



Ontario
Home Builders'
Association

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RE: Regulatory and Policy Proposals (Ph 2) under the Conservation Authorities Act (ERO 019-4610)

The Ontario Home Builders' Association (OHBA) is pleased to provide the *Ministry of the Environment, Conservation and Parks (MECP)* with comments in response to the regulatory proposals and policies (Phase 2) under the *Conservation Authorities Act* posted on the *Environmental Registry of Ontario (ERO 019-4610)* and being considered by the *MECP*. The OHBA has been supportive of Bill 229, the *Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020*, which amended the *Conservation Authorities Act (CAA)* and the *Planning Act*. The OHBA has also been engaged with the *MECP* staff throughout the consultation process on *Conservation Authorities (CAs)* during the past several years.

The OHBA understands that the intent of the proposals is to improve the overall governance, oversight, transparency, and accountability of *Conservation Authority (CA)* operations. This OHBA supports. In addition, we notice that the proposals include municipal levy provisions, proposed budget processes, and classes of programs and services for which *CAs* can charge a fee. The OHBA, however, cautions the *MECP* regarding the apportionment by *CAs* of their capital costs and operating expenses to be paid by their participating municipalities through municipal levies. This could result in unnecessary financial consequences at the municipal level and to the development industry at large.

Further, the OHBA recommends that any non-mandatory functions planned to be downloaded to municipalities by the *CAs* be scrutinized as to their actual need and value add. OHBA's focus has been consistent and has continually sought ways and means to streamline processes in order to reduce timelines and financial implications regarding the approval and cost of housing supply. Any related cost increases in our opinion would be counterproductive. OHBA feels that it is time to look closely and very pragmatically in order to determine the real need for various services beyond simply 'shuffling the deck' regarding various responsibilities.

The OHBA feels that increased transparency regarding a fee approach has merit. However, feedback from our members indicates that for any costs regarding user fees incurred, they must be reciprocated with services that are delivered on a timely basis.

The OHBA is appreciative of being given the opportunity to comment on the proposed regulatory and policy proposal intentions presented in *ERO posting 019-4610* during Phase 2 of the review process. The OHBA looks forward to further discussions with *MECP* staff prior to the finalization of any related regulations and policies contemplated as a result of this *ERO* posting. The OHBA is thankful of your consideration.