



Full Authority Agenda

November 9, 2022

KCCA Admin Centre

10:00 a.m.

This meeting will be held electronically. The recording and draft minutes will be posted to KCCA’s web site on November 10, 2022. The meeting will be streamed live at the following link:

Facebook Page - <https://www.facebook.com/KettleCreekCA/>

Audio/Video Recording Notice

“Board members, staff, guests and members of the public are reminded that the Full Authority Board/Committee meeting is being recorded, and will be posted to the Authority’s web site along with the official written minutes. As such, comments and opinions expressed may be published and any comments expressed by individual Board members, guests and the general public are their own, and do not, represent the opinions or comments of the Full Authority and/or the KCCA Board of Directors.

The recorded video of the Full Authority meeting is not considered the official record of that meeting. The official record of the Full Authority meeting shall consist solely of the Minutes approved by the Full Authority.”

Introductions and Declarations of Pecuniary Interest

Hearing Board

Minutes of Meetings

- a) October 19, 2022 Full Authority Meeting.....2
Recommendation: That the minutes of the October 19, 2022 Full Authority meeting be approved.

Matters Arising

Correspondence

Statement of Revenue and Expenses

New Business

- a) More Homes Built Faster.....8
Recommendation: For information and discussion.

Closed Session

Not Required



Full Authority Minutes October 19, 2022

A hybrid meeting of the Full Authority of the Kettle Creek Conservation Authority was held on Wednesday, October 19, 2022 at 10:00 a.m. with members and staff joining in-person and electronically. The meeting was streamed live to Facebook.

The meeting came to order at 10:02 a.m.

Audio/Video Record Notice

Board members, staff, guests and members of the public are advised that the Full Authority Board/Committee meeting is being video/audio recorded, and will be posted to the Authority’s web site along with the official written minutes. As such, comments and opinions expressed may be published and any comments expressed by individual Board members, guests and the general public are their own, and do not represent the opinions or comments of the Full Authority and/or the KCCA Board of Directors.

The recorded video of the Full Authority meeting is not considered the official record of that meeting. The official record of the Full Authority meeting shall consist solely of the Minutes approved by the Full Authority.

VanHooren conducted a roll call with the following members identifying their presence:

Members Present:

| | | |
|----------------------------|----------------------|-----------|
| Dennis Crevits, Vice Chair | Central Elgin | In Person |
| Dominique Giguère | Township of Malahide | Virtual |
| Stephen Harvey | Middlesex Centre | In Person |
| Grant Jones | Southwold Township | In Person |
| Bill Mackie | City of London | Virtual |
| Steve Peters | City of St. Thomas | Virtual |
| Alison Warwick, Chair | Thames Centre | In Person |
| Ralph Winfield | City of London | Virtual |

Members Absent:

| | |
|------------------|--------------------|
| Jim Herbert | City of St. Thomas |
| Elizabeth Peloza | City of London |

Staff Present:

| | | |
|-------------------|--------------------------------------|-----------|
| Jennifer Dow | Water Resources Supervisor | In Person |
| Joe Gordon | Manager of Planning/Development | In Person |
| Jessica Kirschner | GIS/Information Services Coordinator | Virtual |

| | | |
|----------------------|-------------------------------------|-----------|
| Brandon Lawler | Forest and Lands Technician | Virtual |
| Jeff Lawrence | Forestry and Lands Supervisor | Virtual |
| Marianne Levogiannis | Public Relations Supervisor | Virtual |
| Betsy McClure | Stewardship Program Supervisor | Virtual |
| Elizabeth VanHooren | General Manager/Secretary Treasurer | In Person |

As the meeting was conducted with electronic participants all votes were recorded and are included in the Recorded Vote Registry.

Introductions & Declarations of Pecuniary Interest

There were no declarations of pecuniary interest.

Hearing Board

There was no Hearing required.

Minutes of Meeting

FA111/2022

Moved by: Steve Peters

Seconded: Grant Jones

That the minutes of the September 21, 2022 Full Authority meeting be approved.

Carried

FA112/2022

Moved by: Bill Mackie

Seconded: Dennis Crevits

That the minutes of the October 6, 2022 Executive Committee meeting be approved.

