



November 23, 2022

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor - 777 Bay St.
Toronto, ON
M7A 2J3

Dear Minister Clark,

Re: Proposed Bill 23, More Homes Built Faster Act, 2022

On behalf of The Corporation of the City of Waterloo, please accept the following comments on the proposed Bill 23, *More Homes Built Faster Act, 2022*.

Bill 23 is proceeding quickly through the legislature. Due to the recent municipal election and council transition, Waterloo City Council has not had an opportunity to review and evaluate Bill 23, nor provide comments. With tight commenting timelines, and highly consequential changes being proposed, the enclosed comments on the proposed Bill 23 are advanced by City staff for Provincial consideration.

The City of Waterloo supports the objectives of increasing the housing supply and streamlining the development approvals process. The City has strategically planned for growth, focusing intensification within designated nodes and corridors, and completing Station Area Planning for Major Transit Station Areas along the ION / LRT corridor in 2017. Intensification is complemented by thoughtfully planned greenfield subdivisions that protect significant natural features and systems, and the countryside line. The result has been robust growth, economic vibrancy, and a broad range of housing opportunities in our community. We currently estimate

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over 20,000 dwelling units in various stages of the development pipeline, which exceeds the 16,000 provincial target for Waterloo. This includes:

- a. Approximately 11,000 units that either have active building permits or are in the site plan review process;
- b. An approved district plan for an additional ~2,300 units in northwest Waterloo; and
- c. Planning applications for 6,900 new housing units are actively being worked on.

We are committed to doing our part to increase the housing supply and meeting the Provincial targets of 16,000 units for Waterloo over the next decade, while achieving the high land use planning standards our community expects.

There are components to Bill 23 that will positively contribute to increasing the housing supply in a manner that is cost-effective to the tax payer, and sympathetic to existing communities.

We support these components, which include:

- As of right permissions for up to three (3) dwelling units on residential properties. Such permissions will create opportunities for gentle density and missing middle housing. In alignment with the proposed Bill 23, earlier this year, the City amended its Official Plan to enable up to three (3) dwelling units on residential properties in a broad range of low-rise residential areas, as well as medium-rise residential areas, to encourage denser forms of context sensitive smaller scale intensification (re: OPA 34).
- Additional resources to support the Ontario Land Tribunal (OLT). This will undoubtedly unlock housing supply by breaking the backlog of OLT cases and expediting hearings.
- Fast tracking new zoning for Major Transit Station Areas (MTSAs) to support transit-oriented development and to ensure significant capital investments are appropriately leveraged. In the City of Waterloo, enabling mixed-use developments in MTSAs has the potential to significantly increase new housing opportunities. As previously noted, the City completed Station Area Planning for MTSAs in 2017, however we have not been able to activate the residential component of our planning framework due to existing legislative barriers that require an upper-tier municipal comprehensive review to be

completed prior to enabling mixed-use developments in employment areas. In August 2022, the Region of Waterloo amended its Official Plan (re: ROP Amendment No. 6), after completing the requisite municipal comprehensive review – we are hopeful that the amended Regional Official Plan will be approved by the Province in the near future, so that we can unlock the potential of Waterloo’s lands for more homes by implementing our comprehensive Station Area Planning initiative.

- The 2031 Municipal Housing Target for the City of Waterloo is 16,000 dwelling units. The City’s current zoning framework can accommodate multiples of the target. While the City will do our part to ensure development capacity exists, we recognize that the construction of new housing is contingent upon the development industry doing its part to construct the units (including affordable and attainable housing units) in a timely manner, and that new construction is influenced by a wide range of factors beyond Provincial and municipal control including economic conditions, a shortage of skilled tradespeople, supply chain disruptions, and developer disputes. Provincial commitment to supporting municipalities should be clear and deep, including infrastructure funding and investment. Like municipalities, the development industry must pledge to construct new dwelling units at the needed pace, including affordable and attainable housing. Recognizing that we all must do our part, a collaborative approach is needed to achieve positive results.

