

Submission to:

Region of Waterloo Council

City of Cambridge Council

City of Kitchener Council

City of Waterloo Council

Township of North Dumfries Council

Township of Wellesley Council

Township of Wilmot Council

Township of Woolwich Council

Ministry of Municipal Affairs and Housing

**Re: Minister of Municipal Affairs and Housing's Request
for Local Mayoral Comments Relating to the Approval of
Regional Official Plan Amendment No. 6**

**Kevin Eby, RPP, PLE
Kevin Thomason, Grand River Environmental Network
Mark Reusser, Waterloo Federation of Agriculture**

November 21, 2023

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EXECUTIVE SUMMARY

On November 2, 2023, the Minister of Municipal Affairs and Housing (Minister) issued a letter to the mayors of the seven local municipalities in the Region of Waterloo clarifying that the previous approval of Regional Official Plan Amendment No. 6 (ROPA 6) was being reversed. Minister Calandra's letter then goes on to seek submissions from the local mayors regarding "changes that the municipality would like to see made to the official plan, based on the modifications that the province had previously made ...". Such submissions are welcomed with or without "a council endorsement of their proposed changes". No mention is made of consultation with other stakeholders, the public, or First Nations.

This submission identifies a number of issues with Minister Calandra's letter.

- The Minister is reversing the approval of ROPA 6 because the process was tainted. He is now attempting after-the-fact to establish cover for these inappropriate actions by seeking local mayoral endorsement as a means of justifying the unjustifiable.
- The urban boundary expansions imposed by the Ministry do not conform to the Planning Act and the Growth Plan and were approved with no supporting engineering studies demonstrating the lands added can be fully serviced at the required densities. It is even questionable whether some of the lands can be serviced at all given the lack of assimilative capacity for wastewater effluent in some of the Region's receiving waterways.
- There is no need for additional land to meet either the 2031 Provincial targets or the longer term 2051 targets.
- The Region of Waterloo Official Plan review process resulting in ROPA 6 was an open and collaborative process involving a multitude of citizens and stakeholders over a two-year period. Of special note was the strong support for ROPA 6 expressed by First Nations representatives in that process. To collectively have the voices of this multitude of individuals and organizations simply drowned out now in favour of an expedited process of questionable integrity is simply not appropriate.
- Minister Calandra's request to local mayors to respond (with or without consultation with their own councils and with no mention whatsoever of consultation with First Nations, the public and stakeholder groups) simply compounds and attempts to transfer to the local mayors the very problems the Provincial government has inflicted upon itself.

Any response by the local mayors other than expressing strong support for ROPA 6 as adopted by Regional Council would:

- seriously taint this region's reputation for excellence in planning;
- threaten the positive relationships being developed with First Nations through the ROPA 6 process; and
- be incredibly disrespectful of the multitude of individuals and organization that participated in good faith in the extensive Regional Official Plan review consultation process.

If future monitoring determines that additional lands are required to meet long term forecasts there will be plenty of opportunities as part of the future five-year reviews of official plans mandated by the Planning Act to undertake such expansions, properly informed through updated infrastructure master plans and extensive public consultation processes. That is precisely the purpose of such reviews.

1.0 INTRODUCTION

On November 2, 2023, the Minister of Municipal Affairs and Housing (Minister) issued a letter to the mayors of the seven local municipalities in the Region of Waterloo clarifying that the previous approval of Regional Official Plan Amendment No. 6 (ROPA 6) was being reversed (see Appendix A). The original approval of ROPA 6 by the Ministry contained modifications that arbitrarily, without justification and out of conformity with the Planning Act and Growth Plan for the Greater Golden Horseshoe (Growth Plan) expanded the Region's urban boundaries by 2,780 more ha than supported by Regional Council.

Minister Calandra's letter seeks submissions from the local mayors regarding "circumstances or projects where construction has already begun ... particularly those projects that are directly reliant on the modifications made to the plan through the ministry's decision"; and "if there are changes that the municipality would like to see made to the official plan, based on the modifications that the province had previously made ...". The letter goes on to state:

"Heads of council may choose to seek a council endorsement of their proposed changes, but that is not required."

Apparently, democracy has ceased to exist in Ontario.

This submission addresses a number of issues that arise from Minister Calandra's letter.

