

May 7, 2019

Carolyn O'Neill  
Great Lakes Office  
Ministry of the Environment, Conservation and Parks  
40 St Clair Avenue West, Floor 10  
Toronto, ON M4V 1M2

Dear Ms. O'Neill:

**Re: Modernizing conservation authority operations  
Environmental Registry Number 013-5018**

City of Waterloo planning staff are providing this letter in response to the proposed amendments to the *Conservation Authorities Act* that would help conservation authorities focus and deliver on their core mandate and improve governance. The amendments would:

- Clearly define the core mandatory programs and services provided by conservation authorities to be, natural hazard protection and management, conservation and management of conservation authority lands, drinking water source protection (as prescribed under the *Clean Water Act*), and protection of the Lake Simcoe watershed (as prescribed under the *Lake Simcoe Protection Act*).
- Increase transparency in how conservation authorities levy municipalities for mandatory and non-mandatory programs and services. Update the *Conservation Authorities Act* to conform with modern transparency standards by ensuring that municipalities and conservation authorities review levies for non-core programs after a certain period of time (e.g. 4 to 8 years).
- Establish a transition period (e.g. 18 to 24 months) and process for conservation authorities and municipalities to enter into agreements for the delivery of non-mandatory programs and services and meet the transparency standards.
- Enable the Minister to appoint an investigator to investigate or undertake an audit and report on a conservation authority.
- Clarify that the duty of conservation authority board members is to act in the best interest of the conservation authority, similar to not-for profit organizations.

In addition, un-proclaimed provisions of the *Conservation Authorities Act* related to the following are proposed to be proclaimed:

- fees for programs and services
- transparency and accountability
- approval of projects with provincial grants

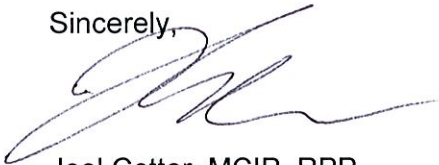
- recovery of capital costs and operating expenses from municipalities (municipal levies)
- regulation of areas over which conservation authorities have jurisdiction (e.g. development permitting)
- enforcement and offences
- additional regulations.

Our comments are outlined below and are provided in the context of the need to manage natural hazards, the need for watershed-based natural resource programs that protect water, provide green space and build community resilience, and the important role the Grand River Conservation Authority plays in helping to build our community.

1. The Grand River Conservation Authority provided comments to this Environmental Registry posting through Report GM-04-19-41. City planning staff support the comments provided in that report.
2. The City has a long-standing, positive relationship with the Grand River Conservation Authority. The Grand River Conservation Authority provides a valuable and unrepeated service and City staff rely upon the natural hazard and natural environment expertise they provide. The involvement of the Grand River Conservation Authority in plan development (e.g. Official Plan, Comprehensive Zoning By-law and subwatershed planning) and plan review (e.g. subdivisions, zone changes and site plans) is key to ensuring the livability and resiliency of our community.

Thank you for the opportunity to comment.

Sincerely,



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