – denote the capital infrastructure needs to service the anticipated development. The capital requirements to support the servicing needs (water, wastewater, roads, fire, parks and recreation, etc.) will often be identified through growth-related studies and service master plans. Financing methods for funding the infrastructure are then considered in light of external financing recoveries (including D.C.s) and internal recoveries (reserves, transfers from operating). Any shortfalls in annual funding of the capital infrastructure is often cash flowed by the use of debt financing (the debt financing will then be included in annual operating budgets to service the principal and interest payments).
- Orange Boxes – denote the additional operating expenditures anticipated over time. These costs have been assessed on two different bases: operating costs related to infrastructure; and operating costs related to population/employment. The former identifies the specific operating costs anticipated to be incurred as additional infrastructure (i.e. treatment plants, roads, facilities, etc.) is constructed. The latter identifies program expenditures that are linked to population and employment growth.
- Blue Boxes – denote anticipated operating revenues commensurate with growth. The upper box identifies the additional assessment anticipated as residential, commercial and industrial building activity occurs over the forecast period. This new assessment gives rise to additional property tax revenue. The lower box identifies non-tax revenues such as user fees, permits, licences, etc., which are anticipated to grow in concert with population and employment growth.
- Yellow Box – denotes the overall financial impact on property taxes and rates over the forecast period. It is this impact that Council will have to consider in the future as secondary plans are approved and development approvals come forward.

Figure C-1
Overview of the Financial Impact of Growth



Appendix D

Development Charges and Affordable Housing

Appendix D: Development Charges and Affordable Housing

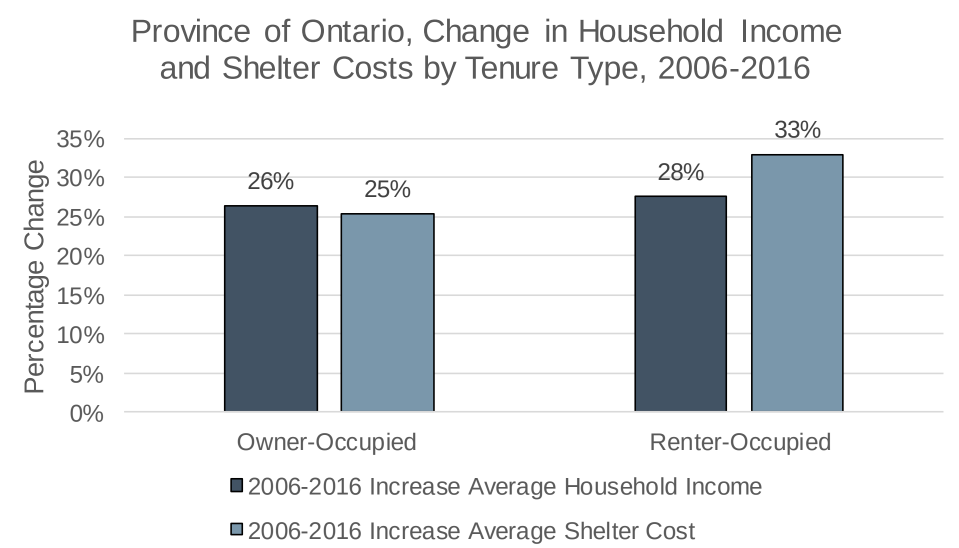
Housing costs are typically the most significant household expenditure and the costs associated with housing relative to household income can have a significant impact on household well-being. Measuring affordability typically involves comparing housing costs to household income.

"Affordability," as defined in this context, is continually changing and is based on a number of parameters, including the dynamics of the housing market (supply and demand), mortgage costs (determined by interest rates), operating costs, characteristics of households (household income, position in life cycle, lifestyle choices) and government policy. Affordable housing includes both low-cost market housing for homeowners and renters, as well as non-market housing available at subsidized rates.