2.0 TAINTED PROCESS

The Minister's letter fails to provide any detailed explanation as to why the approval is being reversed, although it is commonly understood that the approval process was tainted through:

- inappropriate access by development and homebuilding industry representatives to decision makers within the Ministry; and
- the role of political staff in overriding the expert professional advice from the Ministry's own urban planners.

While the specific modifications affecting ROPA 6 were made without consultation with the Region, First Nations and the public, apparently the development and homebuilding industries had considerable access to decision makers at the Province.

In an April 2023 speech, then Ontario Homebuilders' Association (OHBA) CEO Luca Bucci, boasted about the role of the OHBA in creating Bill 23 and in the Region of Waterloo Official Plan approval. Immediately prior to taking on his role with the OHBA, Mr. Bucci was Chief of Staff for Ministry of Municipal Affairs and Housing Minister Steve Clark.

Mr. Bucci's speech can be found at:

<https://youtu.be/3-SgUqdJpEg>.

At 1:43 into the recording, Mr. Bucci states:

“We helped the government create and implement Bill 23” [emphasis added].

If the OHBA helped create Bill 23 (which among other things proposes to eliminate the Region of Waterloo as a municipality with planning responsibilities), they were the only ones we know of that played that role (or even knew about it) outside the Provincial staff and politicians. No one else outside the development and homebuilder industries appears to have had prior notice before its release.

Then 2:04 into the recording of his speech, Mr. Bucci stated:

“We have helped expand urban boundaries in Hamilton, Ottawa and Waterloo Region and other areas of the Province ...” [emphasis added].

Just days before the release of the Auditor General’s report on the process leading to the Greenbelt take outs the OHBA issued a brief letter stating Mr. Bucci “is no longer with the Ontario Homebuilders’ Association effective today ...”.

Earlier this fall, a leaked briefing note for Conservative MPPs rather vividly demonstrates the lack of appropriate consultation associated with the urban expansions¹.

As stated in the Provincial briefing note:

- “There may be some concerns about the lands proposed to be added including third-party requests that were assessed by regional staff and were not recommended for inclusion in the urban boundary. **Other lands added to the urban boundary through modification were also not assessed by regional staff.**” [emphasis added]
- “Six Nations of the Grand River and Mississaugas of the Credit First Nations expressed support for the Region’s adopted official plan amendment. The support includes the incorporation of Indigenous views, the Region’s intensification first approach to growth and settlement area boundary expansions. A Minister’s decision to expand the Regions settlement boundary by 2,380 ha is likely to be met with opposition by Indigenous communities. **The Ministerial modifications to expand the Regions settlement boundary were not shared with Indigenous communities.**” [emphasis added]

The Minister is reversing the approval of ROPA 6 because the process was tainted and is now attempting after-the-fact to establish cover for these inappropriate actions by seeking local mayoral endorsement as a means of justifying the unjustifiable. It would be extremely unfortunate if the local mayors were to taint our local processes by supporting what was and continues to be essentially a land grab by the development industry.

¹ Minister’s Decisions on Official Plans – Site Specific KMs [Key Messages] (April 2023)

3.0 CONFORMITY WITH THE GROWTH PLAN

Schedule 3 of the Growth Plan establishes a 2051 planning horizon and a forecast population for the Region of Waterloo at that time of 923,000 people. These were incorporated into the Regional Official Plan through ROPA 6 and approved at the time by the Ministry.

Based on the application of the intensification and density targets adopted by Regional Council and approved by the Ministry, the capacity of the urban areas after the urban expansions imposed by Ministerial modifications to ROPA 6 would approach or possibly even exceed a population of 1,100,000 (177,000 more people than the applicable Growth Plan Schedule 3 forecast). These modifications do not conform to the Planning Act and the Growth Plan and were approved with no supporting engineering studies demonstrating the lands added can be fully serviced at the required densities. It is even questionable whether some of the lands can be serviced at all given the lack of assimilative capacity for wastewater effluent in some of the Region's receiving waterways.

