

Chief Executive Officer



December 15, 2025

POL-2025-00080  
VIA EMAIL  
[ca.office@ontario.ca](mailto:ca.office@ontario.ca)

Public Input Coordinator  
Ministry of the Environment, Conservation and Parks  
Conservation and Source Protection Branch  
300 Water Street North Tower, 5<sup>th</sup> Floor  
Peterborough, ON K9J 3C7

**Re: ERO #025-1257 Proposed boundaries for the regional consolidation of Ontario's conservation authorities**

Thank you for the opportunity to provide comments on the Ministry of Environment, Conservation and Parks Environmental Registry of Ontario (ERO) posting, "Proposed boundaries for the regional consolidation of Ontario's conservation authorities".

Toronto and Region Conservation Authority's (TRCA) Board of Directors endorsed the report on the [Ontario Provincial Conservation Agency \(Bill 68\) and Proposed Regional Consolidation of Ontario's Conservation Authorities \(ERO# 025-1257\)](#) at its meeting on November 28, 2025 adopting Resolution A#155/25 as follows:

*WHEREAS on November 6, 2025, Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 was introduced into the legislature and proposes to amend, among other Acts, the Conservation Authorities Act to create the Ontario Provincial Conservation Agency (the Agency);*

*AND WHEREAS the Agency would be a provincial board-governed agency to provide centralized leadership, efficient governance, strategic direction, and oversight of Ontario's conservation authorities;*

*AND WHEREAS on November 7, 2025, the Ministry of Environment, Conservation and Parks (MECP) posted "Proposed boundaries for the regional consolidation of Ontario's conservation authorities" for public comment on the Environmental Registry of Ontario (ERO# 025-1257) for a 45-day period ending December 22, 2025;*

*AND WHEREAS the Agency would oversee the transition to a regional watershed-based framework for authorities in Ontario;*

*THEREFORE LET IT BE RESOLVED THAT:*

*TRCA supports the province's proposal to keep TRCA's watershed boundaries and TRCA Board governance structure intact;*

*TRCA requests that the proposed re-naming of TRCA to Central Lake Ontario Regional Conservation Agency be abandoned;*

*That all costs of the new Agency and the proposed regional consolidation and with any transition be entirely borne by the Province;*

*That TRCA staff continue to participate in the consultation to provide TRCA's advice on best practices from our experience successfully delivering programs as Ontario's most highly populated CA;*

*That this report on the Agency and ERO# 025-1257 be received and that any comments from the Board of Directors help inform TRCA's final submission to the ERO;*

*AND FURTHER THAT the Clerk and Manager, Policy, so advise TRCA's partner municipalities and Conservation Ontario.*

The above noted report (Attachment 1), which forms part of this ERO submission, provides an overview of the amendments to the Conservation Authorities Act in Schedule 3 of Bill 68: Plan to Protect Ontario Act (Budget Measures), 2025 to create the Ontario Provincial Conservation Agency and an analysis of the ERO posting on the proposed consolidation of Ontario's 36 conservation authorities into seven regional conservation authorities. In the proposal, the watershed-based boundaries of TRCA's jurisdiction are proposed to remain the same with our name proposed to change to Central Lake Ontario Regional Conservation Authority.

Since the release of Bill 68 and ERO posting, TRCA staff have been engaged with officials at the Province involved in this process, including the Chief Conservation Executive and we participated in MECP's Regional Engagement Session held on November 25, 2025 with municipalities and conservation authorities. TRCA has expressed our appreciation for keeping our watershed boundaries intact in the current proposal. We have also communicated legal, governance, financial and administrative implications of the proposal as outlined in our Board report. This includes the potential disruption and cost involved with our proposed name change or any potential changes to TRCA's boundaries that could be an outcome of the provincial consultation process.

To accelerate informed decision-making and achieve efficiencies in support of provincial priorities, TRCA has also prepared a suite of recommendations in Attachment 2 for consideration by MECP and the Chief Conservation Executive. These recommendations have been developed based on our experience of successfully delivering programs and services as

Ontario's most highly populated and growing CA. We would welcome the opportunity to meet with Ministry staff to have a focused discussion on these recommendations.

Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at [john.mackenzie@trca.ca](mailto:john.mackenzie@trca.ca).

