



May 16, 2019

The Honourable John Yakabuski
 Minister of Natural Resources and Forestry
 99 Wellesley St W
 Whitney Block
 6th Floor, Room 6630
 Toronto, ON
 M7A 1W3

Re: Environmental Registry of Ontario Posting Number 013-4992

Subject: In response to the April 5th, Ministry of Natural Resources and Forestry's posting number 013-4992 on the Environmental Registry of Ontario; 'Focusing conservation authority development permits on the protection of people and property'.

Dear Minister Yakabuski,

South Nation Conservation (SNC) has demonstrated a strong history of working with developers, including Ted Moran & Sons Ltd., to offer streamlined, convenient and pragmatic approaches to development proposals, local regulation and permit approvals that adhere to their core mandate of protecting people and property from natural hazards. This includes:

- Delivering municipal watershed planning reviews on behalf of member municipalities to determine if development could be susceptible to natural hazards.
- Offering pre-consultation meetings to review development proposals with developers, residents, and municipal staff, leading to more efficient approvals.
- Offering septic and property inquiry services for property owners and developers, providing a record of history to inform valuable decision-making for development.
- Delivering municipal programs through memorandum of understanding agreements, including issuing permits and performing inspections for septic installation and maintenance on behalf of 13 participating municipalities under Part 8 of the Ontario Building Code; SNC delivers this program with exceptional service and hosts an annual septic meeting to engage with local developers.
- Preparing floodplain maps and updating regulated areas for municipalities to guide official plans and zoning by-laws, and guide future development away from flood and erosion-prone areas; SNC holds public open houses and communicates directly with developers and residents to inform updated mapping.





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Conservation Authorities are one of the only boots-on-the-ground agencies that work directly with stakeholders, municipalities and residents in a timely and meaningful way.

SNC's ability to streamline approvals from several agencies and work directly with developers through site visits and pre-consultations is valuable and one of the best local assets to our communities and the environment.

SNC's local service delivery model has proven to be an effective and efficient approach to Ontario's commitment to reducing red tape for development.

Ted Moran & Sons Ltd. supports the Province's effort to consolidate and harmonize Conservation Authority regulations to ensure consistency throughout the Province, while still allowing for local flexibility based on differences in risks posed by flooding and other natural hazards.

We support legislation that allows Conservation Authorities to exempt low-risk development activities from requiring permits provided in accordance with local policies.

Partnerships with SNC have enabled our resilient communities to grow safely and sustainably and have allowed us to come together on shared environmental priorities.

We encourage the Ministry of Natural Resources and Forestry to consider the value in existing approaches by Conservation Authorities to work closely with developers to protect people and property from natural hazards.

Sincerely,

NAME *Karl Moran*
TITLE *Vice-President*
Ted Moran & Sons Ltd.