By comparison, ROPA 6 as adopted by the Council of the Region of Waterloo fully complies with the legislated requirements of the Planning Act, conforms to the Growth Plan and is consistent with the Provincial Policy Statement and the LNA Methodology, and is supported by the Region's infrastructure Master Plans. ROPA 6 as adopted was also strongly supported by the applicable First Nations (see Appendix B). **There is no Provincial policy basis that requires or even supports Ministerial modifications to ROPA 6 to expand urban boundaries.**

4.0 NO NEED FOR ADDITIONAL LAND

There is no need for additional land to meet either the 2031 Provincial targets or the longer term 2051 targets. This has been demonstrated through the Land Needs Assessment completed as part of the ROP review that fully complied with the Province's Land Needs Assessment Methodology Guideline.

Over the past 20 years local municipalities have worked diligently to pre-zone lands in transit station areas, nodes, and corridors along transit routes to accommodate multi-residential development. As noted in the Regional Official Plan review "Intensification Strategy Technical Brief (August 2021)" by Dillon Consulting Limited | Watson & Associates:

"Across the BUA, there is significant potential capacity for growth in both population and employment. Based largely on existing planning permissions, there is a potential to accommodate an additional around 173,000 people and 143,000 jobs by 2051 ..."

This would translate into capacity for approximately 90,000 of the additional 121,000 homes required in the Region of Waterloo to 2051 and would likely not include many of the significant number of additional large intensification projects being approved almost monthly by the three city councils. Combined with a year-end 2022 plan of subdivision inventory of 37,426 housing units in unbuilt registered, draft approved and pending plans of subdivision, there is ample capacity to accommodate forecasted growth to 2051 in conformity with the approved intensification targets. The capacity referenced above **does not include** vacant lands within the urban area for which plans of subdivision have yet to be submitted.

Mr. Rod Regier, the Region of Waterloo's Commissioner of Planning, Development and Legislative Services earlier this year at Regional Council stated that should the portion of the 1.5 million housing units assigned to the Region of Waterloo (70,800) be required by 2031, the Region would be able to accommodate such development from both an approvals and servicing perspective without adding any more land.

There are many reasons why there is a shortfall of affordable homes being built in the Region of Waterloo, but shortages of land or delays in municipal approvals are not among them. While planners can always do better in speeding up approvals (particularly site plan approvals), the quantum of existing approvals is not an issue and hasn't been for almost two decades.

From year-end 2006 to year-end 2022 there was an average of 19,393 approved units² in plans of subdivision at the start of each year in the Region of Waterloo. During this period an average of only 1,757 homes were built annually in the Region's designated greenfield area. **This represents construction of an average of only 9.2% of the approved housing inventory available in plans of subdivision at the start of each year from 2007 to 2022.** The year with the highest absorption rate of approved housing inventory was 2016 when 2,818 of the 20,089 approved units existing at the beginning of the year were built. This represented a 14.0% absorption rate.

The average absorption rate has remained consistent over varying periods examined. The average over the past 10 years (2013 to 2022) was 9.1% and over the past 5 years (2018 to 2022) was 9.0%.

The current plan of subdivision inventory is well balanced. As of year-end 2022, the plan of subdivision inventory of 37,426 unbuilt registered, draft approved and pending units included:

- 11,938 single-/semi-detached units (7,784 approved)
- 12,773 townhouse units (7,171 approved)
- 12,715 apartment units (6,511 approved)

Also showing remarkable consistency is the year-end quantum of approved ground-related units (single-detached, semi-detached and townhouses). Since year-end 2015, the approved unbuilt ground-related housing units at year-end in the plan of subdivision inventories were as follows:

- 2015 = 14,462 units
- 2016 = 14,625 units
- 2017 = 13,668 units
- 2018 = 14,756 units
- 2019 = 14,235 units
- 2020 = 14,648 units
- 2021 = 14,262 units
- 2022 = 14,955 units

Year after year the plan of subdivision approval process in the Region of Waterloo successfully replaces approved vacant inventory as it is absorbed by the homebuilding industry. This is precisely what a well-functioning development approval system should be striving to achieve.

² Based on annual Region of Waterloo growth monitoring reports and year-end plan of subdivision inventory memos. Approved units include unbuilt registered and draft approved units in plans of subdivision.

Members of the development and homebuilding industries regularly refer to shortages of approved lots for single-detached dwellings as being the reason the construction of such units has declined consistently over the past 20 years. This, however, is not correct.