Carried

Matters Arising

- a) Media Report
- b) Project Tracking
- c) Watershed Conditions

FA113/2022

Moved by: Grant Jones

Seconded: Stephen Harvey

That Matters Arising a) through c) be received.

Carried

Correspondence

No correspondence.

Statement of Revenue and Expenses

FA114/2022

Moved by: Stephen Harvey

Seconded: Bill Mackie

That the Statement of Revenue and Expenses dated September 30, 2022 be approved.

Carried

New Business

a) Fee Schedule

FA115/2022

Moved by: Ralph Winfield

Seconded: Grant Jones

That the proposed 2023 Fee Schedules be approved.

Carried

b) 2023 Campground Operations

FA116/2022

Moved by: Steve Peters

Seconded: Dennis Crevits

That the 2023 Campground Operations report be received; and further

That the changes to the 2023 Seasonal Camping Permit Application be approved.

Carried

c) 2022 Year End Conservation Area Expenditures

FA117/2022

Moved by: Ralph Winfield

Seconded: Bill Mackie

That staff proceed with the 2022 Year End Conservation Area Expenditures as outlined with an upset limit of \$20,000.

Carried

d) 2023 Draft Budget Preparations

- i) Dalewood Dam Concrete Repairs
- ii) Draft Capital Budget Scenarios

Staff presented both reports simultaneously in order to solicit feedback and discussion on how to proceed with repairs to the Dalewood Dam and impacts to the 2023 Capital Budget. In addition to the two options presented in the advanced reports, (prepare an RFT for scaled repairs in 2023 or delay repairs until sufficient funds are in place to complete all required repairs) a third option was presented at the meeting for discussion: that staff give consideration to the costs associated with decommissioning the dam. Decommissioning the dam was considered as part of a 1988 Dalewood Dam Assessment Report but was ultimately dismissed due to the social and recreational impacts.

There was a general consensus that decommissioning should be explored as an option. Members also directed staff to consider public input as well as the involvement and/impact to the City of St. Thomas. Staff will investigate further; however, should decommissioning be explored public and stakeholder involvement would be solicited as part of the decommissioning process.

FA118/2022

Moved by: Grant Jones
Seconded: Dennis Crevits

That GD Vallee be contracted to continue quarterly inspections of the Dalewood Dam to monitor and advise the Authority of signs of further deterioration; and further

That staff further investigate decommissioning and associated costs as an alternate option, make the 1988 report available to members, communicate with the City of St. Thomas on the condition of the dam, and report back to the Full Authority; and

Finally that no costs associated with dam repairs be included in the 2023 capital budget.

Carried

- e) Lake Erie Look Up Tables

FA119/2022

Moved by: Dennis Crevits
Seconded: Ralph Winfield

That the Port Stanley Main Beach Wave Uprush Look-Up Tables Report (TRUE, 2022) be approved as presented.

Carried

d) Planning and Regulations Activity Report

FA120/2022

Moved by: Ralph Winfield

Seconded: Grant Jones

That the October Planning and Regulations Activity Report be received.

Carried

Members were reminded that the November 9, 2022 will be as required. A training session for new members will be held on December 15, 2022 at 10:00 a.m.

Closed Session

A Closed Session was not required.

FA121/2022

Moved by: Grant Jones

Seconded: Dennis Crevits

That the meeting adjourn at 11:24 a.m.

Carried



Elizabeth VanHooren
General Manager/Secretary Treasurer

Alison Warwick
Chair

Recorded Vote Registry FA111/2022 to FA115/2022

A=Absent Y=Yes N=No

| Board Member | FA110/2022 | FA111/2022 | FA112/2022 | FA113/2022 | FA114/2022 | FA115/2022 |
|---------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Crevits | Y | Y | Y | Y | Y | Y |
| Giguère | Y | Y | Y | Y | Y | Y |
| Harvey | Y | Y | Y | Y | Y | Y |
| Herbert | A | A | A | A | A | A |
| Jones | Y | Y | Y | Y | Y | Y |
| Mackie | Y | Y | Y | Y | Y | Y |
| Peters | Y | Y | Y | Y | Y | Y |
| Pelosa | A | A | A | A | A | A |
| Warwick | Y | Y | Y | Y | Y | Y |
| Winfield | Y | Y | Y | Y | Y | Y |
| Result | Carried | Carried | Carried | Carried | Carried | Carried |

