

The Honourable Doug Ford
Premier of Ontario

The Honourable Jeff Yurek
Minister of the Environment, Conservation, and Parks

The Honourable John Yakabuski
Minister of Natural Resources and Forestry

The Honourable Steve Clark
Minister of Municipal Affairs and Housing

The Honourable Rod Phillips
Minister of Finance

Dear Premier Ford, Minister Yurek, Minister Yakabuski, Minister Clark and Minister Phillips,

The Government of Ontario's introduction of legislation within an omnibus budget bill (**Bill 229, Section 6**) will diminish Conservation Authorities' (CAs) ability to ensure responsible development within their watersheds. We are alarmed that the proposed changes are being made without public comment, contrary to the rights of community members/citizens/taxpayers/voters, and that these changes will undermine the CAs' efforts to protect citizens and properties from natural hazards. These hazards include flooding, the severity of which will increase with climate change, further increasing soil erosion and property damage. The proposed changes in Bill 229 allocate greater power to developers, while negating the role of CAs. It should not be this way.

The purpose of the Conservation Authorities Act (CAA) is to "provide for the organization and delivery of programs and services that further the conservation, restoration, development and management of natural resources in watersheds in Ontario". Ontario's CAs were originally created to manage soil erosion, deforestation, water quality, and to provide public spaces and natural areas, all of which fall within the CAA's stated purpose. These complex and far-reaching responsibilities are becoming **MORE** important with climate change, not less.

Section 6's proposed amendments to the CAA will introduce a number of deeply problematic changes that will remove or significantly hinder CAs' ability to manage natural resources and ensure the safety of citizens and their properties. These detrimental changes include but are not limited to:

- Removing the ability of CA's to seek to appeal municipal planning decisions;
- Introducing new rights for developers to force fast-tracking of development approvals and to appeal decisions they do not like, without providing the same opportunity to citizens who may wish to challenge decisions that damage the environment;
- Giving the Minister new power to overturn a CA's decision to refuse to issue a permit for development;

- Removal of a watershed-focused mandate by placing members onto boards who are legally bound to promote interests within their own municipal boundaries; and
- Removing science-based review of development impacts.

These changes are remarkably short-sighted. The environmental regulations and protections that the Ontario Government's new Section 6 will dismantle were established because of poor land use practices and natural disasters (e.g., Hurricane Hazel, 1957) and environmental crises (e.g., Walkerton Water Crisis, 2000).

These existing CAA regulations also save Ontarians money. Seasonal flooding is an inevitable, far-reaching and expensive risk to Ontario's homes and businesses (e.g., a 72 mm rain event caused \$80 million in flood insured damage in Toronto on August 8, 2018), the cost of which is expected to triple by 2030 with no or reduced mitigation. Allowing construction projects that are detrimental to flood management objectives provides benefit to a limited few while costing Ontario taxpayers millions of dollars in flood recovery after each event.

If Section 6, as it currently stands, is included in Bill 229 **the result will be a short-term gain for developers while sacrificing long-term safety, health and financial well-being of Ontario's voters and taxpayers.** There are better ways to boost employment numbers and maintain a strong economy than by circumventing environmental regulations that are proven to effectively protect citizens. The Government of Ontario's proposed changes to the CAA will be detrimental to all Ontarians.

As Ontario water professionals, voters and citizens, we call unequivocally for the REMOVAL of Section 6 in its entirety from the omnibus bill 229.

Signed,
Members of Women in Ontario in Water & Associates

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