



CORRESPONDENCE ITEMS PRESENTED FOR INFORMATION
February 4, 2025

(To jump to the information, just click the item)

1. Correspondence from the Municipality of South Huron regarding heritage preservation in South Huron.
2. Correspondence from Northumberland County regarding protection of agricultural lands and sustainable development.
3. Correspondence from the City of Woodstock regarding sustainable funding for the Children's Aid Society of Oxford County and other child welfare agencies throughout Ontario.
4. Correspondence from the Town of Alymer regarding opposition to Provincial legislation on cycling lanes and support for municipal authority in transportation planning.
5. Correspondence from the Municipality of South Huron regarding the Top Aggregate Producing Municipalities of Ontario (TAPMO) letter regarding the pre-budget announcement.
6. Correspondence from Grey County regarding the Forest Management Options Report PDR-CW-31-23.
7. Correspondence from the Ministry of Natural Resources regarding an update to the proposed regulation regarding Minister's Permit and Review powers under the Conservation Authorities Act.
8. Correspondence from the Township of Southgate regarding notice of a virtual public meeting for a proposed zoning bylaw amendment.
9. Correspondence from the Canadian Union of Postal Workers regarding an industrial inquiry commission reviewing Canada Post.



CORPORATION OF THE MUNICIPALITY OF SOUTH HURON

322 Main Street South P.O. Box 759

Exeter Ontario

N0M 1S6

Phone: 519-235-0310 Fax: 519-235-3304

Toll Free: 1-877-204-0747

www.southhuron.ca

Item 1

October 15, 2024

Via email: doug.fordco@pc.org

Premier's Office
Room 281
Legislative Building, Queen's Park
Toronto, ON M7A 1A1

Dear Honourable Doug Ford

Re: Heritage Advisory Committee

Please be advised that South Huron Council passed the following resolution at their October 7, 2024, Regular Council Meeting:

Motion: 355-2024
Moved By: Aaron Neeb
Seconded by: Marissa Vaughan

Whereas the South Huron Heritage Advisory Committee has presented a letter to South Huron Council outlining concerns regarding heritage preservation in South Huron; and

Whereas prior to Royal Assent of the More Homes Built Faster Act, 2022 Subsection 29(1.2) of the Ontario Heritage Act provided Council of a Municipality the opportunity to give a notice of intention to designate a property within 90 days of a prescribed event; and

Whereas the More Homes Built Faster Act, 2022 amended Subsection 29(1.2) of the Ontario Heritage Act to provide that Council may give notice of intention to designate a property only if the property is listed in the register under subsection 27 (3), or a predecessor of that subsection, as of the date of the prescribed event; and

Whereas the Heritage Advisory Committee has noted concerns regarding this amendment limiting the authority of municipal councils to designate properties with the potential to undermine the effectiveness of heritage preservation efforts across the province; and

Whereas the Heritage Advisory Committee has provided correspondence, attached hereto, to South Huron Council in relation to the concerns requesting Council support and to communicate these concerns to the Province and forward a copy of this motion to the Association of Municipalities of Ontario, Municipal Councils across the province, and Provincial MPP.

Now therefore be it resolved that the Corporation for the Municipality of South Huron request the Province reconsider the amendment to Subsection 29(1.2) of the Ontario Heritage Act; and that this motion and attached correspondence be forwarded to the Premier of Ontario, Minister of Municipal Affairs and Housing, Minister of Citizenship and Multiculturalism, Association of Municipalities of Ontario, Municipal Councils across the province and MPP Thompson

Result: Carried

Please find attached the originating correspondence for your reference.

Respectfully,

Kendra Webster, Legislative & Licensing Coordinator
Municipality of South Huron
kwebster@southuron.ca
519-235-0310 x. 232

Encl.

cc: Minister of Municipal Affairs and Housing, Hon. Paul Calandra, Paul.Calandra@pc.ola.org ; Minister of Citizenship and Multiculturalism, Hon. Michael Ford, Michael.Ford@pc.ola.org; MPP Huron-Bruce, Hon. Lisa Thompson, Lisa.Thompson@pc.ola.org; AMO, resolutions@amo.on.ca, Township of Ashfield-Colborne-Wawanosh, info@acwtownship.ca, Municipality of Bluewater, info@municipalityofbluewater.ca , Municipality of Central Huron, info@centralhuron.com, Town of Goderich, townhall@goderich.ca, Township of Howick, clerk@howick.ca, Municipality of Huron East, clerk@huroneast.com, Municipality of Morris-Turnberry, mail@morristurnberry.ca, Township of North Huron, clamb@northhuron.ca, Municipality of North Perth, info@northperth.ca , Township of Perth South, lscott@perthsouth.ca, Township of Perth East, acarater@pertheast.ca, Municipality of West Perth, clerk@westperth.com, Town of St. Marys, clerksoffice@town.stmarys.on.ca, City of Stratford, clerks@stratford.ca, Municipality of Brook-Alvinston, idenkers@brookealvinston.com, Township of Dawn-Euphemia, clerk@dawneuphemia.on.ca, Township of Enniskillen, dmctavish@enniskillen.ca, Municipality of Lambton Shores, clerks@lambtonshores.ca, Village of Oil Springs, clerk@oilsprings.ca, Town of Petrolia, petrolia@petrolia.ca, Town of



CORPORATION OF THE MUNICIPALITY OF SOUTH HURON

322 Main Street South P.O. Box 759

Exeter Ontario

NOM 1S6

Phone: 519-235-0310 Fax: 519-235-3304

Toll Free: 1-877-204-0747

www.southhuron.ca

Plympton-Wyoming, ekwarciak@plympton-wyoming.ca, Village of Point Edward, jburns@villageofpointedward.com, City of Sarnia, clerks@sarnia.ca, Township of St. Clair, webmaster@twp.stclair.on.ca, Township of Warwick, info@warwicktownship.ca, Municipality of Adelaide-Metcalf, info@adelaidemetcalf.on.ca, Municipality of Lucan-Biddulph, clerk@lucanbiddulph.on.ca, Municipality of Middlesex Centre, hutson@middlesexcentre.ca, Municipality of North Middlesex, ashleyk@northmiddlesex.on.ca, Municipality of Southwest Middlesex, abushell@southwestmiddlesex.ca, Municipality of Strathroy-Caradoc, bdakin@strathroy-caradoc.ca, Municipality of Thames Centre, tmichiels@thamescentre.on.ca, Village of Newbury, case@newbury.ca.

July 31, 2024

The Heritage Advisory Committee for the Municipality of South Huron wishes to thank South Huron Council for their support of resolution 128-2024 of March 18, responding to the Town of Coburg's request of February 28 for support regarding a proposed amendment to subsection 27(16) of the Ontario Heritage Act.

In addition to the concerns South Huron council supported in resolution 128-2024, our committee would like to add that we have additional concerns about amendments to the Ontario Heritage Act implemented by Bill 23 that have direct impact on our local community and - more broadly - the Province of Ontario.

Specifically, subsection 29 (1.2) of the Heritage Act traditionally provided that if a prescribed event occurs, a notice of intention to designate a property must be given within 90 days of the prescribed event. These prescribed events include the submission of development applications under the Planning Act, for example. However, with changes from Bill 23, this subsection is re-enacted to also provide that the municipality may only give a notice of intention to designate the property within 90 days if the property was already included in the register under subsection 27 (3) as of the date of the prescribed event.

This raises significant concerns for our committee. Specifically, we are troubled by the proposed amendments that would limit the authority of municipal councils to designate properties that are not already listed on a municipal register. In South Huron, like many other municipalities around Ontario, there are countless significant structures that are not yet listed under subsection 27 (3), and these changes significantly limit efforts of council to react to proposed demolitions of significant heritage properties in our municipality after planning applications are made.

We believe that these changes have the potential to undermine the effectiveness of heritage preservation efforts in our community and across the province. By weakening the protections afforded to heritage properties and reducing the ability of municipalities to designate and safeguard significant sites, we risk irreparable loss to our built and cultural heritage.

We urge council to carefully consider the implications of the changes to the Ontario Heritage Act under Bill 23 and to advocate for amendments that strengthen rather than weaken heritage preservation efforts. Specifically, we would ask that the province re-establish the 90 day period that had previously been a part of the Ontario Heritage Act for all properties, not just those already listed in the register under subsection 27 (3).

We ask that you pass a resolution to add our specific concerns to those you have already supported, and communicate these to the Province of Ontario. We also ask that you circulate this letter and seek the support of other municipalities.

Thank you for your attention to this important matter, and we look forward to our continued work together.

Sincerely,

South Huron Heritage Advisory Committee

Sample Resolution:

Whereas prior to Royal Assent of the More Homes Built Faster Act, 2022 Subsection 29(1.2) of the Ontario Heritage Act provided Council of a Municipality the opportunity to give a notice of intention to designate a property within 90 days of a prescribed event; and

Whereas the More Homes Built Faster Act, 2022 amended Subsection 29(1.2) of the Ontario Heritage Act to provide that Council may give notice of intention to designate a property only if the property is listed in the register under subsection 27 (3), or a predecessor of that subsection, as of the date of the prescribed event;

Whereas the Heritage Advisory Committee has noted concerns regarding this amendment limiting the authority of municipal councils to designate properties with the potential to undermine the effectiveness of heritage preservation efforts across the province; and

Whereas the Heritage Advisory Committee has provided correspondence, attached hereto, to South Huron Council in relation to the concerns requesting Council support and to communicate these concerns to the Province and forward a copy of this motion to the Association of Municipalities of Ontario, Municipal Councils across the province, and Provincial MPP.

Now therefore be it resolved that the Corporation for the Municipality of South Huron request the Province reconsider the amendment to Subsection 29(1.2) of the Ontario Heritage Act; and that this motion and attached correspondence be forwarded to the Premier of Ontario, Minister of Municipal Affairs and Housing, Minister of Citizenship and Multiculturalism, Association of Municipalities of Ontario, Municipal Councils across the province and MPP Thompson.

Item 2



Northumberland County Council Resolution

SENT VIA EMAIL

January 7, 2025

Honourable Doug Ford (Premier of Ontario)
Honourable Andrea Khanjin (Minister of the Environment, Conservation and Parks)
Honourable Rob Flack (Minister of Agriculture, Food and Agribusiness)
Honorable David Piccini (Minister of Labour, Immigration, Training and Skills Development and MPP for Northumberland-Peterborough South)
Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA)
Northumberland Federation of Agriculture
All Ontario municipalities

Re: Correspondence, 'Protection of Agricultural Lands and Sustainable Development'

At a meeting held on December 18, 2024 Northumberland County Council approved Council Resolution # 2024-12-18-909, adopting the below recommendation from the December 2, 2024 Public Works Committee meeting:

Moved by: Councillor Mandy Martin
Seconded by: Councillor Robert Crate

"**That** the Public Works Committee, having considered the correspondence from the Township of Puslinch regarding 'Protection of Agricultural Lands and Sustainable Development', recommend that County Council support the correspondence and direct staff to send a copy of this resolution to key stakeholders."

Council Resolution # 2024-12-18-909

Carried

If you have any questions regarding this matter, please do not hesitate to contact the undersigned at matherm@northumberland.ca or by telephone at 905-372-3329 ext. 2238.

Sincerely,
Maddison Mather



Manager of Legislative Services / Clerk
Northumberland County

Council Resolution

Moved By M. Martin

Agenda
Item 15

Resolution Number
2024-12-18- 909

Seconded By R. Crate

Council Date: December 18, 2024

"That Council adopt all recommendations from the five Standing Committees, as contained within the Committee Minutes (meetings held December 2, 3, and 4, 2024), with the exception of the following items (referenced from the Standing Committee Minutes), that will be held for discussion:

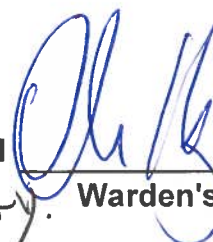
Committee Name	Item #	Description	Held By
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- | | | | |
|---|---------------------------------------|--|--|
| - | Community Health Committee, Item 8.a, | 'Report 2024-156 'Long-term Care Staffing Challenges' – Held by Councillor Logel | |
|---|---------------------------------------|--|--|

And Further That the items listed above and held for separate discussion each require a separate resolution."

