

May 7, 2019

Alex McLeod
Natural Resources Conservation Policy Branch
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, ON K9J 8M5

Dear Mr. McLeod:

**Re: Focusing Conservation Authority Development Permits on the Protection of People and Property
Environmental Registry Number 013-4992**

City of Waterloo planning staff are providing this letter in response to the proposed regulation that would further define the ability of a conservation authority to regulate prohibited development and other activities for impacts to the control of flooding and other natural hazards. The proposal would create one new regulation for all conservation authorities, replacing the existing 36 individual regulations. The proposal would also:

- Update definitions for key regulatory terms to better align with other provincial policy, including: “wetland”, “watercourse” and “pollution”;
- Define undefined terms including: “interference” and “conservation of land” as consistent with the natural hazard management intent of the regulation;
- Reduce regulatory restrictions between 30m and 120m of a wetland and where a hydrological connection has been severed;
- Exempt low-risk development activities from requiring a permit including certain alterations and repairs to existing municipal drains subject to the *Drainage Act* provided they are undertaken in accordance with the *Drainage Act* and *Conservation Authorities Act* Protocol;
- Allow conservation authorities to further exempt low-risk development activities from requiring a permit provided in accordance with conservation authority policies;
- Require conservation authorities to develop, consult on, make publicly available and periodically review internal policies that guide permitting decisions;
- Require conservation authorities to notify the public of changes to mapped regulated areas such as floodplains or wetland boundaries; and
- Require conservation authorities to establish, monitor and report on service delivery standards including requirements and timelines for determination of complete applications and timelines for permit decisions.

Our comments are outlined below and are provided in the context of the need to manage flooding and other natural hazards, especially in the face of climate change, and the important role the Grand River Conservation Authority plays in helping to build our community.

1. The Grand River Conservation Authority provided comments to this Environmental Registry posting through Report GM-04-19-39. City planning staff support the comments provided in that report.
2. The City has a long-standing, positive relationship with the Grand River Conservation Authority. The Grand River Conservation Authority provides a valuable and unrepeated service and City staff rely upon the natural hazard and natural environment expertise they provide. The involvement of the Grand River Conservation Authority in plan development (e.g. Official Plan, Comprehensive Zoning By-law and subwatershed planning) and plan review (e.g. subdivisions, zone changes and site plans) is key to ensuring the livability and resiliency of our community.

Thank you for the opportunity to comment.

Sincerely,



Joel Cotter, MCIP, RPP
Director, Planning Division
City of Waterloo
100 Regina Street South
PO Box 337, Station Waterloo
Waterloo, ON, N2J 4A8
P: 519-747-8543
E: joel.cotter@waterloo.ca

cc: Joe Farwell, GRCA (email)
Nancy Davy, GRCA (email)