Recorded Vote Registry FA116/2022 to FA121/2022

A=Absent Y=Yes N=No

| Board Member | FA116/2022 | FA117/2022 | FA118/2022 | FA119/2022 | FA120/2022 | FA121/2022 |
|---------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Crevits | Y | Y | Y | Y | Y | Y |
| Giguère | Y | Y | Y | Y | Y | Y |
| Harvey | Y | Y | Y | Y | Y | Y |
| Herbert | A | A | A | A | A | A |
| Jones | Y | Y | Y | Y | Y | Y |
| Mackie | Y | Y | Y | Y | Y | Y |
| Peters | Y | Y | Y | Y | Y | Y |
| Peloza | A | A | A | A | A | A |
| Warwick | Y | Y | Y | Y | Y | Y |
| Winfield | Y | Y | Y | Y | Y | Y |
| Result | Carried | Carried | Carried | Carried | Carried | Carried |

DRAFT

TO: Full Authority
FROM: Elizabeth VanHooren
Date: November 9, 2022
Subject: Omnibus Bill 23: More Homes Built Faster Act
Recommendation: For Discussion



PURPOSE

To present for discussion an analysis of the proposed regulatory and legislative changes that pertain to conservation authorities (CAs) and the *Conservation Authorities Act* (CA Act) that are included in Bill 23: the More Homes Built Faster Act, that was introduced on October 25, 2022.

REPORT SUMMARY

- On October 25, 2022 the Province introduced Omnibus Bill 23 “*More Homes Built Faster Act*” as a means to address a housing shortage in the province.
- The Omnibus Bill included several legislative and regulatory changes affecting Conservation Authorities (CAs) and are intended to further focus CAs on hazard programs and services, support faster and less costly approvals, streamline CA processes and help make land suitable for development available in a timely manner.
- All proposals can be found on the Environmental Registry for public comment:

19-6141 Legislative and Regulatory Proposals under the CA Act

Comment deadline: November 24, 2022

<https://ero.ontario.ca/notice/019-6141>

19-2927 Proposed Updates to the Regulation for the Protection of People and Property from Natural Hazards in Ontario

Comment deadline: December 30, 2022

<https://ero.ontario.ca/notice/019-2927>

Planning Act and Other Provincial Plans/Guidance

ERO 19-6162 Consultations on More Homes Built Faster

Comment deadline: November 24 – December 30

Includes Policy reviews of Ontario’s Natural Heritage and Ontario Wetland Evaluation Strategy <https://ero.ontario.ca/notice/019-6162>

- At the Full Authority meeting staff will be presenting an analysis of the proposals and the implications to CAs with the aim to establish an appropriate response to the ERO Postings. A high-level summary is included below.

BACKGROUND

The province has committed to getting 1.5 million homes built over the next 10 years. As part of that strategy, an Omnibus Bill 23 “*More Homes Built Faster Act*” was introduced on October 25, 2022 which included a number of legislative and regulatory changes affecting CAs. The links to the relevant proposals are listed in the summary above.

According to the province the objective of the various proposals is intended to further focus CAs on protecting people and property from natural hazards, support faster and less costly approvals, streamline CAs processes and help make suitable land for housing available in a timely manner. In addition to proposed changes to the CA Act, the province introduced policy reviews including proposed changes to Ontario’s Natural Heritage and Ontario Wetland Evaluation Strategy.

Early review of the proposals has raised concerns within the CA network. See attached a news release from Conservation Ontario (October 27, 2022) and a letter to the Province from Conservation Halton’s Board of Directors (October 31, 2022).