Recorded Vote
Requested by _____
Councillor's Name

Deferred _____
Warden's Signature

Carried 
Deputy Warden's Signature

Defeated _____
Warden's Signature

Public Works Committee Resolution

Committee Meeting Date: December 2, 2024

Agenda Item: 7.d

Resolution Number: 2024-12-02- 860

Moved by: J. Logel

Seconded by: B. Ostrander

Council Meeting Date: December 18, 2024

"That the Public Works Committee, having considered the correspondence from the Township of Puslinch regarding 'Protection of Agricultural Lands and Sustainable Development', recommend that County Council support the correspondence and direct staff to send a copy of this resolution to key stakeholders."

Carried 
Committee Chair's Signature

Defeated _____
Committee Chair's Signature

Deferred _____
Committee Chair's Signature



Hon. Paul Calandra
Minister of Environment,
Conversation and Parks
VIA EMAIL:
Paul.Calandra@pc.ola.org

Hon. Doug Ford
Premier of Ontario
VIA EMAIL:
premier@ontario.ca

Township of Puslinch
7404 Wellington Road 34
Puslinch, ON N0B 2J0
www.puslinch.ca

November 7, 2024

Hon. Rob Flack
Minister of Agriculture,
Food, and Agribusiness
VIA EMAIL:
minister.omafra@ontario.ca

Hon. Matthew Rae, MPP
VIA EMAIL:
Matthew.Rae@pc.ola.org

Hon. Ted Arnott, MPP
VIA EMAIL:
ted.arnottco@pc.ola.org

Barclay Nap
Wellington Federation of
Agriculture
VIA EMAIL:
napbarclay@gmail.com

RE: Motion for the Protection of Agricultural Lands and Sustainable Development in Relation to Provincial Projects and Excess Soil Management Practices

Please be advised that Township of Puslinch Council, at its meeting held on October 23, 2024 considered the aforementioned topic and subsequent to discussion, the following was resolved:

Resolution No. 2024-378: Moved by Councillor Hurst and
Seconded by Councillor Sepulis

Whereas the provincial government is undertaking:

- a) significant road and underground projects over the next ten years which will generate significant excess soil to be managed and disposed; and
- b) studies of underground projects that if implemented will also generate significant excess soil: and



Whereas landfill sites across Ontario are already near capacity, necessitating amendments to legislation to allow certain quality soil to be disposed at excess soil reuse sites instead of being disposed of in landfills effective January 1, 2025; and

Whereas the Ministry of the Environment, Conservation and Parks (MECP) is currently under resourced and lacks the capacity to effectively manage the additional enforcement and oversight required for the relocation of excess soil; and

Whereas the responsibility to enforce and oversee excess soil regulations is being downloaded onto municipalities, which have limited enforcement capabilities and face the risk of significant costs being passed on to local taxpayers; and

Whereas contamination of existing soil and groundwater is a significant concern, particularly in rural municipalities with valuable agricultural lands and reliance on groundwater for its residents; and

Whereas agricultural lands must be prioritized equally with housing needs, roads and underground infrastructure; failure to adequately protect these lands could exacerbate the ongoing food crisis in Ontario; and

Whereas Ontario is not alone in navigating the challenges of sustainable development, and the United Nations provides guidance through its Sustainable Development Report, which includes goals focused on economic growth, infrastructure, sustainable communities, hunger, clean water and sanitation, climate action, and life on land; and

Whereas it is critical that governments consider the comprehensive impacts on all of these areas when conducting feasibility studies and implementing projects which generate excess soil; and

Whereas neglecting to account for the broader implications of projects may lead to negative outcomes;

Therefore Be It Resolved that the Council of the Township of Puslinch calls on the provincial government to:



1. Prioritize the protection of agricultural lands in the management of excess soil from roads and underground projects and in the planning and feasibility studies related to such projects.
2. Ensure that adequate resources are allocated to the MECP to support effective enforcement and oversight of excess soil regulations.
3. Collaborate with municipalities to provide necessary support and funding for enforcement activities related to excess soil management, minimizing financial burdens on local taxpayers.
4. Conduct a comprehensive impact assessment that considers all aspects of sustainable development, in alignment with the United Nations Sustainable Development Report, before proceeding with the traffic tunnel project and any further amendments to excess soil legislation; and

That the Township of Puslinch Council direct staff to send a copy of this resolution to the Minister of the Environment, Conservation and Parks; the Premier of Ontario; all Ontario municipalities; MPP Arnott; MPP Rae; the Wellington Federation of Agriculture; and OMAFRA requesting support for the protection of agricultural lands and sustainable development practices in Ontario.

CARRIED

As per the above resolution, please accept a copy of this correspondence for your information and consideration.

Sincerely,

Justine Brotherston
Municipal Clerk

CC: All Ontario Municipalities



Item 3

The Honorable Doug Ford
Premier of Ontario
Legislative Building, Queen's Park
Toronto, ON M7A 1A1
Via email premier@ontario.ca

The Honorable Michael Parsa
Minister of Children, Community and Social Services
438 University Ave.
Toronto, ON M5G 2K8
Via email MinisterMCCSS@ontario.ca

Jerry Acchione
Mayor
City of Woodstock
500 Dundas St.
Woodstock, ON N4S 0A7
519-539-2382 x2100
mayor@cityofwoodstock.ca

Dear The Honorable Doug Ford and The Honorable Michael Parsa,

I am writing on behalf of Woodstock City Council to express the urgent and pressing need for adequate and sustainable funding for the Children's Aid Society of Oxford County and other child welfare agencies throughout Ontario. These organizations play a vital role in safeguarding and enhancing the health, well-being, and safety of our children, youth, and families and deserves appropriate support and attention from our elected officials.

Our community, like many across the province, relies on the Children's Aid Society and other child welfare agencies to not only protect children and youth from abuse or neglect, but provide critical crisis intervention, early intervention, and preventative services. Their work ensures children receive necessary care at the most crucial times, close to their own homes, allowing families to remain intact and thrive together.

The lack of access to healthcare, mental health supports, poverty reduction initiatives and affordable housing is taking a toll on families and caregivers. These systemic shortfalls propel child welfare agencies into roles they were never intended to assume, filling gaps in services to ensure the well-being of children, youth, and families.

Without sufficient financial backing, these agencies are strained to a breaking point. They operate without the ability to deny families the services they desperately need. They cannot turn clients away, manage waitlists, or declare services unavailable. Yet, even with remarkable community partnerships, these agencies lack the means to expedite or ensure access to necessary treatments for those in their care.

The repercussions of this funding deficit extends well beyond individual families, affecting the community at large. Our local Children's Aid Society is supporting an ever-increasing number of youth exhibiting complex behaviors. These challenges translate into higher intervention costs, increases costs for and pressure on police and emergency service providers.

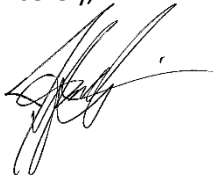
The lack of access to critical early intervention services is correlating to a distressing rise in youth homelessness. The financial sustainability and stability of the child welfare sector can no longer be deferred

for debate. It is imperative the funding formula is updated to prioritize trauma-informed, culturally relevant and proactive care.

On behalf of Woodstock City Council, I urge the province to prioritize and support the financial needs of these vital agencies. All levels of government must work together to improve upstream intervention and support to prevent the tragic outcomes we are seeing as a result of inadequate funding.

Thank you for considering this urgent matter that affects our community and its future generations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jerry Acchione', with a long horizontal flourish extending to the right.

Mayor Jerry Acchione
City of Woodstock

Cc:

The Honourable Ernie Hardeman, Oxford MPP - ernie.hardemanco@pc.ola.org

Safe and Well Oxford - safewelloxford@gmail.com

Children's Aid Society Oxford County - info@casoxford.on.ca



Item 4

The Corporation of the Town of Aylmer
46 Talbot Street West, Aylmer, Ontario N5H 1J7
Office: 519-773-3164 Fax: 519-765-1446
www.aylmer.ca

January 9, 2025

The Honorable Doug Ford
Premier of Ontario
Legislative Building
Queen's Park
Toronto, ON M7A 1A1
premier@ontario.ca

Re: Motion regarding Opposition to Provincial Legislation on Cycling Lanes and Support for Municipal Authority in Transportation Planning

At their Regular Meeting of Council on January 8, 2025, the Council of the Town of Aylmer endorsed the following resolution:

WHEREAS the Government of Ontario has announced legislation requiring provincial approval for new cycling lanes;

AND WHEREAS this legislation would compel municipalities to demonstrate that proposed cycling lanes will not negatively impact vehicle traffic;

AND WHEREAS cycling infrastructure is crucial for environmental transportation, road safety, and public health, and provincial oversight in this matter represents an unwarranted intrusion into municipal authority;

AND WHEREAS the Town of Aylmer is evolving an active transportation plan to enhance walking and cycling infrastructure;

AND WHEREAS the Association of Municipalities of Ontario (AMO) has strongly criticized this proposed legislation as a "significant overreach" into municipal jurisdiction;

AND WHEREAS AMO has stated that none of its 444 member municipalities were consulted or shown evidence justifying the province's proposed veto power over new bike lanes;

THEREFORE, BE IT RESOLVED:

1. That the Town of Aylmer strongly opposes the proposed provincial legislation governing bicycle lanes and affirms its support for maintaining municipal jurisdiction over cycling infrastructure decisions.

2. That the Town of Aylmer endorses the AMO's position that municipalities are better positioned than the Ministry of Transportation to make decisions about local transportation matters based on local knowledge and community input.

3. That the Town of Aylmer calls on the Government of Ontario to withdraw the proposed legislation and respect the established authority of municipalities to make informed decisions about local transportation needs, including the implementation of cycling lanes.

4. That the Town of Aylmer reaffirms its commitment to its transportation plan and the continued development of safe, environmentally friendly, efficient cycling infrastructure for the benefit of all residents.

5. That the Town Clerk be directed to forward a copy of this resolution to the Premier of Ontario, the Minister of Transportation, the Member of Provincial Parliament representing constituencies within the Elgin-Middlesex-London region, to the Association of Municipalities of Ontario (amo@amo.on.ca) and all Municipalities in Ontario.

6. That the Town of Aylmer calls upon municipalities across Ontario to adopt similar resolutions in defense of local decision-making authority and sustainable, efficient and environmentally friendly transportation planning.

Thank you,

Owen Jaggard

Director of Legislative Services/Clerk | Town of Aylmer

46 Talbot Street West, Aylmer, ON N5H 1J7

519-773-3164 Ext. 4913 | Fax 519-765-1446

ojaggard@town.aylmer.on.ca | www.aylmer.ca

CC:

Hon. Prabmeet Singh Sarkaria prabmeet.sarkaria@pc.ola.org

Hon. Rob Flack rob.flack@pc.ola.org

Association of Municipalities of Ontario resolutions@amo.on.ca

All municipalities



CORPORATION OF THE MUNICIPALITY OF SOUTH HURON

322 Main Street South P.O. Box 759

Exeter Ontario

N0M 1S6

Phone: 519-235-0310 Fax: 519-235-3304

Toll Free: 1-877-204-0747

www.southhuron.ca

Item 5

January 15, 2025

Via email: Peter.Bethlenfalvy@pc.ola.org

Ministry of Finance
Frost Building South
7th Floor
7 Queen's Park Crescent
Toronto, ON M7A 1Y7

Dear Peter Bethlengalvy,

Re: TAPMO Letter Regarding Pre-Budget Announcement

Please be advised that South Huron Council passed the following resolution at their January 13, 2025 Regular Council Meeting:

Motion: 15-2025

Moved: M. Vaughan

Seconded: T. Oke

Whereas the Ministry of Finance has introduced a one-time \$7 million reduction in education taxes in 2024, a subsidy that will be absorbed by the province through a 95% reduction in education taxes—marking the first such subsidy provided by the province to any industry;

Whereas the Ministry of Finance's plans to introduce a new aggregate property sub-class in 2025, which is set to provide a \$6 million subsidy to the aggregate industry, with \$3 million of that subsidy being transferred back to the municipal (primarily residential) tax base, raises serious concerns about the fairness and equity of the system;

Whereas the claims that the new sub-class will provide tax stability and predictability seem hollow and do not address the

systemic inequities in the taxation framework, which continues to shift an undue burden onto municipal taxpayers, particularly those in rural areas who host these aggregate operations;

Whereas there is significant concern that the government's actions prioritize the interests of the aggregate industry over the financial realities faced by municipalities and their residents, and that this shift in burden undermines public trust in the fairness and integrity of Ontario's legal and tax frameworks;

Whereas TAPMO has presented evidence demonstrating that the aggregate industry is financially capable of meeting its tax obligations, including substantial profits and royalty payments made by industry leaders, further undermining the need for these subsidies;

Whereas the municipal taxpayer should not bear the cost of correcting a past error in assessment methodology that unfairly benefited the aggregate industry, and the new property tax class ratio risks further undermining the principle of revenue neutrality and eroding confidence in Ontario's legal and tax systems;

Therefore be it resolved that the Council of the Municipality of South Huron strongly objects to the undue burden being placed on municipal taxpayers to subsidize the aggregate industry, and calls on the provincial government to:

Reevaluate and correct the misguided subsidies being provided to the aggregate sector, and ensure that future tax policies are fair, equitable, and consistent for all taxpayers.

