

December 18, 2025

Submitted online and via email to ca.office@ontario.ca

RE: Proposed boundaries for the regional consolidation of Ontario's conservation authorities

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to provide feedback regarding the proposed new boundaries for the consolidation of Ontario's conservation authorities, as outlined in the [Ministry's Environmental Registry of Ontario posting](#).

In principle, the City supports efforts to improve and modernize the conservation authority system. As Ontario's municipalities face increasing growth pressures, conservation authorities remain essential partners in managing flood risks, protecting drinking water, and supporting sustainable growth under a system which is unique to Ontario. As municipalities and the province seek to accelerate the pace of growth, modernization will be important to provide a consistent and effective operating environment for municipalities, homebuilders, and the public.

However, the City is concerned that the scale of the proposed consolidation, as well as the governance structure of the new Ontario Provincial Conservation Agency (OPCA) will remove local context and influence from decision making, and will risk undermining the effectiveness of the new Regional Conservation Authorities in meaningfully evaluating and responding to local issues, while downloading additional costs onto municipalities. As a general recommendation, the City would encourage the province to consider the Grand River Conservation Authority's proposal for the future consolidation of conservation authorities as a more democratic and sustainable path towards modernization.

Below, you will find the City's detailed responses to the Ministry's discussion questions and overall recommendations regarding this proposal:

What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

Aligning Regional Conservation Authority Boundaries with Source Protection Regions:

The City of Guelph relies almost entirely on groundwater for its drinking water supply, making it unique among large Ontario municipalities. This also means that Guelph faces unique water supply threats which require a local approach to management. While the modernization of conservation authorities to improve service delivery is worthy of consideration, the current proposed regional model may be too large in scale to meaningfully consider unique local circumstances, and may therefore result in weakened protections to drinking water sources.

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Regional consolidation, at the currently proposed scale, would likely require the re-development of existing Source Protection Areas, Authorities, Regions and Committees, which may be detrimental to local decision making and understanding of local watershed issues and conditions. Further, the consolidation may result in the City losing its ability to develop Source Protection Plan policies at a municipal level which would reduce the City's ability to protect drinking water from existing and future drinking water threats as outlined by the regulations.

To maintain meaningful protection of municipal drinking water, the City echoes the Grand River Conservation Authority's (GRCA) recommendation to consider smaller, regionally focused models for consolidation, such as the existing Source Protection Regions. These areas were developed through a Joint Committee and thoroughly assessed to maintain the local watershed perspective while supporting the actions stemming out of the Walkerton Inquiry. Retaining the current geographic scales of these areas would allow Conservation Areas to maintain existing relationships with local communities and stakeholders, and support efficiency with administrative tasks and program delivery, while maintaining local representation. Under this consolidation scenario, board governance would remain similar to what is seen today with respect to representation of the municipalities within the Lake Erie Source Protection Region.

Maintaining continuity in services and preserving existing relationships:

The City of Guelph works closely with the GRCA on a variety of initiatives, conducts work in GRCA-regulated areas requiring permits, and relies on GRCA modeling and expertise for land use and planning decisions. It will be essential to maintain existing staff-to-staff relationships where possible, and to implement continuity strategies to ensure that the ongoing collaborative work is not disrupted. The following are some examples of joint initiatives where continuity will be important throughout the consolidation process:

- Project-related Permits: The City has projects in design/construction that overlap with GRCA-regulated areas (ex. 544/25 Speedvale Avenue East – Permit and Lower Road Collection System at the Arkell Wellfield). It will be important to make sure that these active permits are being managed by the same staff where possible, and that continuity is maintained.
- Water Level Control: GRCA manages the Guelph Dam, which controls the flows and water levels in the Speed River. At high flows, GRCA's management provides flood control for the City of Guelph, as well as other downstream municipalities. At low flows, the GRCA ensures minimum river flow to safely assimilate effluent from the City's Water Resource Recovery Centre (wastewater treatment) in the river. Experienced and skilled dam management and continuity of personnel and communication pathways through current emergency alerting systems will be necessary throughout the consolidation process.
- Water Quality and Quantity Modeling: GRCA holds and maintains water quality and quantity models for the Grand River watershed. Specifically, GRCA models for the Speed River include the Grand River Simulation Model (GRSM) and the HEC-RAS hydraulic model. As noted above, experienced and skilled

modelers and continuity of personnel will be necessary to ensure that these modeling tools remain up to date and usable.

- Parks and Land Management: The City of Guelph and GRCA share long standing land management agreements and operational understanding. Throughout the transition process, it is important to ensure that:
 - Current management agreements are transitioned smoothly and not impacted;
 - Any in-progress files awaiting GRCA board or City approval are not impacted;
 - Any uploading in decision making around these files and agreements from the local level to the provincial level is clearly communicated; and
 - Local context is maintained in CA decision making around land management.

In addition to these examples, there will need to be a consistent process for determining how various programs and services that are outside the scope of the Conservation Authorities Act, but have been put in place through a Memorandum of Understanding with the City, would be assumed by a consolidated conservation authority. Continuity in services and personnel, and clear communication on any changes remains paramount throughout this process.

Preserving local technical knowledge and expertise:

Beyond project-specific relationships, it is important that overall local knowledge and expertise is preserved post-consolidation. The GRCA has been a valuable partner to the City, and has historically been responsible for work that has been integrated into municipal official plans, and informed local conservation, restoration and protection efforts. Preserving local knowledge and expertise post-consolidation will be essential to maintain this valuable partnership and the environmental and life safety benefits associated with collaborative planning.

