



June 23, 2021

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

Attention: Liz Mikel

Dear Ms Mikel:

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

Thank you for the opportunity to provide comments on the “Regulatory proposals (Phase 1) under the Conservation Authorities Act. MVCA has developed the following comments based upon our review of the consultation guide.

1. The Partnership with MECP and MNRF going forward:

Conservation Authorities require clarity on the future of our partnership with MECP – MNRF with regard to the Natural Hazards and Drinking Water Source Protection programs.

- a) Flood Forecasting: At the present time MNRF provides some funding in partnership with Water Survey of Canada and conservation authorities to support the flood forecasting network in Ontario. This partnership is crucial to the Province and conservation authorities being able to provide timely warning of impending flood events to municipalities across the Province.
- b) Section 39 Funding-Flood Safety: MNRF also provides some financial support directly to conservation authorities to help cover the costs of flood and erosion safety services and infrastructure.
- c) Water and Erosion Control Infrastructure Fund: MNRF allocates \$5 million dollars to support water and erosion infrastructure that conservation authorities are responsible for maintaining. This fund provides 50% of the cost of assessments, maintenance, repairs and decommissioning of water and erosion control infrastructure. It is crucial that this program be maintained and increased over time.
- d) Drinking Water Source Protection Program: This program has been identified as a mandatory program for conservation authorities to continue to deliver. Conservation Authorities require clarity on whether this program will continue to be funded by MECP.

Clarification on the partnership between MECP-MNRF and conservation authorities going forward would greatly assist our ability to develop a transition plan in 2022 and to undertake planning and budgeting for 2023 and beyond.

## 2. Natural Hazards: Eligible Programs and Services - Watershed Stewardship Nature Based Solutions for Water Management:

The consultation guide identifies that watershed stewardship services is a non-mandatory service.

MVCA recommends that watershed stewardship be included as an eligible program within Natural Hazards. Conservation Authorities use nature based stewardship approaches to help reduce the risk of flooding, erosion and drought.

Restoring headwater areas, flood plains, river valleys, riparian areas, wetlands, soil and water conservation all help to reduce the risk of flooding, erosion and drought. In agricultural watersheds, such as the Maitland where almost 80% of the land is used for agriculture, it is imperative that watershed stewardship be included as a mandatory service.

In 2018 the Insurance Bureau of Canada released a report on the importance of using nature based solutions to reduce the risk of flooding in Canada.

The United Nations and the International Union for the Conservation of Nature released “Nature Based Solutions for Water Management: A Primer” in 2018. This report also outlined the importance of nature based solutions for dealing with flooding, erosion and drought. A copy of this primer has been attached to this letter.

## 3. Conservation Lands:

The consultation paper states that, “other land uses, such as the provision of recreational opportunities or environmental education, on conservation authority land are not mandatory programs or services (including the management and maintenance of lands for these purposes).”

Over the years conservation authorities have converted maintenance roads to trails for the public to use on many of their conservation areas. There is no user fee charged to the public to use the majority of MVCA’s conservation areas. Therefore MVCA has no way of recouping the costs of maintaining this infrastructure. It should be noted that these trails and roadways are also used by conservation authority staff to access the property to undertake maintenance and management activities such as forest management. MVCA would recommend that the maintenance and management of trails and other passive recreational infrastructure (privies and picnic shelters) should be included as a mandatory services for conservation lands.

In closing we would like to note that MVCA supports the comments on the consultation paper that Conservation Ontario has submitted. Their letter goes into more detail on the comments included in our letter.

Respectfully submitted



Dave Turton, Chair