There are various aspects of Bill 23 that are of concern to the City of Waterloo, and which could result in unintended negative consequences. We request that the Province defer Bill 23 until further evaluation and consultation can be undertaken with municipalities. Municipalities at both the upper-tier and lower-tier levels have significant day to day experience in dealing with the challenges relating to the current planning framework and can offer valuable insights. Let’s work together to find solutions and achieve our shared goals. We offer the following comments:

- **Deferral:** In a letter dated November 16, 2022 to Premier Ford (attached), Waterloo City Council advanced a request to the Province to defer Bill 23 at the committee stage until such time as further evaluation and analysis can be undertaken, coupled with

additional consultation between the Province and its municipal partners. We believe the outcome of such a deferral would be positive refinements to the proposed Bill 23 to the benefit of Ontarians. Moving quickly is imperative, but so is getting Bill 23 right, and the full impacts of the proposed Bill 23 must be explored and negative impacts mitigated prior to implementation. As stated by the Ontario's Big City Mayors, there is no such thing as a one-size fits all approach with municipalities, driving the need for more in-depth consultation between the Province and its municipal partners.

- **Operational / Capacity Challenges:** The scope of the proposed Bill 23, in combination with Bill 109, and the recently introduced *Better Municipal Governance Act, 2022* (Bill 39), is significant, and is anticipated to result in significant financial and operating pressures for municipalities, including the City of Waterloo. With limited resources, we are already extremely busy rapidly processing a high volume of development applications, taking an “all hands on deck” approach. The scope and speed of the upcoming and proposed legislative changes is unprecedented. Transition regulations will be critical to achieving a positive outcome, and must be carefully drafted to acknowledge and reflect current municipal operating realities and labour market constraints. In addition, sufficient time is needed for municipalities to retool and pivot in response to Bills 23, 39 and 109. Building up operating capacities to achieve new proposed levels of service will take time, in part due to the limited funding tools available to municipalities to finance new hires, and the small pool of qualified and experienced candidates available in the marketplace. Absent additional funding, it is unclear how municipal financial impacts will be managed. Significant tax and rate increases are not supported by the City, in part because such increases negatively impact housing affordability in the broader community, contrary to our shared housing objectives.

In addition to the concerns set out above, we offer the following preliminary comments based on review of the proposed legislation to date:

- **Development Charges and Community Benefit Charges:** Bill 23 proposes numerous changes to the Development Charges Act and Planning Act that, if passed, will

significantly impact how municipal governments recover the costs associated with growth. We maintain support for the widely accepted concept that 'growth should pay for growth'. As currently proposed the potential loss of DC revenue for Waterloo exceeds \$23M (27% reduction) over the next five years and we believe it is incumbent on the Province to fill this funding gap and not leave it for the general property tax base or rate payer to pay.

Municipalities have limited funding tools. Unless funded by the Province, Bill 23 will shift certain growth costs to the tax base/rate payers. Significant increases to municipal taxes and utility rates to off-set funding shortfalls created by Bill 23 will have a negative impact on affordability for existing homeowners and will surely be met with public outcry, particularly during this time of increased cost of living and high inflation. Further, Bill 23 fails to incent or require developers to pass on any savings to home purchasers or renters.

Unlike many municipalities where growth is primarily low-rise greenfield housing, the majority of growth in the City of Waterloo is infill and intensification, which more effectively leverages existing infrastructure and capital investments in servicing, transit and active transportation. Bill 23 will have significant financial impacts on intensifying municipalities like Waterloo. The mandatory 5-year phase-in, discounts for rental housing, loss of funding for studies, affordable housing exemptions, loss of some land eligibility, a shift to a 15-year service life from 10 years, will collectively reduce the capital funding for growth related infrastructure by an estimated \$23M-\$31M (27%-36% reduction in revenues) in a five year period within the City of Waterloo. These figures are understated as no assumptions have been included for attainable housing, nor have operating impacts been factored in. This funding gap will need to be filled by the Province, otherwise municipalities will face large increases to property taxes, utility rates and/or a reduction in the construction of growth related infrastructure, or a combination thereof.

It should be noted that while there may be some balances in DC Reserves, this is not extra cash. A positive overall consolidated DC reserve balance ensures that there is

money available for the City to move forward with planned investments in multi-year capital growth infrastructure. As DCs are not a guaranteed revenue stream, the timing of when DCs are received in comparison to budget is not linear.

It is recommended that the Province remove the proposed changes to the Development Charges Act and Planning Act that, if passed, would negatively impact how municipal governments recover the costs associated with growth. Alternatively, significant ongoing Provincial funding to municipalities will be required in order to offset or mitigate the potential impacts to the tax base and/or delays in construction of growth related infrastructure.

