

December 22, 2025

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**Re: Environmental Registry (ERO #025-1257).**

To Whom It May Concern,

After reviewing the available information, I recognize that the proposed changes to the Conservation Authorities Act and Bill 68 present both opportunities and significant concerns.

**Key Concerns:**

- The proposed merger process lacks detail regarding timelines, local governance, and transition strategies.
- There is a risk that these changes may undermine the core mandate of conservation authorities, particularly in flood control, groundwater protection, conservation land management, food security, and climate change mitigation, in favour of the developer rather than the public's interests.
- The current housing shortage, lauded as the reason for the proposed changes, is not due to a lack of developable land, but rather to construction labour shortages, infrastructure gaps (water and wastewater), high construction costs, weak pre-construction sales, a prolonged municipal planning process, and land banking practices. Data indicates there is ample land and shovel-ready units to meet housing needs within existing urban boundaries for the foreseeable future. The role of conservation authorities within the development process is minor compared to the other reasons mentioned, yet they are singled out for special treatment. Why?

**Potential Benefits of Amalgamation:**

- **Administrative Efficiency:** Reduced duplication and overhead, with potential cost savings and improved service delivery through centralized systems.
- **Policy Coordination:** Enhanced alignment with provincial priorities and consistent standards.
- **Capacity Building:** Larger agencies can pool resources and expertise for complex challenges.
- **Transparency:** Standardized processes and digital systems can improve public access and accountability.
- **Modernization:** Centralized digital permitting supports more responsive service.

## Risks and Challenges:

- **Loss of Local Governance:** Decision-making may become less responsive to local needs, diminishing community accountability and weakening local relationships.
- **Service Equity:** Smaller and rural communities may face reduced service levels and slower decision-making.
- **Transition Costs:** Governance restructuring and IT integration may divert resources from core programs.
- **Threats to Local Programs:** Standardization could jeopardize specialized local initiatives and watershed-based management.
- **Transparency and Consultation:** The proposal lacks a comprehensive cost-benefit analysis and sufficient engagement with municipalities and Indigenous communities.
- **Bilingual Service Risks:** Amalgamation may reduce access to French-language services.
- **Legal and Ethical Issues:** The transfer of donor lands and conservation easements raises compliance concerns.
- **Conservation Authority Foundations:** Do these registered charities and fundraising arms continue to exist to raise extra local funds to support projects beyond an Authority's core mandate (e.g., land acquisition, restoration, community education, and nature programming)?

Regarding the five specific discussion questions related to the amalgamation proposal, I offer the following views for consideration. These views are based on the lived experience of the January 1, 1999, amalgamation of Elora, Fergus, and the Townships of Nichol, Pilkington, West Garafraxa, and a portion of Eramosa into the Township of Centre Wellington, and on time spent serving on a municipal council and a conservation authority board.

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

#### A. Clear Governance and Decision-Making Framework

- Establish transparent, equitable governance structures with balanced representation from all member municipalities (i.e., single and upper tier only). It is unreasonable to expect direct representation for each of Ontario's 444 municipalities
- Define decision-making processes for budget approval, policy development, and significant operational changes
- Implement weighted voting systems where appropriate to reflect financial contributions and population

#### B. Stakeholder Engagement and Communication

- Maintain continuous dialogue with all stakeholders throughout the transition

- Create dedicated communication channels for municipalities, Indigenous communities, and the public
- Develop regular reporting mechanisms to keep stakeholders informed of progress and challenges

#### C. Preservation of Local Knowledge and Expertise

- Ensure retention of experienced staff and local conservation knowledge
- Establish knowledge transfer protocols between legacy authorities and the new regional structure
- Create regional advisory committees to maintain local input on watershed management

#### D. Service Continuity and Risk Management

- Develop a comprehensive transition plan that ensures the uninterrupted delivery of critical services
- Identify key service areas (flood forecasting, permitting, source water protection (includes Nutrient Management Act enforcement), conservation and management of Authority-owned and controlled lands, climate change mitigation) and establish continuity measures
- Implement risk assessment protocols to identify and mitigate potential disruptions

#### E. Financial Sustainability and Resource Allocation

- Establish explicit cost-sharing formulas that reflect municipal size, population, and assessment bases
- Create transparent budgeting processes with early consultation and feedback loops
- Develop long-term funding models (e.g., ten-year asset management plans, a provincial guaranteed liability insurance plan that offers lower premiums) that ensure financial stability. Liability insurance is a steadily increasing cost that dampens not only conservation authorities' efforts to provide public access to the outdoors but also those of outdoor associations. There has to be a better way of covering risk.

