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December 22, 2025

Re: Region of Waterloo submission to ERO Posting 025-1257, Bill 68, Schedule 3

On behalf of the Region of Waterloo, thank you for the opportunity to provide comments on the province's proposal to modernize Ontario's Conservation Authorities system, including the introduction of Bill 68 and the creation of the Ontario Provincial Conservation Agency (OPCA). We recognize and support the province's objectives to enhance consistency, improve permitting processes, modernize technical standards, and strengthen coordination across Ontario. These goals align with our shared commitment to effective watershed management.

A regional conservation authority framework offers several potential benefits. Standardized permitting and processes across regions could reduce complexity for municipalities and developers, while improved access to technical resources would help smaller municipalities address watershed management challenges more effectively.

While we appreciate the intent behind these proposed changes, concerns regarding the restructuring remain. Under the current proposal, the Grand River Conservation Authority (GRCA) would become part of the Lake Erie Regional Conservation Authority, encompassing approximately 25,000 km² and 81 municipalities, a minority of which are supplied by groundwater, with most others having access to lake water. The proposed changes risk weakening local accountability and watershed-specific focus that have historically underpinned Ontario's success in managing natural hazards, housing-enabling infrastructure planning, source water protection and watershed health.

The GRCA delivers essential, cost-effective watershed programs that directly support the Region of Waterloo's groundwater supply, drinking water protection, and wastewater compliance. The Region of Waterloo serves approximately 700,000 residents and represents one of Ontario's largest groundwater-based communities, with roughly 80% of its drinking water sourced from wells across a wide geographic area. Treated wastewater is discharged to the Grand River and its tributaries, which also serve as a drinking water source for the Region and downstream communities. This unique hydrogeologic context requires programs beyond those typically associated with watersheds serving lake-based communities. GRCA's programs are calibrated to balance:

- Flood management through reservoir and dam operations,
- Source water protection for municipal wells and surface water withdrawals,
- Wastewater assimilative capacity and phosphorus management, and
- Stakeholder coordination across rural and urban areas.

Any changes must preserve strong, formalized local representation for the Grand River watershed and maintain GRCA's tailored programs and technical capacity. Transition planning must prioritize staff retention and continuity of service to avoid delays in approvals and risk to environmental performance particularly considering Bill 56 changes to source water protection approval authorities.

To maintain local engagement, strengthen community relationships, and improve efficiency, adoption of a proven model such as Source Protection Regions – one that aligns with watershed boundaries, leverages shared resources, and keeps decisions locally informed - will better meet community needs while achieving provincial objectives.

Included below are responses to the discussion questions posed by the Ministry of the Environment, Conservation and Parks (MECP) via ERO posting 025-1257. Thank you for considering these comments. The Region of Waterloo looks forward to continued collaboration with the province to ensure that modernization efforts enhance efficiency with local accountability and watershed-based decision-making.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod Regier". The signature is fluid and cursive, with a prominent loop at the end.

Rod Regier

Commissioner, Planning, Development and Legislative Services

ERO #025-1257: Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities

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

To ensure a successful transition, the Region of Waterloo emphasizes four critical factors for that should be considered to safeguard local priorities and maintain the integrity of programs critical to drinking water security and watershed health.

1. Preserve Watershed-Specific Program Delivery

The Region of Waterloo faces unique water management constraints as one of Ontario's largest groundwater-based communities, serving approximately 700,000 residents. Approximately 80% of drinking water comes from over 100 wells across a wide geographic area, and treated wastewater is discharged to the Grand River - a water supply source also relied on by the Region and downstream communities. This unique hydrogeologic context is fundamentally different from the lake-based water systems that comprise much of the proposed Lake Erie Regional Conservation Authority. Accordingly, the GRCA's watershed-specific infrastructure and programs, including maintenance and operation of dams and reservoirs, water quantity and quality monitoring and modeling, and land management programs, are calibrated to balance:

- Flood management;
- Drinking water supply and source water protection for municipal wells and surface water withdrawals;
- Wastewater assimilative capacity; and
- Stakeholder coordination across rural and urban areas.

2. Maintain Local Governance Structures and Administration of Critical Programs

The Region of Waterloo recommends that any future governance model include defined voting representation from the GRCA and the Region of Waterloo, supported by mechanisms such as *watershed advisory committees* to ensure technical input informs decisions. These measures are essential to maintain accountability and reflect local hydrogeology, infrastructure constraints, and downstream water needs.

