



Hamilton

City of Hamilton
City Hall, 71 Main Street West
Hamilton, Ontario Canada L8P 4Y5
www.hamilton.ca

Planning and Economic Development Department
71 Main Street West, 5th Floor, Hamilton ON L8P 4Y5
Phone: 905-546-2424, Ext. 1258 Fax: 905-540-5611

December 10, 2025
Ministry of the Environment, Conservation and Parks
Province of Ontario

SENT VIA ERO POSTING

RE: City of Hamilton Comments in Response to ERO #025-1257 – Consolidation of Conservation Authorities

Attached, please find City of Hamilton comments in response to the above-noted ERO posting. This includes a motion passed by Hamilton Planning Committee and Council, as well as City of Hamilton staff comments which were endorsed by Planning Committee and Council in their December 2, 2025, and December 10, 2025, meetings.

Should you have questions or comments, please contact myself or Sarah Marshall, Planner I – Natural Heritage, Planning Division, at (905) 546-2424 Ext.3595 or by email at Sarah.Marshall@hamilton.ca.

Regards,

A handwritten signature in black ink, appearing to read "Anita Fabac".

Anita Fabac, MCIP, RPP
Acting Director of Planning and Chief Planner
Planning Division
Planning and Economic Development Department
City of Hamilton

Enclosed (2).

Enclosure 1: Hamilton City Council Motion: Opposition to the Amalgamation of Conservation Authorities
Enclosure 2: City of Hamilton Staff Comments in Response to ERO #025-1257 – Consolidation of Conservation Authorities.

cc:
Steve Burke (Manager, Sustainable Communities)

Jana Kelemen (Manager, Heritage & Urban Design)
Sarah Marshall (Planner I, Natural Heritage)

Enclosure 1: MOTION: Opposition to the Amalgamation of Conservation Authorities

MOVED BY: Councillor C. Cassar

SECONDED BY:

WHEREAS the *Conservation Authorities Act* (1946) established Conservation Authorities (CAs) as local, watershed-based bodies to manage natural resources in partnership with municipalities;

WHEREAS Conservation Authorities are governed by Boards of Directors comprised of municipally elected officials or appointees, ensuring direct accountability to the local tax base;

WHEREAS Bill 68 (Schedule 3) has received royal assent creating the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities”), proposing to reduce Ontario’s 36 conservation authorities to 7 regional entities as part of a broader restructuring; and

WHEREAS the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks; and

WHEREAS Conservation Authorities in partnership with their member municipalities have for decades tailored programs and services to local watershed and community needs; and

WHEREAS The Province has not substantiated a case for the proposed consolidation with an outline of specific performance objectives for CAs and a related evaluation of current performance; and

WHEREAS the current funding model relies heavily on municipal levies and self-generated revenue, with the Province of Ontario contributing approximately 5% or less to operating budgets (e.g., the Hamilton Conservation Authority receives 35% of their funding from the City of Hamilton and less than 1% from the Province); and

WHEREAS a forced amalgamation threatens to dilute local decision-making, sever the critical link between local property taxes and local service delivery, and ignore the unique hydrological and environmental differences between our distinct watersheds;

THEREFORE BE IT RESOLVED:

That the City of Hamilton

- a) Formally opposes the proposed amalgamation of Conservation Authorities as outlined in ERO 025-1257;
- b) Calls upon the Province of Ontario to maintain the current watershed-based governance model that ensures local accountability;
- c) Urges the Province to strengthen centralized standards, resources, and communication rather than undertaking broad structural amalgamation and to provide **sustainable, predictable provincial funding** across conservation authorities—particularly where gaps exist—to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years;
- d) Requests that the Ministry engage meaningfully and collaboratively with affected municipalities, CAs, and local First Nations before advancing any changes for CAs to ensure that any changes reflect both local needs and the practical realities of implementation; and
- e) That a copy of this resolution be forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, the Minister of Municipal Affairs and Housing, all local MPPs, the Association of Municipalities of Ontario (AMO), All Ontario Municipalities, Conservation Ontario, Hamilton Conservation Authority, Grand River Conservation Authority, Niagara Peninsula Conservation Authority and Conservation Halton.