<u>Change in Household Income vs. Shelter Costs, 2006 to 2016</u>

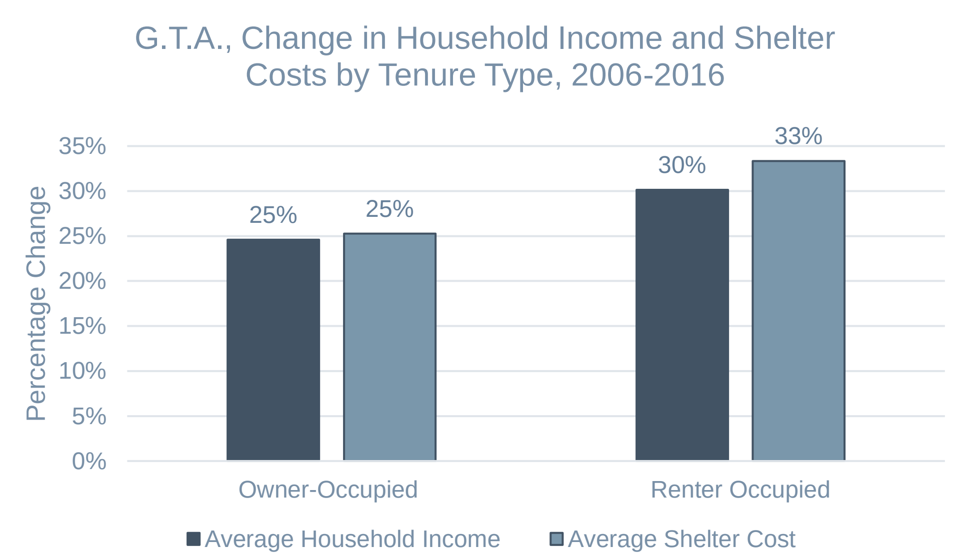
- Figures 1 and 2 summarize the percentage change in average household income and average shelter costs for owner-occupied and renter-occupied households in Ontario and the G.T.A. over the 2006 through 2016 periods, based on Census data. Key observations:
    - Owner-occupied household income has generally kept pace with increases in shelter costs over the period in the Province of Ontario and in the G.T.A.; and
    - Renter-occupied shelter costs have increased more over the past decade than household income, suggesting that there has been erosion in rental housing affordability over the period.

Figure 1



Source: Derived from Statistics Canada Census, 2006 & 2016, by Watson & Associates Economists Ltd., 2019.

Figure 2



Source: Derived from Statistics Canada Census, 2006 & 2016, by Watson & Associates Economists Ltd., 2019.

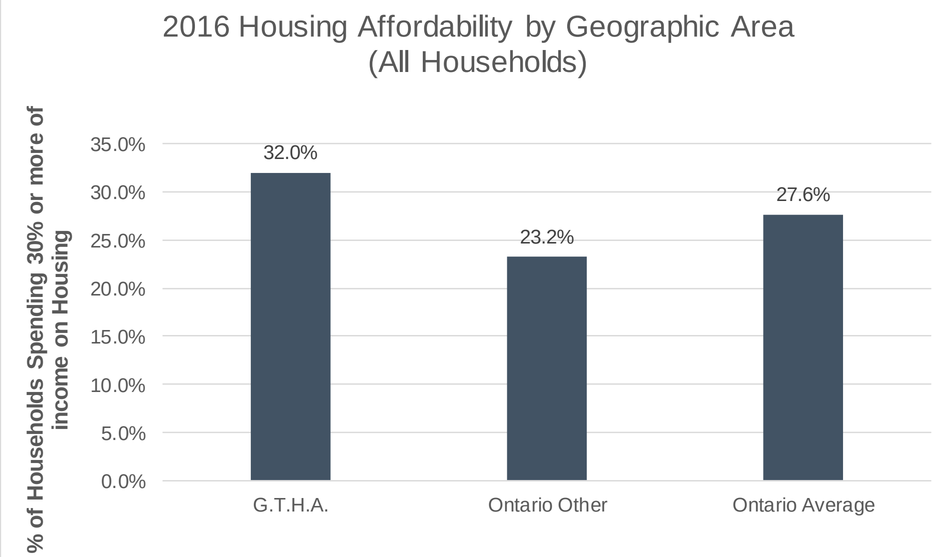
Share of Households Spending 30% or more on Shelter Costs

In Canada, housing affordability is often measured through the shelter cost-to-income ratio. A ratio of 30% is commonly accepted as the upper limit for affordable housing. Households spending more than 30% on housing are generally considered in need of more affordable housing alternatives. This measure is applicable to both owner-occupied and rental dwellings.

Figures 3 through 6 illustrate the share of households in Ontario spending 30% or more of household income on shelter costs. This data provides insight into the relative affordability challenges by geographic location, housing tenure and how affordability has changed over the past decade (2006 to 2016). Key observations:

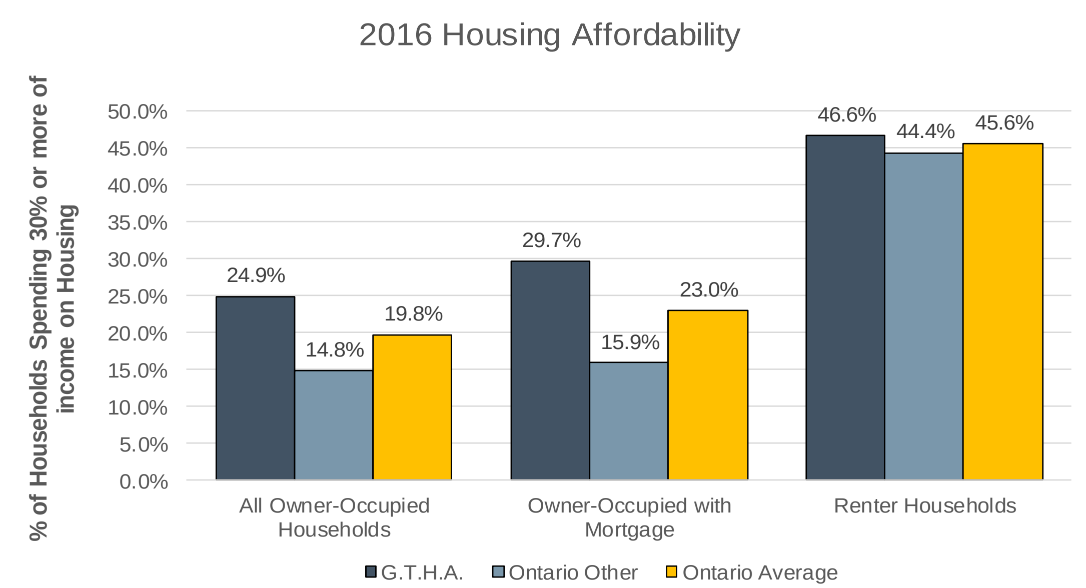
- In 2016, 27.6% of Ontario households spent more than 30% of their household income on shelter costs. The share of households spending more than 30% of household income on shelter costs was higher in the G.T.H.A. than elsewhere in the Province (32.0% vs. 23.2%);
- 45% of renter-occupied households in Ontario are spending 30% or more of household income on shelter costs – a significantly higher share than owner-occupied households. There is minimal variation between the G.T.H.A. and the rest of Ontario with respect to this metric;
- 20% of owner-occupied households in Ontario are spending 30% or more of household income on shelter costs. The share is notably higher in the G.T.H.A. vs. elsewhere in the Province (25% vs. 15%). The share of households is higher when considering only owner-occupied households with mortgages. In the G.T.H.A., 30% of owner-occupied households with mortgages are spending 30% or more of household income on shelter costs. This is compared to 16% in the rest of the Province;
- The share of owner-occupied households with mortgages spending more than 30% of household income on shelter costs has declined marginally between 2006 and 2016. This trend has been observed in both the G.T.H.A. and in the rest of the Province; and
- With respect to renter households, the share of households spending more than 30% of household income on shelter costs has increased marginally between 2006 and 2016; this increase has been observed both provincially and in the G.T.H.A.

Figure 3
Share of Households Spending 30% or More of Household Income on Shelter Costs, 2016



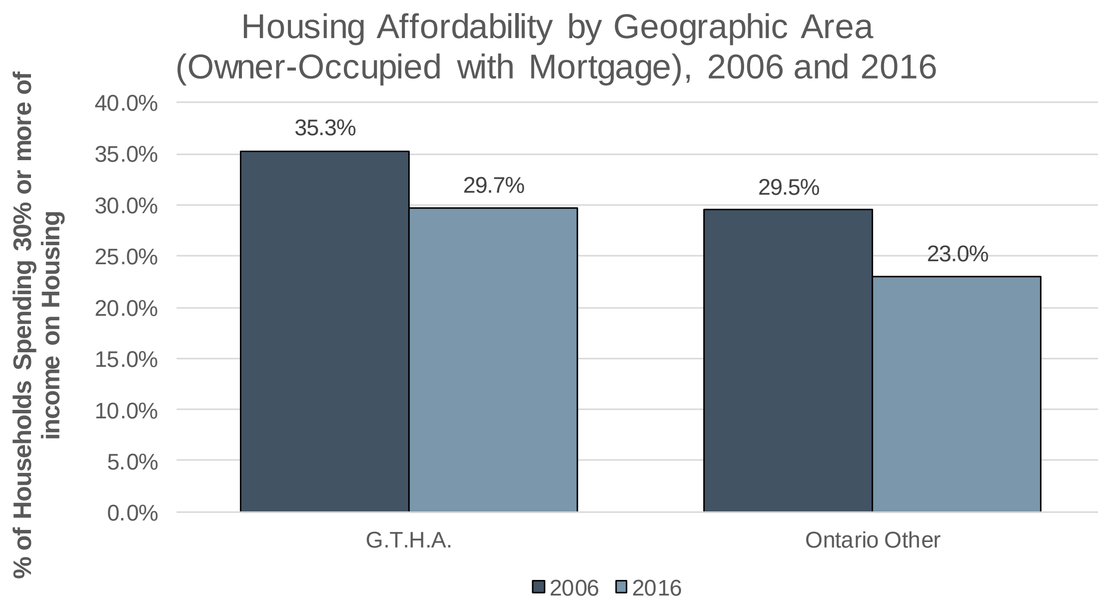
Source: Data from Statistics Canada, 2016 Census of Population, Catalogue no. 98-400-X2016228 by Watson & Associates Economists Ltd., 2018.