#### F. Inclusive Representation and Equity

- Ensure meaningful representation of all member municipalities, including smaller ones
- Consider Indigenous representation through dedicated seats or advisory roles
- Implement mechanisms for equitable decision-making that prevent dominance by larger municipalities

#### G. Capacity Building and Training

- Provide orientation and training for new board members and staff on regional governance
- Develop shared capacity-building programs to enhance technical skills across the region
- Establish mentoring relationships between experienced and new staff

#### H. Performance Monitoring and Evaluation

- Create clear performance metrics for the consolidated Authority
- Implement regular review processes to assess effectiveness and make adjustments
- Establish public reporting mechanisms to demonstrate accountability and outcomes

#### I. Legal and Regulatory Framework

- Ensure compliance with existing legislation (e.g., Conservation Authorities Act)
- Clarify roles and responsibilities in the new structure
- Address liability and risk management issues in the transition

#### J. Phased Implementation and Flexibility

- Adopt a gradual transition approach with opportunities for adjustment
- Allow for pilot programs in specific regions before full implementation
- Maintain flexibility to adapt the structure based on early experiences

#### K. Community and Indigenous Engagement

- Develop formal engagement protocols with Indigenous communities
- Create mechanisms for ongoing consultation on watershed management
- Ensure cultural sensitivity in all aspects of the transition

#### L. Technology and Data Integration

- Implement shared data systems for watershed monitoring and management
- Develop centralized platforms for service delivery and stakeholder communication
- Ensure data interoperability across the region

The success of this transition depends on balancing efficiency gains with the preservation of local knowledge and relationships. By prioritizing transparency, equity, and continuity, the consolidation can achieve its goals while maintaining the trust and support of all stakeholders.

## **2. What opportunities or benefits may come from a regional conservation authority framework?**

#### A. Enhanced Service Delivery and Efficiency

- Reduced administrative duplication through centralized operations
- Greater consistency in service standards across the region
- Improved resource allocation to front-line conservation work rather than administrative overhead
- Economies of scale in procurement, technology, and specialized staff

#### B. Stronger Technical Capacity

- Access to broader expertise through shared technical staff and specialized programs
- Better coordination of watershed-scale initiatives (e.g., flood forecasting, water quality monitoring, trail and railway development and maintenance)
- Improved data integration across jurisdictions for more effective decision-making

#### C. Improved Governance and Accountability

- More precise lines of responsibility for regional watershed management
- More transparent decision-making with standardized processes across municipalities
- Reduced governance complexity by consolidating multiple boards into one

#### D. Greater Resilience and Sustainability

- Long-term planning for climate change adaptation and watershed protection
- Strengthened source water protection through coordinated management
- Enhanced flood risk management with regional modelling and response systems
- Reinforced sustainable environmental conservation, converting abandoned land (e.g., pits, quarries, railway rights-of-way) to conservation lands for public access and recreational activities

#### E. Better Stakeholder Engagement

- Unified voice for conservation issues across the region
- More effective partnerships with Indigenous communities, landowners, and other stakeholders
- Streamlined consultation processes that reduce redundancy

#### F. Increased Public Trust and Confidence

- Consistent messaging and service delivery across the region
- Greater transparency in budgeting and decision-making
- Stronger accountability mechanisms for conservation outcomes

#### G. Improved Funding and Resource Allocation

- More efficient use of public funds through reduced administrative costs
- Better leverage of provincial and federal funding opportunities
- Enhanced ability to attract grants and partnerships for large-scale projects