1. Uphold the principles of revenue neutrality in the aggregate tax framework and ensure that any new tax classifications or methodologies do not result in a net loss of revenue for municipalities, especially those that are already facing significant financial challenges.



CORPORATION OF THE MUNICIPALITY OF SOUTH HURON

322 Main Street South P.O. Box 759

Exeter Ontario

NOM 1S6

Phone: 519-235-0310 Fax: 519-235-3304

Toll Free: 1-877-204-0747

www.southhuron.ca

2. Commit to meaningful reform that ensures fairness and consistency across all sectors of the economy and actively engages municipalities and taxpayers in a transparent and inclusive process, rather than catering to the demands of the aggregate industry.

3. Take immediate action to correct the existing inequities in the tax framework, ensuring that the burden of this correction is not unjustly shifted to municipal taxpayers, particularly those in rural communities who host these operations.

4. Respect and uphold the integrity of the legal process by honouring the decisions of the Divisional Court and ensuring that all assessment methodologies are transparent, accountable, and based on a fair and balanced approach.

5. Further, be it resolved that the Council of the Municipality of South Huron supports TAPMO's call for the provincial government to adopt reforms that prioritize the needs and fairness of municipal taxpayers and to ensure that the aggregate sector contributes its fair share to the province's tax base; and

Further be it resolved that this resolution be forwarded to the Minister of Finance, the Minister of Municipal Affairs and Housing, local school boards, AMO, ROMA, Local MPP, all Ontario Municipalities and the Municipal Property Assessment Corporation.

Please find attached the originating correspondence for your reference.

Respectfully,

Kendra Webster, Legislative & Licensing Coordinator

Municipality of South Huron
kwebster@southhuron.ca
519-235-0310 x. 232

Encl.

cc: Minister of Municipal Affairs and Housing, Hon. Paul Calandra, Paul.Calandra@pc.ola.org; Avon Maitland District School Board, info@amdsb.ca; Huron-Perth Catholic District School Board, info@huronperthcatholic.ca; MPP Huron-Bruce, Hon. Lisa Thompson, Lisa.Thompson@pc.ola.org; AMO, resolutions@amo.on.ca; ROMA, roma@on.ca; MPAC, John.Young@mpac.ca; TAPMO, info@tapmo.ca, All Ontario Municipalities



Finance Minister Chrystia
Freeland
VIA EMAIL:
chrystia.freeland@parl.gc.ca

Hon. Paul Calandra
VIA EMAIL:
minister.mah@ontario.ca

Township of Puslinch
7404 Wellington Road 34
Puslinch, ON N0B 2J0
www.puslinch.ca

December 13, 2024

Association of Municipalities
of Ontario (AMO)
VIA EMAIL:
amo@amo.on.ca

Top Aggregate Producing
Municipalities of Ontario
(TAPMO)
VIA EMAIL:
info@tapmo.ca

Rural Ontario Municipalities
Association (ROMA)
VIA EMAIL:
roma@roma.on.ca

Hon. Ted Arnott, MPP
VIA EMAIL:
ted.arnottco@pc.ola.org

RE: TAPMO Letter regarding Pre Budget Announcement

Please be advised that Township of Puslinch Council, at its meeting held on November 27, 2024 considered the aforementioned topic and subsequent to discussion, the following was resolved:

Resolution No. 2024-430:

Moved by Councillor Sepulis and
Seconded by Councillor Bailey

That the Consent Agenda items listed with the exception of items 6.10, 6.11, and 6.12 for NOVEMBER 27, 2024 Council meeting be received for information; and

Whereas the Township of Puslinch Council supports the information provided by TAPMO to member municipalities of TAPMO; and

Whereas the Township of Puslinch Council sees the value and significance of circulating this information provided by TAPMO to all Ontario municipalities;



Therefore, that Council directs staff to forward items 6.10, 6.11, and 6.12 to all Ontario municipalities; and

That Council direct staff to forward the following resolution to the Minister of Finance, the Minister of Municipal Affairs and Housing, local school board trustees, AMO, ROMA, Local MPP, all Ontario Municipalities and the Municipal Property Assessment Corporation:

Whereas the Ministry of Finance has introduced a one-time \$7 million reduction in education taxes in 2024, a subsidy that will be absorbed by the province through a 95% reduction in education taxes—marking the first such subsidy provided by the province to any industry;

Whereas the Ministry of Finance’s plans to introduce a new aggregate property sub-class in 2025, which is set to provide a \$6 million subsidy to the aggregate industry, with \$3 million of that subsidy being transferred back to the municipal (primarily residential) tax base, raises serious concerns about the fairness and equity of the system;

Whereas the claims that the new sub-class will provide tax stability and predictability seem hollow and do not address the systemic inequities in the taxation framework, which continues to shift an undue burden onto municipal taxpayers, particularly those in rural areas who host these aggregate operations;

Whereas there is significant concern that the government’s actions prioritize the interests of the aggregate industry over the financial realities faced by municipalities and their residents, and that this shift in burden undermines public trust in the fairness and integrity of Ontario’s legal and tax frameworks;

Whereas TAPMO has presented evidence demonstrating that the aggregate industry is financially capable of meeting its tax obligations, including substantial profits and royalty payments made by industry leaders, further undermining the need for these subsidies;

Whereas the municipal taxpayer should not bear the cost of correcting a past error in assessment methodology that unfairly benefited then aggregate industry, and the new



property tax class ratio risks further undermining the principle of revenue neutrality and eroding confidence in Ontario's legal and tax systems;

Therefore be it resolved that the Council of the Township of Puslinch strongly objects to the undue burden being placed on municipal taxpayers to subsidize the aggregate industry, and calls on the provincial government to:

Reevaluate and correct the misguided subsidies being provided to the aggregate sector, and ensure that future tax policies are fair, equitable, and consistent for all taxpayers.

1. Uphold the principles of revenue neutrality in the aggregate tax framework and ensure that any new tax classifications or methodologies do not result in a net loss of revenue for municipalities, especially those that are already facing significant financial challenges.

2. Commit to meaningful reform that ensures fairness and consistency across all sectors of the economy, and actively engages municipalities and taxpayers in a transparent and inclusive process, rather than catering to the demands of the aggregate industry.

3. Take immediate action to correct the existing inequities in the tax framework, ensuring that the burden of this correction is not unjustly shifted to municipal taxpayers, particularly those in rural communities who host these operations.

4. Respect and uphold the integrity of the legal process by honouring the decisions of the Divisional Court and ensuring that all assessment methodologies are transparent, accountable, and based on a fair and balanced approach.

5. Further be it resolved that the Council Township of Puslinch supports TAPMO's call for the provincial government to adopt reforms that prioritize the needs and fairness of municipal taxpayers and to ensure that the aggregate sector contributes its fair share to the province's tax base; and

Further be it resolved that this resolution be forwarded to the Minister of Finance, the Minister of Municipal Affairs and Housing, local school board trustees, AMO, ROMA,



Local MPP, all Ontario Municipalities and the Municipal Property Assessment Corporation.

CARRIED

As per the above resolution, please accept a copy of this correspondence for your information and consideration.

Sincerely,

Justine Brotherston
Municipal Clerk

CC: All Ontario Municipalities, Municipal Property Assessment Corporation (MPAC), Local school board trustees



Top
Aggregate
Producing
Municipalities of
Ontario

Sent via email

November 1, 2024

Premier Doug Ford
Legislative Building
Quenn's Park
Toronto, ON M7A 1A1

Minister of Finance Peter Bethlenfalvy
Ministry of Finance
Frost Building South, 7th Floor
7 Queen's Park Crescent
Toronto, ON M7A 1Y7

Dear Premier Ford and Minister Bethlenfalvy:

Re: Pre Budget Announcement

As you are aware there was a lengthy Assessment Review Board hearing as well as a divisional court ruling increasing the taxes paid by the aggregate sector due to an inappropriate tax relief mechanism implemented by MPAC.

TAPMO recognizes funding for rural, small and northern municipalities is proposed to see an increase in OMPF funding. This increase is very much appreciated. This increase will begin to address the farm tax rebate shortfalls that rural, small and northern municipalities have been experiencing under the former program. Increasing this funding ensures all Ontarians are supporting farmers and not just the residents that call home to small, rural and northern communities. The impact of Provincially significant programs needs to be absorbed by all Ontarians.

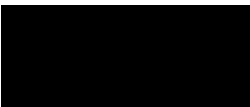
If it is the desire of the Government to provide special treatment to one sector and burdening this special treatment on small, rural and northern communities (where most aggregate operations exist), TAPMO is of the opinion that an aggregate subsidy is not appropriate and should be borne by all Ontarians.

The pre budget announcement provides \$200 to every Ontarian, adding approximately \$3 billion to the Ontario budget. If the Government is willing to add \$3 billion to the deficit. Carrying over the 95% reduction in education tax relief absorbed by all Ontarians for 2024, would have added \$7 million to the total deficit for 2025 or 0.11666667% additional deficit.

TAPMO request the following questioned to be answered:

Explain the justification of increasing taxes on small, rural and northern municipalities which are host to most aggregate operations, to provide a preferential tax relief to the aggregate sector, versus absorbing any relief through increased deficit for all Ontarians?

Yours truly,


James Seeley
Board Chair

Ministry of Finance

Provincial-Local
Finance Division

Frost Building North
95 Grosvenor Street
Toronto ON M7A 1Y7

Ministère des Finances

Division des relations provinciales-
municipales en matière de finances

Édifice Frost nord
95 rue Grosvenor
Toronto ON M7A 1Y7



October 31, 2024

His Worship James Seeley
Chair, Top Aggregate Producing Municipalities of Ontario (TAPMO)
jseeley@puslinch.ca

Don MacLeod
Executive Director, TAPMO
executivedirector@tapmo.ca

Dear Mayor Seeley and Mr. MacLeod:

Thank you for your letter about the new aggregate extraction property class.

As noted in my letter of October 3, the Province will be setting municipal tax ratios and education tax rates for the new aggregate extraction property class to provide tax mitigation for properties in the class. The plan is to provide an overall \$6M tax reduction to properties in the class relative to the original 2024 tax level, comprised of \$3M municipal tax and \$3M education tax. While the specific tax ratios and impacts will not be available until after the assessments for 2025 are finalized by the Municipal Property Assessment Corporation (MPAC), the intention is that municipalities overall will still benefit from the majority of the incremental tax revenues that resulted from the assessment methodology changes implemented by MPAC for 2024.

More details will be shared when they become available. We appreciate the importance of providing municipalities with as much time as possible to support their budgetary planning. We have taken note of your request to receive this information by November 30th and will endeavour to provide the data as close to this date as possible.

Regarding your request that TAPMO be included in consultations during 2025, that is an important part of our plan. We will be reaching out to TAPMO as well as the aggregate sector, and working with MPAC and the Ministry of Natural Resources, to seek more detailed information regarding aggregate activities and discuss possible updates to the definition of the property class.

The government understands the challenges small and rural municipalities face. In this regard, in the 2024 Fall Economic Statement announced the Ontario Municipal Partnership Fund will be increased by \$100 million (20% increase) annually. This will be phased in over two years with an immediate \$50 million increase in 2025.

TAPMO

November Newsletter



INTRODUCING TAPMO'S EXECUTIVE DIRECTOR

Don MacLeod held the position of Chief Administrative Officer for the Township of Zorra from 1996 to 2024. The Township of Zorra is in the top 10 aggregate producing municipalities in Ontario. Recently, Don transitioned into the role of Executive Director for TAPMO. With this wealth of experience, Don is particularly well-suited to continue the success of TAPMO in developing a sustainable plan for aggregate extraction across Ontario.

NOVEMBER HIGHLIGHTS

- **Introducing Don MacLeod, TAPMO Executive Director**
- **Aggregate Property Taxation Assessment Challenges: What to expect in 2025**
- **Meet the Board of Directors and membership!**

STAY CONNECTED

What to stay in the know?