KCCA staff will provide further analysis of the proposed changes with local perspective at the Full Authority meeting, including recommendations for a possible response to the ERO postings. Below is a high-level summary of the legislative and regulatory changes under the CA Act:

1. Proposed updates for the protection of people and property from natural hazards

- a. Allow development approved under the Planning Act to be exempt from requiring a permit under the CA Act in certain municipalities provided certain conditions are met. Affected municipalities and conditions are to be outlined in regulation.
- b. Remove the terms “conservation of land” and “pollution” and add the term “unstable soils and bedrock” while also maintaining “flooding,” “erosion”, and “dynamic beaches” to the matters considered in permitting and related decisions.
- c. Update the timeframe after which an applicant may appeal the failure of a CA to issue a permit to the Ontario Land Tribunal from 120 to 90 days.
- d. Require CAs to issue permits for projects subject to a Community Infrastructure and Housing Accelerator (CIHA) order requested by a municipality under section 34.1 of the *Planning Act* and allow the Minister to review/amend any conditions to those permits.
- e. Provide that the Minister may limit the conditions a CA may include in permits for areas subject to a CIHA order; and
- f. Make minor corrections and clarifications to the CA Act (e.g. removing “proposed” from provisions referring to permits that have already been issued; clarifying the definition of “development project”)

2. Focusing role of CAs in review of development proposals and applications (comments, appeals)

- a. Legislative changes, if passed, would enable the scoping of CA review/commenting role with respect to development applications and land use planning policies under the prescribed Acts to matters set in the Mandatory Programs and Services regulation (O. Reg. 686/21)
- b. Regulatory proposal, if approved, would not allow a CA to enter into an MOU with a member municipality as a Category 2 or Category 3 program or service to review or comment on the following Acts:
 - i. The Aggregate Resource Act
 - ii. The Condominium Act, 1998
 - iii. The Endangered Species Act, 2007
 - iv. The Environmental Assessment Act
 - v. The Environmental Protection Act
 - vi. The Niagara Escarpment Planning and Development Act
 - vii. The Ontario Heritage Act
 - viii. The Ontario Water Resources Act
 - ix. The Planning Act

3. Enable the Minister to freeze fees charged by CAs

- a. Legislative changes, if passed, would allow the Minister to temporarily direct a CA to maintain fees charged for the programs and services it provides at current levels, including fees for reviewing and commenting on planning and development proposals, as well as for permits.

4. Identifying CA lands suitable for housing and streamlining severance and disposition processes to help facilitate faster development

- a. Regulatory changes, if approved, would require CAs to identify CA-owned or controlled lands that could support housing within their land inventories – to be completed by December 31, 2024.
- b. Legislative changes, if passed, would streamline processes associated with disposition of CA-owned land by requiring a written notice 90 days before the proposed disposition to the Minister for dispositions of land in respect of which there has been a provincial grant (Currently, this requires Minister’s approval.)
- c. Require the posting of a public consultation on the CA’s website and a consultation for >45 days prior to providing the Minister notice.
- d. Enable the Minister to direct the CA to apply a share of the proceeds of the dispositions to support mandatory programs and services.

In addition to the legislative changes, there are a number of regulatory changes proposed including:

- Creating a single provincial regulation to replace the 36 individual regulations for each CA

- Update the definition of a watercourse from an identifiable depression to a defined channel having a bed, and banks or sides
- Maintain the existing river and stream valley limits and areas that are adjacent or close to the shoreline of the Great Lakes-St. Lawrence River System or to inland lakes that may be affected by flooding, erosion or dynamic beach hazards, as well as the flood standards for the determination of hazardous lands associated with flooding.
- Update the “other areas” in which the prohibitions on development apply to within 30 metres of all wetlands.
- Streamline approvals for low-risk activities, which may include exempting some activities from requiring a permit if certain requirements or conditions are met.
- Require CAs to request any information or studies needed prior to the confirmation of a complete application.
- Limit the site-specific conditions that may be attached to a permit to focus on natural hazards/public safety.
- Provide increased flexibility for a CA to issue a permit up to its maximum length of validity and issue extensions as necessary.
- Require CAs to:
 - Develop, consult on, make publicly available, and periodically review internal policies that guide permitting decisions.
 - Establish, monitor and report on service delivery standards including requirements and timelines for determination of complete applications.
 - Provide maps depicting the areas where permitting requirement applies and consult on any significant changes.
 - Outline a process for pre-consultation on a permit.