- **Parkland:** Bill 23 proposes various amendments to the Planning Act with respect to parkland. Of particular concern are two components of the proposed Bill 23. First, the concept of counting encumbered parkland / strata parks and privately owned publicly accessible spaces (POPS) towards satisfying the parkland requirement. Particularly for intensifying municipalities like Waterloo, ample and high quality parkland is critical to meeting community needs, as demonstrated throughout the pandemic. If lowered parkland contributions are an outcome of Bill 23, the lands provided should not be encumbered. Servicing, utility and other encumbrances can significantly limit the function, usability and design of parkland, to the detriment of Ontarians. Strata parks may work, depending on design, location, configuration, and the abutting non-park land use – the acceptance of strata parks could be encouraged by policy, but should be left to the discretion of municipalities to determine how or if the proposed strata park is appropriate based on criteria established through the required Park Plan pursuant to subsection 42(4.1) of the Planning Act. POPS are an emerging concept, and like strata parks, are complicated – the acceptance of POPS towards the parkland contribution (in whole or in part on a prorated basis based on design, location, and public recreational services provided) could be encouraged by policy, but should be left to the discretion of municipalities to determine how or if the proposed POPS is appropriate based on criteria established through the required Park Plan pursuant to subsection 42(4.1) of the Planning Act.

Second, Bill 23 proposes maximum parkland rates for developments containing affordable residential units, attainable residential units, or inclusionary zoning units. As written, the legislation provides no distinction between developments based on the amount of affordable / attainable / inclusionary zoning units provided. A development with one percent (1%) affordable housing units is treated the same as a development with seventy five percent (75%) affordable housing units. It is recommended that the maximum parkland rate provision be prorated based on the number of affordable / attainable / inclusionary zoning units in the development compared to the total number of units constructed for equity in application.

- **Tax-Based Subsidies for Affordable Housing:** Affordable housing is critically needed throughout Ontario. Bill 23 proposes to exempt affordable housing, attainable housing and inclusionary zoning units from development charges, community benefit charges, and parkland dedication. As written, the legislation does not incorporate necessary controls or protections related to the future sale of “attainable units” to ensure they remain attainable. Without such controls or protections, Bill 23 may amount to a subsidized capital gain for the development industry or other real estate investors, to which the City is opposed, and would be contrary to our shared objective of providing long-term affordable and attainable housing in Ontario.
- **Inclusionary Zoning:** Bill 23 proposes a maximum 25-year affordability period for inclusionary zoning units, a five percent (5%) cap on the number of required inclusionary zoning units, and a standardized approach to determining the price or rent of an affordable unit.

The City is supportive of a standardized approach to determining the price or rent of an affordable unit, but would recommend that a definition be provided for *average market rent* (AMR) and *average resale purchase price* to ensure consistent application of IZ regulations.

We are concerned with the 25-year affordability period as a maximum, for reasons including:

- (i.) 25-years is a relatively short period of time in relation to housing;
- (ii.) the significant loss of affordable housing units in the medium term (after 25-years);
- (iii.) the significant loss of affordable housing units in high-order transit areas after 25-years;
- (iv.) the short duration is less attractive to municipalities with respect to subsidizing inclusionary zoning units to create deeper affordability;
- (v.) the approach limits variations in how inclusionary zoning can be implemented, such as a municipality requiring a lower percentage of units (e.g., 3% instead of 5%) but requiring a longer duration (e.g., 99-years rather than 25-years), which may be preferable to the developer.

It is recommended that a period longer than 25-years be considered, under the lens of securing longer term affordable housing within Ontario and creating flexibility in how inclusionary zoning is applied based on the conclusions of the required assessment report pursuant to Ontario Regulation 232/18.

Based on available information and current market conditions in Waterloo, the five percent (5%) cap on the number of inclusionary zoning units appears reasonable. However, if market conditions change and a higher percentage can be justified through the required assessment report pursuant to Ontario Regulation 232/18, it would be unfortunate to not be able to realize the additional affordable housing units due to the proposed legislation. The assessment report and inclusionary zoning by-law are enacted through an open and transparent planning process, creating sufficient certainty to the development industry, in our opinion – we do not believe the cap is necessary.

