



RESPONDING TO THE SURVEY ON CONSERVATION AUTHORITIES (CAs)

Conservation Authority Survey

The Ministry of Environment, Conservation and Parks is consulting on the mandate of conservation authorities (CAs) and wants the public to [respond to a survey](#) to help them determine the value of CAs to Ontarians. The survey follows public sessions where big developers and others have been urging the government to remove conservation authorities from the planning process, and to limit their mandate and scope. Limiting the mandate of CAs will only open the floodgates for unchecked development, threatening our communities' flood plains, drinking water, biodiversity, natural heritage and more.

Ontario's Conservation Authorities play a key role in protecting Ontarians from the impacts of climate change. We must resist this trend towards environmental deregulation in Ontario.

FOUR KEY MESSAGES

1. The role of CAs in planning decisions must be maintained. The CAs' role in planning decisions under the *Planning Act* and the *Environmental Assessment Act* ensure that developments do not result in changes to the floodplain and natural heritage that would put communities at risk from flooding. The [Flood Advisor's report](#) showed strong support for the conservation authority model in protecting Ontario from the impacts of climate change. This model only works if CAs have the regulatory power necessary to intervene in planning decisions and development applications.

2. The role of CAs in monitoring needs to be maintained and supported. Watershed-scale monitoring programs are necessary for delivery of "core" programs regarding flood mitigation, natural hazards, and drinking water source protection. Additionally, they hold significant value in delivering broader environmental protections including land conservation, biodiversity conservation, water quality protection, and ecological restoration.

3. CAs should continue to play a key role in delivering community projects in partnership with municipalities and local organizations, providing on-the-ground expertise. CAs partner with local environmental and conservation groups, farmers, and their communities to deliver regionally significant projects including rehabilitating natural heritage, implementing agricultural best practices, and restoring or creating wetlands. They often provide match funding, in addition to on-the-ground expertise.

4. The watershed approach of conservation authorities (CAs) must be preserved. CAs operate at the watershed scale, providing a much-valued bridge across jurisdictional boundaries to understand and address environmental concerns, including flooding. CAs conduct watershed-scale monitoring, data collection, modelling and assessments. They are ideally positioned to develop watershed strategies and



encourage decision-making at that scale. They support watershed-wide activities including stewardship, communication, outreach and education.

SUGGESTIONS FOR SURVEY RESPONSES

Section 2: Mandatory and non-mandatory programs and services

1. Which conservation authority programs and services should be mandatory for each of the following categories and why? Please provide answers for any of the categories that are relevant to you: preparing and protecting against the risk of natural hazards; managing conservation authority-owned lands; and protecting drinking water sources.

- The government's current effort to constrain the role and mandate of conservation authorities is contradictory to the needs of the people of Ontario who are facing enormous risks as a result of climate change and biodiversity loss. At the very least, in addition to the three categories mentioned above, conservation authorities should have a mandatory role in watershed and land-use planning and permitting.
- Activities required for effective delivery of these programs include: watershed-scale data collection, management and modelling; watershed-based technical studies, plans, assessments and strategies; and water and land-based stewardship, restoration, education and communications.
- Conservation authorities are grassroots organizations that have a solid track record in responding innovatively and effectively to community needs. The government should enhance, not limit their roles and effectiveness.

2. What programs and services provided by conservation authorities should be non-mandatory?

- The rigid division between mandatory and non-mandatory programs sets up unnecessary barriers to effective and responsive management. Instead, CAs should continue to determine programs with local partners, based on community needs and priorities. Such flexibility is important, given the significant differences among municipal resources and expertise across Ontario.
- Given the limited contributions of the Government of Ontario to the operations of CAs, it would be more appropriate to ask which programs the government should directly support through funding.

Section 3: The existing conservation authority model

1. What is working well in the existing conservation authority model?

- The CAs' role and regulatory power in planning decisions ensure that developments do not result in changes to the floodplain and natural heritage that would put communities at risk from flooding. The Flood Advisor's report showed strong support for the conservation authority model in protecting Ontario from the impacts of climate change.
- The watershed approach of CAs works well, providing a much-valued bridge across jurisdictional boundaries to understand and address environmental concerns, including



flooding. CAs conduct watershed-scale monitoring, data collection, modelling and assessments. They are ideally positioned to develop watershed strategies and encourage decision-making at that scale. They support watershed-wide activities including stewardship, communication, outreach and education.