Visit the TAPMO website to review agendas and minutes from previous meetings:

<https://www.tapmo.ca/resources#agenda>

Next TAPMO meeting: Monday November 18, 2024 @ 2:30pm



[tapmo.ca](https://www.tapmo.ca)
executivedirector@tapmo.ca

TAPMO

November Newsletter

Property Taxation Changes and Concerns for Municipalities

Following an appeal decision of the Divisional Court, the Municipal Property Assessment Corporation (MPAC) revised the assessment methodology and property tax classification of aggregate sites to ensure sector-wide consistency, resulting in tax changes for pits and quarries across the province for 2024 (an increase of \$12M municipal and \$5M education). These properties continue to be assessed based on the province-wide valuation date of January 1, 2016, but the methodology used to derive those values has been modified in line with the court ruling. This legal process was spearheaded by Wellington County. In a troubling response to the Divisional Court decision, the Ministry of Finance has introduced a one-time (2024) \$7 million education tax reduction, to mitigate the impact of these changes on the aggregate industry. This reduction will be absorbed by the province through a 95% reduction in education taxes, which is the first time this kind of a subsidy is being provided by the province for any industry.

Looking ahead to the 2025 tax year, a new aggregate property sub-class is set to be introduced, but the intent to create improved tax stability and predictability feels hollow. The sub-class will result in a \$6 million subsidy for the aggregate industry, \$3 million of which is being transferred back to the municipal (primarily residential) tax base. The tax subsidy will be funneled through a temporary property tax sub-class within the industrial property category, with MPAC and local municipalities tasked with its implementation. However, the claim that this newly established sub-class will provide stability and predictability raises serious concerns. Instead of genuinely addressing the inequities in the system, it seems to merely provide an unwarranted tax break to the aggregate industry, while shifting the burden onto municipal taxpayers and perpetuating an unjust structure.

The government's approach appears to prioritize the interests of the aggregate sector over the financial realities faced by municipalities and their constituents. MPAC's collaboration with the aggregate sector and the Ministry of Finance (MOF) to gather detailed information on aggregate sites may result in more of the same, rather than meaningful reform. While the government claims this refined data will support future discussions with the Ontario Stone, Sand & Gravel Association (OSSGA) and municipalities, the focus seems skewed toward accommodating industry demands rather than ensuring fairness and accountability for all taxpayers. This direction threatens to undermine any hope of establishing a principled and sustainable approach to aggregate taxation, leaving communities to bear the consequences.

TAPMO

November Newsletter

Property Taxation Changes and Concerns for Municipalities

continued from page 2

In light of these changes, TAPMO wishes to voice serious concerns regarding the new tax class ratio established by the Ministry of Finance. Contrary to fostering a revenue-neutral outcome, this adjustment is expected to lead to \$3 million being refunded directly from local taxpayers to the aggregate industry starting in 2025 and beyond. Neither the Ministry nor representatives from the aggregate industry have provided sufficient justification for what seems to be a residential taxpayer-funded subsidy to benefit a for-profit industry. Concerns from both the Ministry of Finance and the aggregate sector highlight that potential cost increases for residential housing stemming from the Assessment Review Board (ARB) ruling have not been adequately assessed or documented. Claims suggesting a mere \$3-4 increase per Ontarian fail to capture the disproportionate impact this assessment framework will have on rural residents, who predominantly host these aggregate operations.

The OSSGA has yet to provide conclusive evidence of the industry's inability to contribute its fair share of taxes. In fact, TAPMO has presented evidence indicating that aggregate producers can meet their tax obligations. For example, Dufferin (CRH) paid \$2 million in royalties to the University of Guelph in 2023, while St. Mary's Cement (CBM Canada) reported total net revenues of \$109,785,000 USD for aggregate products in their 2022 financial statements.

While TAPMO recognizes that tax increases on any property class may be unpopular, we argue that the aggregate industry has long benefited from an inappropriate tax discount. The Divisional Court ruling clarified that MPAC lacked the authority to grant such tax relief. The municipal taxpayers should not have to provide tax relief to the industry as a result of correcting an inappropriate tax benefit that the industry has come to expect. The new property tax class ratio fails to maintain revenue neutrality and threatens to erode trust in Ontario's legal frameworks. Ontarians deserve confidence that these processes are respected and upheld.

TAPMO remains committed to advocating for fair and equitable taxation practices that support both municipal taxpayers and the sustainability of our communities. The future of Ontario's aggregate taxation framework must prioritize transparency, fairness, and the principles of revenue neutrality.

TAPMO

November Newsletter

Property Taxation Changes and Concerns for Municipalities - What's Next?

TAPMO is urging members to raise awareness of this issue by requesting your Municipal Council consider supporting the following motion:

Whereas the Ministry of Finance has introduced a one-time \$7 million reduction in education taxes in 2024, a subsidy that will be absorbed by the province through a 95% reduction in education taxes—marking the first such subsidy provided by the province to any industry;

Whereas the Ministry of Finance's plans to introduce a new aggregate property sub-class in 2025, which is set to provide a \$6 million subsidy to the aggregate industry, with \$3 million of that subsidy being transferred back to the municipal (primarily residential) tax base, raises serious concerns about the fairness and equity of the system;

Whereas the claims that the new sub-class will provide tax stability and predictability seem hollow and do not address the systemic inequities in the taxation framework, which continues to shift an undue burden onto municipal taxpayers, particularly those in rural areas who host these aggregate operations;

Whereas there is significant concern that the government's actions prioritize the interests of the aggregate industry over the financial realities faced by municipalities and their residents, and that this shift in burden undermines public trust in the fairness and integrity of Ontario's legal and tax frameworks;

Whereas TAPMO has presented evidence demonstrating that the aggregate industry is financially capable of meeting its tax obligations, including substantial profits and royalty payments made by industry leaders, further undermining the need for these subsidies;

Whereas the municipal taxpayer should not bear the cost of correcting a past error in assessment methodology that unfairly benefited the aggregate industry, and the new property tax class ratio risks further undermining the principle of revenue neutrality and eroding confidence in Ontario's legal and tax systems;

Therefore be it resolved that the Council [INSERT MUNICIPALITY] strongly objects to the undue burden being placed on municipal taxpayers to subsidize the aggregate industry, and calls on the provincial government to:

1. Reevaluate and correct the misguided subsidies being provided to the aggregate sector, and ensure that future tax policies are fair, equitable, and consistent for all taxpayers.
2. Uphold the principles of revenue neutrality in the aggregate tax framework and ensure that any new tax classifications or methodologies do not result in a net loss of revenue for municipalities, especially those that are already facing significant financial challenges.
3. Commit to meaningful reform that ensures fairness and consistency across all sectors of the economy, and actively engages municipalities and taxpayers in a transparent and inclusive process, rather than catering to the demands of the aggregate industry.
4. Take immediate action to correct the existing inequities in the tax framework, ensuring that the burden of this correction is not unjustly shifted to municipal taxpayers, particularly those in rural communities who host these operations.
5. Respect and uphold the integrity of the legal process by honouring the decisions of the Divisional Court and ensuring that all assessment methodologies are transparent, accountable, and based on a fair and balanced approach.

Further be it resolved that the Council [INSERT MUNICIPALITY] supports TAPMO's call for the provincial government to adopt reforms that prioritize the needs and fairness of municipal taxpayers and to ensure that the aggregate sector contributes its fair share to the province's tax base; and

Further be it resolved that this resolution be forwarded to the Minister of Finance, the Minister of Municipal Affairs and Housing, local school boards, AMO, ROMA, Local MPP, all Ontario Municipalities and the Municipal Property Assessment Corporation.

TAPMO



**Chair
Mayor James Seeley**
Township of Puslinch



**Vice-Chair
Mayor Jennifer Coughlin**
Township of Springwater

Board of Directors



Mayor Dave Barton
Township of Uxbridge



Mayor Jim Hegadorn
Loyalist Township



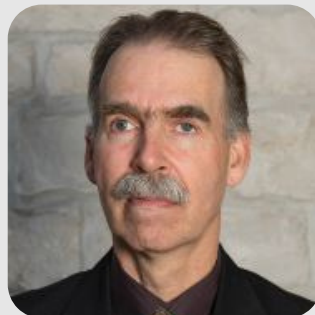
Councillor Tony Brunet
Town of Lincoln



Mayor Kevin Eccles
Municipality of West Grey



Deputy Mayor Peter Lavoie
Township of Oro-Medonte



Councillor Matthew Bulmer
County of Wellington



Deputy Mayor Katie Grigg
Township of Zorra

TOWNSHIP OF
Southgate



TOWNSHIP OF
EAST GARAFRAXA



TOWN OF
MONO



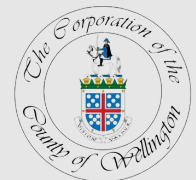
Jump In

CITY OF
Burlington



**WOOLWICH
TOWNSHIP**

TOWN OF
ERIN



Township of
Springwater



Town of
Lincoln





Top
Aggregate
Producing
Municipalities of
Ontario

October 24, 2024

Sent via email

Minister of Finance Peter Bethlenfalvy
Ministry of Finance
Frost Building South, 7th Floor
7 Queen's Park Crescent
Toronto, ON M7A 1Y7

Dear Minister Bethlenfalvy:

Re: Aggregate Assessment

I am writing to raise TAPMO's concerns with the new tax class ratio for aggregate operations that does not maintain a revenue neutral outcome. TAPMO has been informed that the new tax class ratio will result in \$3 million of assessment being refunded to the aggregate industry for 2025 and beyond.

To date, neither the Ministry nor the aggregate industry has provided any justification for this residential taxpayer funded subsidy. The concerns raised by the MOF and the aggregate industry indicate that the potential cost increase for residential housing resulting from the ARB ruling applied across the province has not been thoroughly assessed or documented. Impacts of \$3-4 dollars per Ontarian are not accurate. Most aggregate operations are located in rural municipalities, thus rural residents will be providing this relief on a disproportionate level.

I would draw your attention to the developments in the Town of Erin. Developers are largely paying nearly \$200 million in up-front cost to build a wastewater treatment facility. This cost will be a direct pass through to the cost of the homes serviced by the treatment plant. In comparison, a revenue neutral tax class would be adding less than a quarter dollar to the cost of per tonne of aggregate.

Generally speaking, in Ontario, the provincial framework we strive to achieve is known at the municipal level as "Growth pays for Growth". Taxing aggregate properly brings us as a society closer to achieving that result. The aggregate tax class ratio does not support the revenue neutral tax outcome, nor does it support the principle of "Growth pays for Growth".

The OSSGA has failed to bring definitive evidence of the industry's inability to pay their fair share of taxes. Quite contrary, TAPMO has provided evidence of the ability of producers to pay their fair share. We are referencing the royalties Dufferin paid the University of Guelph (\$2 million in 2023). Further to the point, St. Mary's Cement's (CBM Canada) audited 2022 Financial Statements indicate a total net revenue for aggregate products at a whopping \$109,785,000 USD.

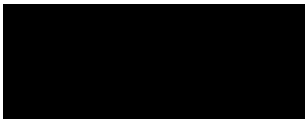
TAPMO recognizes that any increase of taxes on any property class would likely not be welcome. Unfortunately, as recorded in the Divisional Court decision, MPAC did not have the legislative authority to be providing tax relief (page 12 note 55 of the decision) that the industry experienced from 2016 onward. The aggregate industry is accustomed to an inappropriate tax discount. In TAPMO's view, residential taxpayers should not have to provide tax relief to the industry as a result of correcting an inappropriate tax benefit that the industry had come to expect. We respectfully reassert our position that OSSGA has not brought forward evidence to support their claim, other than highlighting the displeasure of paying more taxes. We have also not received evidence from the MOF supporting this relief for 2025 and beyond.

Lastly, we are deeply concerned that the lengthy and expensive legal process undertaken by Wellington County, and the decisions ordered by both the Assessment Review Board and Divisional Court is being undermined. This is particularly concerning given that the ARB decision was upheld. The new property tax class ratio fails to maintain a revenue-neutral tax assessment and undermines the legal process, which incurred significant costs for Wellington County taxpayers. This is extremely disturbing; Ontarians must have confidence in the legal processes in Ontario. Undermining the ARB assessment through a property tax class ratio that does not preserve revenue neutrality erodes that trust.

It is essential that discussions be inclusive and that any future assessment changes involve a fair and balanced approach in consultation with municipal partners, not just the aggregate sector.

