



Nottawasaga Valley
Conservation Authority

4 December 2025

By EMAIL

Hon. Todd McCarthy MPP
Minister of the Environment, Conservation and Parks
College Park, 5th Floor, 777 Bay Street
Toronto, ON M7A 2J3

Re: NVCA Board Submission on the Proposed Regional Consolidation of Ontario's
Conservation Authorities

Dear Minister McCarthy,

On behalf of the Board of Directors of the Nottawasaga Valley Conservation Authority (NVCA), I am writing to provide our formal comments regarding the Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities pursuant to the enclosed resolution (see attachment 1), which our Board passed unanimously. Our staff will also be making a detailed submission through the Environmental Registry of Ontario.

As you know, conservation authorities were created by municipalities under provincial statute to deliver watershed-based resource management, hazard protection and local environmental stewardship. They are funded and governed locally because their work is most effective when aligned with the distinct conditions, needs and local priorities of the watersheds they serve. Today, municipalities provide between 25% and 50% of the operating funds that make conservation authority services possible, while the province contributes approximately 3%. The authority-municipality partnership is, therefore, both operational and financial, and inherently grounded in local accountability.

The NVCA Board supports the Province's goals of efficiency, service modernization, digitization and fiscal prudence. In fact, NVCA has already implemented many of these improvements, including: digital permitting; shared-service models; external service and cost-recovery reviews; and strengthened transparency and communication practices, which our past correspondence (see attachment 2) to you and your officials has outlined in greater detail. These changes demonstrate that meaningful modernization is already achievable within the existing watershed-based framework.

Our Board is not in favour of amalgamation. As you may know, earlier this year we carefully explored an amalgamation proposal to merge our authority with a neighbouring one. This proposal was opposed by our Board, as well as opposed by the overwhelming majority of our shared member municipalities.

We specifically have concerns with the proposed "Huron-Superior Regional Conservation Authority", which would merge NVCA with six other conservation authorities across a geographic span of over 1,400 kilometres and 78+ municipalities — from Thunder Bay through Northern Lake Huron and into fast-growing regions of Southern Ontario in the Greater Toronto Area. This configuration would combine watersheds and communities with little shared hydrology, climate, infrastructure reality or economic alignment. It would also impose transitional costs for governance restructuring, IT integration, human resources amalgamation and policy harmonization. These transitional costs could divert resources from frontline permitting, hazard management and restoration work that municipalities and residents rely on.

In addition, the proposed consolidation risks weakening the very local accountability and municipal partnership that underpin conservation authority effectiveness. Decisions about permitting, floodplain management and watershed planning are best made by those who understand local site conditions, municipal growth patterns and community needs. A distant, mega-regional structure merging the GTA, the North and rural regions may make it more difficult for builders, farmers and municipalities to receive timely advice, resolve issues early and keep critical housing and infrastructure projects on schedule. We are also worried about the possible loss of the municipal voice, given the lack of clarity around how future board governance would be conducted.

The Board also notes that two of the proposed consolidated authorities — the Lake Simcoe Region Conservation Authority and the Lakehead Region Conservation Authority — operate in distinct contexts. Lake Simcoe functions under its own statute and the Lake Simcoe Protection Plan, while Lakehead serves Northern Ontario communities with vastly different watershed and infrastructure challenges than our region. We believe a single administrative structure cannot reasonably or efficiently meet all of these unique requirements.

For these reasons, the NVCA Board does not support the proposed "Huron-Superior" configuration as presented. Instead, we request further provincial consultation directly with all affected municipalities and conservation authorities before finalizing any boundary decisions or legislative amendments.

Should the Province continue to explore consolidation, the NVCA Board believes there are more geographically coherent and fiscally responsible alternatives. For example, a model focusing only on merging conservation authorities with contiguous Georgian Bay-area watersheds may better achieve alignment, reduce transition costs and would preserve local accountability while maintaining Lake Simcoe Region and Lakehead Region as distinct entities appropriate to their unique legislative or geographic contexts. There may well be benefits to having consolidation across Georgian Bay from a service-delivery perspective and in accessing federal grants. We wish to be clear that consolidation is not our

preference, but if the province proceeds with consolidation, this approach is our recommendation.

We appreciate the opportunity to comment and would welcome direct dialogue with your Ministry as this important file proceeds. Our aim is to work to achieve the goals you are seeking, but in a manner we consider more likely to be effective. Protecting people, property, and our shared natural environment requires solutions that are efficient, fiscally responsible and firmly grounded in the realities of Ontario's diverse watersheds. We believe such outcomes are achievable, and we stand ready to contribute constructively to that work.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Scott', with a stylized, sweeping flourish extending from the end of the name.

Jonathan Scott
Chair, Board of Directors
Nottawasaga Valley Conservation Authority

cc:

Hon. Sylvia Jones, MPP for Dufferin—Caledon
Hon. Caroline Mulroney, MPP for York—Simcoe
Hon. Doug Downey, MPP for Barrie—Springwater—Oro-Medonte
Hon. Lisa Thompson, MPP for Huron—Bruce
Hon. Jill Dunlop, MPP for Simcoe North
Hon. Andrea Khanjin, MPP for Barrie—Innisfil
Brian Saunderson, MPP for Simcoe—Grey
Paul Vickers, MPP for Bruce—Grey—Owen Sound
Conservation Ontario
Association of Municipalities of Ontario
Member Municipalities in the Proposed Region
Grey Sauble Conservation Authority
Saugeen Valley Conservation Authority
Maitland Valley Conservation Authority
Ausable Bayfield Conservation Authority
Lake Simcoe Region Conservation Authority
Lakehead Region Conservation Authority

Attachment 1: NVCA Board Resolution

Attachment 2: Letter - NVCA's progress in modernisation, efficiency and accountability