



Friday, February 25, 2022

Maria Vavro
Senior Policy Advisor
Conservation and Source Protection Branch
40 St Clair Ave West
Toronto, ON M4V 1M2
Dear Ms. Vavro,

RE: ERO 019-4610 Regulatory and policy proposals (Phase 2) under the Conservation Authorities Act

The City of Guelph (City) appreciates the opportunity to comment on proposed regulations under the Conservation Authorities Act (CAA) related to municipal levies, user fees, and the Conservation Authority (CA) budgeting process. The City is a strong supporter of our local CA and welcomes the services and benefits they provide to our community. We support measures aimed at making CAs more accountable and recommend to the province that any proposed changes ensure cost neutrality for municipal governments while maintaining CA service levels for essential services (i.e. flood protection) and protecting other public services, including recreational opportunities, delivered locally by the Grand River Conservation Authority (GRCA). The City appreciates our relationship to the GRCA, and looks forward to contributing to and participating in CA reform for the benefit of our community. Given tight timelines, it is important that key regulations are finalized before the upcoming provincial election. We also encourage the province to ensure municipalities like Guelph are involved in the inventory process, and in providing input into the 6 mandated progress reports.

In terms of the current draft regulations, the City is generally supportive of the province's proposed approach given their consistency with existing practices. We support the provincial focus on ensuring flexibility and respecting existing dynamics between municipalities and their CAs. We are also supportive of the user pay principle when it comes to establishing user fees as well as the proposal to enable rates to be set by CAs via their municipal representation.

Our key comment would be to encourage the province to lengthen the CA budget consultation period to at least 45 days to ensure the draft budget's fulsome review by municipalities. We also welcome municipal government's continued right to appeal CA levy decisions to the Ontario Land Tribunal (OLT) as it enables recourse for municipalities who may disagree with the levy proposed by their local CA. To effectively realize this right to appeal, there is a need to further invest in the OLT to address current backlogs and ensure the Tribunal is resourced to function efficiently.

Thank you again for the opportunity to contribute to ongoing discussions about CA reform. We look forward to continuing to work collaboratively with the province and the GRCA to work through these changes.

Sincerely,



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