In addition to the above, there is a missed opportunity to advance Provincial and municipal objectives related to increasing the supply of affordable housing. It is recommended that the Province, through Bill 23, expand the locations to which inclusionary zoning applies beyond MTSA's, to include designated nodes and corridors as delineated and described in an official plan. The City of Waterloo has comprehensively planned for growth and intensification, and would benefit from being

able to apply inclusionary zoning to certain nodes and corridors in the city that are outside MTSAs but are well served by transit and planned for medium and high densities, subject to feasibility being demonstrated through the assessment report required under Ontario Regulation 232/18.

- **Regional Planning:** Bill 23 proposes to designate the Regional Municipality of Waterloo as an “upper-tier municipality without planning responsibilities”. It is recommended in particular that this component of Bill 23 be deferred until after Bill 39 is acted upon. We believe the Provincial facilitator appointed under Bill 39 will observe and realize the collaborative and efficient working relationship existing between the Region of Waterloo and each of the lower tier municipalities, and the merits of the Region retaining select planning functions. Planning for and coordination of large scale transportation and infrastructure servicing works, land budgeting, and protection of the countryside line, significant cultural heritage, and natural features / systems is most effectively planned at the regional level in our experience. Any modifications to planning-related responsibilities should be carefully reviewed and considered in discussion with all stakeholders.

Of note, if certain upper-tier planning responsibilities are removed from the Region of Waterloo and delegated to lower-tier municipalities, the lower-tier municipalities will be required to hire or contract out a broad range of planning services in order to secure expertise currently provided by the Region. This approach is inefficient in our opinion, increases the likelihood of inconsistent results across the region, and will potentially increase costs to developers.

If upper-tier planning responsibilities are removed from the Region of Waterloo, it appears that certain decisions would then rest with the Province (e.g., Official Plans and Official Plan Amendments), which will increase the workload at the Provincial level. We know how busy the ministries are managing current provincial responsibilities. In our opinion, refinement of the current scopes of responsibility would be the most efficient and effective approach for our region through Bill 39, as the Region has

existing staff and processes in place to efficiently complete necessary technical compliance reviews and issue timely decisions.

Absent careful review with all stakeholders, the proposed modifications do not have the effect of increasing efficiency, and risk creating additional cost and delay.

- **Conservation Authorities:** As indicated by AMO, the proposed amendments to the Conservation Authorities Act and the Planning Act in Bill 23 are concerning, as they signal a move away from an appropriate level of environmental review and protection at a time when climate change impacts are being felt more and more at the local level. Environmental protection and sustainable community building is a cornerstone of Waterloo's success, and should be a priority consideration in land use planning.

Like municipalities, conservation authorities are not all the same. The Grand River Conservation Authority (GRCA) is a valued partner in our local development approvals process, and in our experience, fulfills its mandate in a constructive, collaborative and professional manner. Within our municipality, the GRCA has never appealed a development application. The GRCA should be held up as an example of how conservation authorities positively contribute to local planning for floodplains, hazard lands, wetlands, and conservation areas.

The City is concerned with scoping the duties and authorities of the GRCA. For example, the proposed updates to the Ontario Wetland Evaluation System shifts planning-related responsibilities for wetlands solely to municipalities. Wetland ecology and hydrogeology is complicated and relies on specialized expertise currently housed with the GRCA. The proposed modifications would require the City to hire or contract out specialty services currently provided by the GRCA. This is inefficient in our opinion, increases the likelihood of inconsistent results across the watershed, and will potentially increase costs to developers. Further, given the connections that exist between wetlands and flooding, we believe it is best that the GRCA retains its current authorities.

With respect to the removal of wetlands if “net positive impact is demonstrated”, the City is open to the concept where appropriate.

Further information is required to better understand the implications of no permits for regulated areas if the activity is part of a development authorized under the Planning Act. If this amendment is passed, it should be expanded to provide for municipal authority to apply conditions to developments in regulated areas, in order to avoid unintended consequences and/or to avoid municipalities taking a conservative approach to land use planning in regulated areas to minimize risk.

- **Site Plan Control:** Most buildings remain in a community for 50-100 years, and design matters. Landscaping and urban design are critical to creating successful built environments and a sense of community identity, particularly in the context of infill and intensification. The Ontario Professional Planners Institute (OPPI) conference this year centered around strengthening the relationship between planners and landscape architects as key contributors to urban design.

