



**Ganaraska Region  
Conservation Authority**

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MEMBER OF  
CONSERVATION ONTARIO

November 20, 2020

Via Email

Honourable Doug Ford  
Premier of Ontario

[premier@ontario.ca](mailto:premier@ontario.ca)

Honourable Jeff Yurek  
Minister of Environment, Conservation and Parks

[minister.mecp@ontario.ca](mailto:minister.mecp@ontario.ca)

Honourable Rod Phillips  
Minister of Finance

[minister.fin@ontario.ca](mailto:minister.fin@ontario.ca)

Honourable Steve Clark  
Minister of Municipal Affairs and Housing

[minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)

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

I am writing you on behalf of the Board of Directors of the Ganaraska Region Conservation Authority (GRCA) in response to the proposed amendments to the *Conservation Authorities Act* (CA Act), contained in Schedule 6, Bill 229.

It is the opinion of the GRCA that several of the proposed amendments will increase the risk to life and property from natural hazards and the degradation of the environment. We respectfully request you withdraw Schedule 6 from Bill 229 until a more thorough analysis of the appropriate solutions can take place, with more clarity on what problems were identified through the consultation process. We also encourage you to engage with Conservation Authorities in effective and meaningful ways (rather than force through proposed legislative changes in an Omnibus Bill) as you work on regulations that will eventually define the limits of the various CA Act clauses. We feel this is critical to ensure that the focus and performance of CAs is actually improved.

Several changes, such as those related to governance, ministerial authority to issue permits, the removal of our ability to appeal decisions at LPAT, and the removal of enforcement tools will lead to increased administrative costs, red tape, delays, and above all, bring into question the integrity and transparency of the permitting and planning process.

The GRCA is proud to work in partnership with our municipal partners to avoid duplication of effort and remain focused on our core responsibilities. When working with landowners and stakeholders, the GRCA seeks solutions that are best for all of those involved. The GRCA prides itself on working well with the community and our partners in an effective and timely manner. It is our view that the proposed amendments that would allow the Minister of Natural Resources and Forestry jurisdiction over certain permit applications and the appeal process, has the potential to allow individuals to circumvent checks and balances that exist to protect the communities in our watersheds. These proposed changes may inadvertently cause more people in the community to be at risk, rather than protected, from natural hazards. The 1980 flood in the Municipality of Port Hope that severely damaged the Port Hope downtown acts as a reminder to residents of our watershed who are all too familiar with the devastation associated with a natural hazard.

The Ganaraska Region Conservation Authority was formed in October 1946 under the Conservation Authorities Act and is one of the oldest conservation authorities in Ontario. The GRCA has a distinguished history of being the first watershed in the Province of Ontario to be studied by a team under the leadership of A.H. Richardson, Chief Conservation Engineer, Department of Planning and Development. The study produced a report entitled The Ganaraska Report and in many ways serves as the foundation for the conservation authorities movement in the Province of Ontario.

For nearly 75 years, the GRCA has served the interests of its residents and stayed true to those founding principles of conserving the environment to enable watershed communities to prosper socially and economically while ensuring resilience and safety for generations to come. From the planting of thousands of trees and managing 11,000 acres of land including the Ganaraska Forest, providing outdoor education to thousands children, ensuring people build their homes and businesses in safe places and regularly checking the pulse of our environment through monitoring and restoration efforts, the GRCA continues to be a trusted and accountable partner to our watershed municipalities and the Province.

The GRCA has participated in the previous consultations regarding the modernization of the CA Act and had the honour of hosting Minister Yurek at the administrative offices in Port Hope on February 7<sup>th</sup>, 2020. While it was unexpected to see further proposed changes to the Act in Bill 229, we are encouraged that the purposes of the Act for Conservation Authorities to provide delivery of programs and services that further the conservation, restoration, development, and management of natural resources in Ontario watersheds remains the same.

The proposed changes to the composition of CA boards negatively disrupts what is currently a relatively apolitical structure. This will significantly reduce the capacity of boards to make decisions on a watershed basis. Our Board of Directors carry out their fiduciary responsibilities, guide strategy, approve policies in support of our Provincial and municipal responsibilities and track performance. They ensure the GRCA makes decisions with integrity, based solely on our core responsibilities. It is our view that



changing the composition to reflect elected officials that only represent the interests of their respective municipalities creates a setting ripe for conflict of interest. It runs counter to all governance principles.

The GRCA continues to remain accountable to all our watershed municipalities by providing open and transparent operations which include regular and timely financial reports. The GRCA is focused on our core programs and is able to offer other programs in consultation with our watershed municipalities, many of those offered on a self supporting basis without cost to the municipalities. It should be noted that the operating municipal levy for 2021 is less than 30% of the total preliminary budget and the provincial funding contribution remains at about 2% of the total budget.

In conclusion, the GRCA Board of Directors do not want to see an increased risk to public safety, or increased liabilities to the Province, municipalities, and conservation authorities. Nor do we want more red tape, disruption and ultimately delays in helping the government achieve its goal of economic recovery. Given the time sensitive nature of this Bill, we respectfully request that the Province remove Schedule 6 from Bill 229 and consult with Conservation Authorities through meaningful dialogue.

On behalf of the GRCA Board of Directors, I appreciate you taking the time to consider our concerns and look forward to further discussion. Together we can find the best solution to deal with the actual issues, and those which are perceived, while moving forward to support your mandate in an effective manner.

Yours truly,



Jeff Lees  
Chair, Board of Directors

cc. David Piccini, MPP, Northumberland-Peterborough South  
Watershed Municipalities