

June 27, 2021

Liz Mikel Ministry of Environment, Conservation, and Parks  
Conservation and Source Protection Branch  
40 St. Clair Avenue West, 14th Floor  
Toronto, ON M4V 1M2

**Re: ERO# 019-2986: Regulatory proposals (Phase 1) under the Conservation Authorities Act**

Dear Ms. Mikel,

Thank you for this opportunity to respond to the proposed Phase 1 regulations supporting the *Conservation Authorities Act*.

Since it was established in 1979, the Long Lake Watershed Property Owners Association (LLWPOA) has recognized the health of the lake and its watershed as essential to ensuring both its enjoyment by future generations of residents and visitors, and the integrity of its natural heritage.

The LLWPOA supports watershed stewardship initiatives that enable progress toward our [vision for the future of Long Lake](#). Over the years, we have nurtured a productive relationship with the Rideau Valley Conservation Authority (RVCA) and have worked collaboratively with them across a range of initiatives, including water quality monitoring, invasive species, and the responsible use and enjoyment of Long Lake.

Increasingly, budget cuts at the RVCA have led to fewer available staff to serve the needs of our lake, placing greater demands on our members to help fill the gap. At this time, the LLWPOA relies on the dedication of one particular member to perform essential water monitoring services on behalf of the RVCA. Without his efforts to ensure a consistent record on the health of Long Lake, early warnings signs of potential changes to our water quality could be missed. We are very concerned about the impact of budget cuts on the ability of conservation authorities (CAs) to maintain its partnerships, and to undertake the preventative and proactive approaches to watershed stewardship that are not only more cost effective in the long run, but often essential to mounting an effective response to threats like the spread of invasive species.

We also offer the following comments on the Phase I Regulatory Proposals, as described in the *Regulatory Proposal Consultation Guide*, for your consideration.

**PART ONE: PROGRAMS AND SERVICES DELIVERED BY CONSERVATION AUTHORITIES**

***Core Watershed-based Resource Management Strategy***

- We support the requirement that that each CA be required to develop a core watershed-based resource management strategy that “documents the current state of the relevant resources (principally water resources)”, with the view to achieving the potential benefits outlined such as the identification of stressors and risk management, as well as the proposal that it also include annual reporting on the accomplishments, outcomes, and impacts of the strategy.

- As noted in the Consultation Guide, there is significant variation in the circumstances of individual CAs and the programs and services they offer. Extensions to the mandated programs and services provided by CAs must be supported by viable revenue streams so that, if a CA has minimal opportunities to earn through one income stream (say, through 'self-generated' revenue), sufficient funding is available through one or more of the other funding mechanisms identified.

## **PART TWO: GOVERNANCE AND OVERSIGHT OF CONSERVATION AUTHORITIES**

### ***Regulation to Require 'Community' Advisory Boards***

- The LLWPOA is supportive of efforts to ensure there are effective channels for interested parties to exchange information and participate in discussions with our CA on issues affecting our watershed.
- We also support the advice offered by Conservation Ontario<sup>1</sup> on the implementation of this regulation, in particular that
  - o the regulation not restrict or complicate the ability to convert existing Advisory Boards or Committees to meet the minimum requirements of Community Advisory Boards,
  - o if CAs are required to establish a Community Advisory Board, ... that it augment not duplicate the work of the CA General Membership, and
  - o costs associated with the development and ongoing management of Community Advisory Boards would be eligible for municipal levy.

Conservation authorities play an important role in the health of our watersheds. The LLWPOA has benefited tremendously from our collaborations with the RVCA and places a high value on the expertise, support and services they offer. It is critical that CAs have the resources and retain the authority to make watershed-based resource management decisions in the interest of the environment, health, and safety.

We will continue to follow developments on Phase 1 Regulatory proposals, and other regulatory proposals put forward in Phase 2 concerning amendments to the *Conservation Authorities Act*.

Please do not hesitate to contact me should you have any questions about our submission.

Sincerely,

Danielle Femes, Director (South Shore)  
On behalf of the LLWPOA

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<sup>1</sup> Conservation Ontario. ["CO ERO Response Letter June 22 – Phase 1 Regulatory Proposals under the Conservation Authorities Act"](#), pgs 3-4. Accessed June 23, 2021.