#### H. Support for Local Communities

- Continuity of essential services (flood forecasting, permitting, water monitoring, climate change mitigation, conservation lands management and acquisition for recreational opportunities)
- Preservation of local knowledge through structured representation
- Opportunities for local input in regional decision-making

#### I. Innovation and Adaptation

- Faster adoption of new technologies and best practices
- Greater capacity to pilot innovative conservation approaches
- Improved ability to respond to emerging environmental challenges

#### J. Long-Term Sustainability

- Strengthened institutional capacity to manage watershed challenges
- Better preparation for future climate and environmental changes
- Enhanced ability to protect natural resources for future generations

These benefits are particularly relevant in the context of Ontario's proposed consolidation, where maintaining service continuity while improving efficiency and governance is a key objective. The transition period offers an opportunity to implement these improvements while preserving the valuable relationships and expertise built over decades of local conservation work.

### **3. 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?**

#### A. Board Size

- Optimal range: 12-18 members to balance:
  - Adequate representation across a larger geographic area
  - Ability to maintain quorum and conduct efficient meetings
  - Diversity of perspectives without becoming unwieldy

- Consider weighted voting as an alternative to huge boards, enabling smaller boards with votes proportional to municipal contributions or population, as practiced by Ontario's Conservation Authorities.

## B. Board Composition

### Municipal Representatives (majority)

- Proportional representation based on:
  - Municipal population and/or assessment base
  - Financial contribution to the Authority
  - Geographic distribution across the watershed
- Minimum of one representative per member (single and upper tier) municipality (for smaller municipalities)
- Larger municipalities could receive additional seats based on population thresholds

### Stakeholder/Expert Representatives (minority)

- Include 2 - 4 non-municipal members with expertise in:
  - Environmental science or watershed management
  - Agriculture and rural land use
  - Indigenous knowledge and perspectives
  - Community development or planning
- These members provide specialized knowledge, while municipal representatives maintain decision-making authority

## C. Appointment Process

### Municipal Representatives

- Council appointment: Each single and upper-tier municipal council appoints their representative(s), typically:
  - An elected councillor or mayor/warden (ensuring political accountability)

- Appointments are reviewed annually or at the start of council terms
- Transparent process for alternates when primary representatives are unavailable

#### Term Limits and Continuity

- Staggered terms (e.g., 2-3 years) to maintain institutional knowledge during transitions
- Allow reappointment to preserve expertise while enabling fresh perspectives
- Consider limiting consecutive terms to 4 to 6 years to encourage renewal

#### Selection Criteria

- Municipalities should consider appointing members with:
  - Interest/experience in environmental or water management issues
  - Ability to commit time to meetings and site visits
  - Understanding of both local and watershed-scale perspectives

### D. Governance Structure Options

#### Option 1: Single-Tier Board

- All single and upper-tier municipalities are represented on one board
- Simpler structure, but may become large
- Works well for smaller consolidations (under 15 municipalities). Consider limiting membership to single and upper-tier government representatives (e.g., Toronto, Wellington, Halton, Perth, Guelph, etc.).

#### Option 2: Two-Tier Structure

- Executive Board (8-12 members): Makes operational decisions, meets frequently
- Full Board/Council (all municipalities (single and upper tier only)): Approves budgets, strategic plans, and significant policies
- Balances efficiency with comprehensive representation

- Ontario's 444 municipalities are divided into 30 upper-tier, 241 lower-tier, and 173 single-tier municipalities, which makes it challenging to have a municipal representative on each board.

#### Option 3: Regional Committees

- Main board with sub-watershed or regional advisory committees
- Committees address local issues and make recommendations to the main board
- Ensures local concerns reach decision-makers while maintaining regional coordination

### E. Decision-Making Mechanisms

#### Voting Systems

- Simple majority for routine matters
- Weighted voting for budget approval (votes proportional to financial contribution)
- Super-majority (2/3 or 75%) for significant policy changes or strategic plan amendments
- Consider requiring support from a minimum number of municipalities (not just vote percentage) to prevent dominance by the most prominent members

#### Quorum Requirements

- Set at 50 - 60% of members to ensure broad participation
- Require representation from multiple geographic regions within the watershed for a quorum