Conserving Ontario’s Natural Heritage

Ontario has also posted a specific discussion paper to seek feedback on how development pressures on wetlands, woodlands, and other natural wildlife habitat could be offset. The discussion paper is based around the following principles:

- Net Gain
- Avoidance First
- Informed by the best available science and knowledge
- Transparency and Accountability
- Limits to the Offsets for certain wetlands and other areas that historically have been important

Ontario Wetland Evaluation System

Ontario is also proposing changes to the Ontario Wetland Evaluation System (OWES) Manuals adding new guidance related to re-evaluation of wetlands and updates to mapping of evaluated wetland boundaries.

Recommendation: For Discussion.

From: [Great Lakes and Water Policy Section \(MNRF\)](#)
To: [Great Lakes and Water Policy Section \(MNRF\)](#)
Subject: MNRF proposals in support of More Homes Built Faster: Ontario's Housing Supply Action Plan 2022-23
Date: October 25, 2022 4:54:20 PM
Attachments: [image001.emz](#)
[image002.emz](#)
[image004.png](#)
[image005.emz](#)
[image006.png](#)
[image007.png](#)

*** This message is being sent on behalf of Jennifer Keyes, Director, Resources Planning and Development Policy Branch, Ministry of Natural Resources and Forestry ***

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October 25, 2022

Good afternoon,

On October 25, 2022, the government released More Homes Built Faster: Ontario's Housing Supply Action Plan 2022-23 that proposes bold and transformative action to get 1.5 million homes built over the next 10 years.

Details about the range of proposed measures in the government's plan can be found in the news release here: [Ontario Putting Home Ownership in Reach for More People | Ontario Newsroom](#).

More Homes Built Faster: Ontario's Housing Supply Action Plan 2022-23 proposes policies and tools that reflect recommendations from the [Housing Affordability Task Force Report](#), and builds on the [More Homes, More Choice Act](#) and the [More Homes for Everyone Plan](#). These changes would provide the foundation to address Ontario's housing supply crisis over the long term and would be supplemented by continued action in the future.

As part of More Homes Built Faster: Ontario's Housing Supply Action Plan 2022-23, the government introduced Bill 23 – the *More Homes Built Faster Act, 2022*, and is seeking feedback on the changes proposed under the legislation.

In addition, the Ministry of Natural Resources and Forestry has proposed regulatory and policy changes on which we are seeking your feedback. These and other related proposals can be found through [the Environmental Registry of Ontario](#).

Sincerely,

Jennifer Keyes
Director, Resources Planning and Development Policy Branch
Ministry of Natural Resources and Forestry

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FOR IMMEDIATE RELEASE

Province Continues to Change Roles and Responsibilities of Conservation Authorities

Newmarket, Ontario (October 27, 2022) In a bid to address the housing supply, the Ontario government released a series of new proposed legislative changes, many of which impact Ontario's 36 conservation authorities.

Among them, the Province proposes to prevent municipalities from entering into agreements with conservation authorities to review planning applications on their behalf, proposes exemptions from natural hazard permits for select municipalities where *Planning Act* approvals are in place, remove 'conservation of lands' and 'pollution' as considerations in permit decisions, to put a freeze on development fees and to possibly tap into conservation lands to support housing.

To date, conservation authorities have supported the Province's efforts to increase the housing supply by streamlining and speeding up review and approval processes for plan applications and permits.

"At the same time, we need to make sure mechanisms are still in place to ensure that we balance growth with a healthy environment," said Angela Coleman, General Manager of Conservation Ontario. Conservation Ontario represents Ontario's 36 conservation authorities.

Ms. Coleman points out that conservation authorities are not a barrier to growth. Through Conservation Ontario's Client Service and Streamlining Initiative, timely reviews are provided and service level enhancements and improvements have continued throughout the Conservation Authorities Act review dialogue.

In terms of plan reviews, Ms. Coleman points out that municipalities need to continue to be able to enter into agreements with conservation authorities for advisory services and CAs need to retain responsibility for Natural Hazard approvals.

"The plan review process by conservation authorities ensures the protection of the watershed-based approach and enables the connections to be made between flood control, wetlands and other green infrastructure or natural cover, thus ensuring safe development", Ms. Coleman says.

