



June 27, 2021

Via email  
[Minister.MECP@ontario.ca](mailto:Minister.MECP@ontario.ca)

Honourable David Piccinni  
Minister of Environment, Conservation and Parks  
Ontario Ministry of the Environment, Conservation and Parks  
College Park 5th Floor, 777 Bay St  
Toronto, ON  
M7A 2J3

Dear Minister Piccinni,

**Management of Infrastructure under the *Conservation Authorities Act*  
ERO #019-2986 – Regulatory Proposals (Phase 1)**

Congratulations on your appointment to this portfolio. We look forward to working with you.

The purpose of this letter is to provide comments on the above proposed regulatory changes. By way of this letter, Mississippi Valley Conservation Authority (MVCA) endorses the comments submitted by Conservation Ontario dated June 22, 2021, and provides specific feedback regarding the funding and management of grey and green infrastructure.

Conservation areas (CAs) owned by Mississippi Valley Conservation Authority (MVCA) are kept largely in a natural state while providing for passive recreational use. Like provincial parks, our conservation areas have boardwalks and bridges, comfort stations and shelters, and other amenities that require capital renewal and replacement over time. And, like provincial parks, conservation areas are used by people coming from well beyond the boundaries of the local municipality, which is why a broader tax base is used to support them.

Ongoing operations and maintenance, capital renewal, and asset replacement are needed to ensure safe use of these facilities by the public. At minimum, annual operating budgets and long-term capital investment must ensure that provincial regulatory requirements are met. This includes everything from water testing per O.Reg. 319/08 under the *Health Promotion and Protection Act* to bridge inspections under O.Reg. 472/10 per the *Public Transportation and Highway Improvement Act*.

The MECP Consultation Guide indicates that the basic services needed to keep our sites accessible and safe will not be considered mandatory. This is incongruent with the mandatory function of owning and operating conservation areas. We cannot dial back the clock at these

sites. The tangible capital assets (TCAs) on these properties come with fundamental legal and fiduciary responsibilities that must be addressed and require sustainable secure revenues. While “non-mandatory programs” at these sites may change over time and can be accommodated by the proposed 4-year Memoranda of Understanding (MOU), existing physical assets require sustained investment and should fall within the definition of “mandatory services”.

The Insurance Bureau of Canada (IBC) recognizes Green infrastructure as a cost-effective means for mitigating floods and reducing grey infrastructure costs. In the early years of conservation authorities, considerable land was purchased and stewardship programs designed and delivered specifically for hazard mitigation (e.g. rural reforestation and shoreline planting.) For example, in the 1970s most of the municipal levy for MVCA was dedicated to the delivery of stewardship programs in the watershed. CAs need to retain the revenue stream needed to continue these hazard mitigation programs and services.

We believe it is our shared goal to see grey and green assets properly maintained for the benefit of current rate payers and future generations. To that end, we request the following be recognized as mandatory programs and services in the new regulation:

- stewardship and land acquisition that mitigate risk of natural hazards; and
- operations, maintenance, and renewal of existing conservation area tangible capital assets.

On behalf of the MVCA Board of Directors, we appreciate you taking the time to consider our submission.

Sincerely,



Jeff Atkinson  
Chair, Board of Directors



Sally McIntyre  
General Manager

cc. Liz Mikel, Conservation and Source Protection Branch  
MVCA Board Members  
MVCA member municipalities  
Conservation Ontario  
E. Ontario CAs  
Merrilee Fullerton, MPP  
Goldie Ghamari, MPP  
John Yakabuski, MPP