From 2006 to 2022 there has been a year-end average of 8,568 approved single-detached lots available in plans of subdivision (2,580 unbuilt registered units and 5,988 draft approved units). During this same period, an average of 1,152 single-detached lots were built annually (**representing only 13.4% of approved single-detached units**).

Over the most recent five-year period (2018 to 2022) there has been an annual average of 7,870 single-detached lots in approved plans of subdivision compared to an annual average absorption of 922 such units (**representing only 11.7% of approved single-detached units**).

Presumably construction of some of these additional units would have occurred if the homebuilders had adjusted their prices and/or product and brought additional lots/blocks under their control onto the marketplace. They did not.

At least a partial solution to the affordability issues has been available to the development industry for years and their response appears to have been that low volume / high price is a more desirable business model today than low price / high volume. Why would anyone expect the development industry would deal with additional greenfield lands added to the urban area any differently than they have the existing ones?

Land constraints are not an issue in the Region of Waterloo.

5.0 CONSULTATION

The Region of Waterloo Official Plan review process that resulted in ROPA 6 was an open and collaborative process involving a multitude of citizens and stakeholders over a two-year period. This process and the resulting ROPA 6 are things for this community to be proud of. Of special note was the strong support for ROPA 6 expressed by First Nations participants in this process (see Appendix B).

Minister Calandra's request to local mayors to respond within 45 days (with or without consultation with their own councils and with no mention whatsoever of consultation with First Nations, the public and stakeholder groups) simply compounds and attempts to transfer to the local mayors the very problems the Provincial government has inflicted upon itself.

Any expansions to urban areas in the Region of Waterloo should only be considered in the context of a broad consultation process involving the public, First Nations, local municipalities, and other stakeholder groups.

6.0 REVIEWS OF OFFICIAL PLANS

The Planning Act mandates a review of existing official plans every five-years. Where a new official plan has been adopted, the first review is to take place 10 years after adoption. ROPA 6 is not a new official plan, so the Region of Waterloo would be required to review the Regional Official Plan no later than 2027 or 2028. If, following appropriate monitoring it is determined that additional lands are required to meet the long-term housing needs of the community, it is perfectly appropriate for such expansions to be considered at that time in a process providing for broad consultation with the public, affected municipalities, the Province, First Nations, and stakeholder groups.

Expansions considered through this process can also be informed by the upcoming updates to the Region's infrastructure master plans.

7.0 CONCLUSIONS

There is no legitimate need or justification for local mayors to support the Province in repackaging a tainted process by requesting that urban boundary expansions previously imposed by the Minister through modification to ROPA 6 be reinstated. To do so without broad consultation is the antithesis of the good planning processes this region is known for. A multitude of individuals and organizations participated diligently and in good faith in the ROP Review process over a two-year period. It was only after the completion of this broad and robust consultation process that Regional Council adopted ROPA 6. No objections to the adoption of ROPA 6 were voiced by any local municipal councils. To collectively have the voices of the multitude of individuals and organizations that participated in the Regional Official Plan review simply drowned out now in favour of an expedited process of questionable integrity is simply not appropriate.

These lands are not required to meet either the 2031 housing targets imposed by the Province or the 2051 population forecast for the Region mandated for use by the Growth Plan. There is no Provincial policy basis that requires or even supports Ministerial modifications to ROPA 6 to expand urban boundaries and we would respectfully suggest that the argument that adding more land to the urban area will somehow help solve short- or even medium-term housing affordability issues is simply disingenuous nonsense. The lands in question are not needed for such purposes and have little if any hope of coming to the marketplace in the near to medium terms.

Any response other than expressing strong support for ROPA 6 as adopted by Regional Council would:

- seriously taint this region's reputation for excellence in planning;
- threaten the positive relationships being developed with the First Nations through the ROPA 6 process; and
- be incredibly disrespectful of the multitude of citizens and organization that participated in good faith in the extensive Regional Official Plan review consultation process.

If future monitoring determines that additional lands are required to meet long term forecasts there will be plenty of opportunities as part of the future five-year reviews of official plans mandated by the Planning Act to undertake such expansions, properly informed through updated infrastructure master plans and extensive public consultation processes. That is precisely the purpose of such reviews.