While many developers will make every effort to achieve good urban design because they value and understand its importance, equally many will not unless they are held to minimum standards. We are concerned with the proposed amendments to Section 41 of the Planning Act, and the potential for undesirable outcomes. The controls in question are necessary to ensure positive outcomes, consistency within the built environment, and to maintain property values, prevent offensive design elements, mitigate undesirable impacts (e.g., wind), foster sustainable design, etc. It is appropriate for municipalities to evaluate exterior design (including architectural details) and landscaping through the site plan process. In our experience, such evaluations have minimal impact on application timelines and generally have very positive outcomes. If the Provincial concern relates to one or more municipalities overstepping their authority granted under Section 41, we believe the preferred solution to be restricting exterior design (including sustainable elements) and landscaping authorities under Section 41 to urban design standards embedded into municipal Official Plans – this approach ensures expectations are clear and reasonable, with

appropriate “checks and balances” provided through the planning process and appeal mechanisms in Sections 17 and 21 of the Planning Act.

If the goal is to increase housing supply, it is unclear why the scope of the proposed amendments to Section 41 equally applies to non-residential development.

Bill 23 proposes the removal of site plan control for developments containing 10 dwelling units or less. It is unclear what concern the proposed amendment seeks to address. Bill 109 mandates that site plans be processed quickly (60 days), addressing concerns related to timely approvals. In Waterloo, a 10 unit residential building could house up to 50 individuals, a density sufficient to warrant site plan controls. In our opinion, municipalities should have discretion to apply site plan control to projects containing more than three (3) units to ensure developments are safe, accessible, orderly, aesthetic/functional, and a positive contribution to the area, and to mitigate undesirable impacts related to wind, shadows, and uncompleted sites. This is particularly true for infill development. If the intent of Bill 23 is to encourage denser forms of context sensitive smaller scale intensification, we believe the preferred solution to be exempting certain building typologies from site plan control such as triplexes and townhouses, rather than specifying a unit threshold in Section 41 of the Planning Act.

- **Third Party Appeals:** As originally written, Bill 23 proposes to eliminate third party appeals of planning decisions to the Ontario Land Tribunal (OLT). No one other than the applicant, the municipality, certain public bodies, and the Minister would be allowed to appeal municipal decisions to the OLT (including consents and minor variances) if Bill 23 passes as originally written. The City of Waterloo is encouraged to hear that the Standing Committee is re-evaluating this amendment. Third party appeals are uncommon in the City of Waterloo, and rarely succeed. Notwithstanding the foregoing, the planning system in Ontario is based, in part, on the principles of transparency and inclusiveness, principles which are important to the City of Waterloo. We encourage the Province to further evaluate the impacts of eliminating third party appeals with

respect to inclusiveness, and further amend the legislation to address negative outcomes.

- **Ontario Land Tribunal (OLT):** Bill 23 proposes to increase OLT's powers to order costs against a party, and to dismiss appeals for undue delay. We are concerned with increasing the OLT's powers to order costs against a party. In our opinion, costs awarded against a party should be an exception, not the rule, and the threshold for awarding costs should not be based on the outcome of the OLT decision. Rather, awarding costs should relate to conduct and the existing threshold of "unreasonable, frivolous, vexatious, or bad faith" as determined by the OLT Member.
- **Heritage:** Bill 23 proposes various amendments related to heritage planning. The conservation of cultural heritage resources is an integral part of community planning. Cultural heritage resources contribute to the city's identity and quality of life. If passed, Bill 23 will place a significant burden on municipalities to complete substantive and unbudgeted heritage evaluations within a relatively short period of time by requiring non-designated properties on municipal heritage registers to be evaluated and notices of intent to designate (NOID) being issued within two years, failing which they would be de-listed from the register. In Waterloo, over 150 properties and buildings will need to be evaluated. The demand for specialized heritage consultants to assist municipalities in this important work will exceed supply. We believe that staff resources would be better directed to updating Official Plans, Secondary Plans, Zoning By-laws and the like under the lens of increasing housing supply, rather than evaluating non-designated heritage properties. Bill 23 also proposes that a municipality may give notice of intention to designate a property only if the property is listed on the register as of the date of a prescribed event (not after). We believe the appropriate time to evaluate non-designated heritage properties is concurrent with a development application, rather than before. The impact of the Bill, as proposed, will be the unintended loss of heritage resources that are valuable to the community. It is recommended that Bill 23 be amended to remove the requirement to evaluate non-designated properties on the municipal heritage register within two years, and the provision requiring that a

municipality can give notice of intention to designate a property only if it was on the register as of the date of a prescribed event.

