



November 26, 2020

Dear Minister Jeff Yurek, Ministry of the Environment, Conservation and Parks,

Surprisingly, Bill 229 'Protect, Support, and Recover from COVID-19 Act (Budget Measures), 2020' includes Schedule 6 outlining changes to the *Conservation Authorities Act*. It is deeply concerning that, as a budget bill, the Province deemed public comment through the EBR unnecessary. However, Ontarians' serious concerns need to be heard.

Schedule 6 should be removed from Bill 229 to better reflect on the alarming consequences that will result from proposed changes. Issues including those raised in our letter are being sent to the Province in over a hundred thousand responses from Ontarians since the Bill's introduction on November 5, 2020.

This Schedule will weaken and undermine the Province's COVID-19 response. It is a step backwards with near- and future-term negative impacts on public health, wellbeing and safety while creating a more complex bureaucratic process.

At this time of incredible uncertainty, people are feeling anxious about their future. Conservation Authorities support health and wellbeing, equitable access to parks and trails, environmental resilience, flooding risk mitigation and preparedness, and climate adaptation through their programs and services. These will be undermined with Schedule 6 proposals.

The currently efficient processes for permitting and land use planning will become more bureaucratic. With more levels of government involved, it will become more convoluted with options for the Province to go around and override Conservation Authority and local municipal decisions; and more delayed with Provincial involvement options on the table. Changes will enable special interest groups to be served instead of the public interest.

Conservation Authorities work across municipal boundaries with a holistic science-, data- and ecosystem-based watershed approach. The core mandates identified in Schedule 6 connect back to different times when watershed management was only responsive to drought, flooding and erosion issues. This is not what is needed today. Currently Conservation Authorities are innovative, effective and future-focused dealing not only with the impacts of too much or too little water, but with existing and future challenges including climate change by protecting, preserving, restoring, and enhancing critical watershed functions and green infrastructure. To do this work they have staff experts in hydrology, ecology, watershed management and coastal engineering that municipalities rely on. Healthy natural heritage systems are green infrastructure reducing stormwater runoff and flooding, buffering extreme weather impacts, cooling the air, and preventing erosion. Well managed systems are more resilient and cost-effective than gray (built) infrastructure and support the green economy. Conservation Authorities ensure that their watershed functions to mitigate risks and protect public safety, supporting our wellness and economic health. Schedule 6 compromises Conservation Authorities' abilities to continue this work.

Conservation Authority governance bridges municipal boundaries and is relatively non-partisan. They operate without undue influence from conflicting interests of municipalities, sector representatives, and special interest groups that would sway watershed health-based decision-making. Conservation Authority Boards are established to serve the watershed with fiduciary duty as are all Boards. Making municipal members represent their municipal interests will introduce many conflict situations, create stalemates in decision-making and not achieve more effective and efficient governance.

Enabling Provincial Minister consideration to go around and override Conservation Authority requirements or decisions will in effect also override local municipal decisions. Municipalities work in partnership with Conservation Authorities in land use planning matters and permitting to protect and preserve the important watershed features and functions of flood hazard lands, waterways, wetlands, woodlands, drinking water sources and endangered species habitats. Special interest groups will move through the Province to push for projects in protected areas without needing to responsibly consider enormous consequences, increasing risks and overall impacts to watershed health, our communities and costs to taxpayers.

Dividing programs and services into mandatory and non-mandatory, e.g. recreation and education, will create have and have not situations across the province, undermining equitable access to parks, trails and recreation. These types of programs and services are usually self-funded, not drawing on taxpayer's money but instead often provide revenue to support critical core mandates. Schedule 6 would require agreements with municipalities, as a new level of bureaucracy, but could also be overridden by the Province. Conservation Authorities run these programs effectively without impact on municipal levies providing much needed access to outdoor recreation and education especially important in these times of COVID-19 and changing climate.

We urge you to remove Schedule 6 in its entirety from Bill 229 recognizing the far-reaching negative consequences and the concerns of a significant number of Ontarians.

On behalf of the Halton Environmental Network Board,

Lisa Kohler, Executive Director

cc: Minister Steve Clark, Ministry of Municipal Affairs and Housing
Minister John Yakabuski, Ministry of Natural Resources and Forestry
MPP Crawford (Oakville)
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