

## **ERO Submission: CVC Response to Posting #025-1257**

### **Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities**

Credit Valley Conservation (CVC) appreciates the opportunity to comment on Ontario's proposal to consolidate 36 Conservation Authorities (CAs) into seven Regional Conservation Authorities (RCAs). This submission provides evidence-based feedback intended to support sound policy development, protect public interest, and ensure effective watershed management.

CVC does **not support** consolidation as proposed. While consolidation may improve equity and service delivery in some regions, the proposed boundaries introduce significant governance, financial, operational, and service-delivery risks for high-capacity conservation authorities like CVC that are effectively supporting safe, sustainable growth.

Before proceeding with consolidation, the Province is encouraged to fully evaluate whether modernization goals could be achieved through enhanced provincial coordination, standardized approaches, and digital integration delivered through the new Ontario Provincial Conservation Agency (OPCA)—without restructuring the existing CA network.

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#### **1. Key Factors for a Successful Transition and Outcome**

##### **a. Preserve Local Municipal Governance and Decision-Making**

The proposed Western Lake Ontario RCA (WLOORCA) would encompass 27 local municipalities and nearly 3 million residents. This scale risks diluting local municipal representation, particularly for smaller and rural communities.

CVC currently receives significant benefit-based apportionment from Peel Region; under consolidation, Peel's influence—and its ability to ensure alignment with local priorities—would be substantially reduced. This represents a major financial and service risk.

Bill 68 grants the OPCA broad directive-making authority across governance, strategy, budget, and operations. Without safeguards, these directives could supersede municipal oversight and centralize decision-making.

##### **b. Provide Dedicated Provincial Funding for the Transition and OPCA**

Merging four large, municipally governed corporations without funding is unprecedented. Costs will be substantial, including:

- IT and data system integration
- HR and union harmonization
- Fee and policy alignment
- Corporate service model consolidation

- Rebranding, signage, and legal transitions
- Asset and liability assessment

Expecting municipalities to fund these costs while simultaneously reducing their influence is untenable. CVC's Board underscores the need for full provincial funding, transparent cost estimates, and clarity on OPCA funding and representation.

### **c. Preserve CA Land Ownership and Public Greenspace**

Messages from MECP have indicated that land title would reside with the proposed RCA and not the province. Municipalities rely on CAs to secure and manage greenspace. Transferring ownership from current CA's to the new RCA's risks legal complexity, reduced access, and long-term impacts on ecological integrity and community use.

### **d. Harmonize RCA, Municipal, and Source Protection Boundaries**

The proposed boundaries fragment several municipalities within CVC's jurisdiction and do not align with the CTC Source Protection Region. Boundary inconsistencies will complicate planning, permitting, emergency management, and municipal collaboration.

### **e. Protect and Leverage High-Performing CAs**

CVC is a high-performing CA that delivers:

- 99% compliance with permit timelines
- An average permit decision time of 11 days
- Modern digital permitting, robust hazard mapping, and strong technical guidelines
- Transparent budgeting and governance
- Effective municipal partnerships

Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. Instead, high-performing CA's like CVC can be leveraged as models for best practices, sharing expertise, systems, and processes across the province to improve efficiency and consistency without compromising their local effectiveness.

### **f. Align with Other Provincial Reforms**

The proposal intersects with Bill 68 (OPCA creation), Bill 60 (Peel water/wastewater restructuring), and Source Protection boundaries. Integrated planning across these reforms is critical to avoid regulatory gaps.

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## **2. Potential Opportunities or Benefits**

Opportunities may be possible, but they must be viewed realistically and supported by evidence to ensure the benefits outweigh the risks and costs associated with amalgamation.

### **a. Potential for Greater Technical Consistency**

Consistency in certain hazard standards or shoreline management could benefit smaller CAs. CVC already meets or exceeds provincial expectations for hazard mapping, permitting, and watershed science.

**b. Shared Technical Capacity**

CVC’s strong technical programs may support other regions if resources and governance enable effective collaboration.