Conservation Ontario is calling for the re-establishment of the Multi-stakeholder Conservation Authority Working Group which is comprised of members from conservation authorities,

municipalities, development sector and agriculture. The CA Working Group helped guide the Province in its implementation of the last round of changes to the CA Act.

In terms of another provincial proposal to freeze conservation authority development fees, Ms. Coleman states that 'development needs to pay for development'. Freezing these fees just creates a backlog of costs that will eventually need to be addressed.

"Conservation authority fees are based on cost recovery and there is no other mechanism being suggested that would ensure those costs are met," Ms. Coleman said. "Who will pay for the eventual shortfall?"

Regarding the provincial proposal that conservation lands be used to support housing development, Ms. Coleman points out that careful consideration is required when identifying CA lands in this way. Conservation authorities own approximately 147,000 hectares of land which are made up of important natural systems and biodiversity such as wetlands, forests, moraines, and ecologically sensitive lands. These lands typically have clear functions and purpose.

Conservation authority lands are often located in floodplains and help to protect against flooding and erosion. They offer trails and other outdoor amenities that contribute to public well-being and they protect important sources of drinking water and biodiversity. They also contribute to climate change adaptation measures by capturing emissions, cooling temperatures and protecting water quality.

"Regardless of the source of funding for the lands, clear policies are needed to protect these locally significant conservation lands and land use should only be considered for housing in exceptional circumstances," Ms. Coleman points out.

Conservation authorities provide cost-effective solutions that help to solve challenging local issues. Their watershed-based approach is recognized globally as the best management unit for ensuring we take into consideration a wide range of competing interests and impacts on natural resources. When downloading these kinds of responsibilities to municipalities, we need to consider how development in one jurisdiction can impact other adjacent or 'downstream' municipalities.

One last consideration Ms. Coleman points out, is that it's important to maintain local stability particularly now. The recent municipal elections in Ontario have created a plethora of new municipal council and conservation authority Board appointments and transitions. "The conservation authorities' collaboration in plan review with municipalities provides a long-term, consistent approach which enables more effective planning and implementation

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For more information contact:

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acoleman@conservationontario.ca | 289-763-4807

Jane Lewington | Manager, Marketing & Communications, Conservation Ontario
jlewington@conservationontario.ca | 905-717-0301

The Honourable Doug Ford
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The Honourable Steve Clark
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The Honourable Graydon Smith
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The Honourable David Piccini
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david.piccinico@pc.ola.org

October 31st, 2022

Dear Premier Ford, Minister Clark, Minister Smith and Minister Piccini,

We are writing to you in response to Bill 23, the *More Homes Built Faster Act*, which was announced on Tuesday, October 25th, 2022, specifically regarding Schedule 2.

We agree that there is a housing supply and affordability issue in Ontario that needs to be pragmatically addressed. We support the government's commitment to reducing unnecessary barriers to development and streamlining processes. We share this commitment and publicly report on the standards of service delivery to illustrate our goal of providing the best customer service to the municipalities, communities, residents and developers we serve.

We will do our part to help the Province meet its goal of building 1.5 million homes in Ontario over the next ten years. We think your stated outcomes are important but are concerned that your proposed legislative changes may have unintentional, negative consequences. Rather than creating the conditions for efficient housing development, these changes may jeopardize the Province's stated goals by increasing risks to life and property for Ontario residents.

1. Potential sweeping exemptions to transfer CA regulatory responsibilities to municipalities

Conservation Halton would like to understand the government's intentions with this proposed exemption. It is unclear whether it will be limited to certain types of low-risk development and hazards, or if the purpose is to transfer Conservation Authorities (CA) responsibilities to municipalities on a much broader scale. While the government wants to focus CAs on their core mandate, this proposed sweeping exemption signals the exact opposite. As proposed in the legislation, the CA exclusions will nullify the core functions of CAs and open up significant holes in the delivery of our natural hazard roles, rendering them ineffective. This will negatively

impact our ability to protect people and property from natural hazards, which seem to be more and more prevalent with extreme weather events.