Enclosure 2: City of Hamilton Staff Comments in Response to ERO #025-1257 – Consolidation of Conservation Authorities

The following table contains guiding questions provided by the Province through [ERO 025-1257](#) to elicit feedback on proposed changes to Conservation Authorities. The final section contains staff comments which were not addressed within the provided discussion questions.

ERO #025-1257–Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities	
Discussion Questions	Comments
What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?	<p>Consideration of Alternatives</p> <ul style="list-style-type: none"> • As a general comment, staff note that the questions are framed in a manner that does not provide the opportunity to consider alternatives to the proposal to consolidate 36 CAs into 7 RCAs. Meaningful consultation must provide this opportunity. • Conservation Authorities were established to reflect the need to manage key issues and concerns at the local watershed level. For almost 80 years, this has included core roles in flood and erosion control, watershed management, and source water protection in the aftermath of the Walkerton crisis. Conservation authorities serve a critical role in preserving and protecting watersheds, including the natural waterways and natural landscapes found within them, and protecting the public from risks including flooding, erosion, and drought. This essential work is undertaken with the direct support and engagement of local government and residents living within a given watershed. • This local focus is an essential ingredient in ensuring the effectiveness of conservation authority efforts. In Hamilton, this has included ensuring that there are protected natural spaces in reasonable proximity to every Hamiltonian. It has also involved vision and community support for innovative initiatives like the Saltfleet Conservation Area, which has been designed not only to create more publicly accessible natural spaces and habitat to support local biodiversity, but also to enhance watershed protections through upstream green infrastructure as climate impacts continue to become more severe. • Currently, Conservation Ontario, a non-profit organization, represents all Conservation Authorities. The vision of this organization is “Conservation Ontario will engage Conservation Authorities in matters of common interest and to shape effective policy relating to Conservation Authorities”. Further, the mission of this organization is “to

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	<p>promote and continually strengthen a watershed-based conservation coalition in Ontario”. Having this organization within Ontario is a strength.</p> <ul style="list-style-type: none"> • To have a successful transition, the strengths of Conservation Ontario should be built upon, instead of creating a new Provincial oversight agency (Provincial Conservation Agency). The governance structure of the Provincial Conservation Agency has not been determined. If Conservation Ontario was the lead, it would allow for equal representation and protection of the local context. <p>Clear Implementation Framework</p> <ul style="list-style-type: none"> • Another key to success is having a clear and transparent implementation plan, including the development of transition documentation at a system-wide and individual-project level. • Many large municipal projects span multiple CA jurisdictions and involve multi-year planning; early clarity is needed to anticipate and manage changes effectively. • It has been noted by the Province that the regional boundary change would have financial support from the Province for three years. A clear framework and agreement-related text that stipulates financials of this transition is critical for municipalities, who already have a major funding role for CAs. • Creating a single public-facing webpage to provide regular updates on the rollout of this process would enhance transparency and keep stakeholders informed. <p>Stakeholder Consultation</p> <ul style="list-style-type: none"> • Meaningful and fulsome consultation with all stakeholders (i.e., Conservation Authorities, municipalities, residents, and Indigenous groups) is key to success. This consultation should be undertaken at key milestones in the process to ensure that the desired outcome can be achieved. <p>Maintenance of Current CA Staffing / Resources / Programs</p> <ul style="list-style-type: none"> • The pursuit of regional efficiency must be balanced with local responsiveness, particularly for site-specific permitting and stewardship initiatives.

