Citizens-United
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September 22, 2026

Delivered by electronic mail

Ana Djukic
Chief of Staff
Office of the Mayor & Council
City of Cambridge

Dear Ms. Djukic

Thank you for your letter dated September 22, 2026, in response to my letters of August 18 and August 23. In your letter and the accompanying attachment, you refer to the principles of **"fairness" and "transparency."** Respectfully, I would argue that neither principle has been demonstrated by the recent change in the way stormwater management is funded.

Was this simply a change in the method of collecting an existing cost, or has it resulted in an additional financial burden on property owners?

Stormwater is a municipal responsibility, not an individualized service

The argument for separating stormwater management from general property taxation appears to rely, at least in part, on the principle that those properties generating more runoff should contribute more toward the cost. While that may appear equitable at first glance, it overlooks the fundamental nature of stormwater infrastructure. Stormwater management is not comparable to a discretionary service such as cable television or a premium internet package. It is an essential component of municipal infrastructure and public safety.

Flooding does not respect property boundaries.

When inadequate stormwater infrastructure causes flooding in one neighbourhood or affects a particular public area, the consequences can extend throughout the municipality. Roads can be damaged, transportation disrupted, businesses affected, public infrastructure compromised and property values impacted. Cambridge has experienced the consequences of significant flooding before, including the **Great Galt Flood of 1974**. The protection provided by stormwater infrastructure therefore extends well beyond the individual property receiving the bill. A homeowner may never personally experience flooding, yet that homeowner still benefits from a municipal system designed to protect roads, public infrastructure, businesses, neighbouring properties and the broader community.

We already accept this principle throughout municipal taxation

The principle of collective responsibility is not new. Property taxes fund many services where the benefit cannot be accurately assigned to an individual property owner. A property owner without children still contributes to public education and benefits from the development of an educated workforce and a stronger local economy. A homeowner whose property has never experienced a fire still benefits from the existence of a properly funded fire service. Residents who rarely use a particular road still benefit from a connected and maintained transportation network. We do not calculate these services according to individual consumption because municipalities function as interconnected communities.

Stormwater management is no different.

The fact that one property may generate more runoff than another does not mean that the broader municipal benefit disappears. Nor does it necessarily mean that responsibility for maintaining the infrastructure should be transferred from the community as a whole to individual property owners.

The question of fairness

There is another important issue that has not been adequately addressed. Residential and commercial property owners have paid property taxes for decades. Those taxes have supported infrastructure and services including stormwater throughout the entire municipality, including services from which individual properties may receive little or no direct benefit. We accepted that principle because that is how municipal government works.

Simply moving the charge from one bill to another does not, by itself, establish fairness or transparency. If the total amount being collected from taxpayers has increased, then this is not merely a change in billing methodology. **It represents an increased financial burden.** That distinction is fundamental.

Many residential properties also suffer erosion and other adverse effects associated with inadequate stormwater infrastructure, yet their tax dollars have historically contributed toward infrastructure development and improvements throughout the community.

Where does this principle end?

I also believe Council should consider the broader precedent being established. If municipal services can progressively be separated from general taxation and assigned to individual property owners according to specific characteristics or presumed levels of benefit, **where does that principle end?**

Could snow clearing eventually be charged according to property frontage?

Could road maintenance be allocated according to the number of vehicles owned or kilometres driven?

Could education costs be allocated according to the number of children living in a household?

Could emergency services be subject to an individual availability charge because some properties may use them more frequently than others?

These examples may sound extreme, but they illustrate the underlying issue.

A municipality is not simply a collection of individual properties purchasing individual services. It is an interconnected community whose infrastructure protects and supports everyone.

Our property is a good example

Our own property illustrates the difficulty with attempting to assign municipal services strictly according to direct individual benefit. Our property does not have municipal stormwater infrastructure serving it in the same manner as many other properties. Nor do we have municipal sewage, City water, streetlights, sidewalks or curbs, or what we consider to be a safe road to drive on. Yet we have never argued that we should be exempt from contributing toward those municipal systems.

Why?

Because we understand that municipal taxation is based upon a broader principle of collective responsibility. That same principle should apply to stormwater management.

The questions that remain

I would therefore ask you to address two straightforward questions.

First: Do you believe it is fair for residential and commercial property owners who have paid property taxes for decades—taxes that have supported infrastructure and municipal services throughout the entire community—to now be told, in effect:

"Thank you for paying for this service for all these years, but we have decided to charge you separately for it at a greater cost?"

Many residential properties suffer erosion and other adverse effects from inadequate infrastructure, yet their tax dollars have supported infrastructure development throughout the entire community without objection to the principle of collective taxation for the common good.

Second: If the principle is that individual municipal services should increasingly be separated from general property taxation and charged according to individual property characteristics, **where does that principle end?**

At what point does the collective funding of essential municipal infrastructure become a series of individual user charges?

Stormwater management is part of the infrastructure that keeps Cambridge functioning. It protects roads, businesses, homes, public spaces and the broader community. Its benefits are shared, and its consequences when infrastructure fails are shared as well.

I respectfully request a clear and substantive response to these questions, particularly the fundamental question of whether this change represents **a change in the method of collection or an actual increase in the financial burden placed on property owners.**

Commercial properties and private stormwater infrastructure

This concern is particularly significant for commercial property owners.

Many have invested **tens of thousands of dollars—sometimes substantially more—in designing, constructing and maintaining their own stormwater management systems**, often at the City's direction and as a condition of development.

For example, I am aware of one commercial property owner who invested approximately **$100,000** in a stormwater management facility when the property was developed. At the City's insistence, the property's driveway was designed and sloped so that runoff would be directed into and managed by this private system.

That private stormwater management system is **still being used today**, and the property does not have access to a City-provided stormwater system. The owner continues to bear the cost of maintaining and operating the infrastructure that was required to manage the property's stormwater and is now required to pay a substantial municipal stormwater fee as well.

Yet, despite having already paid for and continuing to maintain a private stormwater management system, the property owner is now also being charged the City's separate stormwater fee.

How is that fair?

If the City's position is that the new charge represents a fair allocation of municipal stormwater costs, then property owners should be shown how privately funded stormwater infrastructure is taken into consideration when determining their municipal charge.

There is also a broader concern regarding the environment in which Cambridge businesses are operating.

The Canadian Federation of Independent Business (CFIB), in its **2026 Municipal Report Card**, ranked Cambridge **56th out of 66 municipalities across Canada**, the lowest-ranked municipality in Ontario. Cambridge received a score of **3.91 out of 10 and a grade of F**. The report assessed municipalities based on cost burden, regulatory burden and small-business friendliness.

This is significant because the CFIB report specifically identifies municipal costs, including property taxes, as a recurring expense affecting small businesses.

Against that backdrop, I believe Council should carefully consider whether imposing additional municipal charges on residential and commercial property owners that have supported this community for decades—supports the City's stated objective of fairness and transparency.

Sincerely,

Denis F. Lanno

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