



**Canadian
Environmental Law
Association**
EQUITY. JUSTICE. HEALTH.



Honourable Kathryn McGarry
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Honourable Bob Chiarelli
Minister of Infrastructure
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Honourable Glen Murray
Minister of Environment and Climate Change
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Honourable Dr. Eric Hoskins
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Hepburn Block, 10th Floor, 80 Grosvenor St.
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Honourable Jeff Leal
Minister of Agriculture, Food and Rural Affairs
11th Floor, 77 Grenville St.
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Minister of Education
Mowat Block, 22nd Floor
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Honourable Eleanor McMahon
Minister of Tourism, Culture and Sport
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Honorable David Oraziatti
Minister of Community Safety and Correctional
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George Drew Bldg, 18th Floor
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Honourable Bill Mauro
Minister of Municipal Affairs
777 Bay St.
College Park, 17th Floor
Toronto, Ontario M5G 2E5

October 6, 2016

Re: Conservation Authorities Act Review

Dear Ministers,

Our organizations work together in support of Ontario's economic and environmental priorities. We have taken the time to consider the *Conservation Authorities Act Review* and to identify a couple of high level common goals and objectives that we all agree with. These comments are in addition to our more detailed submissions made to *Conserving our Future: Proposed Priorities for Renewal* (EBR 012-7583) and they are not intended to limit the government's review of those comments.

Improving Client Service Delivery

Our organizations have a history of working together for improved service delivery within both the Conservation Authorities' plan review and permitting programs. We welcome the creation of a multi-stakeholder Service Delivery Review Committee (similar to the Ministry of Natural Resources/Ministry of Municipal Affairs CA Liaison Committee (CALC) with additional stakeholders) to address, on a regular basis, streamlining and other issues related to service standards (e.g. Service Agreements, user fees). It is supported that regular multi-stakeholder training on the MNRF (2010) *Policies & Procedures for CA Plan Review and Permitting Activities* be provided. It is further noted that varying financial capacity/disparity among Conservation Authorities impacts the programs and services that are available on a province-wide basis. Frameworks for improvement need to allow flexibility to reflect local watershed needs and reflect best practices on a continual basis.

Addressing the Provincial Funding Gap

The lack of a renewed/updated funding commitment from the Province continues to be disappointing. There have been no increases (neither inflationary nor program improvements) to the provincially funded portion of the natural hazards program since the mid-1990s despite increased risks presented by climate change. As well, there is a lack of support for examining the broader benefits and cost savings obtained by the Province from program delivery through an integrated watershed management approach. It makes sense to invest in Conservation Authority programs and services which protect water, build ecosystem resilience, provide green space, and, prevent costly expenditures for flood damages, business disruptions and healthcare. We support development of a sustainable multi-ministry funding formula to achieve provincial priorities and to meet Ontario's current and emerging environmental imperatives (e.g. climate change, Great Lakes water protection). In the examination of broader benefits/provincial interest, it is noted that, if new responsibilities devolve to CAs; new funding needs to accompany these new duties. We also urge the Province to re-engage the federal government which also has expectations for local watershed management. Finally, in development of a sustainable funding formula, to address in part some issues of capacity, the Province should consider some resource equalization grants for CAs, taking into account local ability to pay.

Again, we are committed to working together, as provincial organizations and through our members at the watershed level to ensure the sustainable and resilient ecological and socio-economic well-being of Ontario. We ask that the Province partner with us. To be successful, we need your leadership and action on the above two priorities.

Sincerely,



Dick Hibma, Chair,
Conservation Ontario



Lynn Dollin, President,
Association of Municipalities of Ontario



Don McCabe, President,
Ontario Federation of Agriculture



Theresa McClenaghan, Executive Director,
Canadian Environmental Law Association

c.c. Gillian McEachern, Premier's Office
Dr. Dianne Saxe, Environmental Commissioner of Ontario
Gilles Bisson, Critic, MNRF
Todd Smith, Critic MNRF
CAOs, All Conservation Authorities