TAPMO thanks the Ministry for the opportunity to comment on this very important issue and we look forward to strengthening this relationship.

Yours truly,



James Seeley
Board Chair

From: Sarah Johnson <sarah.johnson@grey.ca>

Sent: January 20, 2025 9:50 AM

To: Group: Local Municipal Clerks <Group_LocalMunicipalClerks@grey.ca>

Subject: Grey County Forest Management Options Report PDR-CW-31-23

Item 6

Good Morning,

Please see the attached document to a report that was previously presented to Grey County Council in 2023 regarding the Grey County Forest Management Plan. The direction was to share the information with lower tiers, but it appears that this task was not completed at that time.

If you have any questions regarding the report, please don't hesitate to contact myself.

Kind Regards,

Sarah Johnson, HBA, MCIP, RPP

Trails and Forestry Coordinator

Grey County

595 9th Avenue East

Owen Sound, ON N4K 3E3

Phone: +1 548-877-0720

sarah.johnson@grey.ca

<https://www.grey.ca>

<https://www.visitgrey.ca>

<https://greyroots.com>

To:	Warden Milne and Members of Grey County Council
Committee Date:	July 27, 2023
Subject / Report No:	Forest Management Options / PDR-CW-31-23
Title:	Forest Management Options Report
Prepared by:	Natalie Mechalko
Reviewed by:	Scott Taylor
Lower Tier(s) Affected:	Township of Chatsworth, Township of Georgian Bluffs, Municipality of Grey Highlands, Municipality of Meaford, Township of Southgate, Town of The Blue Mountains and Municipality of West Grey
Status:	Recommendation adopted by Committee as presented per Resolution CW114-23; Endorsed by County Council August 10, 2023, per Resolution CC57-23.

Recommendation

1. That report PDR-CW-31-23 regarding Forest Management Options be received, and
2. That the report be shared with member municipalities within Grey County for their review; and
3. That staff be directed to proceed with amending the harvest schedule in the Forest Management Plan to 25 years and reduce the total basal area to 16 – 18 metres squared per hectare; and
4. That staff be directed to prepare a further report for Council's consideration exploring potential for revenue from carbon offset projects, based on the amended harvest schedule, identifying select forests where harvesting may not be feasible from an ecological, recreational, or access perspective, and provide for public consultation on the County's forest management approaches.

Executive Summary

The County owns and manages 45 separate forest properties, comprising 3,198.1

hectares (7,899.3 acres) of forest. These forests are managed in accordance with the Forest Management Plan that was adopted in 2003 and updated in 2021. The Forest Management Plan update was completed by Grey Sauble Conservation Authority staff in consultation with the Forest Management Plan Advisory Committee made up of industry stakeholders. In light of recent public feedback on harvest operations, heightened risk of forest fires, Grey County's recent Climate Change Action Plan (Going Green in Grey), and Council's declaration of a climate emergency, County staff are seeking direction to re-examine forest management in the County-owned forests. This report does not apply to privately owned forests or other publicly owned forests not under Grey County ownership. Additionally, recent inventories have indicated that forests are not regenerating as quickly as anticipated due to various reasons. The options for consideration are as follows:

- a) Amend the harvest schedule in the Forest Management Plan and continue with harvesting as per the plan,
- b) Harvest in select County forests only, and cease harvesting in other County Forests,
- c) Explore carbon offset projects for County forests,
- d) Discontinue harvesting in County forests.

Staff recommend proceeding with options A, B and C at this time. Staff also recommend investigating carbon offset projects and identifying County forests where harvesting may not be as feasible for ecological or access reasons. Staff are not recommending proceeding with option D for the reasons outlined in the report.

Background and Discussion

What is Forest Management?

Forest management contributes to healthy, productive forests for present and future use. Sustainable use of the forest means forests can be harvested at the rate it can regenerate. Healthy, productive forests contain a variety of plant species, in addition to different sizes and age classes of trees that provide a wide range of ecosystem services. Forest Management Plans ensure that forestry operations and related activities are carried out in ways that support the sustainable use of all forest resources for generations to come.

Most County forest properties are former "Agreement Forest" properties purchased by the County as part of a provincial reforestation program. Even though that program was discontinued in the 1990's, Section 2 of the Forestry Act mandates that the County only use those properties for forestry purposes, and prohibits the County from selling, leasing or otherwise disposing of them unless the Province has given specific approval.

Selective Harvesting

Selective harvesting in accordance with Good Forestry Practices is the selective removal of trees based on certain criteria, such as tree maturity, height, age and whether the tree is diseased. Good Forestry Practices is defined within the *Forestry Act* as, “*the proper implementation of harvest, renewal and maintenance activities known to be appropriate for the forest and environmental conditions under which they are being applied and that minimize detriments to forest values including significant ecosystems, important fish and wildlife habitat, soil and water quality and quantity, forest productivity and health and the aesthetics and recreational opportunities of the landscape*”.

Selective harvesting can create a diversity of age classes or stand structures to reduce the availability of preferred hosts for pests and pathogens and increasing diversity of tree species within forest stands. It can also reduce tree density in fire-prone ecosystems and alter the forest structure to reduce the severity or extent of wind and ice damage.

Negative impacts of selective harvesting includes the removal of genetically superior trees which contribute to forest health. The leftover tree debris can alter the microclimate in the forest and have mixed effects on seedling establishment. Harvesting machines and associated equipment can damage standing trees, cause soil impaction, and other ground disturbance which negatively affects forest microclimates and soil ecosystem dynamics. Good forestry practices minimizes these negative impacts. Grey County Forests are selectively harvested in accordance with Good Forestry Practices. Harvested wood is generally consumed locally for fuelwood and lumber. During an active harvest, or leading up to a harvest, members of the public often express concern about the destruction of the forest as a result of harvest operations. The forest immediately following a harvest may look different to forest users, as per Figures 1 and 2 below. However, Figure 3 below shows the regeneration that happens in a forest a few years after the harvest.



Figure 1: Topcliff North 2023 Harvest Logging Trail



Figure 2: Topcliff North 2023 Harvest Preserved Wildlife Tree



Figure 3: Copper Kettle 2020 Harvest Regeneration

Grey County's Forest Management Plan

The County's forests are managed in accordance with the Forest Management Plan (FMP) that was adopted in 2003 and updated in 2021. The Forest Management Plan update was completed by Grey Sauble Conservation Authority staff in consultation with the Forest Management Plan Advisory Committee made up of industry stakeholders. An approved FMP is a requirement for Forest Stewardship Council (FSC) Certification through the Eastern Ontario Model Forest's Forest Certification Program. [FSC's Forest Management Certification](#) is voluntary for forestry organizations who want to demonstrate responsible forest management by having their forest management planning and practices independently evaluated against FSC's forest management standards. Grey County's forests have been FSC certified since 2011. The maintenance of the FSC certification provides a third-party review that ensures that Grey County strives to protect the plant and animal communities that depend on the forests, as well as to respect the land rights of local Indigenous Peoples. There is a program cost to maintaining the FSC certification of approximately \$7,300 per year.

Updates to the FMP included policies that promote biodiversity protection and enhancement, including species at risk surveys to mitigate and protect during harvests, invasive species management and other opportunities to enhance natural features. A key component of the updated FMP is that the forests can be managed sustainably considering the need to both adapt to and mitigate climate change. Additional amendments included: renaming of some of the County Forests; whether sap collection or beehive activities should be considered within County Forests; as well as discussion regarding First Nations and Metis traditional land acknowledgements. These amendments were based on feedback received as part of the public consultation.

The FMP outlines how Grey County Forests are managed within a 22-year period from January 1, 2023, to December 31, 2042. The forests are on a 15-year harvest schedule with a designated number of acres per year and hardwoods being harvested down to 20 metres squared per hectares (m^2/ha). $20m^2/ha$ refers to the total surface area of stumps if every tree if one hectare was removed at 1.3 metres above the ground. $20m^2/ha$ is the target basal area for hardwoods as indicated by the Ministry of Natural Resources and Forestry to maintain the necessary stand density and allow for forest regeneration.

Mitigation measures are implemented for harvests to minimize adverse environmental impacts while striving to achieve the ideal basal area distribution. These measures include:

- Harvesting through late August to March to avoid bird nesting season from April to early August, and
- Prioritizing harvests during the winter months when the ground is frozen to minimize ground disturbance and impacts to forest soils (with the exception of plantations, as it is best to harvest these forests when the ground is not frozen to increase seed germination).

As part of the FSC certification, Grey County is required to protect areas of high conservation values (HCVs). These HCV areas include portions of the forests that may contain significant concentrations of rare, threatened, or endangered plants and/or animals, rare or significant ecosystems, or areas which represent rare or outstanding biological, ecological, or social values. Such areas include Provincially Significant Wetlands (PSW), Areas of Natural and Scientific Interest (ANSI), and habitats of Species At Risk (SAR). There are some forest groups that are excluded from the harvest schedule due to issues with access due to water levels and the number of HCVs present in these forest groups.

The FMP also outlines how harvesting can reduce the spread of Emerald Ash Borer (EAB) through reducing ash populations. Ash is typically represented by 20-30 percent of the forest and harvesting efforts target the medium and large ash for removal over any other species.

Grey County's Recreational Trails Master Plan (RTMP)

The County Forests also serve as recreational amenities across the County. Particularly during the COVID-19 pandemic and associated restrictions during 2020 and 2021, the County saw increased users in a number of our County Forests. In 2019 the County completed the [Recreational Trails Master Plan](#) which guides the recreational uses in our County Forests. Typically, the County's Forests are open year-round to recreational users, though most trails are not maintained in the winter, except for those maintained by agreement with snowmobile, cross-country skiing, or snowshoe clubs. When there is an active harvest occurring in a County Forest, all or a portion of the forest is closed to public access. In recent years, County staff have experienced more 'push-back' when temporarily closing access due to forest harvests. In considering forest harvest options moving forward, the impact on recreational users of the County Forests is also one criterion for consideration. Not all County forests have improved trails or heavy recreational use, so this criterion would not impact all forests equally.

Grey County's Climate Change Action Plan

Grey County's Climate Change Action Plan, *Going Green in Grey*, indicates that 40-45 percent of Grey County is forested and these areas provide significant ecosystem services and carbon sequestration. Of the County's total forested area, 66 percent is under private ownership and 34 percent is public ownership. Grey County Forests account for 34 percent of the publicly owned forested area. *Going Green in Grey* highlights the importance of afforestation and recommends a study to analyze land use change and forest cover over time. A further study of forest and tree canopy sequestration potential could also be undertaken to acquire local data that includes detailed analysis of the influence of weather, soil characteristics, tree age and species. The plan also notes that forestry and its associated practices produces greenhouse gas emissions. Action 1: Afforestation, Habitat and Biodiversity Protection highlights the importance of reforestation, planting trees where they once stood and afforestation, adding additional trees, to capture carbon dioxide from the atmosphere and convert it into biomass. Sequestering carbon dioxide will support the County's efforts to meet emission reduction targets in 2030 and reach net-zero emissions by 2050. The recommendation out of Action 1 is to develop a multi-faceted approach to advance the protection of natural assets, throughout Grey County. The strategy considers the critical importance of the forests owned by the County and protection of these County-owned forests which act as a source for carbon sequestration.

Forest Carbon

Forests help maintain Earth's carbon balance and moderate climate change by absorbing about one-quarter of the carbon emitted by human activities such as the burning of fossil fuels and changes in land uses. Carbon uptake by forests reduces the

rate of carbon accumulation in the atmosphere, reducing the rate at which climate change occurs. Forests' ability to remove the proportion of carbon emitted by human activities will affect the future rate of carbon increase in the atmosphere.

Natural Resources Canada indicates that forests can act as either carbon sources or carbon sinks. A forest is considered a carbon source if it releases more carbon than it absorbs through burning trees, decay after dying or debris decay from harvesting activities. A forest is considered a carbon sink if it absorbs more carbon from the atmosphere than it releases. Carbon sequestration is the process of carbon absorption from the atmosphere through photosynthesis and the subsequent deposition in forest biomass, dead organic matter and in soils. The net balance of all these carbon exchanges determines whether a forest is a carbon source or sink. For the past century, Canada's managed forests have been a significant carbon sink, steadily adding carbon to that already stored. As a result of forest fires and insect infestations over the last 15 years, Canada's forests as a whole have become carbon sources, releasing more carbon into the atmosphere than they are accumulating in any given year.

