



Nickel District Conservation Authority  
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ConservationSudbury.ca

May 21, 2019

Hon. Rod Phillips, Minister  
Ministry of the Environment, Conservation and Parks  
c/o Carolyn O'Neill, Great Lakes Office  
40 St Clair Avenue West, Floor 10  
Toronto, ON  
M4V 1M2

**RE: ERO Proposal 013-5018 – Modernizing Conservation Authority Operations**

Dear Minister Phillips,

Thank you for the opportunity to provide comment on the proposal to modernize operations as described in the *Conservation Authorities Act, RSO 1990*.

A conservation authority presence has been part of the fabric of the Sudbury area for 60 years and this has yielded noticeable results indeed. In a year where so many parts of the province have experienced record snowfalls followed by significant flooding, the impact in our area has been minimal thanks in part to the good work of the authority in guiding planning and development away from flood-prone areas.

The construction and operation of dams and other key infrastructure has proven to mitigate flooding impacts to neighbourhoods that pre-dated our formation by the member municipalities of the day. This, when combined with our flood forecasting and warning system, provides a measure of peace of mind to residents and businesses that built in floodplains prior to our mapping efforts of the late 1970s.

Although much has been accomplished in past decades, there remains significant work ahead with respect to climate change adaptation and the resiliency of the communities found within our watersheds.

Keeping people and property safe – or safer as the case may be – is one of the key roles that conservation authorities are known for and is the primary driver of the natural hazard protection and management program at our authority. Having this function listed is one of the core mandatory programs makes perfect sense but it should not be isolated from the watershed management concept.

The 48% in-year funding cut associated with this function recently announced is disheartening to say the least, as is the ripple effect it will have across our programs. The funding was already lacking, having been based on 1995-calculated levels and had not seen an increase in two dozen years. Our authority, like others located in areas of low development, relied upon belt tightening and an ever-increasing contribution from the municipal levy to keep the program sustained at an effective level. Unfortunately this meant that there was little opportunity to expand the amount of data collected, to update essential maps, or to take advantage of new technologies in an effective manner.

This authority endorses Conservation Ontario's May 10, 2019 submission entitled *Key Recommendations for Modernization of Conservation Authority Operations* regarding your Ministry's proposal 013-5018 and Schedule 2 of Bill 108. In that submission it is noted that "watershed management has been the foundation for all CA programs and services since the inception of conservation authorities." Therefore it is our recommendation that authorities retain within the core mandate the ability to "study and investigate the watershed and to determine programs and services whereby the natural resources of the watershed may be conserved, restored, developed and managed."

The inclusion of watershed management is fundamental to both mitigating natural hazard risks and to conserving natural resources in our watershed and permits us to enter into project partnerships with local landowners, municipalities, businesses and non-profit groups – partnerships that support clean waters, healthy landscapes, and indeed the "Made-in-Ontario Environment Plan."

The role that conservation authorities were assigned with respect to the *Clean Water Act* has been instrumental in ensuring Ontarians have protections on the sources of their drinking water. Acknowledgment of this as one of the core-mandated roles is acceptable; however any inference that core programs are solely supported by municipal levies is certainly not. Our authority has been working cooperatively with your staff for many years to find a steady-state funding model. We request that these good efforts continue so that provincial financial support for the administration of the source-protection plan serving the municipalities of Greater Sudbury and Markstay-Warren is sustainable.

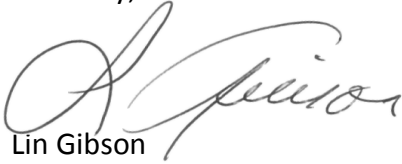
Our authority supports full transparency in our relationship with our sole municipal partner, the City of Greater Sudbury. Furthermore, our *Administrative By-Law 2018-01*, enacted in November 2018, includes robust Code of Conduct and Conflict of Interest appendices that address the fiduciary duties entrusted to those appointed as Members of our General Board.

Your posting concludes with two statements:

- *Conservation authorities ... play an important role in Ontario's land use planning and environmental protection process. They not only help protect people and property from extreme weather, such as flooding and other natural hazards, but they also are essential to protecting sources of drinking water and conserving our province's natural resources.*
- *(It's) important that conservation authorities refocus on delivering their core mandate.*

We suggest that the core mandate alluded to in the latter, be comprehensive enough to allow conservation authorities to undertake the pivotal roles captured by the former.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lin Gibson', written in a cursive style.

Lin Gibson  
Chairperson

Copy: Mayor Brian Bigger and Council, City of Greater Sudbury  
Mayor Stephen Salonin, Municipality of Markstay-Warren  
Kim Gavine, Conservation Ontario  
Jamie West, MPP for Sudbury  
France Gelinis, MPP for Nickel Belt  
Paul Lefebvre, MP for Sudbury  
Marc Serre, MP for Nickel Belt