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December 22, 2025

Dear Premier Ford and Ministers,

We, the 74 undersigned individuals, have dedicated decades of service to local science-based and integrated water resource management through our efforts with Conservation Authorities (CAs) across Ontario. We appreciate the opportunity to respond to the proposed consolidation of Conservation Authorities outlined in ERO #025-1257 and further detailed in Schedule 3 of Bill 68, and urge you to proceed with care and caution.

The proposed restructuring appears to lack an evidence-based approach and business case. Its development was without input from those most affected by the changes – the CAs and their member municipalities. To succeed, we believe a transformative initiative of this scale requires the effective and meaningful engagement of all partners throughout the process.

Although this proposal originated within the Ministry of the Environment, Conservation and Parks, the proposed consolidation of Ontario’s 36 CAs into 7 regional CAs, as proposed, raises substantial questions that relate to the mandates and the responsibilities of several other

Ontario government ministries. These include Municipal Affairs and Housing, Emergency Preparedness and Response, Natural Resources, Rural Affairs, and Finance.

We remind provincial decision makers that watershed management in Ontario was initiated to address major water challenges like flooding, drought, erosion, and poor water quality. Under the leadership of Premier George Drew, during and immediately after WWII, Ontario's Progressive Conservatives introduced the *Conservation Authorities Act* in 1946. This was a visionary and nonpartisan act as part of the nation-building efforts following WWII. Modelled after the Tennessee Valley Authority and Ohio Conservancy Districts, the act enabled municipalities to voluntarily form watershed partnerships for managing land and water.

The Act was based on three key principles:

1. **Watershed Based Management**: Resource management is most effective when organized by watershed units.
2. **Local Initiative:** Communities within a river basin could form CAs
3. **Provincial-Municipal Partnership**: Municipalities forming CAs could receive provincial funding and technical support.

From 1946 to 1979, 36 conservation authorities were established by municipalities, in large part due to the strong support among subsequent Ontario Progressive Conservative Premiers, including Leslie Frost (1949-61), John Robarts (1961-71) and William Davis (1971-85).

Municipalities contribute financially and make decisions through appointed representatives to the Board. The Board identifies local resource management needs, endorses programs specifically designed to meet these needs, and, through partnerships with all levels of government and others, delivers on-the-ground projects. This governance approach has shown strong results. CAs carry out watershed management initiatives valued at more than $300 million each year, meeting the priorities of local municipalities and the Ontarians they serve.

Together, CAs continue to:

- Significantly reduce flooding, drought, and erosion through structural and non-structural approaches, including dams and berms, wetland protection and enhancement, land acquisition, reforestation, and regulatory and planning tools. CAs operate and maintain 900 dams, dykes, channels and other erosion control structures along rivers and shorelines valued at $3.8 billion in 2019 dollars. Water and erosion control infrastructure managed and maintained by CAs helps to avoid more than $150 million annually (2022 dollars) in damages to properties.[1]

- Improve water quality in Ontario's rivers by operating multi-purpose dams to maintain steady water flow in the summer and help increase Ontario's climate resilience by offering nature-based solutions to rehabilitate degraded landscapes and wetlands.

[1] 2022. Conservation Ontario. 2022 Provincial Budget Consultation.

- Manage and own 150,000 hectares of natural areas, including forests, wetlands, areas of natural and scientific interest, recreational lands, natural heritage and cultural sites, and land for flood and erosion control within each of their watersheds. Among these lands are approximately 500 Conservation Areas, with more than 300 publicly accessible. These public treasures make up approximately 80,000 hectares. These lands protect important natural features, provide recreational opportunities for people to enjoy, such as hiking, canoeing, camping, snowshoeing and many other outdoor activities, as well as living classrooms for schools, nature groups, and others to explore and learn about nature. Over six million Ontarians visit these areas each year,[2] contributing to the local economy and tourism.

- Develop a governance framework that allows each authority to design customised decision-making approaches, balancing urban and rural voices while implementing specific initiatives that address their unique watersheds and concerns. This governance model has been internationally recognized, with the Grand River and Lake Simcoe Region Conservation Authorities both winning the Theiss International River Prize for exemplary river management.[3]

On June 27, 2025, we welcomed the appointment of the province's Chief Conservation Executive. This appointment appears to signal a renewed provincial commitment to Conservation Authorities (CAs) and offers an opportunity to strengthen collaborative and professional relationships between the province, CAs, and member municipalities. Such a partnership recognises the vital role that CAs play in supporting the health and well-being of Ontarians.

Then, on November 6, 2025, further changes to the *Conservation Authorities Act,* leading to the creation of the Ontario Provincial Conservation Agency (OPCA), as part of Bill 68, the *Plan to Protect Ontario Act (Budget Measures) 2025,* were made. Through these amendments, the OPCA has the potential to advance the core objectives of the *Conservation Authorities Act* by assuming responsibilities previously managed by the first-ever Conservation Branch, established in 1944. This includes providing policy and technical direction to Conservation Authorities (CAs), thereby promoting greater consistency in addressing resource-related issues across the province – a need that has remained unmet for several decades. Some of the undersigned have served in the Conservation Authorities Branch,[4] and would welcome the opportunity to share relevant historical context and experience with staff at the new agency.