**c. Digital Modernization and Common Systems**

Integrated GIS, monitoring, and performance systems are valuable goals. These could be achieved without amalgamation. Benefits depend entirely on provincial investment and retention of high-performing systems such as CVCOne - CVC’s digital platform that allows residents, municipalities, and partners to apply for permits, access watershed data, and view hazard maps online, improving efficiency, transparency, and service delivery.

**d. Potential Back-Office Efficiencies (Long Term)**

Some efficiencies may emerge over time; however, consolidating four distinct corporate service models will take years, require substantial funding and planning, and many of these efficiencies could likely be achieved more quickly and effectively through OPCA oversight rather than full regional consolidation.

**e. Opportunity to Expand CA Jurisdiction Province-Wide**

The proposal does not extend CA jurisdiction to currently unserved areas, representing a missed opportunity.

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**3. Governance Structure Considerations**

**a. Create a Governance Model That Is Functional and Fair**

Applying current legislative population formulas would produce a WLORCA Board exceeding 60 members, which is unmanageable and ineffective. A workable Board should be:

- Under 30 members
- Reflective of population, levy contribution, land base, watershed complexity, and service demand
- Structured to preserve meaningful local influence

**b. Maintain Municipal Appointment Authority**

Appointments must remain municipal to ensure transparency, accountability, and local alignment.

**c. Clarify OPCA’s Authority and Limits**

The governance model must clearly define:

- Decisions reserved for the RCA Board
- The scope and limits of OPCA directives
- How oversight, appeals, and land decisions will function

Board members expressed strong concern about centralization of authority at the provincial level.

#### **4. Maintaining a Transparent and Consultative Budgeting Process**

##### **a. Require Full Disclosure of Assets, Liabilities, and Capital Obligations**

The four participating CAs differ significantly in landholdings, infrastructure, and capital backlogs. Transparent asset transfer and financial due diligence are essential.

##### **b. Ensure Tax Fairness Through Apportionment**

Given high property values in CVC's watershed, municipalities risk subsidizing other areas without a clear and equitable apportionment model.

##### **c. Fully Fund the Transition Provincially**

Costs for integration—IT, HR, capital, data, governance, and branding—are extensive and must not fall to municipalities.

##### **d. Engage Municipalities in Budget Development**

Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Variations in land type, fee structures, property assessment, and asset conditions must all be accounted for.

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#### **5. Maintaining and Strengthening Local Relationships**

##### **a. Retain Local Presence**

Local offices and staff are essential for timely permitting, program delivery, operations, community engagement, and effective stewardship.

##### **b. Protect Local Programs**

Locally delivered conservation authority programs such as Sustainable Neighbourhood Action Plan (SNAP), tree planting, education, and trail stewardship are rooted in community identity. They must be preserved.

##### **c. Ensure Continuity of Emergency and Hazard Services**

Flood forecasting and monitoring systems are critical public safety functions that must not be disrupted. Phased implementation and performance monitoring are essential.

##### **d. Preserve Community Access to Greenspace**

Many municipalities rely on CA lands for recreation because local acquisition is cost prohibitive. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities.

##### **e. Maintain Trust Through Engagement**

Strong communication, responsive service, and meaningful municipal oversight are essential to maintaining public confidence. Conservation authorities like CVC have over 70 years of community history and identity, and public trust and association must be maintained.

## **Conclusion**

CVC supports modernization, consistency, and improved capacity across Ontario's conservation sector. However, consolidation as proposed carries significant risks that outweigh potential benefits without:

- Strong provincial funding
- Clear governance and municipal representation
- Preservation of local decision-making
- Protection of CA lands
- Alignment with other provincial reforms
- Respect for the performance and capacity of existing high-functioning CAs

CVC encourages the province to fully assess governance, financial, operational, and land-related implications and to evaluate whether modernization goals can be met through the OPCA and enhanced coordination rather than regional consolidation.