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	<ul style="list-style-type: none"> • It is recognized that the proposed consolidation may result in the streamlining of upper-level administrative structures. However, it is crucial that the staffing levels for technical review staff, particularly those who interact with municipalities day-to-day, remain in place. • The retention and redeployment of technical staff will help ensure continuity of watershed-specific knowledge and avoid gaps in flood prevention and source protection programs. • A flexible approach will be needed to sustain restoration and stewardship programs.
<p>What opportunities or benefits may come from a regional conservation authority framework?</p>	<p>Standardization and Streamlining</p> <ul style="list-style-type: none"> • A centralized permitting platform and uniform performance standards could streamline processes and improve transparency. It also creates a single point of contact for municipalities, reducing the need to coordinate with multiple CAs for individual projects. • Increased standardization may streamline operations and reduce unnecessary complexity. By minimizing expenditures on upper-level administrative structures, resources can be redirected toward more impactful and practical initiatives. <p>Jurisdictional Consistency and Resource Sharing</p> <ul style="list-style-type: none"> • This consolidation presents an opportunity to promote consistency across CAs by aligning resource use and standardizing processes, which may lead to potential cost savings for municipalities. • The City of Hamilton currently interacts with four CAs, and the expectations for response rate and interest in project collaboration varies by CA. Creating consistency across the new RCAs will help make projects more predictable. • Regionalization could facilitate knowledge and resource sharing across watersheds, improving technical capacity, efficiency, and resource allocation. This may result in an overall net benefit for more communities.

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	<p>Data, Mapping, and Modernization</p> <ul style="list-style-type: none"> • Province-wide floodplain mapping and centralized data systems may strengthen hazard management data and planning consistency, and help support evidence-based decision making with respect to watersheds, asset management, etc. • Digital tools and standardized protocols may accelerate permitting timelines and improve service delivery for development and infrastructure projects. • The creation of a regional conservation authority framework allows for the modernization of mapping systems and permitting systems. Further funding from the province would assist in the modernization. <p>Concerns and Considerations</p> <ul style="list-style-type: none"> • It is important to consider that there may be unintended consequences. Modernization (through the increase in technology and digital platforms) may be a barrier to residents. A range of methods for submitting permits (maintaining local offices, providing non-digital methods, and providing staff to assist residents) needs to be considered. • Rather than pursuing the proposed regional framework, which appears to involve establishing more bureaucracy at the provincial level, it would be far more prudent to consider injecting more provincial resources into existing conservation authorities. • Local resources are urgently needed as municipalities and conservation authorities work to strengthen local climate resilience, particularly against more frequent extreme weather events. Regionalization risks diluting the hyperlocal focus that is essential for effective planning and response.
Do you have suggestions for how governance could be structured at the regional conservation authority level,	<p>Appropriate Representation of Municipalities</p> <ul style="list-style-type: none"> • Currently, municipalities provide funding to the Conservation Authorities. Given the proposal to consolidate the Hamilton Conservation Authority – the CA that encompasses the majority of the land base within the City of Hamilton – with much larger CAs located in Niagara, Halton and Peel, it is going to be a challenge to establish a governing body with adequate representation from the Hamilton area, while keeping

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including suggestions around board size, make-up and the municipal representative appointment process?	<p>the size of the board at a reasonable number of representatives so that effective interaction is still possible.</p> <ul style="list-style-type: none"> • Within the Western Lake Ontario RCA there will be 28 municipalities while in the Lake Erie RCA there will be 81 municipalities. There needs to be continued equitable representation to ensure accountability and oversight for the appropriate use of funding. The governance needs to be balanced to represent the voices of both the urban and rural communities. • It would seem to be a challenge for consolidation to bring any certainty that there will be adequate levels of representation for each watershed. This is a significant concern, as these governance structures are essential in guiding the work of CAs, including supporting locally specific needs and addressing locally specific challenges. • Recognizing the major contribution of municipalities to CA funding and the importance of CAs to recreational service delivery, governance structures of RCAs need to take local influence and representation into account. Governance should be structured, at least in part, to reflect municipal financial contributions and maintain accountability. <p>Integration of Knowledge and Expertise</p> <ul style="list-style-type: none"> • It is critical to define clear criteria for board membership. To support impartial and informed decision-making, the board should prioritize independent individuals with relevant technical expertise, rather than only political appointees. • The board should include a minimum number of members with technical expertise from academic institutions to provide a balanced approach and assist with understanding the technical aspects/best management practices. • The consolidation presents an opportunity for Indigenous engagement and larger-scale integration of Traditional Ecological Knowledge, if nations are interested in participating.
Do you have suggestions on how to maintain a transparent and	<p>Consultation and Engagement</p> <ul style="list-style-type: none"> • A Conservation Authority staff / municipal staff liaison committee should be created to consult / discuss budget constraints prior to the submission of a budget.