However, we believe that the consolidation plan presents significant risks to the continuity and effectiveness of watershed management practices that have been carefully developed and refined over the past eighty years. We are deeply concerned that the loss of local expertise and

[2] Conservation Ontario. Conservation Authorities are Ontario's Second Largest Landowners.
[3] International River Foundation. Thiess International River Prize. 2000 Grand River Conservation Authority and 2009 Lake Simcoe Region Conservation Authority.
[4] The Conservation Branch evolved into the Conservation Authorities Branch in 1962 and remained so until 1980.

the reduction of community representation in decision-making processes will undermine Ontario's ability to respond effectively to environmental challenges. Furthermore, the proposed restructuring may adversely impact collaborative relationships with municipalities, Indigenous communities, and local stakeholders, who have played an essential role in shaping sustainable water resource strategies throughout the province.

We seek clarification on the issues the Government of Ontario intends to address through the proposed consolidation of CAs. Should the focus be on the housing crisis, it is essential to acknowledge that this issue arises from a range of complex factors, with CAs being an inconsequential barrier to the issue. In fact, of the fifty-five recommendations cited in the Report of the Ontario Housing Affordability Task Force (2022), for improving access to housing in Ontario, CAs are not mentioned as an impediment. Rather, CAs overall have repeatedly shown themselves to be excellent and responsive problem solvers throughout their history.

It is our view that merging CAs will divert senior leadership at these organizations and their member municipalities, requiring significant attention to administrative and logistical matters related to establishing regional entities. This process could hinder the ability of CAs to fulfill essential mandated programs, including flood protection for communities and capacity for local hazard management.

We offer the following 16 recommendations in the spirit of collaboration and enhancement of client service, watershed management, and natural hazard management in Ontario.

RECOMMENDATIONS

We recommend that the Government of Ontario implement the following:

1. **Renew a Collaborative and Collegial Governance Relationship with Municipalities and Conservation Authorities.** The creation of the new Ontario Provincial Conservation Agency (OPCA) provides a unique opportunity to rekindle the relationship with CAs and municipalities. The goal of this renewed relationship is to ensure that future decisions honour the legacy established by Premiers George Drew, Leslie Frost John Robarts and William Davis. These decision makers demonstrated foresight in enabling the formation of CAs through strong municipal-provincial partnerships to address natural resource challenges affecting economic growth and development by promoting restorative conservation initiatives for the people of Ontario.

   Resource issues resulting from changing landscapes and climate will continue to emerge. The key to successfully managing outcomes depends on ongoing collaboration among the Ontario government, municipalities, and conservation authorities.

   We understand that the OPAC shall consist of at least five and not more than 12 members appointed by the Lieutenant Governor in Council, who shall form the independent Board of Directors for the Agency. This independent Board will oversee the activities of the OPCA. Consequently, it will be important that this Board work

collaboratively with CAs and the Board Members to ensure decisions impacting CAs are based on knowledge of programs and services such that they remain effective and efficient.

2. **Reduce Regulatory Fragmentation.** Both provincial and federal governments have created overlapping, sometimes conflicting legislation, each with its own administrative process. This complexity increases costs and inefficiency and doesn't always achieve the intended results. CAs, as service providers, often sit at the intersection between the public and government and may be mistakenly viewed as part of the problem.

3. **Support Efficient Planning and Permitting by Updating Provincial Technical Guidelines and Shared Service Tools.** Update provincial technical guidelines and shared service tools to foster consistency among CAs, rather than initiating structural amalgamation. The province already has the authority and tools to work directly with CAs. Any effort to regionalize permitting must not create delays or reduced access to technical expertise.

4. **Pause the Approval of the Proposed Regional Consolidation.** The OPCA, in conjunction with municipalities, CAs, and Conservation Ontario, should fully evaluate whether modernization goals could be achieved through enhanced provincial coordination, standardized approaches, and digital integration delivered through the new OPCA, without substantive restructuring of the existing CAs.

5. **Explore Alternative, Right-sized Regional Models.** Work with municipalities, CAs and Conservation Ontario, and other interested parties, through a meaningful and effective engagement process to consider smaller, more focused regional models that improve efficiency while preserving local knowledge and relationships, and effective and fair municipal representation. These discussions should also include voluntary regional collaboration units to ensure policy, practice, fees, and expertise/staffing are shared where needed. Voluntary regional CA collaborations already exist; however, no provincial resources are allocated to facilitate this collaboration.

6. **Conduct a Cost-Benefit Analysis and a Business Case/Feasibility Study.** A cost-benefit analysis and business case/feasibility study should be completed before any amalgamations are proposed. If this was done, it has not been made public. Nor has the province provided any details on how the CA funding model would work with the proposed amalgamation. This review will need to show the optimal size and boundaries of any new regional CAs to maximize cost savings and other potential benefits while minimizing impacts. These studies will also need to examine the relationship with other provincial agencies that have mandated responsibilities for resource management to avoid further fragmentation, inconsistencies, and double standards in program delivery.

It is recommended that if warranted, one region be consolidated first, where the identified need is greatest and interest is high, to ensure implementation is successful.