### F. Transparency and Accountability

#### Public Engagement

- Open meetings with public delegation opportunities
- Live-streaming or recording of board meetings
- Apparent conflict of interest policies
- Annual public reporting on goals, performance, and finances

### Municipal Accountability

- Board members report back to their appointing councils regularly
- Annual presentations to each member municipality
- Transparent process for municipalities to provide direction to their representatives

### G. Transition Considerations

- Interim governance during consolidation with representation from legacy authorities
- Phased implementation, allowing adjustment of the structure after the initial operating period
- Review the clause requiring governance evaluation after 2-3 years of operation

### H. Indigenous Representation

- Consider dedicated seat(s) for Indigenous communities within traditional territories
- Develop nation-to-nation protocols for engagement beyond board representation
- Ensure Indigenous knowledge holders have meaningful input in decision-making

### I. Best Practices

- Provide orientation and training for new board members on:
  - Conservation authority mandate and legislation
  - Watershed science and management principles
  - Governance roles and responsibilities
  - Financial oversight
- Support board development through annual retreats and continuing education
- Establish clear roles and responsibilities, distinguishing board governance from staff operations

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

A. Governance Structure Design

- Establish clear representation frameworks that ensure all member municipalities have appropriate input in budget decisions, potentially through:
  - Proportional representation on governing boards based on municipal size or funding contributions
  - Regional committees or advisory groups representing different geographic areas
  - Defined voting mechanisms that protect smaller municipalities' interests

B. Budget Development Process

- Implement multi-stage consultation where:
  - Draft budgets are shared early with all member municipalities and their constituents for review and feedback
  - Municipal councils have designated periods to provide input before final approval
  - Regular financial reporting occurs throughout the year, not just at budget time
  - Budget assumptions and cost allocation methodologies are clearly documented and explained

C. Cost Allocation Transparency

- Develop clear, equitable formulas for distributing costs among municipalities that consider:
  - Assessment base and population
  - Geographic extent of services received
  - Watershed boundaries and specific program benefits
  - Historical funding arrangements during transition periods
- Publish these formulas and make them accessible to municipal staff and the public

#### D. Communication Mechanisms

- Create dedicated channels for ongoing dialogue:
  - Regular meetings with municipal treasurers and CAOs
  - Public budget documents with plain-language summaries
  - Online portals showing budget breakdowns by municipality and program
  - Annual reports demonstrating value and outcomes achieved

#### E. Accountability Measures

- Establish performance metrics tied to budget commitments
- Conduct regular audits and make results publicly available
- Create feedback mechanisms for municipalities to raise concerns about budget execution

### **5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?**

#### A. Communication and Transparency

- Maintain transparent and consultative budgeting processes across member municipalities within regional authorities
- Ensure service continuity during and after consolidation, particularly for critical programs like flood forecasting, permitting, conservation land management and acquisition, and source water protection

#### B. Preserving Local Knowledge and Expertise

- Draw on decades of local knowledge and partnerships that conservation authorities have built
- Balance expertise and capacity across the consolidated authorities to enhance technical skills while maintaining regional understanding
- Consider governance structures that ensure adequate representation from local municipalities and communities

### C. Inclusive Engagement

- Adopt an inclusive approach that takes account of stakeholder interests and encourages their involvement in all aspects of management and planning
- Continue coordinating the transition process with conservation authority, municipal, and stakeholder involvement, including Indigenous communities
- Build on existing long-term relationships with communities while engaging diverse groups, including youth

### D. Operational Improvements

- Leverage the regional structure to provide greater consistency and transparency in service delivery
- Free up resources for front-line conservation work by reducing administrative duplication
- Strengthen local partnerships by simplifying accountability between conservation authorities and municipalities

### **Conclusion:**

While amalgamation may offer efficiency and modernization, it also poses risks to local governance, service equity, and specialized programs. The transition could be costly and disruptive, with unresolved issues around transparency and consultation. It is essential to prioritize protecting flood control, groundwater resources, food security, conservation land management and acquisition, and climate change mitigation, and to ensure that local voices remain central in conservation efforts.

Thank you for considering my opinion.