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February 25, 2022

The Honourable David Piccini  
Minister of the Environment, Conservation and Parks  
College Park, 5th Floor  
777 Bay Street  
Toronto, Ontario M7A 2J3

**RE: Proposed Regulatory and Policy Proposals (Phase 2) under the  
*Conservation Authorities Act*, ERO Posting #019-4610**

Dear Minister Piccini,

On behalf of the Association of Municipalities of Ontario (AMO), I am pleased to provide AMO's perspectives regarding the Regulatory and Policy Proposals (Phase 2) under the *Conservation Authorities Act* (ERO #019-4610).

These comments are in addition to feedback already provided through the Ministry's Conservation Authority Working Group (CAWG) which we appreciate participating in as the transition to the new Conservation Authority (CA) regime.

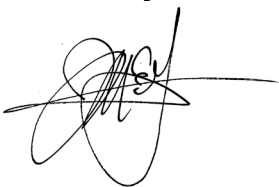
### **Overall Feedback**

- AMO supports regulations that reflect scalability and take an outcomes-based approach as not all Conservation Authorities (CAs), or municipal governments have similar staff capacity and/or skill sets.
- The current means of assessing municipal governments, generally using modified current value assessment, but also having other methods where appropriate has served well. There is no need to alter these methodologies.
- The current options for voting, be it weighted voting in some cases, or a "one person, one vote" system in other cases, is working well. We urge that these methods continue as this system is not broken.
- Almost every dollar spent by CAs impacts the financial burden on municipal governments. We support greater transparency about all funding so that more realistic expectations about CA costs and services can be realized by all involved.

- We urge that a combined user-pay principle be used where fees are charged by CAs. There should be modified approaches to reflect if the fee is for an entirely discretionary activity or a mandatory activity.
- While legislative and regulatory changes may create greater transparency and fuller agreement on the scope of activities and level of service from CAs, the longstanding concerns regarding strained staffing capacity at the CA and the need for infusing reliable long-term funding remain.
- It is essential that the Ministry educate council members, staff, the public, and associations and organizations, on the intent and scope of the Phase Two regulations to provide a common level of understanding.
- We strongly encourage the Ministry to promptly finalize these regulations after the posting closes to ensure there is ample time to implement the transition in time for January 1, 2024 budgets.

Thank you for the opportunity to provide comments. After this round of changes are implemented, we look forward to our continued work together on matters related to the Act and implementing guidance to regulations.

Sincerely,



Jamie McGarvey  
AMO President and Mayor of Parry Sound

cc: The Honourable Steve Clark Minister of Municipal Affairs and Housing  
Kate Manson-Smith, Deputy Minister, Ministry of Municipal Affairs and Housing  
Chloe Stuart, Assistant Deputy Minister, Land and Water Division, Ministry of the Environment, Conservation and Parks