In conclusion, there are many positive components to the proposed Bill 23. Various concerns also exist as described herein. And while moving quickly is imperative, so is getting Bill 23 right. The full impacts of Bill 23 need to be explored and understood, and negative impacts mitigated prior to implementation. From a municipal perspective and for greater efficiency, the governance work under the proposed Bill 39 should occur before the implementation of Bill 23 in relation to upper-tier planning responsibilities. We respectfully request that the Province defer components of Bill 23 until such time as further evaluation and analysis can be undertaken, new councils are engaged, and additional consultation occurs between the Province and its municipal partners.

Thank you for the opportunity to comment on this important legislation. Staff would be pleased to meet with the Province to provide further input on the proposed Bill 23 and Bill 39.

Sincerely,



Tim Anderson, P. Eng
Chief Administrative Officer, City of Waterloo

Cc: MPP Mike Harris
Mayor Dorothy McCabe

November 16, 2022

The Honourable Doug Ford, M.P.P
Premier of Ontario
Office of the Premier
Legislative Building
Queen's Park
Toronto ON M7A 1A1

RE: Resolution from the City of Waterloo passed November 14, 2022, re: Bill 23

Dear Premier Ford,

Please be advised that the Council of the Corporation of the City of Waterloo at its Council meeting held on Monday, November 14th, 2022 resolved as follows:

WHEREAS the Province of Ontario's Bill 23 – "More Homes Built Faster" Act recently passed Second Reading and is now open for comment; and

WHEREAS Bill 23 is a significant piece of legislation that would, if passed, be highly consequential to land use planning at both the City and Regional level, significantly altering municipal responsibilities, restricting appeals, decreasing review timelines and eliminating public consultation for plans of subdivision; and

WHEREAS Bill 23 would have highly consequential financial implications to the City of Waterloo with respect to funding infrastructure and growth, as well as creating staffing pressures related to shifting Regional planning responsibilities, leading to an increased tax burden on ratepayers in the City; and

WHEREAS Bill 23 has far reaching impacts related to environmental protections, ranging from challenges in meeting Regional planning objectives such as the Countryside Line, to limiting of the City's ability to implement Green Development Standards, to restrictions of Conservation Authorities and reduced protections for wetlands; and

WHEREAS the City of Waterloo acknowledges the affordable housing crisis and is in the process of creating the City's first ever Affordable Housing Strategy; and

WHEREAS City of Waterloo staff are preparing comments on Bill 23 that will be submitted to the Province prior to the November 24th deadline, however the timing of introduction of Bill 23 does not permit ample opportunity for newly elected City of Waterloo Council to appropriately assess the significant changes proposed and provide their commentary, given their inaugural meeting is November 21st and their first regular meeting is December 5th; and

WHEREAS the Ontario Big City Mayors have requested that the Government of Ontario extend the comment period on Bill 23, to allow for full municipal participation, in recognition of twelve newly-elected Mayors in Ontario, including in the City of Waterloo;

THEREFORE BE IT RESOLVED that the City of Waterloo requests the Government of Ontario to defer clause-by-clause review of Bill 23 at committee stage until such time as further evaluation and analysis by the incoming City of Waterloo Council has occurred; and

BE IT FINALLY RESOLVED that a copy of this resolution be sent to the Premier of Ontario, the Minister of Municipal Affairs and Housing, to local and area MPP's, the Association of Municipalities of Ontario, the Ontario Big City Mayors, and to the Region of Waterloo and local area municipalities.

If you have any questions or require additional information, please contact me.

Sincerely,



Julie Scott
City Clerk, City of Waterloo

CC (by email):

Hon. Steve Clark, Minister of Municipal Affairs and
Housing
Catherine Fife, M.P.P (Waterloo)
Laura Mae Lindo, M.P.P (Kitchener Centre)
Brian Riddell, M.P.P (Cambridge)
Jess Dixon, M.P.P (Kitchener-South Hespeler)
Mike Harris, M.P.P (Kitchener-Conestoga)
Association of Municipalities of Ontario (AMO)
Ontario Big City Mayors

William Short, Regional Clerk, Regional
Municipality of Waterloo
Danielle Manton, Clerk, City of Cambridge
Amanda Fusco, Clerk, City of Kitchener
Ashley Sage, Clerk, Township of North Dumfries
Grace Kosch, Clerk, Township of Wellesley
Arthur Flach, Clerk, Township of Wilmot
Jeff Smith, Clerk, Township of Woolwich