Figure 4
Share of Households Spending 30% or More of Household Income on Shelter Costs, 2016



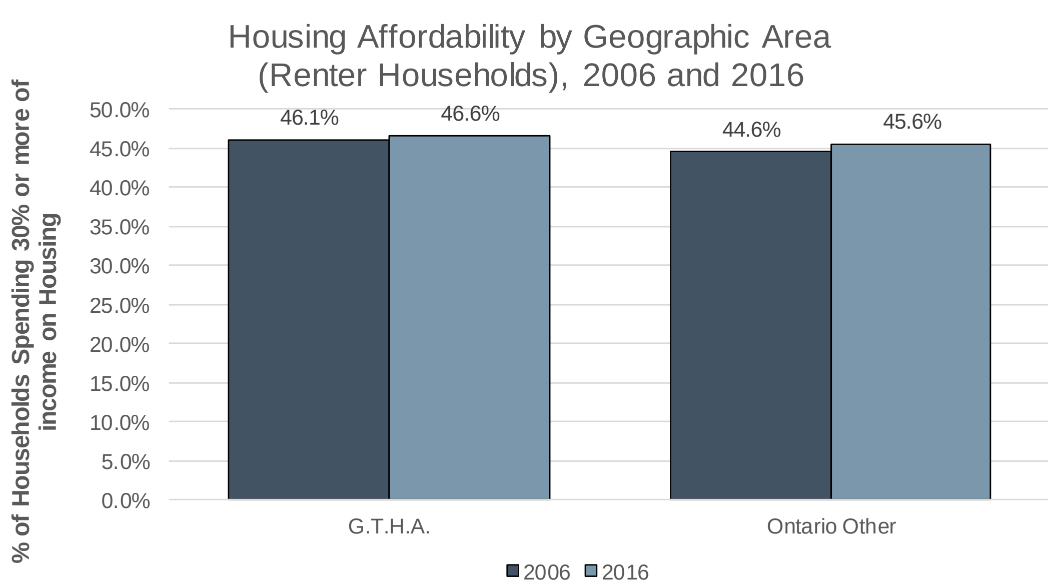
Source: Data from Statistics Canada, 2016 Census of Population, Catalogue no. 98-400-X2016228 by Watson & Associates Economists Ltd., 2018.

Figure 5



Source: Data from Statistics Canada, 2006 and 2016 Census of Population, Catalogue no. 97-554-XCB2006038 and 98-400-X2016228 by Watson & Associates Economists Ltd., 2018.

Figure 6



Source: Data from Statistics Canada, 2006 and 2016 Census of Population, Catalogue no. 97-554-XCB2006038 and 98-400-X2016228 by Watson & Associates Economists Ltd., 2018.

Observations

The analysis presented herein suggests that over the 2006 to 2016 period, erosion in housing affordability has been largely in the rental market, and not in the owner-occupied segment.

While new home prices have risen over the period, there are a number of factors that help explain why housing affordability in the ownership market has remained relatively steady over the period:

- The decline in interest rates over the period, which has reduced borrowing costs for mortgages and helped manage carrying costs;
- A significant shift in new housing mix to more affordable housing products – increasing absorption of townhouse and condo units as a share of total; and
- An increase in multi-generational living and other non-traditional living arrangements (largely occurring the G.T.H.A.).

Need for Affordable Rental Housing

To maintain a well-balanced, strong community and ensure long-term sustainability, it is vital that municipalities offer a wide range of housing options for a broad range of income groups, including a provision for rental housing and affordable housing.

Market demand for rental housing has been increasing due to a number of factors, including a growing population, the erosion in housing ownership affordability**,** and changing demographics (e.g. aging population). Despite this, there has been a limited supply of new purpose-built rental housing developed in the past 15 years. Instead, the majority of new rental units has come through the secondary market – condominium units rented by owners and second suites – as well as non-profit housing development.

Meeting the needs of rental and affordable housing requires a significant emphasis to be placed on expanding the purpose-built rental inventory to meet growing market demand. While the secondary market and non-profit housing continue to be important suppliers of rental housing in the market, it is recognized that to significantly increase the supply of rental housing will likely require greater participation by the private-sector development community to construct purpose-built rental housing.