Factors such as the increase in the annual total area burned by wildland fires and unprecedented insect outbreaks have resulted in forests shifting to carbon sources. The annual harvest rates have shifted dramatically in response to economic demand, increasing in the 1990's and decreasing sharply with the global economic recession from 2007 to 2009. The combination of these events and activities has resulted in Canada's managed forest acting as a net carbon source in years when large areas are burned.

Older forests store more carbon than younger forests, but they sequester carbon at a slower rate. Young trees are more efficient carbon absorbers as the new trees grow quickly. Age diversity within a forest and across the landscape is the best way to maximize both carbon storage and sequestration. Age diversity also contributes to climate resilience and forest health.

Changing Climate Impacts on Forests

Climate influences the structure and function of forest ecosystems and plays an essential role in forest health. A changing climate affects the growth and productivity of forests and could alter the frequency and intensity of forest disturbances such as insect outbreaks, invasive species, wildfires and storms, human development and drought. Increases in temperature, changes in precipitation and increases in CO₂ caused by climate change are likely to affect forest growth and productivity.

Warming temperatures can increase the length of the growing season and shift the geographic ranges of some tree species. Certain tree species' habitats will likely shift north or to higher altitudes. Other species will be at risk regionally if conditions in their current geographic ranges are no longer suitable. Increased temperatures may also

enable harmful insect species to develop faster, alter their seasonal life cycles and expand their ranges northward. A lack of predators, pathogens or inadequate defenses in trees can allow insects to spread rapidly. Climate change could result in greater insect outbreaks that defoliate, weaken and kill trees. Climate change may also benefit invasive plants because they are more tolerant to the environmental conditions resulting from climate change than native plants. Invasive plant species can displace important native vegetation because the invasive species often lack natural predators.

Changes in precipitation increase the risk of drought in some areas and the risk of extreme precipitation and flooding in others. Increased temperatures alter the timing of snowmelt, affecting the seasonal availability of water. Although many trees are resilient to some degree of drought, increases in temperature could make future droughts more damaging than those experienced in the past. Drought dries out vegetation and increases its susceptibility to wildfire, and it also reduces trees' ability to produce sap, which protects them from destructive insects.

Increases in atmospheric CO₂ in conjunction with sufficient water and nutrients may enable trees to be more productive, which may change the distribution of tree species. Growth will be highest in nutrient-rich soils with no water limitation and will decrease with decreasing fertility and water supply.

Forest disturbances can reduce forest productivity and change the distribution of tree species. Forests may recover from a disturbance or existing species may shift their range or die out. When existing species die out, the new species of vegetation that colonize the area create a new type of forest. Disturbances can interact with one another, or with changes in temperature and precipitation, to increase risks to forests. For example, drought can weaken trees and make a forest more susceptible to wildfire or insect outbreaks. Similarly, wildfire can make a forest more vulnerable to pests.

The extent, intensity, and frequency of wildfires are expected to increase with climate change in certain areas of the country. Warmer spring and summer temperatures, coupled with decreases in water availability, dry out woody materials in forests and increase the risk of wildfire. Fires can also contribute to climate change, since they can cause rapid, large releases of carbon dioxide to the atmosphere. Extreme weather events exacerbated by climate change can damage forests and result in additional forest loss.

Forests and Climate Change Mitigation

The research on the importance of unmanaged forests for climate change mitigation compared to managed forests is inconclusive. Studies on unmanaged or old-growth forests indicate that these forests are critical for carbon sequestration, the mitigation of climate change, and protecting biodiversity. Other studies focusing on forest management indicate that improved forest management practices boost forest growth

and help mitigate climate change. These studies indicate that improved forest management practices help mitigate climate change by increasing the forest carbon stock through storing carbon in forest products and by generating wood-based materials, substituting fossil carbon-based materials or other CO₂-emission-intensive materials. Some research assumes a trade-off between the timber harvested from existing forests and the stock of carbon in those forest ecosystems, asserting that both cannot increase simultaneously.

Researchers often rely on CO₂ flux measurements in addition to external impacts on growth, such as nitrogen emissions, increasing temperatures, CO₂ enrichment and changed precipitation patterns in effort to determine the relative importance of forests for climate change mitigation. Recent studies have indicated that CO₂ flux measurements alone do not allow conclusions on a superiority of unmanaged to managed forests for mitigation goals due to critical consideration of uncertainties and the application of system boundaries. Some studies argue that the consideration of wood products for material and energetic substitution overrules the mitigation potential of unmanaged forests. Moreover, studies show that impacts of nitrogen emissions, CO₂ enrichment of the atmosphere, increasing temperatures and changed precipitation patterns lead to a meaningful increase in growth, even in forests of higher age. These findings are important because they outline how further research on cause-and-effect relationships between management practices and carbon stocks in different compartments of forest ecosystems in order to account for human-induced changes. Forests should continue to be monitored and management should be adaptive and follow current best practices.

How are other public authorities managing their forests?

County staff have investigated forest management practices in Bruce, Dufferin and Simcoe counties, as well as the Grey Sauble Conservation Authority (GSCA), and the Saugeen Valley Conservation Authority (SVCA). These authorities all manage their forests in accordance with their respective forest management plans which aim to keep forests productive, healthy and enhance diversity over time. Some of these authorities have investigated options such as carbon credits, but none of the above have a current forest carbon project at this time.

County Forest Options

Option A – Continue with Harvesting and Amend Harvest Schedule in Forest Management Plan

If Council were to support continuing with harvesting in County forests, the current harvest schedule in the FMP would need to be amended. Most of the prescriptions written for the hardwood stands identify targets of 20 m²/ha. However, recent

inventories identify that these stands either did not respond well to the previous thinning or that these stands were harvested beyond the ideal retention limit. There are several possible reasons for the lower yields in the current inventory, including:

- Failure to follow tree-marking prescriptions in historic harvests,
- More trees removed during past harvest operations than permitted,
- Insects or disease killing trees during the 15-year cycle,
- Specific growing conditions during the previous 15 to 20-year cycle did not produce the anticipated volumes, or
- Any combination of the above factors.

Lower yields in the current inventory pose an issue for future management. Achieving the ideal class distribution at a total basal area of 20 m² /ha will require either a reduction in harvest volumes from the stands or an extension of the cutting cycle to 25 years, resulting in fewer acres harvested each year. The recommendation of this report is that a 25-year harvest schedule is the preferred option.

The 2003 plan calculated the Maximum Annual Depletion (MAD) at 360.6 hectares (ha) in the tolerant hardwoods for the first five years, equivalent to 72 ha per year. MAD includes events such as harvesting, fire damage or loss, insect damage, disease, and natural depletion of forested land. The 2003 plan's harvest schedule targeted 81 ha per year to be harvested for the hardwoods. The MAD was never recalculated after the first five years and the harvest schedule continued targeting the same total area each year. This resulted in an overharvesting of eight ha per year. Over a 15-year cycle, the overharvesting of eight ha per year equates to 120 hectares, or almost two years of the original MAD calculation. The MAD represents a maximum limit. To ensure sustainability, annual harvest volumes need to be maintained below this limit.

Due to the new acquisitions of property, and disposition of one property, a new 15-year cycle MAD has been calculated in the 2021 FMP for the upland deciduous/mixed to $1259.2 / 15 = 83.9$ ha per year or 419.7 hectares in the first five-year operating plan. The MAD will be recalculated at the end of the first five years to determine if any alterations are required to the harvest schedules.

Due to historic overharvesting, the next cycle of harvests will mostly be improvement cuts rather than commercial sawlog harvests in effort to swing the structure of the stands back towards ideal size class distribution. Only a small number of stands have a sawlog potential in the next harvest.

Based on a review of historic harvest information, the average distribution for Grey County hardwood harvests equals 20 percent sawlog to 80 percent fuelwood. Based on this factor, Grey County could normally expect approximately \$70,000 per year from the annual hardwood harvest. Due to lower available volumes made up of smaller, less valuable sawlogs, it is more realistic to estimate that most years in the next 15-year

cycle will result in an annual income closer to \$50,000, subject to any price fluctuation changes.

The FMP stipulates a current harvest cycle of 10 years for plantations and 15 years for hardwoods. All of the hardwood forests are at the total basal area of 20 m²/ha. The Grey County Forest Manager is proposing to extend the harvest schedule to 25 years and reduce the total basal area to 16–18 m² /ha. The result would be fewer hectares harvested per year, allowing for continued hardwood harvest in the forests provided the forests will increase to the anticipated growth of 26 m² /ha in 25 years. Revenue is anticipated to fluctuate depending on the market price for hard maple and ash.

Option B – Harvest in Select County Forests Only

Option B would consist of selective harvesting in accordance with Good Forestry Practices in select County Forests only. There may be some forests that are more suitable for harvesting than others. The Northern Institute of Applied Climate Science indicates that areas with exceptionally high densities of carbon may warrant protection through the establishment of reserves, which are defined as natural areas with little to no harvest activity that do not exclude management of fire or other natural disturbance processes. However, the impacts of climate change on forest carbon dynamics may necessitate an adjustment of the use and definition of reserves, such that it may be valuable to retain flexibility in the use of management practices that support the maintenance of high carbon stocks. Limiting harvests in some County forests would also promote old forest conditions, which play a large role in carbon sequestration and the mitigation of climate change.

There may be some County forests not suitable for harvesting because forest access is difficult or the forest can only be accessed via non-County property. For example, Dromore County Forest can only be accessed from a private landowner's driveway. An agreement was established between the landowner and the County to allow contractors and forestry staff to access the County forest. Through this agreement, the County is permitted to use this driveway provided the County restores the driveway to its previous condition following each harvest. Additional County forests less suitable for harvest due to access may include Kolapore Uplands, Osprey Wetlands and Lueck Mill.

If Council were to support harvesting in select forests and cease harvesting in others, the MAD would need to be recalculated for those forests. Forests that are determined to be less suitable for harvest can be monitored each year for disease and insect infestation.

Option C – Carbon Offset Project

Option C would allow the County to explore carbon offset projects and determine whether County forests would be eligible for such projects. Forest carbon markets allow

for businesses, municipalities, and other organizations to purchase carbon credits to offset their CO₂ and other GHG emissions. A forest carbon credit is created when a landowner undertakes a specific project to increase their forests' ability to absorb CO₂ and store carbon. The projects are then verified and monetized in the marketplace for forest carbon. Reducing emissions of CO₂ and other GHG's can be difficult and expensive, so forest carbon offset markets provides entities with an alternative to reduce their impacts on climate change. The increased CO₂ intake by forests is used to offset CO₂ emissions by another entity. There are three main types of carbon offset projects:

1. **Avoided conversion:** protecting the forest from future development to keep the carbon in the forest's trees and soils. These projects usually include the establishment of a conservation easement or the transfer of private land to public ownership. In order to qualify, easements cannot be too restrictive on the timber and its management. For most carbon projects, eligible activities should be either future activities, or activities that started recently to respect the principle of additionality. Properties acquired and designated for protection after the year 2000 may be considered under a crediting program.
2. **Afforestation, reforestation, or revegetation:** growing new trees to remove CO₂ from the air and store carbon. For these projects, trees are planted and/or conditions are created that will encourage the growth of trees in an area previously absent of trees.
3. **Improved Forest Management (IFM):** using practices that increase the amount of CO₂ removed from the air and carbon stored in an existing forest. Strategies to do this might include setting aside a reserve area, harvesting less frequently to grow larger trees, thinning to allow remaining trees more room to grow, and/or increasing the diversity of species and age classes (i.e., forest structure).

Improved forest management is the most common forest carbon offset type and the most applicable project type for County forests, as all County forests undergo scheduled management by way of selective harvesting.

County staff have consulted with one carbon offset project organization to date, Bluesource. Bluesource indicates that eligible projects require land ownership in Fee Simple title and a minimum forest area of approximately 5,000 acres to be economically viable as a single project. In the 'business as usual' forest management, all merchantable timber is harvested whereas forest management for a carbon offset project requires harvesting to be within forest growth limits. Carbon credits allow for an additional revenue source, where revenue would be made on harvested wood in addition to carbon credits. Bluesource provides a cost scenario for a forest managed carbon project of \$2 million paid for 400,000 m³ of wood and \$4.2 million paid for 100,000 carbon credits (at \$42 per credit), a total of \$6.2 million for this option

compared to an intensive harvest at \$4 million paid for 800,000 m³ of wood and \$0 paid for 0 carbon credits.