Sincerely,

<Original signed by>

John MacKenzie, M.Sc.(PI) MCIP, RPP  
Chief Executive Officer

Encl.

Attachment 1: Report to Board of Directors: Ontario Provincial Conservation Agency (Bill 68) and Proposed Regional Consolidation of Ontario's Conservation Authorities (ERO# 025-1257)

Attachment 2: Recommendations to Accelerate Informed Decision-Making and Achieve Efficiencies

**Section I – Items for Board of Directors Action**

**TO:** Chair and Members of the Board of Directors  
Friday, November 28, 2025 Meeting

**FROM:** John MacKenzie, Chief Executive Officer

**RE:** **ONTARIO PROVINCIAL CONSERVATION AGENCY  
(BILL 68) AND PROPOSED REGIONAL  
CONSOLIDATION OF ONTARIO’S CONSERVATION  
AUTHORITIES (ERO# 025-1257)**

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**KEY ISSUE**

To provide an overview of the proposed amendments to the Conservation Authorities Act in [Schedule 3](#) of [Bill 68](#), Plan to Protect Ontario Act (Budget Measures), 2025 to create the Ontario Provincial Conservation Agency (OPCA) and an analysis of the Ministry of Environment, Conservation and Parks’ (MECP) posting of the “[Proposed boundaries for the regional consolidation of Ontario’s conservation authorities](#)” on the Environmental Registry of Ontario (ERO# 025-1257) for a commenting period ending December 22, 2025.

**RECOMMENDATION:**

**WHEREAS** on November 6, 2025, Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 was introduced into the legislature and proposes to amend, among other Acts, the Conservation Authorities Act to create the Ontario Provincial Conservation Agency (the Agency);

**AND WHEREAS** the Agency would be a provincial board-governed agency to provide centralized leadership, efficient governance, strategic direction, and oversight of Ontario’s conservation authorities;

**AND WHEREAS** on November 7, 2025, the Ministry of Environment, Conservation and Parks (MECP) posted “Proposed boundaries for the regional consolidation of Ontario’s conservation authorities” for public comment on the Environmental Registry of Ontario (ERO# 025-1257) for a 45-day period ending December 22, 2025;

**AND WHEREAS the Agency would oversee the transition to a regional watershed-based framework for authorities in Ontario;**

**THEREFORE LET IT BE RESOLVED THAT;**

**TRCA supports the province's proposal to keep TRCA's watershed boundaries and TRCA Board governance structure intact;**

**TRCA requests that the proposed re-naming of TRCA to Central Lake Ontario Regional Conservation Agency be abandoned;**

**That all costs of the new Agency and the proposed regional consolidation and with any transition be entirely borne by the Province;**

**That TRCA staff continue to participate in the consultation to provide TRCA's advice on best practices from our experience successfully delivering programs as Ontario's most highly populated CA;**

**That this report on the Agency and ERO# 025-1257 be received and that any comments from the Board of Directors help inform TRCA's final submission to the ERO;**

**AND FURTHER THAT the Clerk and Manager, Policy, so advise TRCA's partner municipalities and Conservation Ontario.**

## **BACKGROUND**

On October 31, 2025, the Minister of the Environment, Conservation and Parks announced the Government's intention to introduce legislation which, if passed, would amend the Conservation Authorities Act (CA Act) to create the Ontario Provincial Conservation Agency (Agency), a provincial board-governed agency to provide centralized leadership, efficient governance, strategic direction, and oversight of Ontario's conservation authorities.

### **Ontario Provincial Conservation Agency**

Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 was introduced in the legislature on November 6, 2025. Schedule 3 of Bill 68 contains amendments to the CA Act to enable the creation of the OPCA (the Agency), including:

- Establishing the objects of the agency;
- Setting out the governance of the proposed agency;

- Establishing tools for agency oversight of conservation authorities;
- Establishing provincial oversight of the agency; and
- Setting out sources of agency funding.

