

Douglas, Julia

From: Legislative Assembly of Ontario
Sent: December 2, 2020 5:47 PM
To: Standing Committee on Finance and Economic Affairs
Cc: Teng, Deborah
Subject: Webform submission: Submission of material 28856

Submitted on Wed, 12/02/2020 - 17:32

Application ID: 28856

Submitted values are:

Bill or item of business: **Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020**

Choose a topic

Do you know the bill title or business (e.g., pre-budget consultations) you'd like to speak or submit material about?

Yes

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Which application would you like to submit?

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Are you submitting material as an individual or on behalf of an organization?

I am submitting material as an individual

Full name

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Paste submission

December 2, 2020.

To: Amarjot Sandhu, Member for Brampton West , Chair of Standing Committee on Finance and Economic Affairs

Subject: Bill 229 Schedule 6 - Submission to Standing Committee on Finance and Economic Affairs

I am a government employee who has worked for 35 years with the Ministries of Natural Resources and Forestry and Environment, Parks and Conservation, in land and water policy/operations and stormwater management. I have grave concerns with Bill 229 Schedule 6.

The Conservation Authorities, a strong effective partnership of municipalities, have managed Ontario waters and lands on a watershed basis for the past 60 + years.

The proposals in Schedule 6, if implemented, gives priority to developers and undermines the ability of CA's to continue to protect human life and property. The long term costs of development in floodplains and wetland areas will be borne by the province, municipal governments and taxpayers not by the developers. The following key issues have been identified with Schedule 6.

Increased Infrastructure and Flooding Costs

The Conservation Authorities regulated flood plains, wetlands and treed natural areas are like "sponges" which hold and slowly release waters into streams. These natural capital assets are designed to protect the entire watershed from the impacts of floods and erosion. Development in these areas will increase stormwater infrastructure and flooding costs. It is the province, municipality and taxpayer who will be left with the capital and operations infrastructure costs in perpetuity. Once these natural capital assets are lost, they are gone forever. Full lifecycle development and infrastructure costs versus "one-time profits" require examination.

Undermines CA's Function to Protect Human Life and Property

Schedule 6 decimates the CA role in permitting, planning and enforcement and paves the way for unfettered development. It is short sighted and irresponsible. The proposed amendments contradict what Conservation Authorities were established for and undermine the watershed approach, which is required to protect human life and property. I've outlined some key issues in Schedule 6 if it were implemented with implications.

Schedule 6 would;

- Restrict board members to municipal councillors only with instructions to represent their municipality, not the broader interests of watershed residents. Consideration of costs and impacts on downstream businesses and users, the fundamental principle of CA's is eliminated. Workload too high for municipal both urban and rural councillors, additional watershed expertise is needed. Reinstate current system.
- The CA will no longer be an independent body but will be under MMAH "one window" and cannot appeal to or be a party to the Local Planning Appeal Tribunal. Public appeal process is disregarded. The Conservation Authorities critical technical input and expertise is required in site development as it eliminates costly infrastructure mistakes. CA's should retain their current role in land use planning.
- Give decision-making powers over permits to the Minister before the CA makes a decision and allow the Minister to make decisions regarding permit applications and appeals in place of the Conservation Authority. This bypasses CA engineering and hydrologic expertise. CA's have the water models and technical information needed to ensure protection of human life and property.
- CA authority is reduced to hazards lands, their lands and source protection and municipal MOU's. Powers to enter lands expropriate is removed. CA's purpose is not limited to hazard lands and their properties, the watershed approach applies to all lands in the watershed. The ability to expropriate, enter property and enforcement of illegal activities must be retained to protect human life and property.

Path Forward

Repeal Schedule 6

Engage municipalities, engineers and citizens to build changes into the Conservation Authority Act reinforcing the CA role in land and water management, permitting, planning and enforcement.

Share publically watershed models and full life cycle costs of development impacts.

Summary

These proposed changes favour developers at the expense of public health and safety.

The Ontario Progressive Conservative Party established the Conservation Authorities with foresight and strength. Do not let your government legacy be their destruction through short sighted, catering to developers.

Sincerely yours,

Barbara Anderson
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