Grey Sauble Conservation engaged Carbonzero to complete a project feasibility assessment to investigate the viability of a Forest Carbon Offset project for their land. Carbonzero suggested GSCA could have a carbon offset project that would bring in revenue between \$32,500 and \$98,000 per year. This range does not include any costs associated with a project or carbon broker fees. Based on the low revenue and high project development costs, GSCA determined that the associated expenses would likely be greater than revenue. The report highlighted the main reasons for the low revenue projections:

- 47% of GSCA's land base has not had Forest Management and through the "Principle of Additionality" it cannot qualify for Carbon Credits. Most of GSCA's land was acquired and designated as "protected" prior to 2000. In order to receive credits from these lands, there needs to be a changed use.
- Leakage occurring as a result of net increases in GHG emissions outside an area as a result of that area's activity. Activity shifting leakage occurs when harvesting stops at one location, which results in an increase in harvesting at another location. Market leakage is a commodity shift that occurs when harvesting stops at one location and the demand shifts somewhere else due to lost supply. For example, people who rely on wood to heat their homes still need the product, so it increases demand from another supplier. Carbonzero estimates leakage to be between 40% and 70%.

Bruce County has signed up for development of a forest carbon offset project, but is currently waiting on the federal protocols for the compliance market to be released prior to proceeding with a project.

Option D – Discontinue Harvesting

The County has the option to discontinue harvesting. This option would have several impacts:

1. Forest growth would slow and eventually decline as a result of a lack of harvesting. A decline in forest growth could result in the forests becoming carbon sources.
2. Leakage occurring as a result of net increases in GHG emissions outside an area as a result of that area's activity. Market leakage is highly dependent of the type of wood product to be harvested. As fuelwood is often consumed locally and is a commodity that can be sourced somewhat easily in the region, leakage is anticipated to be high. Some assessments for carbon offset projects consider the risk of leakage of fuelwood harvesting to be so high that projects areas where fuelwood removal represents more than 5% of annual harvest level are not

eligible. Other assessments indicate leakage to be established at least at 40% but likely at 70% which is much higher compared to other Canadian projects.

3. GSCA contract as 40% of the Grey County Forest Manager/By-Law Officer's job is forest management and 30-40% of the Ecological Lands Technician job is Species At Risk (SAR) inventories on Grey County Forests. SAR inventories are completed on Grey County Forests to determine areas whether certain areas should be avoided during harvest due to presence of SAR. These inventories would not be needed if harvesting were to discontinue. The approximate cost savings would be \$72,487.
4. Tree marking would not be required, and neither would FSC program costs, which would result in cost savings.
5. Loss of revenue, projected between \$50,000 to \$70,000 based on the current FMP.

County staff have considered the best management option for County forests not just from a financial perspective, but from a forest health and overall climate change perspective. For these reasons, County staff are not recommending Option D at this time.

Legal and Legislated Requirements

As discussed above, with respect to Section 2 of the Forestry Act prohibiting the County from using any County Forest property that is a former provincial "Agreement Forest" for any purpose other than forestry, and from selling, leasing or otherwise disposing of them, unless specific approval is granted by the province.

Financial and Resource Implications

If the County were to cease harvesting in select or all forests, there would be revenue loss between \$50,000 to \$70,000 annually from harvests offset by cost savings. This number is subject to fluctuation based on the market for wood and the number of hectares harvested. For example, annual revenue from County forest harvests from 2022, 2021, 2020, 2019 and 2018 was \$75,370, \$95,280, \$135,150, \$70,992 and \$70,388, respectively, averaging at \$75,358 annual revenue over the past five years. If the County were to cease harvesting in all forests, cost savings would come from tree marking, FSC program costs and costs toward contract staff completing forest management and SAR inventories, approximately estimated between \$85,000 and \$100,000 annually. If the County were to harvest in select County forests, cost savings would come from less tree marking. The loss of revenue from harvesting may be able to be partially recouped from carbon credits. Staff would need to complete a financial analysis or feasibility assessment with a carbon credit broker to determine the County's potential revenue from an Improved Forest Management project. If Council were to support Option A, the revenue is anticipated to be closer to or below \$50,000 annually

given fewer hectares will be harvested per year to allow the forests to increase to the anticipated growth of 26 m²/ha in 25 years.

Relevant Consultation

- ☒ Internal: Climate Change staff, Planning staff, and Grey County Forest Manager/By-law Enforcement Officer
- ☒ External: Grey Sauble Conservation Authority and other Forest Manager Authorities

Appendices and Attachments

[Forest Management Plan](#)

[Recreational Trails Master Plan](#)

[Grey Sauble Conservation Authority Staff Report: Carbon Credit Update and Project Feasibility Assessment: Forest Carbon Offset Project for Grey Sauble Conservation Authority](#)

Item 7

Jamie Eckenswiler

From: ca.office (MNR) <ca.office@ontario.ca>
Sent: January 17, 2025 1:44 PM
To: ca.office (MNR)
Subject: Update: Proposed regulation regarding Minister's Permit and Review powers under the Conservation Authorities Act

** This email is being sent on behalf of Jennifer Keyes, Director, Development and Hazard Policy Branch **

Good afternoon:

I am writing to you today to notify you of a new regulation prescribing the circumstances under which the Minister of Natural Resources ("Minister") may make permitting decisions in the place of a conservation authority or review a conservation authority's permitting decision.

New provisions in the *Conservation Authorities Act* came into effect on April 1, 2024, that included powers for the Minister to 1) issue an order to prevent a conservation authority from issuing a permit and to take over the permitting process in the place of a conservation authority ("Minister's permit"), and 2) review a conservation authority permit decision at the request of the applicant ("Minister's review"). It is important to note that when making a permitting decision using one of these tools, the Minister is required to satisfy the same legislative criteria concerning natural hazards and public safety that are considered by conservation authorities.

The new regulation sets out the circumstances under which the Minister may use these powers as circumstances where the proposed development activity or other activity, in the opinion of the Minister, pertains to or supports a matter of provincial interest described in the regulation. Additionally, it includes a transparent process for individuals or businesses to request the use of these powers and sets out the information that must be submitted as part of such a request. This regulation came into effect on January 1, 2025.

A Decision Notice is available at the Environmental Registry of Ontario, posting #[019-8320](#) and supporting information describing the process for requesting the use of these powers is available [online](#).

If you have any questions, please reach out to the Ministry of Natural Resources at ca.office@ontario.ca.

Sincerely,
Jennifer

Jennifer Keyes
Director, Development and Hazard Policy Branch
Ministry of Natural Resources



Taking pride in strengthening Ontario, its places and its people



Item 8 The Corporation of the Township of Southgate Notice of Virtual Public Meeting Concerning a Proposed Zoning By-law Amendment

What: The Township seeks input on proposed Zoning provisions to amend the Decks and Accessory Structure provisions within the municipality.

Public Meeting Date: February 19th, 2025 at 1:00 PM.

Location of the Public Meeting: In person at Council Chambers located at 123273 Southgate Road 12, Holstein Ontario N0G 2A0 **and** electronically via Zoom.

Please join the electronic public meeting from your computer, tablet, or smartphone at the below link: <https://zoom.us/j/98544110624?pwd=fgxDNzOEIjXR7Lpt8VAwJbmyQcc9cK.1>

You can also dial-in using your phone. **Phone:** [+1 647 374 4685](tel:+16473744685) **Meeting ID:** 985 4411 0624
Passcode: 866567

How can I participate in the Public Meeting?

Public participation is encouraged. To participate in the virtual meeting, please contact Lindsey Green, Clerk, by email at: lgreen@southgate.ca or by telephone at: 519-923-2110 ext. 230

What if I can't attend the Public Meeting?

You can learn more about the proposed development by contacting the Township office, or by reading the materials on the website at the below link(s). You may choose to submit comments via letter or email after taking the time to learn about the proposed development. See the relevant contact information below:

Web Link: [Zoning By-law Amendment Application C32-24 for Decks & Accessory Structures](#)

What can I expect at the Public Meeting?

The public meeting is an opportunity for members of the public to learn more about changes to the zoning rules for deck and accessory structure provisions for all of the Township of Southgate. Attendees can hear a brief presentation about the new zoning rules for accessory buildings, ask questions, and/or make statements either in favour of, or in opposition to the zoning changes. No decisions are made at this meeting, it is an opportunity to learn and provide feedback.

What is being proposed through the application?

Changes to the Zoning By-law proposed generally apply to the following:

- Section 3 changes definition of Accessory Building and Structure and add definitions of Carport, Required Yard and Required Setback.
- Section 5.1 (a) through (h) to clarify when main building setbacks apply versus when accessory buildings may encroach into required setbacks.
- Section 5.18 to implement regulations to establish clear rules for above and below ground swimming pools including safety features.
- Change interior side yard provisions in Residential-1, Residential-2, Residential-3, Residential-5 and Residential-6 zones to increase setback distances for dwellings without a garage or carport attached to the main building.
- Other minor changes pertaining to maximum one Additional Residential permitted in certain areas within a detached building and other provisions for separate accessory structures.

To support this proposal, a [Planning Report on Review of Section 5.1 Accessory Buildings and Structures](#) is available on the [Township Planning Applications and Public Notices Website Link](#).

Why is this Public Meeting being held and what are your rights?

In Ontario, the planning and development process is open and transparent, where opinions from all individuals and groups are welcomed. To change its policies and zoning rules the Township must hold a public meeting. This meeting is one of your chances to learn about the proposed changes and offer your opinions. Under the legislation covering this process, you have the following rights:

1. Attend the public meeting and/or make written or verbal representation either in support of or in opposition to the proposed Zoning By-law Amendment.
2. If a person or public body would otherwise have an ability to appeal the decision of the Township of Southgate to the Ontario Land Tribunal but the person or public body does not make oral submissions at a public meeting or make written submissions to the Township of



The Corporation of the Township of Southgate Notice of Virtual Public Meeting Concerning a Proposed Zoning By-law Amendment

Southgate before the Township Zoning By-law amendment is approved or refused, the person or public body is not entitled to appeal the decision.

3. If a person or public body does not make oral submissions at a public meeting or make written submissions to the Township of Southgate before the Township Zoning By-law amendment is approved or refused, the person or public body may not be added as a party to the hearing of an appeal before the Ontario Land Tribunal unless, in the opinion of the Tribunal, there are reasonable grounds to add the person or public body as a party.
4. Section 17(36) and Section 34(19) define the parties that are eligible to appeal the decision on the Zoning By-law amendment to the Ontario Land Tribunal.
5. If you wish to be notified of the decision of the Council of the Township of Southgate on the proposed Township Zoning By-law Amendment, you must make a written request to the Township of Southgate using the contact information noted above, and quote File **C32-24**.

If you have questions, please do not hesitate to contact Township staff, who can answer questions on the proposed changes, or the planning process.

Notice dated this **27th day of January 2025** at the Township of Southgate.

A note about information you may submit to the Township:

Under the authority of the Municipal Act, 2001 and in accordance with Ontario's Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), all information provided for, or at a Public Meeting, Public Consultation, or other Public Process are considered part of the public record, including resident deputations. This information may be posted on the Township or County websites, and/or made available to the public upon request. **Please note that all submissions and the personal information contained therein will become part of the public record in their entirety and may be posted to Southgate's website.**

Please be aware that the public meeting may be broadcast online and may be recorded.

Lindsey Green, Clerk
lgreen@southgate.ca
Township of Southgate
185667 Grey Rd 9,
Dundalk, ON N0C 1B0
Phone: (519) 923-2110 ext. 230

Item 9

From: Marty Le Gallez <mlegallez@cupw-sttp.org>
Sent: Tuesday, January 21, 2025 11:57 AM
To: Mayor WESTGREY <mayor@westgrey.com>
Subject: Industrial Inquiry Commission Reviewing Canada Post



377, rue Bank Street
Ottawa, Ontario K2P 1Y3
tel./tél. 613 236 7238
fax/télé. 613 563 7861
www.cupw-sttp.org



CUPW respectfully acknowledges this office is located on the traditional unceded territory of the Anishinaabeg People.

Le STTP reconnaît, en tout respect, que son bureau est situé sur le territoire traditionnel et non cédé des peuples anishinaabés.

BY EMAIL AND MAIL

January 16, 2025

Kevin Eccles, Mayor
Municipality of West Grey
RR 2 402813 Grey Rd 4
Durham, ON N0G 1R0

Dear Kevin Eccles:

RE: Industrial Inquiry Commission Reviewing Canada Post

As you may know, the Canada Industrial Relations Board, as instructed by the Minister of Labour, Steven MacKinnon, ordered the resumption of mail service at Canada Post on December 17, 2024, under Section 107 of the *Canada Labour Code*. What many do not know is that under Section 108, he also created an Industrial Inquiry Commission led by William Kaplan that will work with CUPW and Canada Post to examine the future of the public post office with a very broad scope.