The proposed objects of the Agency are the following:

1. Oversee the governance of authorities and other aspects of authorities such as their operations, including the programs and services they provide, to further the purposes of the Act;
2. Oversee the transition to a regional watershed-based framework for authorities in Ontario;
3. Promote consistent policies, standards and fees for programs and services provided by authorities;
4. Assess and report on the effectiveness of authorities in furthering the conservation, restoration, development and management of natural resources in watersheds in Ontario, including outcomes related to the implementation of their programs and services;
5. Oversee and evaluate the financial performance of authorities to ensure their long-term operational and capital financial sustainability, including the financial sustainability of their programs and services required under section 21.1;
6. Guide and evaluate the strategic planning by authorities to ensure it aligns with provincial objectives;
7. Support the development and implementation of a standardized and centralized system for processing applications for permits issued by authorities;
8. Lead the development and implementation of digital strategies and shared services to support the operations of authorities, including their programs and services;
9. Support strategic investment in programs and services provided by authorities, including leveraging funding available to Ontario and authorities;
10. Advise the Government of Ontario in respect of the programs and services authorities provide under the Act and any matters related to the objects of the agency; and
11. Any other objects prescribed by regulation.

The proposed Agency will be board-governed with at least five and not more than 12 board members, with one Chair and up to two Vice Chairs, appointed by the Lieutenant Governor in Council. MECP will provide

oversight of the Agency and will also retain policy responsibility for the CA Act and associated regulations. Where the Minister considers it to be in the public interest to do so, the Minister may issue directions to the Agency.

The Agency will provide province-wide coordination, strategic direction and oversight of Ontario's conservation authorities (CAs). Delivery of local programs and services would continue to be led by CAs. The Agency may issue directions and/or guidelines to one or more authorities to address matters such as key performance indicators, key results or service delivery targets, service standards, information technology, procurement, training of members and employees, budgeting, asset management plans and strategic planning.

The proposed Agency funding sources include provincial funding, fees for services and cost recovery from conservation authorities.

Bill 68 passed Third Reading on November 24, 2025, and most of the provisions of the Agency in the CA Act will come into effect upon Royal Assent.

### **Proposed Regional Consolidation of CAs (ERO# 025-1257)**

On November 7, 2025, MECP posted a proposal on the Environmental Registry of Ontario ([ERO 025-1257](#)) seeking feedback on proposed boundaries for the consolidation Ontario's 36 conservation authorities into seven regional conservation authorities (Attachment 1), and the criteria applied to inform the proposed boundaries. The policy proposal notice includes maps depicting the proposed boundaries for the regional conservation authorities and discussion questions relevant to the planning for the future state. In the proposal, the watershed-based boundaries delineating TRCA's jurisdiction are proposed to remain the same with our name to change to Central Lake Ontario Regional Conservation Authority (Attachment 2).

No changes are proposed to the overall extent of conservation authority jurisdiction within the province, and under consolidation, the new regional conservation authorities would remain independent organizations operating with municipal governance and oversight, in accordance with requirements under the CA Act, as administered by MECP.

In addition, the ERO posting notes that the important work that conservation authorities do to protect people and property from the risks of

flooding and other natural hazards will not change. The regional conservation authorities would continue to fulfill provincially mandated programs such as drinking water source protection under the Clean Water Act, regulating, development and other activities in areas at risk of natural hazards like flooding and erosion (e.g. floodplains, shorelines, watercourse and wetlands), flood forecasting and warning, and managing their lands and recreational trails so that Ontarians have access to local natural areas and outdoor activities.

The posting also indicates that regional conservation authorities would continue to provide municipal and other watershed programs and services set out under the CA Act such as tree planting, data collection, restoration and other integrated watershed management activities that enhance the resilience of local watersheds and educate and engage local communities.

The ERO posting lists the following questions to assist in receiving feedback and planning for the future state:

- What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?
- What opportunities or benefits may come from a regional conservation authority framework?
- 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?
- Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?
- How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

### **MECP Virtual Information Session**

On November 18, 2025, MECP held a virtual information session for CAs to provide an overview of the Ontario Provincial Conservation Agency and the proposed regional consolidation of CAs. MECP indicated that the Agency is intended to provide province-wide coordination, shared digital and technical resources, and consistent practices that strengthen the work of regional conservation authorities.

CAs were advised that MECP and the Office of the Chief Conservation Executive will consider all feedback received during the consultation on the proposed boundaries for regional consolidation and to inform the proposed path forward. MECP will undertake further consultation at a future date on any additional proposed legislative and regulatory changes needed to enable regional consolidation.

The new Agency would lead the transition to regional CAs with CA, municipal and stakeholder involvement, including providing guidance support through the consolidation process. Changes are not intended to be initiated until after municipal elections in October 2026. Existing Board members would continue to serve until the expiration of their terms next year.