7. **Preserve Local Municipal Governance and Decision Making.** A single board representing 30 – 80 municipalities will dilute local voices. Any governance model must ensure meaningful local representation that balances rural and urban priorities and interests, so that watershed priorities are focused on priority resource issues and community needs. Further, the scope and meaningfulness of CA Boards should not be diminished by the provincial oversight and authority of the OPCA.

8. **Protect and Empower Local Conservation Efforts.** Centralized decisions may not address local challenges and may inadvertently weaken well-functioning systems through administrative complexity and diluted oversight. It is important to safeguard locally developed services, since adopting a regional model could decrease service quality, cause a loss of specialized knowledge, or limit community access for residents. Local staff best understand their watershed's conditions and needs, making them vital for public safety, environmental protection, and effective community services. Local CA staffing and watershed-specific expertise should be preserved, while maintaining the service improvements achieved since the negotiation of the Memoranda of Understanding between CAs and their member municipalities in 2024.

9. **Adhere to the Principles of Integrated Watershed Management.** Since every watershed differs in hydrology, geology, topography, and land use, each faces distinct challenges. Decisions regarding watershed management should be informed by science, geography, and local hydrological conditions, rather than by broad regional or administrative boundaries. Expansion of boundaries will complicate planning, permitting, emergency management, and municipal collaboration.

10. **Protect and Enhance Local Hazard Management Capacity and Continuity of Infrastructure Operations.** The protection of property and management of natural hazards are intrinsic to many of the multi-disciplinary plans and policies of municipalities across Ontario. CAs operate and maintain 900 dams, dykes, channels, and other erosion control structures along rivers and shorelines valued at $3.8 billion in 2019 dollars. Water and erosion control infrastructure managed and maintained by CAs helps to avoid more than $150 million annually in damages to properties.[5] Many of these structures are coming to the end of their design life and will require significant investment to ensure that the infrastructure continues to provide the protections now and into the future, with considerations for climate change.

    The management of this infrastructure requires local expertise and knowledge, and 24/7 operational readiness. Further, operation of these structures is supported by municipal levies.

[5] 2022. Conservation Ontario. 2022 Provincial Budget Consultation.

CAs' regulation of natural hazardous areas is essential for emergency preparedness and prevention, reducing risk to life and property, protecting flood and erosion control infrastructure, and increasing resiliency to climate change.

11. **Enhanced Provincial Investment required to Support Critical Water and Erosion Control Infrastructure**. In 2020/21, the province approved $10 million in Water and Erosion Control Infrastructure **(**WECI) funding for 68 projects across 21 conservation authorities. Investments in this critical infrastructure recognized the benefit to local communities across the province and ultimately, Ontario's economic recovery.[6] Despite the program being oversubscribed by almost two-fold in 2020/2021, with an estimated total project cost of more than $19 million for 102 project submissions from 30 CAs across the province in 2020/2021, the funding levels were subsequently returned to $5M.

    Continued and adequate investment in both current and future infrastructure is essential for the effective management of flooding and erosion moving forward. Further, this funding will need to recognize the disparate resources across the province and provide flexibility to meet the state-of-good-repair requirements for this essential infrastructure.

12. **Preserve Locally Acquired Assets** – CAs are responsible for owning or managing 150,000 hectares of natural areas, including forests, wetlands, areas of natural and scientific interest, recreational lands, natural heritage and cultural sites, and land for flood and erosion control within each of their watersheds. In some cases, thousands of hectares have also been donated to CAs with the expectation of local stewardship. Regionalization risks breaking that trust. Further, agreements will need to be updated or renegotiated with a new entity. Decisions regarding these lands and resources should remain with the local communities who use and maintain them.

    This point also applies to the Foundations and Boards of Directors that have been established to secure donations and private endowments for parks, trails, and other stewardship initiatives. The proposed CA amalgamations could easily stifle CAs' ability to raise funds for local initiatives.

    Many CAs also have reserve funds that have accumulated over decades through contributions by local municipalities and their taxpayers. It would be inequitable and unfair for these reserves to be distributed using a regional amalgamation model. Financial reserves created over decades through contributions by municipalities to their respective CAs must be retained.

[6] Letter from Water and Erosion Control Infrastructure Committee on the Need for Reallocation of In-Year Water and Erosion Control Infrastructure (WECI) Funds to Kathy Woeller, Director, Integration Branch, Regional Operations Division, MNRF, dated April 23, 2020.

13. **Reinvest Provincial Funding in Conservation Authorities.** The CA model has achieved tremendous successes across Ontario. However, we acknowledge that CAs' ability to deliver relevant programs to address resource challenges may vary in scope and intensity from one watershed to another, influenced by elements such as climate, landscape features, geology, water movement, and patterns of water consumption. Furthermore, the local population, level of municipal support, variability and inequity of the property tax base, provincial funding, and the CA's ability to generate income from fees, land rental, and other sources will also affect the level of programs and services they can deliver.

    By restoring and modernizing the annual provincial transfers to CAs that were halved in 2019 and have remained unchanged since that time, the OPCA could improve the capacity of all CAs to provide comparable services and ensure that flood and watershed management tools and infrastructure are repaired, restored, and modernized to meet the challenges of the future.

