

Corporation of the Municipality of Thames Centre 4305 Hamilton Road, Dorchester, Ontario NOL 1G3 – Phone 519-268-7334 – Fax 519-268-3928 – www.thamescentre.on.ca – inquiries@thamescentre.on.ca

June 24, 2021

Kettle Creek Conservation Authority 44015 Ferguson Line St. Thomas, ON N5P 3T3

As Mayor of the Municipality of Thames Centre, as well as a board member of the Kettle Creek Conservation Authority I am writing this letter in response to the Province's proposed changes to the Conservation Authorities.

I would respectfully ask that funding for the Natural Hazards Program be restored to 2018 levels and continue to fully fund Source Water Protection Authority responsibilities under the Clean Water Act through provincial transfer payments. Many municipalities do not have the capacity to absorb these program costs.

My first concern is that not every conservation authority (CA) delivers the same services but tailors their programs and services to the needs of the watershed and the available municipal resources. Each CA is unique and a one size fit all approach is not appropriate and unlikely to work.

I would request a deferral until 2023 for the following reasons listed below.

Clarification is needed on many fronts. Will the regulation require CA's to deliver all mandatory services or will delivery still be contingent on local capacity and support from member municipalities?

The timeline to define mandatory and non-mandatory services will put a strain on municipal budgets and until final regulations are available will interfere with the budget cycle due to uncertainty of levy requirements.

Smaller CA's should be allowed more time to comply with new requirements and that the minister grant extension to CA's and municipalities upon a written request for the reason that the smaller boards and municipalities have less resources and less time to complete.

The timing of the next municipal and provincial election cycle will be a large stressor to the completion of any of the proposed changes but most especially the creation of Community Advisory Boards, and effective and not rushed communication and input into the inventory of mandatory and non-mandatory programs and services.

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I would also like reassurance that the core watershed resource strategies and conservation area management plans that are being proposed for each individual CA and their associated lands will be funded wholly by the province.

In addition, I have concerns about the community advisory boards. Who will be bearing the additional costs for these boards is my first question.

Municipal officials are already serving on CA boards. It is my understanding that municipal officials will also be asked to form a certain percentage of representation on the proposed advisory boards and will be doing double duty to serve on additional boards. This is particularly problematic for a single municipality that is served by multiple CA boards. Clearly the terms of reference will need to be looked at very carefully to ensure that these boards are not duplicating the efforts, oversight and advice already provided by the CAs Board of Directors.

As a municipality that prides itself on walking trails for our residents, the proposal to shift the passive recreation piece to a non-mandatory activity is disturbing. KCCA saw a big increase in day use during the pandemic and having green space and well maintained trails is an asset to our municipality. As green spaces such as these are shared across municipalities it would be beneficial for the costs to continue to be shared by the watershed municipalities. As a non-mandatory service it is my understanding that individual CAs could back out of funding this form of passive recreation – jeopardizing the CAs ability to deliver the service for the broader community if at all.

To see the shift to make this a responsibility for the municipality will lead to uncertainty of the ongoing use and maintenance of the trails. It has been the experience of KCCA that having well used trails lowers the illegal activities such as vandalism and encroachment on CA owned land.

In summary once more I respectfully request reconsideration and a deferral until 2023 so all questions, concerns and new terms of references are considered in full.

Sincerely,

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Alison Warwick Mayor of Municipality of Thames Centre