The Commission has been tasked with reviewing the obstacles to negotiated collective agreements, as well as making recommendations about the future structure of Canada Post. The Commission has until May 15, 2025, to submit its final report to the government.

While time is extremely short, the good news is that there is an opportunity for you to make a submission as part of the Commission's public review. CUPW would like to ensure that the views of municipalities are considered. Therefore, if at all possible, we would like you to provide input to the Commission.

During the last public review on the mandate of Canada Post in 2016, the active engagement of municipalities was critical in the decision to maintain door-to-door delivery and immediately stop the further rollout of community mailboxes. However, there is nothing to stop the Commission from making recommendations to bring that back or to suggest other cutbacks.

We have enclosed a sample resolution that your municipality can adopt about making a submission to the Commission, expanding services at the public post office, and the need for more

robust public stakeholder consultation. We have also included a document with some suggested themes to consider for your written submission. If you can, please let us know if you plan to participate, pass a resolution, and can send us copies of the materials you submit.

Upcoming Federal Election

We also find ourselves in a period of federal political uncertainty, with the possibility of a federal election only months away. This will raise public discussion and debates on many issues affecting the public and all municipalities.

In all likelihood, it will be the next federal government that will determine what will be done with the Commission's report.

In the run-up to the federal election, we urge you to question the political parties on their intentions for Canada Post, and insist they make clear their public commitments regarding the following issues:

- Preserving our universal and public postal service;
- Maintaining the moratorium on post office closures;
- Maintaining door-to-door mail delivery; and,
- Establishing postal banking to offset the loss of financial services in many communities.

Thank you very much for considering our request. There's a lot at stake and we appreciate anything you can do to help. CUPW is confident that we can build on our past success and convince the Commission to recommend against service cuts, to maintain good jobs in our communities, expand services that generate additional revenues to keep Canada Post self-sustaining and allow us to build a universal, affordable and green public postal system for future generations.

For more information, please visit deliveringcommunitypower.ca or contact Brigitte Klassen at bklassen@cupw-sttp.org.

Sincerely,



Jan Simpson
National President

Encl.

c.c. National Executive Committee, Regional Executive Committees, Regional and National Union Representatives, CUPW Locals, Specialists



Canada Post is Under Review through Section 108 of the *Canada Labour Code*

As you may know, the Minister of Labour, Steven MacKinnon, ordered the resumption of mail service at Canada Post just before the holiday break, ordering CUPW members to return to work under Section 107 of the *Canada Labour Code*. What many do not know is that under Section 108, he also created an Industrial Inquiry Commission lead by William Kaplan that will work with CUPW and Canada Post to examine the future of the public post office with a very broad scope.

It will review Canada Post's financial situation, the possible diversification or alteration of delivery models, Canada Post's viability as it is currently configured, as well as bargaining issues, including full-time employment, health and safety and job security and produce a report not later than May 15, 2025. Accordingly, Kaplan's "recommendations may include amendments to the collective agreement, and any other changes to be implemented, including the structures, rights and responsibilities of the parties in the collective bargaining process."

The Commission is Seeking Input

We have an incredibly short timeline to follow. Hearings will begin January 27 with statements from both CUPW and Canada Post. The good news is that there is an opportunity for third parties to send in a written submission to the Commission as part of its public review. CUPW and Canada Post must have their bilingual submissions in to the commission by end of day Monday, January 20. We do not have a date or mechanism yet for third-party submissions, but it could be very soon. CUPW would like to ensure that the views of community groups, municipalities, allied organizations and labour are also considered. Therefore, if at all possible, we would like you to provide input to the Commission.

Please let us know if you will be making a submission. Please contact Brigitte Klassen at bklassen@cupw-sttp.org, so we can provide you with more details on how to send it to the Commission as soon as we have more information.

As time is of the essence and to help get you started on your submission, here are some suggested themes to consider that are important supplements to CUPW's bargaining demands.

- Keep Canada Post a Public Service
- Maintain universal service at a uniform price
- Expanded services to diversify and generate new revenue streams, no service cuts
 - add financial services
 - maintain the moratorium on post office closures to enable community hubs (meeting spaces, sales of local crafts, community gardens, government services for all levels of government)
 - maintain door-to-door delivery and increase where financially viable
- Major changes to Canada Post should not be made without full public consultation conducted through a mandate review involving all stakeholders

Keep Canada Post a Public Service

The Commission will examine the financial situation at Canada Post. Currently, the Crown Corporation is required only to be self-sufficient. It is completely user-funded and does not rely on taxpayer dollars. Canada Post still tends to prioritize major, high-profit customers over the public and providing a public service. Canada Post must not lose sight of its public interest objectives.

Major changes to Canada Post and the *Canadian Postal Service Charter* should not be made without full public consultation and hearings conducted through a mandate review involving all stakeholders. There is simply not enough time to do this under the Labour Minister's *Canada Labour Code* Section 108 order.

Maintain universal service at a uniform price

There have also been calls in the media and by various think tanks to privatize or deregulate Canada Post with little regard for the impact on public service or working conditions. Though transaction mail has been in decline, there are still over 2 billion letters delivered every year to an increasing number of addresses. Canada Post has an exclusive privilege (a monopoly) to handle letters so that it is able to generate enough money to provide affordable postal service to everyone, no matter where they live, be it a large urban centre or a rural or isolated community. There is no comparison in the world of a deregulated or privatized post office that serves anything near Canada's vast size and geography.

It will become increasingly difficult for our public post office to provide universal postal service if the exclusive privilege is eroded or eliminated. The exclusive privilege funds its universality. If parts of the service are deregulated or privatized, competitors will leave it to Canada Post alone to provide increasingly expensive delivery service to rural and remote communities, while they compete in profitable urban areas.

Providing Canada Post with an exclusive privilege to handle addressed letters is a form of regulation. Reducing or eliminating this privilege is deregulation. We have this regulation for a reason.

Expanded services to diversify and generate new revenue streams, no service cuts

For years, CUPW has been advocating for new and expanded services to help diversify and create new revenue streams as a direct means to handling decline in letter volumes. Many of these services, such as postal banking, already exist in many other post offices around the world and they generate significant revenue. Around the world, more than 1.2 billion people hold postal bank accounts.

Providing new services through the existing corporate retail network ensures that good jobs remain for workers and their families in the communities in which they live.

Financial Services

Given Canada Post's vast retail network, postal banking would offer in-community service for those who are underbanked or who have had their financial institutions close and leave town. Today, there are many rural communities with post offices, but no banks or credit unions. Very few Indigenous communities are served by local bank branches. Hundreds of thousands of low-income Canadians don't have bank

accounts at all, and almost 2 million Canadians rely on predatory payday lenders for basic financial services.

Postal banking is relatively straightforward. Like commercial banks, post offices would provide everyday financial services like chequing and savings accounts, loans and insurance. Postal banking could also be used to deliver government loans, grants and subsidies to boost renewable energy projects and energy-saving retrofits.

In many countries, postal banking is also mandated to provide financial access for all citizens and to play a role in addressing social inequalities. Postal banking could provide reliable financial services that everyone needs at affordable rates.

Community Hubs and Moratorium on Post Office Closures

We have also advocated community hubs (provide government services for all levels of government, meeting space, sales of local crafts, community gardens) and EV charging stations.

One of Canada Post's demands during Negotiations was to have the *flexibility* to close more than 130 of the 493 corporate Retail Post Offices that are protected under the current CUPW-Canada Post Urban Postal Operations collective agreement. These are post offices that are run by Canada Post and are not franchises located inside another host business.

While about three-quarters of these are also covered by an additional 1994 moratorium on closures, for those that are not, they could end up being privatized or disappear altogether if we lose this contract language. Residents may then have to travel further for their postal needs. No franchise host business is going to give up retail space for community hubs, nor parking space for charging stations that generate revenue for Canada Post. Longstanding, good-paying, full-time jobs in our communities could be replaced with low-wage, part-time work.

You can find a list of the post offices under the moratorium and how they are protected here:

<https://www.tpsgc-pwgsc.gc.ca/examendepostescanada-canadapostreview/rapport-report/bureaux-outlets-eng.html>

Senior Check-Ins

We have proposed creating a senior check-in service as well. Senior check-ins could bring peace of mind to loved ones and relatives who don't live nearby. Japan, France and Jersey in the British Isles currently offer effective and successful senior check-in services through their national postal services. Door-to-door postal workers are already watchful for signs that something isn't quite right. They could be allotted extra time on their routes to simply check in on seniors or people with mobility issues who sign up for the service to make sure everything is okay and deliver peace of mind.

Find out more about our service expansion proposals at <https://www.deliveringcommunitypower.ca>

Canada Post and the Industrial Inquiry Commission

Whereas the Canada Industrial Relations Board, as instructed by the Federal Minister of Labour, Steven MacKinnon, ordered the end to the postal strike and the resumption of mail service at Canada Post on December 17, 2024, under Section 107 of the *Canada Labour Code*.

Whereas the Federal Minister of Labour, Steven MacKinnon, created an *Industrial Inquiry Commission* under Section 108 of *Canada Labour Code*, led by William Kaplan, that will work with the Canadian Union of Postal Workers (CUPW) and Canada Post to examine the future of the public post office, including possible changes to the *Canadian Postal Service Charter*.

Whereas Canada Post is, first and foremost, a public service.

Whereas the *Commission* has been tasked with reviewing the obstacles to negotiated collective agreements between CUPW and Canada Post, the financial situation of Canada Post, Canada Post's expressed need to diversify and/or alter its delivery models in the face of current business demands, the viability of the business as it is currently configured, CUPW's negotiated commitments to job security, full-time employment, and the need to protect the health and safety of workers.

Whereas the *Commission* only has until May 15, 2025, to submit its final report to the government and make recommendations about the future structure of Canada Post.

Whereas while there is room for written input, the *Commission* process is not widely publicized, nor equivalent to a full and thorough public service review of Canada Post's mandate allowing for all stakeholder input, as has been undertaken by previous governments.

Whereas it will be crucial for the *Commission* to hear our views on key issues, including maintaining Canada Post as a public service, the importance of maintaining the moratorium on post office closures, improving the *Canadian Postal Service Charter*, home mail delivery, parcel delivery, keeping daily delivery, adding postal banking, greening Canada Post, EV charging stations, food delivery, improving delivery to rural, remote and Indigenous communities, and developing services to assist people with disabilities and help older Canadians to remain in their homes for as long as possible – and at the same time, helping to ensure Canada Post's financial self-sustainability.

Therefore, be it resolved that (name of municipality) provide input to the *Commission* in the form of a written submission.

Therefore, be it resolved that (name of municipality) will write the Federal Minister of Labour, Steven MacKinnon, and the Federal Minister of Public Services and Procurement of Canada, Jean-Yves Duclos, who is responsible for Canada Post, to demand that no changes be made to the *Canada Post Corporation Act*, Canada Post's mandate or the *Canadian Postal Service Charter* without a full, thorough, public review of Canada Post, including public hearings, with all key stakeholders, in every region of Canada.

PLEASE SEE THE MAILING INFORMATION FOR RESOLUTIONS ON REVERSE SIDE

MAILING INFORMATION

1) Please send your resolution to the Commission:

- We do not have a mailing address at this time. As we understand it, this is the email address that will collect the documents on behalf of the Commission:
edsc.cdi-iic.esdc@labour-travail.gc.ca

2) Please send your resolution to the Ministers responsible for Labour and Canada Post, and your Member of Parliament:

- Steven MacKinnon, Federal Minister of Labour, House of Commons, Ottawa, Ontario, K1A 0A6
- Jean-Yves Duclos, Federal Minister of Public Services and Procurement of Canada, House of Commons, Ottawa, Ontario, K1A 0A6
- Your Member of Parliament

Note: Mail may be sent postage-free to any member of Parliament. You can get your MP's name, phone number and address by going to the Parliament of Canada website at <https://www.ourcommons.ca/Members/en>

3) Please send copies of your resolution to:

- Jan Simpson, President, Canadian Union of Postal Workers, 377 Bank Street, Ottawa, Ontario, K2P 1Y3
- Rebecca Bligh, President, Federation of Canadian Municipalities, 24 Clarence St, Ottawa, Ontario K1N 5P3