14. **Preserve Source Water Protection Areas and Regions.** Following the Walkerton inquiry, Justice O'Connor made 121 recommendations on a wide range of areas related to protecting drinking water. These recommendations are the building blocks of Ontario's drinking water protection framework. Justice O'Connor's first recommendation was that drinking water should be protected by developing watershed-based source protection plans. The proposed consolidation splits and/or merges several existing source protection areas. Any proposed amalgamations of CAs must respect this fundamental premise of watershed-based source protection efforts and the governance model for source protection areas.

15. **Fully Fund Transition Costs by the Province.** The consolidation of 36 CAs to 7 regional CAs will result in substantial unfunded costs, including IT integration, HR restructuring, renaming/rebranding, land title work, asset transfers, and legal harmonization. We anticipate that substantial costs will be incurred, and vital conservation initiatives will likely be postponed or discontinued due to a shift in focus. Care must be taken to ensure that this does not happen. Municipalities should not be responsible for the impact or costs of any provincial restructuring efforts.

16. **Fully Fund the Provincial Conservation Agency by the Province.** Bill 68 empowers the OPCA to recover its operational and staffing costs to implement its mandate as described in the legislation. Although not specifically stated, we are concerned that the recovery of these costs and expenses will be borne by CAs through member municipalities and levies. This will further exacerbate the current disparities and the inequities of the existing CA funding model based on property taxes. This will create an excessive financial strain for municipalities and will run counter to the principle of

municipal-provincial partnerships for conservation. Municipalities should not carry the burden of this new agency.

The rationale and concerns that underpin these recommendations are further outlined in the attached Appendix 1.

We highly encourage the Government of Ontario to pause making rapid, drastic, costly, and irreparable changes to the structure of CAs. Rather, we ask that provincial decision makers carefully weigh the advantages and disadvantages of this proposal with input from CAs, municipalities, and other stakeholders. For effective hazard management and conservation improvements in Ontario, major changes must have the backing of those responsible for carrying them out. The safety and well-being of Ontarians must come first.

Yours in conservation,

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Appendix 1 – Our Key Concerns

Our Key Concerns

Uncertainty about the Relationship between OPAC, Municipalities and CAs

Schedule 3 of Bill 68 states that the OPAC shall consist of at least five and not more than 12 members appointed by the Lieutenant Governor in Council, who shall form the independent Board of Directors for the Agency. This independent Board of Directors will oversee the activities of the OPCA. If OPCA is funded by CAs via their municipalities then how do they retain control of how the agency impacts the work and budget of the CA?

The creation of the new Ontario Provincial Conservation Agency (OPCA) provides a unique opportunity to rekindle the relationship with CAs and municipalities. However, there is insufficient information to effectively comment on how OPAC and its associated Board of Directors will interact with CAs, their respective Boards and municipalities.

Nevertheless, the unfolding of this relationship will need to be based on the principles of good governance, while fostering collaboration to ensure CAs programs and services continue to be effectively and efficiently delivered.

Resource issues resulting from changing landscapes and climate will continue to emerge. Time will be of the essence to respond swiftly, as it has been frequently in past decades with more climate related flood events. The key to successfully managing outcomes is ongoing collaboration among the Ontario government, municipalities, and conservation authorities.

Insufficient Evidence to Support Consolidation

The proposal to consolidate 36 CAs to 7 regional CAs is not supported by any evidence-based rationale or business case, cost-benefit analysis, business case/feasibility study or transition work and funding plan for the amalgamation. The timeframe provided for such a change is incredibly short, which greatly increases the likelihood of failure.

For decades, the CA model has fostered successful watershed programs which have reduced potential flood, drought, and erosion losses, restored damaged ecosystems, protected drinking water, and improved water quality. The strength of the model lies in the emphasis on local decision making, collaborative partnerships, and on-the-ground programs. While amalgamations have occurred in the past, they have been at the request of municipalities, and there have been shared resource issues within similar watersheds.

This is not the first instance in which the province has suggested the significant consolidation of CAs. In 1989, the Ballinger Report (also referred to as the Ballinger-Hopcroft Report) was submitted to the government by Mr. Bill Ballinger, MPP and Parliamentary Assistant to the Minister of Municipal Affairs and Housing under the David Peterson administration. The review was prompted by concerns regarding disparities in the capacity and expertise among Conservation Authorities, inconsistencies in program standards and delivery—particularly in plan review and permitting—as well as varying funding levels across authorities.

Following extensive consultations throughout Ontario, the report put forward a recommendation to reduce the number of CAs from 33 to 19. Further recommendations addressed redefining

core mandates, modernizing governance, and restructuring the provincial-municipal funding relationship. Although there was some provincial support for recommendations related to the core mandate and funding, the report did not ultimately receive provincial approval. The process was stalled by factors such as an impending provincial election and increased recessionary pressures.

Additionally, there was significant opposition from municipal leaders regarding amalgamation, most notably from Wardens and Mayors in eastern and southwestern Ontario, who expressed concerns over potential losses of autonomy and local decision-making authority in watershed management priorities. Similar reactions from the municipal sector may again pose challenges to any proposal advocating for the regionalization or consolidation of CAs.

