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May 17, 2019

Environmental Registry of Ontario
ERO Number: 013-5018

To whom it may concern:

Re: Modernizing conservation authority operations – Conservation Authorities Act

The Lakehead Region Conservation Authority is concerned about the proposed changes to the *Conservation Authorities Act* under Environmental Registry of Ontario posting ERO #013-5018, as further defined by Bill 108. Specifically, we are concerned about the proposed changes to the *Conservation Authorities Act* restricting the ability of conservation authorities to levy municipalities only for the identified “core” mandated programs of natural hazard management, management of conservation authority-owned lands, and source water protection. Additionally, the lack of pre-consultation with Conservation Authorities prior to the postings is concerning, as well as the lack of understanding of the full breadth of programming done by Conservation Authorities on behalf of the Province. We consider Conservation Authorities an extension of the Province, and a partner to the Ministries. The minimal commenting period of Bill 108 is extremely concerning, especially given the current flood status of many Conservation Authorities and municipalities that are focused on emergencies, rather than ERO postings and proposed Bills. Further, this Act was updated in 2017 after more than two-years of public input, so the need to further update it is not understood.

Conservation Authorities have municipal representatives on their Boards who approve the annual budget of the Conservation Authority. The requirement of additional Memorandum of Understandings with each Municipal Council for each “non-core” program will add additional unnecessary administrative costs to each program the Province does not consider core, as well inevitably increase “red-tape”. As a small Authority with 10 full time staff, the time required by staff to create, administer, up-date and seek approval from each municipal council (in our case eight Member Municipalities) for each “non-core” program will affect our ability to deliver all of our programs, including “core” programming. This requirement will add an unnecessary burden to both the

Authorities and Municipal Councils, in both staff time as well as financial costs associated with creating and vetting agreements through legal reviews. Our concerns are further compounded by recently announced budget cuts to the already underfunded flood related transfer payments, the 50-million tree program and valuable summer job programs. Conservation authorities already operate on limited budgets and further reductions to funding will adversely affect the valuable programs and services that they provide.

When regulations are enacted regarding the composition and qualifications of Board Members, consideration must be given to ensuring that Municipal Councils with smaller numbers of members, continue to be able to appoint a member of Council, regardless of their qualifications. A Board Member's "qualifications" do not indicate their interest, dedication or available time to be a productive valued member of the Board.

We respectfully implore the Government of the Province of Ontario to change the proposed legislation to continue to allow conservation authorities to design programs on a watershed-scale with the approval of their municipally appointed Board of Directors

Yours truly,


for Donna Blunt
Chair

c.c: Judith Monteith-Farrell, MPP
Michael Gravelle, MPP