### **MECP Regional Engagement Session**

MECP also advised during the Information Session that dates for regional meetings for municipalities and CAs, based on the proposed structure, would be forthcoming to receive feedback.

On November 25, 2025, TRCA's CEO received an invitation from MECP to attend an in-person Regional Engagement Session to be held on Monday, December 1, 2025, with a request to limit participation to a maximum of two delegates from our organization. Per the invitation, this engagement session will provide an opportunity for municipalities and conservation authorities to receive an overview of the proposal and participate in facilitated discussions.

## **RATIONALE**

### **Proposed Response to ERO# 025-1257**

On the basis of TRCA's understanding to date of Schedule 3 of Bill 68, the details in the ERO posting and the virtual MECP Information Session, the following are the key messages TRCA proposes to incorporate in our submission to the ERO, subject to input received from the Board of Directors.

### **Criteria - Regional consolidation of CAs**

The ERO posting sets out the criteria used to determine the proposed Regional CA boundaries, which includes maintaining watershed-based

jurisdictions, relationships between conservation authorities and municipalities, balancing expertise and capacity across conservation authorities and service continuity.

As already noted, TRCA's watershed boundaries are proposed to remain the same in the new regional CA framework but with our name proposed to change to Central Lake Ontario Regional Conservation Authority (Attachment 2). Since the release of the legislation and posting, TRCA's CEO has been speaking with officials at the Province involved in this process, including the Chief Conservation Executive, and expressed appreciation for keeping our watershed boundaries intact in the current proposal. In doing so, the criteria that are so critical and foundational to TRCA, (e.g., watershed-based, municipal, local community and stakeholder partnerships, service continuity, informed by science, etc.) will be preserved and avoid disruption to the delivery of the high-quality programs and services to our municipalities and communities that TRCA serves.

TRCA has also communicated concerns about the financial impact associated with our proposed name change. Based upon a preliminary analysis, renaming would result in substantial costs and staff time to implement across the organization (e.g., communications, brand identity, digital/information technology, cybersecurity, finance and administration, legal and property services, rebranding of facilities, parks, physical assets, uniforms, etc.). Given the fiscal and brand identity implications, TRCA recommends that our current name be retained.

### **Future State: Governance and Budget Process**

The questions in the ERO posting are also seeking feedback on matters related to governance, transparent and consultative budget process and community and stakeholder relationships to inform the successful transition and outcome of the proposed regional CA framework. In this regard, as TRCA is proposed to remain intact as a regional CA, albeit with a proposed name change, it is recommended that our current governance structure of the Board of Directors, Executive Committee (with delegated powers of the Board), Board subcommittees, and current comprehensive, consultative and transparent budgeting process also remain intact to support the continued operations and successful delivery of TRCA's programs, services and projects.

As indicated by MECP, changes are not intended to be initiated until after

municipal elections in October 2026 and existing Board members would continue to serve until the expiration of their terms next year. It is anticipated that much of the work related to governance in the new RCA structure will occur in the next phase of MECP's consultation process involving legislative and regulatory changes to enable the regional consolidation.

**Implications of Regional Consolidation to Source Protection Regions**

Further clarification is required on how the proposed consolidation of 36 conservation authorities into seven regional conservation authorities (RCA) will impact existing Source Protection Regions (SPR), source protection authority boards, source protection committees, assessment reports, work planning structure, etc.

The Credit Valley – Toronto and Region – Central Lake Ontario (CTC) Source Protection Region (SPR) consists of three Source Protection Areas (SPA): Credit Valley SPA (CVSPA), Toronto and Region SPA (TRSPA) and Central Lake Ontario SPA (CLOSPA). The current ERO proposal will place the three CTC Region CAs into parts of three regional CAs. CVC will be consolidated into the Western Lake Ontario RCA and CLOCA will be consolidated into the Eastern Lake Ontario RCA. In the current CTC SPR, CVC is the lead source protection authority and CLOCA provides the file management system for the CTC SPR. CTC staff are undertaking an analysis of the implications of the ERO proposal on the CTC SPR and will be reporting to the Source Protection Committee at their meeting on December 10, 2025.