The proposed amalgamation covers vast areas with different landscapes, water systems and resource management issues and priorities. The proposal creates more questions than answers, such as:

- What specific problems are you trying to solve through the amalgamation, and why is this proposal the only alternative put forward?
- What governance model will regional CAs use? How much influence will each municipality have in decisions?
- What is the process for setting municipal levies? If a CA generates most of its budget through its own revenues, will it be required to support other CAs that are merged with it? How will the haves and the have nots be treated through this process and how will that impact their capacity?
- How will the CA charitable foundations be impacted? Will they need new Letters Patent?
- What are the anticipated costs associated with amalgamation, and which parties are responsible for funding it?
- How will the Source Protection Areas (SPAs) operate, given that the proposed amalgamation splits several SPAs and merges others?

Loss of Local Watershed Management Governance and Oversight

The proposal to move towards a regional watershed-based framework for CAs in Ontario by consolidating 36 CAs to 7 regional CAs runs counter to the founding principles of the *Conservation Authorities Act* in 1946. Specifically, resource management is most effective when organized by watershed units, and communities within a river basin could form CAs with provincial backing if they chose to collaborate. CAs deliver programs and services to address local watershed needs on behalf of municipalities. Municipalities risk losing effective and meaningful control over locally funded assets, dams, conservation lands, and permitting decisions.

While provincial communications maintain that nothing will change – that CAs will retain leadership over local programs and services, and that regional CA Boards will continue to exercise comprehensive governance – including the responsibility to approve budgets – the mandate of the newly established OPCA encompasses a much broader range of authority. Without a blueprint, we remain skeptical of the understanding and true intent of this amalgamation.

The OPCA's mandate includes direct oversight of CA governance, operations, and delivery of programs and services. In practice, this means the Agency will systematically assess the effectiveness of CAs, undertake regular monitoring and evaluation of their financial performance, and play a central role in guiding strategic planning activities. Importantly, the OPCA is empowered to issue binding directives as well as recommended guidance to CAs, thereby shaping both compliance and best practices across the sector.

It is critical to note that the OPCA's jurisdiction is not limited solely to provincially mandated programs such as natural hazard management and source protection. Rather, the scope of its oversight extends to all CA programs and services. This includes initiatives delivered on behalf of municipalities, as well as those programs and services independently developed by local Boards to meet specific watershed challenges and community needs. The wide-ranging nature of this oversight signals a significant and unwarranted expansion of provincial involvement in local watershed management and governance.

While CA Boards may retain governance over CAs, the scope and meaningfulness of their role could be diminished by the provincial oversight and authority of the OPCA. Despite assurances from the province that this will not happen, there is no evidence or any details as to how this local representation will be maintained. This absence of detail about how OPCA, CAs, and municipalities will work together raises questions about transparency and contributes to further uncertainty.

Scale of Proposed Regional CAs is Impractical

The regional CAs, as proposed, are geographically vast, ranging in some cases from 18,500 km^2 to 25,000 km^2. One of the proposals goes so far as to merge the Lakehead Region Conservation Authority (LRCA) into a new "Huron–Superior Regional Conservation Authority," a region that stretches more than 1,300 kilometres south and includes municipalities as far away as southern Ontario.

Compounding the proposed vast geography, these new regional authorities are proposed to serve anywhere between 28-81 municipalities. We assert that the proposed entities are excessively large to ensure effective and equitable municipal representation or efficient watershed management. Moreover, certain areas possess distinct geographical characteristics and concerns, potentially leading to uneven allocation of resources or efforts across the suggested regions.

Larger Regional Bureaucracies Reduce Efficiency Gains

The proposed amalgamation is likely to disrupt service delivery, potentially hindering the province's progress toward economic development and growth. Based on our experience, the current CA structures are nimble and responsive because they stay informed about initiatives and issues, understand local stakeholders, and resolve problems quickly and efficiently. Large regional organizations may result in longer review times, lower standards of service, and diminished collaboration with developers, lake associations, and local governments. Compounding this regionalization will be another level of oversight created through the OPCA, potentially creating even more bureaucratic barriers.

Sacrificing the Key Principle of Integrated Watershed Management

CAs were designed to align with watershed boundaries, rather than municipal boundaries, so they can address hazards and resource issues specific to each drainage basin. Since every watershed differs in hydrology, geology, topography, and land use, each faces distinct challenges.

CA staff have also developed vital local expertise that informs their work, from flood forecasting and warning to environmental restoration programs, which must be maintained if CAs are consolidated. Consolidation would not automatically harmonize services across regions because watershed needs and priorities vary.

Expansion of boundaries will complicate planning, permitting, emergency management, and municipal collaboration.

Challenging the Myth of Inefficiencies

Despite CAs having responded effectively to the last six years of provincially directed changes, addressing concerns for timeliness and focus on core mandates, the province continues to cite inefficiencies as the primary rationale for amalgamation. We maintain that this assumption should be critically examined, considering the available evidence.

In 2019, to ensure consistency in annual reporting for CA permit reviews, Conservation Ontario implemented a standardized template and framework for monitoring review timelines. Benchmarks were established, setting a standard of 30 days for minor permits and 90 days for major permits, thereby promoting uniform reporting across all CAs. In recent years, CAs have invested substantially in new database software and process enhancements to maintain high-quality development review services.

