



LONDON DEVELOPMENT INSTITUTE

June 24, 2021

Minister David Piccini
Ministry of Environment, Conservation and Parks

Subject: ERO 019-2986
Regulatory Proposals (Phase1) under the Conservation Authorities Act.

Dear Minister

LDI would like to thank the Minister for the opportunity to provide input on the proposed regulations related to changes to the Conservation Authorities Act.

The London Development Institute (LDI) is a member-based organization representing most land developers in the London area. LDI has been the leading voice on development issues in our city for more than 40 years. Our goal, working with our partners in local government and the community, is to build a better London.

Our membership has direct involvement with Conservation Authorities (CA) throughout the Province of Ontario and most often with the Upper Thames River Conservation Authority in London. Our comments are based on the day-to day interface our members have and continue to experience with Conservation Authorities.

Overall, LDI supports the proposed regulations defining core mandate and improving governance, oversight, and accountability of Conservation Authorities.

We agree it is important that the regulations clearly distinguish the roles and responsibilities of the Conservation Authority as they relate to mandatory and non-mandatory programs and services. LDI supports the "at the request of and on behalf of the municipality" language for the provision on non-mandated programs and services. This wording establishes the supplier/client relationship that should exist between a municipality and a conservation authority.

LDI also supports the requirement that any Memorandum of Understanding (MOU) between a municipality and a conservation authority for non-mandated programs and services is to be made public.

We are concerned about "jurisdictional creep" in the development of the required strategy for mandatory and non-mandatory programs and services. We believe any strategy developed by a CA must be clear regarding their role and responsibilities for both mandatory and non-mandatory programs. As an example, the chart on page 20 indicates which programs/activities could be included in the CA's strategy which it determines to be advisable. We believe any inclusion of such items in a strategy, outside CA owned land, needs to include an "as requested by" clause to clearly establish the supplier/client relationship and funding source. The less ambiguous the strategy the better for all stakeholders.



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LDI would like to see the timing of these proposed regulations sooner but understands the transition plans outlined in this consultation paper. We would remove the concept of allowing for extensions upon request. The more time you provide the less likely you will see any immediate action on this issue between a municipality and a conservation authority.

If you have any questions or wish to consult with the London Development Institute in further detail on any of the issues raised, please do not hesitate to contact us. We are more than willing to meet with the Minister, his staff, or a Standing Committee of the Government of Ontario.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Mike Wallace". The signature is fluid and cursive.

Mike Wallace
Executive Director