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<p>consultative budgeting process across member municipalities within a regional conservation authority?</p>	<ul style="list-style-type: none"> • Clear engagement tools should be developed for consultation with partner municipalities, Indigenous communities, and stakeholders highlighting the existing and proposed funding arrangements. This should occur before implementation. • The City of Hamilton currently maintains financial agreements with four CAs. Further clarity and dedicated engagement with the City will be important to address any changes to these agreements resulting from the consolidation. One-on-one discussions may also help identify opportunities for streamlining and improved coordination. <p>Levy Allocation</p> <ul style="list-style-type: none"> • There is particular concern with the fairness and equity of CA levy allocation to participating municipalities. • The prevailing methodology for levy allocation, as defined in Section 7 of O.Reg. 402/22 (Budget and Apportionment under the Conservation Authorities Act), uses the Modified Current Value Assessment (MCVA) approach. • When determining levy allocation method, CAs must establish whether the benefits of Category 1 expenditures are proportionate across all participating municipalities (O.Reg. 402/22 Section 8(3)). In situations where all participating municipalities benefit equally, the MCVA formula is to be applied (O.Reg. 402/22 Section 8(2)). • As provided in O.Reg. 402/22 Section 7(3), the key factors that impact the MCVA formula are 1) The Current Value Assessment (CVA) of all properties in the municipality, and 2) The Weightage Factor to be applied for levy allocation. • Experience shows that boundary changes can have an unpredictable impact on levy allocation amounts for participating municipalities, due to changes to CVAs captured by the new boundaries. • To ensure that the intent of O.Reg. 402/22 is properly carried out, and that levy allocation to participating municipalities continues to be fair and equitable, the City requests that the O.Reg. be updated to define, in more detail, different types of “benefits” received by the participating municipalities and how they may be quantified.

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How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?	<p>Preservation and Strengthening of Relationships</p> <ul style="list-style-type: none"> • Maintaining and nurturing solid relationships with local residents and stakeholders becomes harder with regionalization over larger geographic areas. More local resources could facilitate further strengthening of existing relationships that have already been established and continue to be nurtured by existing conservation authorities. • Transition planning should include strategies to maintain existing relationships with organizations, communities, and individual landowners. The amalgamated RCAs must ensure continued open communication with these groups to support trust, collaboration, and effective service delivery. • To assist in maintaining and strengthening relationships, a staff/municipal liaison committee should be created. This would bring together technical experts from the Conservation Authorities and municipalities allowing for more opportunities to problem-solve and address issues as they arise. <p>Continued Presence of Local Offices and Staff</p> <ul style="list-style-type: none"> • To ensure a continued commitment to customer service, it is essential that local CA offices should remain, especially during the transition period. The retention of local offices and staff will preserve expertise, community, and municipal ties. Further it will ensure accessible and regionally responsive service delivery to the public. • Current Source Protection authorities should also remain in place, as greater areas would limit the ability for meaningful collaborative process. <p>Project and Agreement Continuity</p> <ul style="list-style-type: none"> • Greater clarity is needed regarding how municipal relationships with CAs will be maintained, particularly in relation to ongoing projects and existing agreements. Consideration should be given to whether a new blanket agreement or clause is necessary to reflect the updated boundaries. • Projects such as the Hamilton Natural Areas Inventory, Urban Forest Strategy, and Biodiversity Action Plan require extensive community and stakeholder engagement, as