The 2024 annual report presents data on permits received as of April 1, 2024, in accordance with the updated legislative and regulatory framework. During this period, over 7,180 permits were issued by the 36 CAs. Ninety-six percent (96%) of these permits were issued within the

required timelines.[7] Further, some CAs also have longstanding reciprocal staff-sharing arrangements with other CAs to ensure no interruption in service and no permit delays. There are occasional inefficiencies, as is typical in any agency, but these are now exceptions rather than the standard.

Need For Provincial Guidance

We recognise that there may be inconsistencies in the decisions made by CAs regarding permit applications and related planning matters under the CAA and Ontario Regulation 41/24. However, we believe that the provision of more robust technical guidance at the provincial level would be of greater benefit to achieving consistency among CAs, rather than initiating structural amalgamation.

For instance, the province has been asked over several years for direction on when and how Regional Control facilities should be used to support new development and manage stormwater and flooding. CA's still await guidance on this issue. Similarly, CAs have requested provincial technical and policy guidance regarding flood spill management in existing urban areas and on establishing access standards for flood hazard zones. This guidance has not yet been forthcoming to date and would be very beneficial also in addressing those consistency issues noted elsewhere in this document. These are just two examples of many policy challenges that face CAs around regulating natural hazard areas and managing natural hazards.

Regulatory Fragmentation Continues

Both provincial and federal governments have created overlapping, sometimes conflicting legislation, each with its own administrative process. This complexity increases costs and inefficiency and doesn't always achieve the intended results. New issues are generally met with more laws, adding to regulatory burdens that can hinder the economy and affect landowners. CAs, as service providers, often sit at the intersection between the public and government and may be mistakenly viewed as part of the problem. [8] Red tape reduction needs a true examination of where laws, regulations and policies are conflicting, inconsistent or outdated.

Risks to Property and Management of Hazards and Dam Infrastructure

The protection of property and management of hazards is intrinsic to many of the multi-disciplinary plans and policies of municipalities across Ontario. CAs collectively manage flood and erosion control infrastructure requiring local expertise and knowledge, and 24/7 operational readiness. The work of CAs, in conjunction with their municipal partners, helps our province prepare for and respond to the impacts of climate change, ultimately becoming more resilient for

[7] Conservation Ontario. 2024. Annual Report. Conservation Impact. Valuing Positive Contribution through Conversation. Pg. 11.
[8] Conservation Ontario, 2012. Watershed Management Futures for Ontario. Conservation Ontario Whitepaper.

the future. The proposed consolidation may jeopardize local natural hazard management capacity, locally stationed staff, and continuity of infrastructure operations.

CAs' regulation of natural hazardous areas is essential for emergency preparedness and prevention, reducing risk to life and property, protecting flood and erosion control infrastructure, and increasing resiliency to climate change.

The Financial Accountability Office of Ontario warned in 2022 that more extreme rainfall associated with climate change will continue to increase the risk of flooding, straining public infrastructure expenses. That same year, the Auditor General also warned that the majority of municipalities in Ontario are unable to map urban flood risk due to a lack of data, expertise and funding.

Parts of Southern Ontario are experiencing an increase of two to three more heavy rainfall days per year on average. As floods increase in frequency and intensity, homeowners' insurance costs are rising, creating significant financial challenges for many families.

Flooding is Ontario's costliest natural hazard and is expected to become an even bigger threat in the future. Any recommended changes to CAs should enhance their capacity to reduce flood risks and safeguard both life and property. However, it is unclear how the proposed consolidation would accomplish this goal.

Lag in Water and Erosion Control Infrastructure Investments

CAs operate and maintain 900 dams, dykes, channels and other erosion control structures along rivers and shorelines valued at $3.8 billion in 2019 dollars. Water and erosion control infrastructure managed and maintained by CAs helps to avoid more than $150 million annually in damages to properties.[9] Many of these structures are coming to the end of their design life and will require significant investment to ensure that the infrastructure continues to provide the protections now and into the future, with considerations for climate change.

The Ministry of Natural Resources (MNR) provides financial support to critical Water and Erosion Control Infrastructure (WECI). This program provides funding to support up to 50% of project funding for watershed studies, dam and channel maintenance and repairs. The program is delivered through a municipal – provincial – conservation authority partnership. The province provides project funding of $5M, matched by another $5M from municipalities, and then implemented by the CAs.

For many years, this funding was capped at $5 million, yet the program was oversubscribed. In 2020, the WECI Committee, among others, advocated for the province to make further

[9] 2022. Conservation Ontario. 2022 Provincial Budget Consultation.

investments in this critical infrastructure, given the benefit to local communities across the province, and ultimately, Ontario's economic recovery.[10]

In 2020/21, the province approved $10 million in WECI funding for 68 projects across 21 CAs. Despite the program being oversubscribed by almost two-fold in 2020/2021, with an estimated total project cost of more than $19 million for 102 project submissions from 30 CAs across the Province in 2020/2021, the funding levels returned to $5M. This funding is inadequate for future water and erosion control infrastructure needs.

Continued and adequate investment in both current and future infrastructure is essential for the effective management of flooding and erosion moving forward.

