

November 23, 2020

Sent via email: comm-financeaffairs@ola.org

Attn: Julia Douglas, Committee Clerk
Legislative Assembly of Ontario
Standing Committee on Finance and Economic Affairs
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park
Toronto ON M7A 1A2

Re: Schedule 6 to Bill 229

Dear Members of the Standing Committee on Finance and Economic Affairs:

I am the Chief Administrative Officer for the Central Lake Ontario Conservation Authority (CLOCA). I have reviewed Schedule 6 to Bill 229 and have significant concerns with many of the proposed amendments. The proposed amendments to Section 28 (permitting) of the *Conservation Authorities Act* will not advance protection of people and property from flooding and erosion. The proposed Section 28 appeal mechanisms will create red-tape and higher costs to Ontario taxpayers. The proposal to allow the province to make decisions on permit applications removes the conservation authority science-based informed decision making that is needed to protect people from flooding and erosion. The proposal to remove the ability for conservation authorities to issue stop work orders also puts people and property at greater risk to flooding and erosion.

Also, of concerns is the proposed amendment to the *Planning Act* contained in section 26 of the Schedule. Since 1995, conservation authorities have been delegated the responsibility and painstaking task of reviewing site-by-site development proposals to ensure that provincial interests in protecting people and property from flooding and erosion are addressed in planning decisions. Removing conservation authorities' ability to appeal improper decisions to the Local Planning Appeal Tribunal does nothing but hamstring an essential safeguard for public safety in our communities and watersheds.

In response to the proposed Schedule 6 to Bill 229, CLOCA's Board of Directors approved the following motion:

THAT CLOCA's Board of Directors request that the Government of Ontario remove Schedule 6 from Bill 229.

AND FURTHER THAT the Boards resolution and a copy of this report be forwarded to the Premier, Minister of Environment, Conservation and Parks, the Minister of Natural Resources and Forestry, the Minister of Municipal Affairs and Housing, the Minister of Finance, MPPs in our jurisdiction, and CLOCA's partner municipalities.

It is recommended that the government withdraw Schedule 6 to allow for meaningful consultation with stakeholders to ensure that the objects of Schedule 6 can be met without placing people and property at greater risk to flooding and erosion.

Sincerely,

A handwritten signature in black ink, reading "Chris Darling". The signature is fluid and cursive, with a small dot at the end.

Chris Darling, MCIP, RPP
Chief Administrative Officer
Central Lake Ontario Conservation Authority
cdarling@cloca.com