
November 24, 2022

The Honourable Doug Ford
Premier of Ontario
Legislative Building, Queen's Park,
Toronto ON M7A 1A1
premier@ontario.ca

**RE: Bill 23 – Proposed Changes impacting Municipalities and
Conservation Authorities (ERO 019-6161, ERO 019-6160)**

Dear Premier Ford:

Municipalities can appreciate the need for more housing; however, it should not be at the expense of the environment or the people of Ontario's safety. Additionally, it should not be at the expense of removing wetland that is serving a purpose, not supporting the protection of wetlands and should not be achieved by taking away decision making at the local level.

We are concerned some changes proposed in the *More Homes Built Faster Act* will:

- Place new downloaded responsibilities on municipalities related to natural hazards and natural resources that they are unprepared and under resourced to tackle. Many smaller northern municipalities have limited staff that are already overworked and do not have the time to take on another downloaded responsibility, especially where there is already a proven service provider in place. (i.e., Conservation Authorities);
- Weaken the ability of Conservation Authorities to continue protecting people and property from natural hazards such as floods; and,
- Diminish our ability to protect critical natural infrastructure like wetlands which reduce flooding, droughts and improve water quality in lakes and rivers;
- Negative impact to wetlands that provide highly valuable ecological services that give life (clean air and water) that are extremely costly to reproduce – if they can be at all.

To avoid unintended consequences, we recommend:

1. Allowing Municipalities to continue voluntary agreements for review and commenting with Conservation Authorities; this means removal of the clauses in Bill 23 that prevent this from occurring.

The current model enables Municipalities to use existing expertise within Conservation Authorities to fulfill responsibilities for natural heritage and water resources, while saving time and money for applicants.

2. Development subject to *Planning Act* authorizations should not be exempt from Conservation Authority permits, and Conservation Authority regulations should not be delegated to municipalities. This approach could result in building permits issued in error and other unintended results.
3. The multi-stakeholder Conservation Authority Working Group, which was created by your government, should continue working with the Province to provide solutions for shared goals and objectives.
4. Conservation Authority development fees should not be frozen since they are based on cost recovery. If fees are frozen, any additional costs will be downloaded to municipalities, which results in developers being subsidized by the taxpayer.

Conservation Authorities work with local Municipalities to reduce barriers to development and streamline processes for the best possible service to all. Municipalities rely on the benefits of long-standing Conservation Authority partnerships. In our view, the proposed changes undermine the core mandate of Conservation Authorities and may put people – and their homes – at risk.

We request Schedule 2 of Bill 23 and changes to the *Conservation Authorities Act* that: limit the ability of Municipalities to enter into review and commenting agreements with Conservation Authorities; and that delegate Conservation Authority regulations to Municipalities be removed. Additionally, it is recommended that you reconvene your government's Conservation Authorities Working Group to work with your Ministry to propose alternative improvements and refinements to Conservation Authority development review processes.

Sincerely,



Wendy Landry

Mayor Wendy Landry

cc:

The Honourable Steve Clark, Minister of Municipal Affairs and Housing

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