Critical programs must remain locally administered to protect drinking water security and wastewater compliance. The *Rural Water Quality Program* provides immediate source protection benefits and supports future phosphorus offsetting strategies, relying on trusted relationships with rural landowners built over decades. Similarly, the *Wastewater Treatment Optimization Program* and *Grand River Water Quality Model* are vital for understanding assimilative capacity and guiding infrastructure investments to maintain river health. Centralizing these programs risks eroding trust and reducing effectiveness.

3. Ensure Staff Retention and Continuity of Service

Retaining GRCA staff with local expertise and community relationships is critical to avoid delays in approvals and maintain environmental performance during transition. Effective watershed management depends on integrated knowledge of hydrology, natural hazards, ecology, and planning combined with familiarity of sub-watershed conditions. Preserving this institutional knowledge and capacity will prevent service interruptions, slower approvals, and loss of critical partnerships with landowners and municipalities.

4. Clarify Source Protection Authority Roles Under Bill 56

A critical factor for a successful transition is clarity on how GRCA's Source Protection Authority functions will be maintained. It remains unclear how changes to conservation authority boundaries will affect these responsibilities. MECP must provide clear delegations, adequate staffing, and enforceable performance standards to ensure expedited approval timelines envisioned under Bill 56 are achievable post-consolidation.

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

A regional conservation authority framework offers several potential benefits. Standardized permitting and processes across regions could reduce complexity for municipalities and developers, while improved access to technical resources would help smaller municipalities address watershed management challenges more effectively. Consolidation also presents an opportunity to enhance consistency and efficiency in service delivery, ensuring uniform application of policies and technical standards. Finally, the framework could have extended conservation authority jurisdiction to unserved areas - a missed opportunity that would strengthen watershed protection province-wide and allow other communities to benefit from programs that have given the Region of Waterloo a strong advantage, promoting greater equity across Ontario.

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?

The proposed Lake Erie Regional Conservation Authority Board must include defined, voting representation from the Grand River Conservation Authority and the Region of Waterloo to ensure decisions reflect local hydrogeology, infrastructure constraints, and downstream water uses and needs. Any next steps must preserve strong, formalized local representation for the Grand River watershed and maintain GRCA's tailored programs and technical capacity. To achieve this, MECP should also consider mechanisms such as watershed advisory structures (e.g., standing watershed committees) to ensure technical input from GRCA staff and watershed municipalities informs board decisions. These measures will

help maintain accountability, safeguard local expertise, and ensure that governance decisions remain grounded in the unique conditions and priorities of each watershed within the larger regional framework.

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

The funding model for the proposed Ontario Provincial Conservation Agency (OPCA) needs to be designed in such a way that municipalities have a formal avenue to participate in its oversight. In absence of this participation, significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs remain. Because the Region funds GRCA operations, it is essential that the Region have a clear role in setting budgets and service-level commitments. Without this, variations in land type, fee structures, property assessments, and asset conditions could create inequities and unexpected financial pressures for municipalities, and in-turn, impact affordability for residents.

For example, the GRCA's \$1-billion in floodplain infrastructure and 50,000 acres of conservation land must remain dedicated to local watershed priorities. There is a risk that GRCA's well-developed reserves will be redistributed to support capital needs in other watersheds that have not made comparable investments, resulting in a weakening of GRCA's mature and efficient infrastructure maintenance program. A transparent apportionment formula based on criteria such as assessment value, population, and portion of watershed area located within municipalities is currently used and could be used moving forward.

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

Regional conservation authorities can maintain and strengthen relationships with local communities and stakeholders by ensuring decision-making remains grounded in local context and collaboration. While modernization can improve efficiency, if not executed properly, overly large regional models risk distancing decisions from the municipalities and communities they serve. The Grand River watershed demonstrates the value of locally informed governance with its integrated flood-management infrastructure and programs that depend on close partnerships with the Region and community stakeholders.

To preserve these relationships, regional conservation authorities should adopt a smaller regionally focused model such as Source Protection Regions, which offer a proven approach. The Source Protection Region model balances efficiency with local engagement, aligns with science-based watershed boundaries, and enables shared technical resources without sacrificing tailored services. Ontario currently has 19 Source Protection Regions, which operate within manageable geographic areas while maintaining strong community involvement.

By operating within geographic areas that reflect watershed realities, authorities can continue customizing services to local environmental, social, and economic needs, ensuring that modernization strengthens rather than erodes community connections. Aligning with Source Protection Regions would better achieve provincial objectives while preserving the strengths of Ontario's watershed-based system in collaboration with its municipal partners and community stakeholders.