Without limitations or further scoping, these proposed changes signal the likelihood of future delegation of CA permitting roles to municipalities that have neither capacity nor expertise in water resources engineering, environmental planning and regulatory compliance. This will result in longer response times and increased costs and impede the government's goal of making life more affordable.

Municipalities will also assume sole liability for the impact of development on natural hazards within municipal boundaries and on neighbouring upstream and downstream communities, which is a significant and new responsibility that they have never had to manage.

Key Recommendations:

- Address this risk expressly – keep all hazard-related responsibilities with CAs.
- Engage with the existing multi-stakeholder Conservation Authorities Working Group (CAWG) to ensure there is a streamlined, consistent and scoped process for CAs to help the Province achieve its housing goals while ensuring costs are low, the process is fast and Ontario taxpayers are protected.

2. Proposed change that would prohibit CAs from entering into MOUs with municipalities for other services (e.g., natural heritage reviews, select aspects of stormwater management reviews, etc.)

Conservation Halton has demonstrated that we can deliver these services efficiently without lengthening the approvals process. There is no evidence that municipalities can do this faster or cheaper. Bill 23 as currently written, precludes municipalities from entering into agreements with CAs to provide advice on environmental and natural heritage matters. They will have to coordinate with neighbouring municipalities and the Province on a watershed basis, rather than taking advantage of expertise already available within many CAs.

Key Recommendations:

- Municipalities should retain the option to enter into MOUs with CAs, with clearly defined terms, timelines and performance measures, as allowed under Section 21.1.1 (1) of the CA Act.
- Work with the CAWG to develop guidance for commenting and exploring the option of limiting CAs from commenting beyond natural hazards risks except where a CA has entered into an agreement or MOU.

3. Proposed change to freeze CA fees

This proposal has no guidelines on the timing or permanence of the fee freeze. Conservation Halton has already undertaken an extensive cost-based analysis that has been benchmarked against other development review fees to ensure our fees do not exceed the cost to deliver the service. We meet regularly with developer groups and municipalities to ensure our fees, processes and service standards are transparent, consistent and fair. We hope that you will be guided by your already approved fee policy that Conservation Halton supports, otherwise this change will impose additional costs on municipalities.

Key Recommendation:

- Require CAs to demonstrate to the Province that permit and planning fees do not exceed the cost to deliver the program or service and only consider freezing fees if CAs are exceeding 100% cost recovery.

4. Wetland Offsetting

Wetlands play a critical role in mitigating floods. Further wetland loss may result in serious flooding, putting the safety of communities at risk. Wetlands are a cost-effective strategy for protecting downstream properties. The

government must be prudent when considering changes like offsetting, which could negatively affect the ability of wetlands to reduce flooding and confuse roles in wetland management and protection between municipalities and CAs.

Conservation Halton is disciplined and focused on providing mandatory programs and services related to natural hazards. We have a transparent and proven track record of providing regulatory services that are streamlined, accountable and centred on rigorous service delivery standards. Our commitment focuses on stakeholder engagement, from meeting homeowners on-site to engaging with the development community to better understand perceived barriers. This approach helps us find innovative solutions for continued and safe growth in the municipalities we serve.

To ensure the most effective implementation of this Bill, we believe it is critical that the government presses pause on the proposed changes we have highlighted and meet with us to clarify and consider more effective alternatives. It is our hope that we can work with you again to safeguard the best possible outcomes for the people of Ontario.

You had such great success through the multi-stakeholder CA Working Group, which your Progressive Conservative government created and which Hassaan Basit, President and CEO of Conservation Halton, chaired. We strongly suggest continuing this engagement and we stand ready to help.

Sincerely,

Gerry Smallegange



Chair
Conservation Halton Board of Directors

Mayor Gordon Krantz



Town of Milton
Conservation Halton Board member

Mayor Rob Burton, BA, MS



Town of Oakville
Conservation Halton Board member

Mayor Marianne Meed Ward



City of Burlington
Conservation Halton Board member

cc:

MPP Ted Arnott
MPP Parm Gill
MPP Stephen Crawford
MPP Effie Triantafilopoulos
MPP Natalie Pierre
MPP Donna Skelly
MPP Deepak Anand
MPP Peter Tabuns