



**Nottawasaga Valley**  
Conservation Authority

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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 flourish extending from the end.

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



Attachment 1 of 2: NVCA Board Resolution

**Discussion on NVCA Boards position on Provincial Conservation Authority changes**

Recommendation:

RES: 83-25

Moved by: Cllr. Ralph Manktelow

Seconded by: Cllr. Joel Loughead

**WHEREAS:** the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities (CA), and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and

**WHEREAS:** local municipalities collectively currently provide between 25% and 50% of total conservation authority funding, while the Province of Ontario provides approximately 3%; and

**WHEREAS:** conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; 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 that would create an Ontario Provincial Conservation Agency to provide centralized oversight and direction under the *Conservation Authorities Act*, with a municipal cost apportionment yet to be defined; and

**WHEREAS:** under this proposal, the Nottawasaga Valley Conservation Authority (NVCA) would be merged into a new "Huron-Superior Regional Conservation Authority" together with the:

1. Ausable Bayfield CA;
2. Maitland Valley CA;
3. Saugeen Valley CA;
4. Grey Sauble CA;
5. Lake Simcoe Region CA; and
6. Lakehead Region CA

forming a single organization stretching from Thunder Bay and Lake Superior through northern Lake Huron, Simcoe, Dufferin, Bruce, and Grey counties, York Region, Kawartha Lakes, and Durham regions; and

**WHEREAS:** the Board acknowledges and supports the Province's goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed "Huron-Superior" configuration would:

1. Create a geographically vast and administratively complex entity of 78+ different municipalities joining Northern, rural and fast-growing southern municipalities in the Greater Toronto Area with little shared watershed connection or economic alignment;
2. Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;
3. Generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's own business-planning principles of value for money, cost containment and service continuity; and
4. Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda; and

**WHEREAS:** the NVCA has already undertaken significant modernization work aligned with provincial objectives that demonstrates meaningful modernization can occur within the current watershed-based governance framework, including:

- implementation of a digital permitting and inspection system that has reduced turnaround times;
- adoption of shared-service arrangements in Corporate Services;
- independent service reviews identifying opportunities for cost recovery and efficiency; and
- measurable improvements in transparency and client communication; and

**WHEREAS:** the Board notes that the Lake Simcoe Region Conservation Authority operates under the *Lake Simcoe Protection Act* and Lake Simcoe Protection Plan, a unique legislative framework requiring distinct governance and reporting; and

**WHEREAS:** the Board further recognizes that the Lakehead Region Conservation Authority serves Northern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, which would be ill-served by a single administrative structure extending to the Greater Toronto Area and physically based over 1,400 km away: and

**WHEREAS:** if the Province proceeds with reducing the number of conservation authorities, the Board believes a more geographically coherent and fiscally responsible alternative would be to consolidate only those conservation authorities with contiguous watersheds draining to Georgian Bay while maintaining the Lake Simcoe Region CA as distinct entity in recognition of its unique legislative

framework and having Lakehead Region CA form the Northwestern Ontario Regional Conservation Authority reflecting its unique regional context;

**THEREFORE BE IT RESOLVED THAT:**

1. The Board of Directors does not believe that the amalgamation is required and does not support the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257; and
2. The Board instead endorses further provincial evaluation of a more focused specific model that is a more geographically coherent, cost-effective, and locally accountable alternative to advance the government's priorities of efficiency, red-tape reduction and timely housing delivery; and
3. The Board requests that the Ministry engage directly with the 78+ affected municipalities and conservation authorities across Simcoe, York, Durham, Kawartha Lakes, Bruce, Huron, Dufferin, Grey, Lambton, and Northern Ontario before finalizing any consolidation boundaries or legislative amendments; and
4. That this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:
  - the Minister of the Environment, Conservation and Parks and his Opposition critics;
  - local Members of Provincial Parliament;
  - the Association of Municipalities of Ontario and Conservation Ontario; and
  - the Boards of the Grey Sauble, Saugeen Valley, Maitland Valley, Ausable Bayfield, Lake Simcoe Region and Lakehead Region Conservation Authorities.
5. Staff be directed to prepare NVCA's formal response to Environmental Registry Notice No. 025-1257.
  - The response shall reflect NVCA's position on maintaining effective watershed-based management, local accountability, and service continuity for member municipalities and stakeholders.
  - Staff shall submit the finalized response to the Environmental Registry of Ontario by the stated deadline and circulate a copy to the Board for information.

**Carried;**



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

29 October 2025

By EMAIL

Mr. Hassaan Basit  
Chief Conservation Executive  
2nd Floor, 200-6733 Mississauga Rd  
Mississauga, ON L5N 6J5

RE: NVCA's progress in modernisation, efficiency and accountability

Dear Mr. Basit:

On behalf of the Nottawasaga Valley Conservation Authority (NVCA), we extend our congratulations on your appointment as Ontario's first Chief Conservation Executive. Your leadership comes at a pivotal moment as conservation authorities work to deliver faster, more transparent and more consistent service while supporting the province's goals for housing, infrastructure and climate resilience.

Over the past several months, the NVCA has undergone a deliberate, comprehensive transformation. Guided by our Board and new Chief Administrative Officer, we have modernised our systems, streamlined operations and instilled a culture of continuous improvement.

Key achievements include:

- Faster, more predictable permitting. We have cleared a backlog of more than 100 files, introduced e-permitting and digital workflows that save staff an average of 45 minutes per application, and as of September 2025 have achieved 95 per cent compliance with provincial review timelines, with a new average permit delivery timeframe of just 16 days.
- A new triage system allows straightforward applications to move quickly so staff can focus on complex, higher-risk files.

- A 90 per cent customer-satisfaction rating, up from 68 per cent in 2022, reflects our stronger focus on service, communication and problem-solving.
- A leaner, more transparent budget. Following a line-by-line review, 21 of 27 expense categories were reduced or held flat with our operating budget declining by some \$9000 with no service reductions. Category 3 charges were reduced by 31 per cent through proper reclassification of core hazard-mitigation work.
- Partnership with industry and municipalities. Our working group with the Building Industry and Land Development Association (BILD) fosters earlier collaboration and shared solutions, while regular municipal briefings enhance transparency and trust.

These reforms reflect a clear shift in culture. Our role is to apply science and local insight to help communities grow safely and sustainably. We are proving that conservation authorities can deliver both protection and progress.

We would welcome the opportunity to meet with you to discuss how our modernisation work aligns with your mandate to create a more effective, consistent and outcomes-driven conservation-authority sector.

Thank you for your attention and for your leadership in this important portfolio.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Scott', with a stylized flourish at the end.

Jonathan Scott

Chair, Nottawasaga Valley Conservation Authority

cc:

All MPPs representing the Nottawasaga Watershed; Dufferin County Council; Simcoe County Council; Grey County Council.