APPENDIX A: Letter from the Minister of Municipal Affairs

**Ministry of
Municipal Affairs
and Housing**

Office of the Minister
777 Bay Street, 17th Floor
Toronto ON M7A 2J3
Tel.: 416 585-7000

**Ministère des
Affaires municipales
et du Logement**

Bureau du ministre
777, rue Bay, 17^e étage
Toronto ON M7A 2J3
Tél. : 416 585-7000



234-2023-5307

November 2, 2023

**Re: Announcement Impacting Provincial Decisions on Municipal Official Plans/
Official Plan Amendments**

Dear Sir, Madam:

Since becoming the Minister of Municipal Affairs and Housing, I have made it a priority to review past decisions related to land use planning, including official plans and minister's zoning orders, to ensure that these earlier decisions support our goal of building at least 1.5 million homes in a manner that maintains and reinforces public trust.

In November 2022 and April 2023, the ministry issued decisions on official plans impacting the cities of Barrie, Belleville, Guelph, Hamilton, Ottawa and Peterborough, the regional municipalities of Halton, Niagara, Peel, Waterloo and York, and Wellington County. As a result of my review of these decisions, on October 23, 2023, I announced my intent to introduce legislation as soon as possible that would reverse the province's changes to these plans.

For clarity, the proposed legislation will, if passed, bring into effect the official plans or official plan amendments as adopted by municipal council without provincial modifications, except for any modifications that are necessary to protect matters of public health and safety, or which are required to align with legislation or regulations.

The ministry appreciates that the decisions that were made in November 2022 and April 2023 are currently in effect, and I understand that many municipalities are working to actively implement the decisions. I also appreciate that productive collaboration and coordination between the ministry and your municipality is going to be needed to ensure clarity going forward.

As stated in my announcement on October 23, 2023, we are providing 45 days for municipalities to submit information about the modifications to the official plans that were originally submitted to the Ministry, including:

1. Circumstances or projects where construction has already begun in relation to the official plan or official plan amendment decisions, particularly those projects that are directly reliant on the modifications made to the plan through the ministry's decision; and

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2. If there are changes that the municipality would like to see made to the official plan, based on the modifications that the province had previously made, and which you support. Lower-tier municipal feedback on the original official plan submitted to the province will be important to supporting its implementation.

We are asking mayors of impacted single and lower tier municipalities to submit this feedback, including proposed changes and updates to the official plans/official plan amendments, to ministry staff **by December 7, 2023**. Please submit feedback to the following email address: MMAHOfficialPlans@Ontario.ca.

To ensure the province receives the necessary feedback within the 45-day window, we will accept changes directly from heads of council of single and lower-tier municipalities, including to official plans that were originally submitted with council endorsements from upper-tier municipalities. Heads of council may choose to seek a council endorsement of their proposed changes, but that is not required.

While I intend to introduce legislation prior to the conclusion of the 45-day period, please rest assured that municipal feedback received during the 45-day window, and through consultation on the legislation, will be carefully considered to determine the best approach for moving forward, including if further legislative steps or the use of other provincial tools are required.

We are also interested in receiving information and supporting documentation that outlines related planning costs that may have been incurred by your municipality arising out of the provincial decisions. This information can be submitted to the ministry outside of the 45-day window through municipal staff.

Official plans are an important tool for addressing Ontario's shortage of housing. To that end, as you prepare your feedback, I encourage you to ensure your proposed approach to meet your housing targets is ambitious and reflective of the serious need to get more homes built quickly. In particular, I encourage you to look for opportunities to systematically increase density and align this density with existing and planned transit within your municipality. Getting more homes built faster will help more people in your municipality find a home that meets their needs and budget and help municipalities access funding under Ontario's all-new \$1.2 billion Building Faster Fund.

If your staff have questions or concerns, ministry staff are available to discuss this matter further. Please have municipal staff contact the ministry at the email address above and we will connect you with the relevant staff in my ministry.

Thank you,



Hon. Paul Calandra
Minister of Municipal Affairs and Housing

APPENDIX B: First Nations' Letters of Support



August 8, 2022

Rod Regier
Commissioner
Planning, Development and Legislative Services
Region of Waterloo
150 Frederick Street, 8th Floor
Kitchener ON N2G 4J3

VIA EMAIL: RRegier@regionofwaterloo.ca

Dear Mr. Regier

I am writing on behalf of the Mississaugas of the Credit First Nation (MCFN) Department of Consultation and Accommodation (DOCA) to express our appreciation for the early and thorough consultation you and your team undertook with us specific to the Region of Waterloo Official Plan Amendment. As the department responsible for protecting and advocating on behalf of MCFN territory and treaty rights, it was our hope that our input would be taken seriously and at least some of it considered when drafting the Amendment.