The development review process is one example of such collaboration, where the City relies on GRCA's hyper-local expertise to review development proposals. City staff regularly work with GRCA staff to receive local information, including updates to hazard lands, flooding, mapping or other conditions, and other information that is often not available publicly until formal approval. Losing this local expertise at the conservation authority level risks prolonging review times of development applications and permits, or municipalities and developers working with incomplete information, potentially jeopardizing the success of new development needed to achieve provincial growth goals.

Technical modeling is another area where local expertise is essential. The Clythe Creek Subwatershed Study Update (CCSWSU) is an ongoing project within the City of Guelph. CCSWSU hydraulic and hydrologic model parameters were developed with the GRCA to ensure that the mapping and outputs from the project can be integrated into the GRCA floodplain mapping. It is essential that any future programs or models used by a regional conservation body accommodate integration with the City's work, including the CCSWSU and Stormwater Management Master Plan Update.

What opportunities or benefits may come from a regional conservation authority framework?

Consolidation may support improved consistency in permitting, technical standards, and service levels across the province, and if implemented appropriately, may help reduce variability in the service levels available to Ontario's municipalities. Additionally, larger Conservation Authorities may have more bargaining power and face reduced competition when it comes to securing federal funding opportunities, which would enable greater access to enhanced programming. Consolidation may also help amplify messaging and advocacy efforts from Conservation Authorities – for example, the currently proposed Lake Erie Regional Conservation Authority may have more leverage in advocating for Lake Erie protections and conservation efforts than the separate watershed regions alone.

With this in mind, the successes of consolidation will require careful and right-sized implementation. Consolidation into very large regional units, as currently proposed, risks negating the benefits of consolidation, and introducing new issues of slower decision making, disconnection from local communities, and lack of local context. The City would like to refer to the abovementioned comments, and recommend that consolidation proceed based on existing Source Protection Regions to realize the potential benefits of consolidation.

Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

Overall, the City would like to echo the recommendations put forward by GRCA with respect to the governance of the consolidated conservation authorities. The future governance structure must balance local representation with efficiency, and ensure that smaller municipalities have appropriate and proportional representation while keeping the board to a reasonable size to facilitate decision making. As noted by the GRCA, a clear subcommittee and advisory structure will be important, which sees the board of elected officials oversee strategic decisions, and subcommittees of municipal officials and citizen appointees providing local context and policy recommendations at a watershed level.

The City believes that a Source Protection Region approach to consolidation, as recommended by the GRCA, would support a fair and efficient approach to governance. The smaller geography of current Source Protection Regions would encompass a smaller number of municipalities (as opposed to the 81 municipalities to be included in the proposed Lake Erie Regional Conservation Authority), and would enable greater municipal representation on governing boards while maintaining an efficient board size.

Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

The City supports the recommendations regarding budgeting that have been put forward by the GRCA. It will be important that a transparent and consistent cost-sharing formula is used for municipal contributions, and that local input is actively sought and incorporated via a dedicated advisory committee. As the geographic scope of each conservation area is set to increase post-consolidation, it will be important to ensure that municipalities are not required to fund activities outside of their immediate watershed/source protection area which do not have local environmental and planning implications.

The Province should continue funding for the Source Protection program, as defined by the Clean Water Act and provide funding of any transitional costs associated with the proposed amalgamation. This may include conformity exercises for the consolidation of Source Protection Plans, and Assessment reports (technical studies). Resources and funding for both Source Protection Authorities and municipalities will be required to complete any of this work.

Finally, the City would like to echo the GRCA's concerns regarding the approach to the funding and governance of the proposed OPCA. We recognize that a central oversight body is important to support modernization and alignment in process and policy amongst conservation authorities. However, we are concerned that under the current proposal, the OPCA will be governed by an entirely provincially-appointed board, while receiving at least a portion of its funding from conservation authorities, and thus municipalities under a cost recovery model. The City is concerned that this would create a disconnect between budgeting decisions and sources of revenue, and may have municipalities contributing a significant portion of OPCA operating funding with no avenue to provide oversight and contribute to strategic decision making. Given the ongoing and significant municipal contributions towards areas of provincial responsibility, the City calls on the province to assume financial responsibility for the new OPCA without the use of municipal revenue sources.

How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

The current effective relationships that the City has with the GRCA are a result of ongoing collaborative work with GRCA staff. Maintaining continuity in staffing and programming will ultimately be essential to preserve relationships through this consolidation process.

The continuation of watershed-based programming and partnerships is one important way that the larger consolidated authorities can maintain good relationships and increase visibility to stakeholders. The GRCA currently engages in various collaborative initiatives with municipalities, including the development of Water Management Plans, Rural Water Quality Programming, and the [Watershed Wide Wastewater Optimization Program](#), which was pioneered by Guelph and the GRCA and sees municipalities recognized for meeting voluntary effluent discharge limits below provincial compliance limits. Continuing these programs is important to promote a sense of engagement, leverage the strengths of conservation authorities and municipalities to meet shared outcomes, and ultimately build strong working relationships.

Closure:

We appreciate this opportunity to provide input on this proposal. We strongly urge the province to consider these comments, as well as comments provided by the GRCA to chart a democratic, collaborative, and mutually beneficial way forward for consolidation. Should you have any questions about the feedback provided, or require additional details please do not hesitate to contact the City at intergovernmental.relations@guelph.ca.

Sincerely,

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