Breaking Trust – Risks to Locally Acquired Assets

Conservation Authorities are responsible for owning or managing 150,000 hectares of natural areas, including forests, wetlands, areas of natural and scientific interest, recreational lands, natural heritage and cultural sites, and land for flood and erosion control within each of their watersheds. Of these lands, there are approximately 500 Conservation Areas, with more than 300 that are publicly accessible. These public treasures make up approximately 80,000 hectares. These lands protect important natural features, provide recreational opportunities for people to enjoy, such as hiking, canoeing, camping, snowshoeing and many other outdoor activities, as well as living classrooms for schools, nature groups, and others to explore and learn about nature. Over six million Ontarians visit these areas each year,[11] supporting the local economy and tourism.

In some cases, thousands of these hectares have been donated to CAs with the expectation of local stewardship. Agreements will need to be updated or renegotiated with a new entity. Regionalization risks breaking that trust. Decisions regarding these lands and resources must remain with the local communities who use and maintain them.

This point also applies to the Foundations and Boards of Directors that have been established to secure donations and private endowments for parks, trails and other stewardship initiatives. The proposed CA amalgamations could easily stifle CAs' ability to raise funds for local initiatives. To further complicate matters, each Foundation has its own letter patent and Board of Directors.

Many CAs also have reserve funds that have accumulated over decades through contributions by local municipalities and their taxpayers. It would be inequitable and unfair for these reserves

[10] Letter from Water and Erosion Control Infrastructure Committee on the Need for Reallocation of In-Year Water and Erosion Control Infrastructure (WECI) Funds to Kathy Woeller, Director, Integration Branch, Regional Operations Division, MNRF, dated April 23, 2020.
[11] Conservation Ontario. Conservation Authorities are Ontario's Second Largest Landowners.

to be distributed using a regional amalgamation model. Financial reserves created over decades through contributions by municipalities to their respective CAs must be retained.

Continuation of the Disproportionate Funding Model

The proposed amalgamation materials have been silent on how the regional CA model will be funded. This is an essential piece of the puzzle – without which the full implication of the proposal cannot be evaluated. Today, the typical breakdown of funding sources for Conservation Authorities is as follows[12]:

- Municipal levies – 53%
- Self-generated revenue – 35%
- Provincial grants & Special Projects – 8%
- Federal Grants or Contracts – 4%

However, the actual proportion of funding can differ significantly across the 36 Conservation Authorities. For example:

- Essex Region Conservation Authority relies on non-levy funding for approximately 70 percent of its operating budget, drawing from self-generated revenue, grants, and foundation support.
- Conservation Halton, in its 2025 total budget, indicates that only 2% of the funding is from the province and 19% from municipalities. Self-generated revenue, grants, and other sources minimize the impact on the municipal levy.
- Conservation Sudbury receives just over 20 percent of its budget through provincial and federal transfers and grants, while less than 25 percent is sourced from self-generated revenue.
- Grand River Conservation Authority occupies an intermediate position, with under 40 percent of its funding provided by municipal levies and about 50 percent obtained from self-generated revenue.
- To the east, municipal levies for the Rideau Valley Conservation Authority account for 54% of the funding, with the province contributing 5%. Municipalities within the region of the Mississippi Valley Conservation Authority fund approximately 68% of the annual operating budget, compared to a combined provincial and federal contribution of 5%.

The CA model has achieved tremendous successes across Ontario. However, we acknowledge that CAs' ability to deliver relevant programs to address resource challenges may vary in scope and intensity from one watershed to another, influenced by elements such as climate, landscape features, geology, water movement, patterns of water consumption as well as the local

[12] Conservation Ontario. Typical breakdown of funding sources for Conservation Authorities.

population, level of municipal support, and their ability to generate income from fees, land rental, and other sources.

CAs that have a small population base may lack sufficient funding to hire subject matter experts to competently deliver some programs, including programs mandated by the Province of Ontario, such as administering provincial regulations, undertaking hazard modelling and mapping, and undertaking technical watershed studies and analysis.

Historically, provincial funding was initially the primary source of revenue for CAs, including shared funding for infrastructure projects. However, in 1995, under the leadership of Premier Mike Harris, Ontario's Progressive Conservatives drastically reduced provincial funding to CAs as part of its "Common Sense Revolution," slashing the budget for conservation programs from $50 million to $8 million annually, and limited it to hazard management. This significant cut severely impacted operations, leading CAs to lay off 20–60% of their staff and making it more difficult to continue the same level of investment and activity, including flood management, stewardship and watershed management. These cuts also disproportionately impacted smaller CAs with more rural municipalities, as the previous funding formula that was in place allowed rural CAs to access a higher proportion of funding for necessary projects from the province, equalizing the playing field.

Ultimately, despite these enormous financial challenges, CAs pivoted to secure alternative local funding sources once the province allowed CAs to start charging fees. This new financial situation also meant that municipalities had to reassess which watershed-based programs to retain. Although many activities were curtailed, programs continued with the assistance of partnership arrangements with local environmental groups or adjacent CAs. Municipalities also became the primary funder of managing natural hazards and many striking agreements with their CAs to support their environmental needs.

Since that time, municipalities have come together through our 36 CAs to address aging dams, manage natural hazards, enhance land conservation, provide water data and flood warnings to landowners, while also delivering on local stewardship programs and outdoor education initiatives.

Without a commitment of additional provincial funds and a shared approach to facilitate program development and the proposed CA amalgamations, plans to strengthen the work of CAs will be at risk.

