

April 27, 2018

Honourable Indira Naidoo-Harris,
Minister of Education
Minister Responsible for Early Years and Child Care
Ministry of Education
900 Bay Street, Toronto ON

Dear Minister:

Thank for your letter dated April 18, 2018. I am pleased to respond to some of the key points and observations in your letter.

Let me start by saying that we are pleased that the Ministry recognizes that more must be done to respond to population growth pressures in some parts of the City of Toronto, which place enormous demands on our capacity to accommodate students.

You are correct in your observation that the TDSB has not requested funding from the government to purchase land. The Board is aware that the Ministry of Education will increase the funding available through the Land Priorities funding program from \$60 to \$100 million to support the acquisition of land for new schools.

To this end, on April 18, 2018 the Board of Trustees directed staff to proceed with the acquisition of a 1.8 acre school site within the Canadian Tire Lands, an emerging high-density community in North York. A request will be made through the Land Priorities program to support the cost of this acquisition. This will address the need for one site.

However, as you are aware, there are many communities within the City of Toronto that are undergoing significant and rapid growth. Our existing infrastructure cannot support the degree of intensification proposed within these areas because our land and buildings are not adequate to accommodate the projected student population. The Board must plan for, and have funding to support the acquisition of new school sites to support the long-term accommodation of students. It will also need to seek unique and creative solutions to accommodate students in the future, given that in some high- growth areas of the City, land is not available for purchase. Exploring options to have schools located in mixed-use developments will be necessary to ensure that growth can be addressed.

The Board's strategy for addressing areas of significant enrolment growth is outlined within the Long-Term Program & Accommodation Strategy. Historically, the Board has focussed its efforts on accommodating students by maximizing the use of our existing buildings and land. Measures have included the construction of new schools and/or additions to existing schools, funded through the Capital Priorities program. The Board will, of course, continue its strategic approach to managing growth through this process; however, student enrolment projections within many areas of the Board's

jurisdiction clearly dictate that significant additional space will be required. Access to Education Development Charges (EDCs) is critical to adequately plan for and fund site acquisition in these areas.

That being said, with respect to capital project submissions, we acknowledge that the Ministry is now prepared to consider the TDSB as having distinct planning areas and receive capital project submissions/requests by area.

We believe that changes to the Education Development Charges (EDCs) regulation would create additional resources and help school boards respond to accommodation pressures in two key ways:

First, the changes we propose would make the TDSB, and no doubt some other boards, eligible to collect EDCs and use these funds to purchase land, supplementing land purchase grants available through the Ontario government.

Why is this so important? As noted, we recognize that the government will increase the funding available through the Land Priorities funding program to \$100 million to support the acquisition of land for new schools across the province. Yet, when you consider the cost of land in Toronto and specifically in areas of the City that are experiencing rapid growth, \$100 million would probably cover the cost of a single small site, and that does not account for other school boards' needs. We need approximately 60 additional acres of land to serve the projected enrolment growth at our elementary schools alone. In fact, at our recent Board meeting, we passed a motion indicating that we would be seeking to acquire land in the Yonge-Eglinton area.

Our concern is that without EDCs, it would be impossible for the Board to purchase land in this area of the City, where each acre costs approximately \$25 million. For a three-acre elementary school site, land alone could cost \$75 million. On top of that, we would need funding to build the school – in our experience an elementary school would cost approximately another \$25 million. Therefore, we estimate that the cost for one elementary school in the Yonge-Eglinton area would be \$100 million.

Second, with the regulation changes we have proposed, boards would be able to use EDCs funds not just to replace aging schools, but to fund major school improvements and help reduce our school infrastructure deficit.

We agree that the government has increased its funding for school improvements and these investments are being put to good use. But, we also know the school infrastructure deficit at the TDSB is now in excess of \$4 billion. Province-wide, the school repair backlog is more than \$15 billion.

Creating more flexibility to the use of EDCs makes sense for schools, boards and the government. In our view, changes to the EDCs regulation should be made sooner than later to allow the TDSB to start collecting these funds and plan for and address our significant growth-related accommodation needs.

We support the Ministry and school boards conducting a comprehensive assessment on how school boards can create additional strategies and leverage additional resources to respond to school accommodation pressures. However, we feel that changes to the EDCs regulation should have happened

a long time ago and we cannot wait by hoping that the proposed assessment will result in any substantive changes that would address our concerns around the lack of EDCs funding. We, therefore, must move forward with our Court proceeding to seek relief from the Court to allow us access to EDCs. It has been over three years since we first recommended to the Ministry the proposed changes and we have yet to receive any substantive reason as to why these changes should not proceed.

As we have noted, we estimate that the proposed changes to the regulation would generate \$350 million for the TDSB, which could be used for the purchase of new land, build new schools or school improvements to address growth-related accommodation needs. By any standard, this is a sizeable pool of funds that could help improve the learning environment for many, many students. Again, we urge the government to make these changes at its earliest opportunity.

Finally, we respect your observation that the TDSB has \$480 million of unspent funds from the \$814 million in funds the Board received under the School Condition Improvement program; however, the Ministry should not be left with the impression that the TDSB is not spending the money it receives. This is not the case.

First, the Ministry's analysis includes money that the Board received in this budget year – and the year is not yet over. It is normal that money in a current budget year won't be allocated until closer to the end of the fiscal year.

Second, with respect to funds from previous years, the TDSB has allocated grants to projects. As you know, all of the projects require procurement, which could be a long process. While the Board is eager to have the money at work to improve our schools, it is essential that we procure dollars properly and we plan and sequence procurements and construction start times to ensure that pricing is not compromised by lack of competitive tension in the procurement process or lack of construction capacity in the construction marketplace. In short, rest assured no money is being left on the table and in terms of our current budget year, the funds will be allocated to projects with procurement to follow.

Sincerely,

A handwritten signature in black ink, appearing to be 'Robin Pilkey', written in a cursive style.

Robin Pilkey
Chair
Toronto District School Board

CC: The Honourable Kathleen Wynne, Premier of Ontario