The limited supply of new purpose-built rental housing in the G.T.H.A., combined with increasing demand, has driven the vacancy rate to record lows. Currently, the average vacancy rate for purpose-built rental units in the G.T.H.A. is 1.3%. This is compared to a 3% vacancy rate typically observed in a balanced rental market, suggesting that the G.T.H.A. is constrained with respect to supply.

The preference for condominium developments (as opposed to purpose-built rentals) by developers has been largely driven by financial considerations. Unlike condominium projects, which usually require large down payments from unit buyers in advance (pre-sale of units), rental apartments require the developer to cover most of the initial construction costs. The risk can often dissuade builders from investing in these projects. Further, the developer must often rely on a rental revenue stream over a longer time period to recoup initial investment, compared to selling units immediately after project completion in a condominium development. There is also more uncertainty in rental revenue streams due to government rent controls and potential vacancies which can negatively impact future cash flow.

CITY OF **Burlington**

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905-335-7675
angela.morgan@burlington.ca

January 29, 2019

Honourable Steve Clark
Ministry of Municipal Affairs and Housing
steve.clark@pc.ola.org

Honourable Rod Phillips
Ministry of the Environment, Conservation and Parks
minister.mecp@ontario.ca

SUBJECT: Bill 66 - An Act to restore Ontario's competitiveness by amending or repealing certain Acts

Please be advised that at its meeting held Monday, January 28, 2019, the Council of the City of Burlington approved the following recommendation:

> Whereas, the Government of Ontario has introduced Bill 66, an Act to restore Ontario's competitiveness by amending or repealing certain Acts; and
>
> Whereas, Schedule 10 of the proposed legislation would have amended the Planning Act to allow municipalities to pass "open-for-business planning by-laws"; and
>
> Whereas, the Bill would have allowed such by-laws to override important planning, water, agricultural and environmental protections contained in the Clean Water Act, 2006, the Greenbelt Act, 2005, the Places to Grow Act, 2005, and other provincial legislation; and
>
> Whereas, no notice or public hearing would have been required prior to the passing of such a by-law nor were there to be any appeal rights thereafter; and
>
> Whereas, the Greenbelt is an integral component of land use planning that complements the Growth Plan to encourage smart planning, the reduction of sprawl, protection of natural and hydrological features and agricultural lands; and

Whereas, Burlington's land mass is 50% rural, and the Greenbelt protects 1.8 million acres of farmland, local food supplies, the headwaters of our rivers and important forests and wildlife habitat; and

Whereas, a permanent Greenbelt is an important part of the planning for sustainable communities; and

Whereas, Burlington presently has 509 acres (206 hectares) of vacant employment land supply within the urban boundary ready to be used for business, without the need to weaken the protections provided by the Greenbelt or effectively remove land from it; and

Whereas, protections like those included in the Clean Water Act are critical to the health of Burlington residents; and

Whereas the government has said it will now remove Section 10 from Bill 66; and

Whereas, nevertheless, Burlington City Council wishes to declare our commitment to protecting the Greenbelt, opposing urban boundary expansion, and protecting access to clean water;

Therefore, be it resolved,

That Schedule 10 in Bill 66 does not represent how the City of Burlington and its residents want to do business; and

That the City of Burlington opposes provisions in Schedule 10 of Bill 66, that amend, repeal or override the Clean Water Act, 2006, the Greenbelt Act, 2005 and other important legislation in the public interest and applauds their removal from the Bill; and

That notwithstanding the announced changes to Bill 66, the City of Burlington will not exercise any powers granted to it in this or any future sections or schedules to pass such planning by-laws where they are contrary to the City's Official Plan; and

That the approval of a Bill 66 by-law clearly requires that the integrity of the Greenbelt and source water protection be achieved; and

That this resolution be distributed to: the leaders of all parties represented in the Legislature; the Minister of Municipal Affairs and Housing; the Minister of the Environment, Conservation and Parks; all Greater Golden Horseshoe municipalities, Halton MPPs, Environmental Defense, the

Association of Municipalities of Ontario, the Ontario Federation of Agriculture, and the Friends of the Greenbelt Foundation.

If you have any questions, please contact me at extension 7702 or the e-mail address above.

Sincerely,

AMorgan

Angela Morgan
City Clerk

Cc: Halton MPPs
All Greater Golden Horseshoe Municipalities
Environmental Defense
Association of Municipalities of Ontario
Ontario Federation of Agriculture
Friends of the Greenbelt Foundation