



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

RE: PROPOSED CHANGES IN BILL 23 REGARDING CONSERVATION AUTHORITIES

Dear Premier Ford;

Conservation Authorities (CAs) want to do their part to help the Province meet its goal of building 1.5 million homes in Ontario over the next ten years.

We are concerned some changes proposed in the *More Homes Built Faster Act* will:

- Place new responsibilities on municipalities related to natural hazards and natural resources that may lead to inefficiencies, uncertainties, and delays in the development review process;
- Weaken the ability of conservation authorities to continue protecting people and property from natural hazards; and,
- Reduce critical, natural, infrastructure like wetlands that reduce flooding and protect waters in our lakes and rivers.

To avoid unintended consequences, we recommend:

1. Allowing Municipalities to continue voluntary agreements for review and commenting with Conservation Authorities; this means removal of the clauses in Bill 23 that prevent this from occurring.

The current model enables Municipalities to use existing expertise within Conservation Authorities to fulfill responsibilities for natural heritage and water resources, while saving time and money for applicants.

2. Development subject to *Planning Act* authorizations should not be exempt from Conservation Authority permits, and CA regulations should not be delegated to municipalities. This approach could result in building permits issued in error and

other unintended results. The watershed, not municipal boundaries, should continue be the scale used to assess natural hazards.

3. The multi-stakeholder Conservation Authority Working Group should continue working with the Province to provide solutions for shared goals and objectives.
4. Conservation Authority development fees should not be frozen since they are based on cost recovery.

Conservation Authorities work with local Municipalities to reduce barriers to development and streamline processes for the best possible service to all. We are: modernizing policies and procedures; streamlining approvals; reducing timelines and red tape; promoting pre-consultation; and reporting on service standards.

For example, in 2021, 91% of the permits issued by high growth conservation authorities were within provincial timelines. A total of 93% of permits issued by non-high growth CAs were within provincial timelines.

Municipalities rely on the benefits of long-standing conservation authority partnerships. In our view, the proposed changes undermine the core mandate of Conservation Authorities and may put people – and their homes – at risk.

We request Schedule 2 of Bill 23 and changes to the *Conservation Authorities Act* that: limit the ability of Municipalities to enter into review and commenting agreements with Conservation Authorities; and that delegate Conservation Authority regulations to Municipalities be removed.

Sincerely,



Matt Duncan
Chair

cc:

The Honourable Steve Clark, Minister of Municipal Affairs and Housing

The Honourable Graydon Smith, Minister of Natural Resources and Forestry

The Honourable David Piccini, Minister of Environment Parks and Conservation

The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs

The Honourable Matthew Rae, MPP Perth – Wellington

Member Municipalities