

Hello Mayor Ritsma,

I am writing you on behalf of the Upper Thames River Conservation Authority (UTRCA) Board of Directors. I would like to bring to your attention the impact of the decision by the Minister of Natural Resources and Forestry of Ontario, Graydon Smith, to freeze the fees conservation authorities can charge in regard to planning, development, and permitting fees, and ask for your support in requesting that the decision be reversed and the freeze lifted.

The Minister issued a Ministers Direction (attached) on December 28, 2022. As stated by the Minister in the direction, "The purpose of this Direction, which is effective from January 1, 2023, to December 31, 2023, is to require a conservation authority not to change the amount of the fee it charges or the manner in which it determines the fee for any program or service that may be provided by the conservation authority. This relates to reviewing and commenting on planning and development related proposals or land use planning policies, or for permits issued by conservation authorities."

The Minister issued a second Direction (attached) on December 13, 2023, extending the freeze on fees to December 31, 2024. This Direction was further confirmed in a letter from the Ministry (attached) dated February 16, 2024.

The Direction justified the freeze as a way to assist in reaching the goal of Bill 23 (1.5 million homes in 10 years). It stated that, "A number of these changes affect conservation authorities and are intended to support faster and less costly approvals, streamline conservation authority processes, and help make land suitable for housing available for development."

Freezing the development and application fees has the greatest impact on conservation authorities located in high-growth areas of the province, which includes the UTRCA. Since 2021, provincial population reports reflect that municipalities within the Upper Thames watershed are the fastest growing in Ontario. Corresponding to this population growth, the UTRCA has seen a very large increase in the number of planning, development, and permit applications being submitted.

At the same time, the UTRCA is also responding to reduced timelines to review and comment on applications since the changes of Bill 108 and 109 came into effect. Staff have heard from member municipalities about the need for the UTRCA to increase its level of service to respond to these changes, so that the municipalities are also able to meet the timelines imposed on them by the legislation.

Increases in development pressure to accommodate the watershed's population growth, coupled with reduced timelines, have resulted in the UTRCA having to increase staffing

to meet service delivery timelines. This has led to higher costs which, due to the fee freeze, can only be addressed by levying member municipalities for the extra costs.

The UTRCA is trying to limit the impact to member municipalities by proactively looking for efficiencies through streamlining the processes used by staff and implementing technology. These measures will not, however, address the current situation regarding who is being asked to fund this service.

Growth should pay for growth. Under the current freeze, the Authority's ability to assign the cost of growth to those who are benefiting has been removed. This has led to all the residents of the member municipalities having to pay more through increased tax rates.

I ask you to join in signing the attached letter to the Minister asking for a reversal of the Direction to freeze the fees for planning, development, and permitting. Lifting the freeze on fees will enable the UTRCA to limit the levy asks to member municipalities by recovering more of the costs associated with planning, development, and permitting, from those that are using the service.

Sincerely,

A handwritten signature in black ink, appearing to read 'BP', is positioned above the typed name.

Brian Petrie, Chair

Upper Thames River Conservation Authority Board of Directors

Attachment