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	<p>well as long-term relationships between the CA and the municipality. Community projects for which CAs play a major role should be identified to ensure that they are not overlooked during transition.</p>
<p>Key Concerns and Other Comments</p>	<ol style="list-style-type: none"> 1. Loss of Local Expertise <ul style="list-style-type: none"> • Ontario’s watersheds are highly diverse, requiring tailored approaches. The current Conservation Authorities acknowledge and appreciate the local context. Through data collection, management of lands, and developing relationships with landowners, these agencies understand the needs of the local communities. • In the City of Hamilton’s experience, this has not resulted in duplication or overlap. A “one-size fits all” approach (as proposed) does not recognize that the Province is comprised of unique and varied topographies and communities. • Focus on software and uniform standards risk overlooking local knowledge of hydrological and ecological nuances, local history, and priorities. • Regionalization may reduce local offices and staff presence, weakening networking, community engagement, responsiveness and "eyes on the ground" type approach especially if staff will have to travel long distances. 2. Risk of Uneven Excellence and Perceived Bias <ul style="list-style-type: none"> • While regionalization aims to promote consistency and shared best practices, there is a concern that standardization could discourage innovation. Some conservation authorities have developed advanced programs – such as chloride monitoring and mapping – through unique partnerships and funding arrangements with municipalities. These initiatives often go beyond minimum requirements and demonstrate a proactive approach to watershed management. • Under a consolidated model with province-wide KPIs, proactive efforts may not align well with standardized performance metrics, creating a tendency to focus on baseline compliance rather than continuous improvement. If these excellence-driven programs are maintained only within certain parts of a newly formed regional authority, it could

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	<p>foster perceptions that staff prioritize specific municipal initiatives, leaving others feeling overlooked. This may undermine trust and collaboration across the broader watershed.</p> <p>3. Reduced Municipal Involvement</p> <ul style="list-style-type: none"> • Current governance includes municipal councilors and locally appointed representatives. The proposed model does not mention if municipal representation will continue. • Municipalities provide significant funding through levies; lack of representation could erode accountability and trust. • Municipalities should be given the opportunity to engage in one-on-one discussions with the Province to address local priorities and concerns in greater depth. <p>4. Governance, Relationships, and Accountability</p> <ul style="list-style-type: none"> • The City of Hamilton and the existing Conservation Authorities have established strong relationships built on trust, respect, and collaboration. The introduction of the OPCA risks unintentionally weakening these bonds by replacing the current structure with an undefined governance model. • Centralization continues a trend of consolidating decision at the provincial level, potentially undermining local decision-making. • If OPCA assumes regulatory or quasi-regulatory roles, clarity is needed on MOUs, financials, procedures, and decision-making process. <p>5. Impact on Watershed Protection, Stewardship, and Hazard Mitigation</p> <ul style="list-style-type: none"> • Programs such as habitat restoration and community stewardship, often delivered under municipal agreements, may be deprioritized under a narrower mandate focused on hazard management or without the support of local staff. Preventive work or initiatives that mitigate long-term risks could decline, widening gaps over time. • The emphasis on housing and other related priorities in the ERO posting raises concerns, as recent provincial policy changes (i.e., Bill 23) have demonstrated a pattern of reducing protections for natural heritage and species at risk.

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	<ul style="list-style-type: none"> Given the current environmental and legislative context, this is an especially critical time to preserve the integrity of Ontario’s conservation authorities. The provincial government has already enacted legislative changes (i.e., Bill 23) that have profoundly impacted the mandate of these authorities, placing the goal of accelerating development approvals above the need to preserve and protect the watersheds we all live in. This shift raises serious concerns. As climate change continues to intensify, Ontario will face increasingly frequent and severe weather events, and maintaining our collective resilience is paramount.