



OPEN LETTER TO THE MINISTER OF NATURAL RESOURCES AND FORESTRY
REGARDING THE PROPOSED CHANGES TO THE CONSERVATION AUTHORITIES
ACT, R.S.O. 1990 (BILL 229, Schedule 6)

Submitted via email to: minister.mnrf@ontario.ca

CC: Premier Doug Ford, Hon. Phillips Rodd, Hon. Jeff Yurek

November 25th 2020

Hon. John Yakabuski
Whitney Block 6th Floor Rm 6630
99 Wellesley St. W.
Toronto, ON M7A 1W3

Dear Minister Yakabuski,

The Ontario Urban Forest Council is concerned to hear that the Province of Ontario is proposing detrimental changes in Bill 229, Protect, Support, and Recover from COVID-19 Act – Schedule 6- Conservation Authorities Act¹. In Schedule 6, these new changes and sections can significantly impact the province's natural heritage and hydrological features (outlined below). We emphasize the important role that the conservation authorities play in managing Ontario watersheds and protecting our natural assets, including our trees and forests.

Our key concerns in Schedule 6:

- Narrowing and limiting the power of conservation authorities will defeat their core mandate to remain apolitical and undermining their decades of sustainable watershed management and conservation.
- By restricting their powers, conservation authorities are unable to act as independent bodies when making land-use planning decisions. These changes will fast-track developmental approvals and allow developers to appeal and override decisions without the same consideration of the ecological, economic, and social benefits of watersheds and the impact to surrounding urban and rural communities in Ontario.
- COVID-19 has highlighted the need and access to green space for community health and well-being.² If these proposed changes are made as cost-recovery strategies, it is counterintuitive. It will increase the province's costs in other ways (e.g., increased healthcare and flood damage costs). Due to climate change, flood events can result in high costs from property damage compared to other natural hazards in Canada.³ Conservation authorities need to maintain their role and powers in managing watersheds to reduce these damages and costs.

We have found little rationale for severely limiting the role and power of Ontario's 36 conservation authorities. The Ontario Urban Forest Council urges the Government of Ontario, Premier Doug Ford, Ministers John Yakabuski, Jeff Yurek, Rodd Phillips, to rescind Schedule 6 and its proposed changes in Bill 229. Conservation Authorities must have the ability to implement evidence-based practices that: *1) protect us from natural hazards, 2) ensure that development and growth occur sustainably; and 3) educate and engage Ontarians on the benefits of the natural environment.* The Government of Ontario has a responsibility to support the work of the conservation authorities in the developmental process, such that developmental decisions are not politically influenced but rather based on scientific evidence to support the long-term well-being of communities across Ontario.

Respectfully submitted,



Dr. Janani Sivarajah
President
The Ontario Urban Forest Council
on behalf of the Board of Directors

References:

1. <https://www.ola.org/en/legislative-business/bills/parliament-42/session-1/bill-229>
2. Plummer R, McGrath D, Sivarajah S (2020) How cities can add accessible green space in a post-coronavirus world. The Conversation
3. Burn, D. H., & Whitfield, P. H. (2016). Changes in floods and flood regimes in Canada. *Canadian Water Resources Journal/Revue canadienne des ressources hydriques*, 41(1-2), 139-150.