We appreciate Waterloo's sincere and pro-active approach to the consultation process. Consultation meetings were forthright and conducive to establishing an honest, respectful, and cooperative relationship between the MCFN and Waterloo. Questions, comments and concerns of the First Nation were diligently considered and acted upon by the Region.

As you know, it is the philosophy of First Nations to think seven generations ahead and we believe the proposed Amendment embraces that philosophy. In light of this, we are pleased to see that the proposed Growth Plan limits the amount of land the Region of Waterloo feels it needs in order to meet its growth requirements. As such, it is clear to us that you have taken our input into consideration when drafting the Amendment.

In closing I would simply say that the Mississaugas of the Credit First Nation supports the Region of Waterloo's proposed Growth Plan Amendment and that the consultation process with the Region of Waterloo was satisfactory in every respect. It is our hope that the current positive relationship will continue to grow between both treaty partners.



DEPARTMENT OF CONSULTATION AND ACCOMMODATION
Mississaugas of the Credit First Nation
4065 Hwy #6, Hagersville, Ontario N0A 1H0



Phone: (905) 768-4260





Sincerely,

Mark LaForme
Director, Department of Consultation and Accommodation
Mississaugas of the Credit First Nation



DEPARTMENT OF CONSULTATION AND ACCOMMODATION

Mississaugas of the Credit First Nation
4065 Hwy #6, Hagersville, Ontario N0A 1H0



Phone: (905) 768-4260





July 13, 2022

Karen Redman
Regional Chair
Regional Chair's Office
1st Floor, 150 Frederick Street
Kitchener Ontario N2G 4J3

via email: KRedman@regionofwaterloo.ca

Dear Chair Redman,

I would like to take this opportunity to thank the Region of Waterloo for the time and attention that has been taken in consultation with Six Nations of the Grand River Consultation and Accommodation Process (CAP) Team in regards to Region of Waterloo Official Plan.

We are very pleased that you have taken our values, world view, and beliefs into consideration when drafting your plan. The Region of Waterloo is embracing the idea of shared stewardship of the lands that we have called home since time immemorial. This is so important in the face of a rapidly changing climate.

As you know, the protection of the natural environment is paramount in our concerns and we are pleased that you have heard and understood our views. The Grand River is also of utmost importance as it the source of our drinking water and needs protection to the best extent that is possible.

As we are sure you would agree, and as we have stated repeatedly, the natural environment will do quite well without human intervention. As a matter of fact, the natural environment would thrive without human intervention but we, as humans, cannot survive without the natural environment. For instance, if all the trees were destroyed, we would die. If the waters or air were polluted, we would die. If the pollinators had nothing to pollinate, we would die. We are all connected and we need the natural environment to sustain us. That is the basis for our Thanksgiving Address or “the words that come before all else” in which we give thanks for all aspects of the natural environment and is also the basis of the Value Statement that we have shared with you.

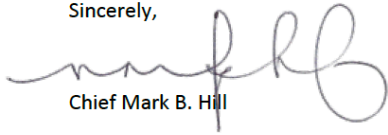
We are very pleased to see that you have significantly limited the amount of land that the Region of Waterloo is in need of in order to meet the growth requirements as set out in the Growth Plan for the Greater Golden Horseshoe.

We are also very pleased that there will still be places in Southern Ontario where our future generations will have an opportunity to live in a world that is not made of steel and concrete, where they will still have the ability to put their feet on ground.

This is possible due to the efforts that the planning team at the Region of Waterloo are making today. That very much aligns with our view of looking ahead seven generations into the future and ensuring that what you are leaving them is something for which we can all take pride.

We are very much in support of the approach to planning that the Region of Waterloo has undertaken and look forward to a continued mutually supportive relationship.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark B. Hill', written in a cursive style.

Chief Mark B. Hill

Six Nations of the Grand River Elected Council