- The existing model provides flexibility to address local needs and priorities. Municipal representation ensures accountability to the community as well as accessibility.
- The existing model is based on a wide range of funding sources and opportunities limiting dependence on single sources of funding and also reducing tax burdens through the securement/generation of non-taxation revenue sources.

2. What could be improved in the existing conservation authority model?

- The existing model could be improved through increased and consistent funding from the Government of Ontario. The most common complaint directed at CAs is about fees and delays in processing development applications. Municipalities face the same issues and transferring responsibilities to them would not resolve the issue, which comes down to funding. Effective and timely review of development applications requires staff, which in turn require adequate funding. Significant reduction in provincial funding means that costs are transferred to applicants. The solution lies in covering costs through an acceptable balance in revenue from taxes, development fees and other sources.
- Clear provincial policy, guidelines and standards that support the watershed approach would be helpful.

3. How can conservation authority operations be more consistent, transparent, and efficient

- CAs are models for ensuring locally appropriate responses to community needs and priorities. Consistency can and should be established through provincial legislation, policies, plans and standards, which can then be locally implemented. Where consistency is lacking and raising legitimate concerns, clear guidance from the Government of Ontario would be helpful. For example, guidance that directs CAs on how to communicate with stakeholders about the limits of their regulatory authority would be useful.
- Local representation on CA boards already ensures transparency.
- Requiring CAs to provide standardized, publicly available reporting would further enhance transparency.
- The watershed planning and engineering resources provided by CAs to municipalities is an efficient model that relieves municipalities from having to independently replicate these services.
- Adequate funding, staffing and training are needed to realize greater efficiencies.

4. How do you feel about the current roles and responsibilities to plan and issue permits?

- The current roles and responsibilities of CAs in planning and permitting are appropriate as they keep people and property safe, with a focus on prevention. They should be maintained. The CAs' role in planning decisions under the *Planning Act* and the *Environmental Assessment Act* ensures that developments do not result in changes to



the floodplain and natural heritage that would put communities at risk from flooding. The Flood Advisor's report showed strong support for the conservation authority model in protecting Ontario from the impacts of climate change. This model only works if CAs are given the regulatory power necessary to intervene on planning decisions to enhance watershed resilience.

- These roles and responsibilities help Ontarians to avoid costs associated with damages and business disruptions resulting from extreme weather events. They also help to protect the lands, waters and wildlife which support many different economic sectors across Ontario.

5. How do you feel about the way conservation authorities currently issue permits?

- As noted above, adequate provincial funding is needed to improve delivery.

6. How can the oversight of conservation authorities be improved? Should there be additional oversight of conservation authority operations (for example, by the province or municipalities?) Why or why not?

- Both the province and local municipalities already directly oversee conservation authorities. No additional oversight is needed.

7. What are your thoughts on conservation authority board composition? Should municipalities be allowed to continue to appoint members of the public to conservation authority boards? What should be the length of conservation authority board appointments? (Currently it is 4 years).

- Yes, municipalities, as the primary funder and partner, should be able to make appointments to CA boards. No changes are needed to the length of appointments.

Section 4: Partnerships and collaborations

- Responses to this section should describe your organization's partnerships and collaborations with CAs.
- A key message to reinforce in this section: CAs play a key role in delivering community projects in partnership with municipalities and local organizations, providing on-the-ground expertise. CAs partner with local environmental and conservation groups, farmers, and their communities to deliver regionally significant projects including rehabilitating natural heritage, implementing agricultural best practices, and restoring or creating wetlands. They often provide match funding, in addition to on-the-ground expertise.

Section 5: Additional feedback

- Reinforce key messages here.
- You could also point out that very few municipalities have the staff capacity and expertise to deal with natural heritage planning, and that CAs are filling this role, in most cases, at the direction of municipalities, according to negotiated Memorandums of Understanding. Removing CAs from this role will not increase efficiencies. Someone will still need to do the work and assume the responsibility of planning and permitting.