Through a reinvestment in provincial funding, the OPCA has the opportunity to improve the capacity of all CAs to provide comparable services and ensure that flood and watershed management tools and infrastructure are repaired, restored and modernized to meet the challenges of the future.

Achievements of Source Protection Plans at Risk

In June 2000, following the tragic incident of bacterial contamination of the water supply in Walkerton, Ontario, in May 2000, the Government of Ontario established a public inquiry – known now as the Walkerton Inquiry. Following the Walkerton inquiry, Justice O'Connor made 121 recommendations on a wide range of areas related to protecting drinking water. These recommendations are the building blocks of Ontario's drinking water protection framework. Justice O'Connor's first recommendation was that drinking water should be protected by developing watershed-based source protection plans.[13]

CAs stepped up again to protect Ontarians. Under the *Clean Water Act, 2006*, 19 local multi-stakeholder source protection committees were established, guiding source water protection efforts in source protection areas across Ontario. The 38 source protection areas are based on Ontario's 36 CAs, the Severn Sound Environmental Association, and the Municipality of Northern Bruce Peninsula. Some of the source protection areas are grouped into larger source protection regions.

The Committees were supported by the Conservation Authorities' Boards of Directors, which, under the *Clean Water Act,* are referred to as "Source Protection Authorities." The Committees, working in collaboration with CAs, gathered science-based technical knowledge on which informed consensus-based decisions were made. Policies were developed in an open and consultative manner that continue to be effective, economical and appropriate for local communities. This supporting role by Conservation Authorities in source water protection continues to this day.

The proposed amalgamation of the 36 CAs to 7 regional CAs does not reference how Source Water Protection Areas (SPAs) and Regions will be maintained. For example, Credit Valley Conservation (CVC) is currently part of the CTC (Credit Valley, Toronto and Region-Central Lake Ontario), Source Protection Region (SPR). This proposal would see the Credit Valley Conservation Authority carved off from the CTC SPR and combined with Halton-Hamilton SPR and Niagara SPR. This configuration would cross the boundaries of three existing SPRs, potentially creating administrative and jurisdictional issues and undermining the principal recommendation advanced by Justice O'Connor twenty-five years ago.

Any proposed amalgamations of CAs must respect this fundamental premise of watershed-based source protection efforts and the governance model for source protection areas.

Amalgamation Costs to be Transferred to Municipalities

The amalgamation of 36 CAs to 7 regional CAs will likely result in substantial unfunded costs, including IT integration, HR restructuring, renaming/rebranding, land title work, asset transfers, and legal harmonization. These costs are unknown but have the potential to be substantive (in the hundreds of millions of dollars) when one considers the amalgamation expenses in 2001

[13] Ontario. Source Protection. Drinking Water Protection Framework

associated with the creation of the new cities of Ottawa, Hamilton and Greater Sudbury with expanded areas and populations.

By February 2001, the province decided that forcing amalgamation was too politically costly; in response to those affected municipalities, the province had to subsequently provide transition funding of $31 million to Hamilton and $108 million to Ottawa.[14] The O'Brien report, which recommended the amalgamation of the City of Greater Sudbury, estimated the transition costs would be around $10 million and suggested the province should cover them.[15] Any proposed amalgamation would also detract from implementing on-the-ground programs.

Although the existing Toronto and Region CA is not proposed to be amalgamated with any other CA, it too will still see substantial transition costs associated with rebranding to its new proposed name, Central Lake Ontario Regional Conservation Authority – a needless expense.

Municipalities should not be responsible for the impact or costs of any provincial restructuring efforts.

New Provincial Agency Will Impose Additional Costs

Bill 68 empowers the OPCA to recover its operational and staffing costs to implement its mandate as described in the legislation. While not specifically stated, we are concerned that recovery of OPAC's costs will be borne by CAs through municipal levies. This will create an excessive financial strain for municipalities and will run counter to the principle of municipal-provincial partnerships for conservation.

Further, what say would CAs have in the budget and control for the agency? As the OPCA is a provincial agency, its budgetary expenditures should be borne by the provincial government.

The province has also been silent on whether it intends to issue a direction to CAs to reallocate their current funding levies from Conservation Ontario (CO) to this new Agency. Such a direction would place CO in an untenable position. CO was established in 1981 to engage and support Conservation Authorities in matters of common interest and to shape effective policy relating to Conservation Authorities. CO is directed by a Council comprised of appointed and/or elected municipal officials from the 36 Conservation Authorities Boards of Directors and Conservation Authorities staff to ensure representation across the range of CAs and their unique circumstances.

To do this, they maintain technical expertise in most of the functions of the CAs and facilitate collaborations and working groups of technical experts in an effort to address consistency and issues across CAs.

How would even as few as 7 regional CAs effectively engage with the agency or other provincial ministries without an umbrella organization? Will the agency assume that role?

As the OPCA is a provincial agency, its budgetary expenditures should be borne by the provincial government.

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[14] CBC News. **Province pays out to ease amalgamation headaches**. February 2001.
[15] Ontario Ministry of Municipal Affairs and Housing (1999). **Report to the Minister of Municipal Affairs and Housing on Local Government Reform for Sudbury**. Toronto, ON: Queen's Printer for Ontario.