**Legal, Corporate and Administrative Implications**

TRCA's understanding of the legal, corporate, and administrative implications of the legislative changes and ERO proposal are ongoing and subject to further analysis to determine financial implications. We have not received clarification on whether the Province will cover costs associated with the new proposed boundary changes (if at the outcome of the consultation they impact TRCA) and TRCA's proposed name change. At this point, and without clarification that costs will be entirely covered by the Province, TRCA staff have identified potential negative financial impacts of this proposal. For example, even though our watershed boundaries are proposed to stay intact, as noted earlier, estimated costs for the proposed name change from TRCA to Central Lake Ontario Regional Conservation Authority are extensive. These working estimates of financial impacts can

be discussed in Closed Session.

Other immediate areas of concern that have arisen from reviewing the legislation and ERO questions relate to the potential financial risk or pressure posed by the powers granted for the Agency which include raising or levying funds from CAs. This is of particular concern as TRCA receives extremely limited stable funding from the Province (on average less than 400k per year of Section 39 CA Act related funding) and is already facing significant financial pressure related to delivering on its provincially mandated functions such as protecting wetlands and natural hazards. TRCA's financial situation related to protecting the provincial interest is also worsening due to the development fee freeze imposed by the Province for the last three years. In addition, TRCA also manages extensive provincial land holdings at a growing cost to TRCA and its municipalities. Any levy that might come from this new provincial agency would only increase these financial pressures to TRCA and its municipal partners.

While the current ERO proposal mapping shows TRCA's watershed boundaries as remaining intact, we understand neighbouring CA's have resolved to oppose their proposed consolidation. If the Province decided to enlarge or change TRCA's boundaries in response to opposition by other CA's or based on stakeholder input received during this consultation, such a change would result in extensive human resource, and corporate and administrative costs to TRCA and partner CAs that have not been budgeted for. Work underway on potential costs and human resource impacts can be discussed further in Closed Session.

The ERO posting notes that the newly created Agency plans to focus on service delivery targets, service standards, information technology, procurement, training of members and employees, budgeting, asset management plans, and strategic planning. TRCA is already high performing or is in the latter stages of modernization work in these areas. Therefore, it would be challenging to understand how the Province could justify levying TRCA in these areas where consolidation is not proposed and where corporate sophistication (e.g., municipally supported budget processes, updated asset management plans, multi-year strategic plan, modern corporate policies and systems, onboarding and learning programs, etc.) is already in place. For example, TRCA's accomplishments including Certificate of Recognition (COR) certification and GTA Top Employer and Greenest Employer recognition along with high performance

on permitting, program and project delivery are often recognized as best practices in the CA, municipal, and government agency sector.

The Agency will have a Board structure and can with Ministerial support also direct a change in TRCA Board governance. TRCA's Board has been well-established to represent its diverse municipalities and a population of over 5 million people living within TRCA's jurisdiction. TRCA's Board structure, Executive Committee, subcommittees and working groups (e.g., BILD/Industry Working Group) have been tailored to address the needs of our municipal, agency, community and industry partners. TRCA's existing governance structure that has been established over time reflects previous historic watershed consolidations and works well for our municipalities and agency partners. TRCA staff will be requesting the Province to keep TRCA's governance structure intact. Lastly, with the new Agency Board structure as outlined in the legislation, TRCA staff will be suggesting that the Province consider how municipalities in TRCA's jurisdiction would be represented on this new Agency Board.

**Relationship to TRCA's 2023-2034 Strategic Plan**

This report supports the following Pillars and Outcomes set forth in TRCA's 2023-2034 Strategic Plan:

**Pillar 1 Environmental Protection and Hazard Management:**

- 1.1 Deliver provincially mandated services pertaining to flood and erosion hazards

**Pillar 2 Knowledge Economy:**

- 2.4 Integrate environmental considerations and science into decision making

**Pillar 3 Community Prosperity:**

- 4.2 Provide and manage an efficient and adaptable organization

**Pillar 4 Service Excellence:**

- 4.3 Responsive relationships and a trusted brand with a reputation for excellence

**FINANCIAL DETAILS**

Staff are engaged in the policy analysis work per the normal course of duty, with funding support provided by TRCA's participating municipalities to account 120-12. No additional funding is proposed to support the policy analysis work associated with the preparation of these comments.

**DETAILS OF WORK TO BE DONE**

Staff are undertaking the following next steps:

- Receive input from the Board of Directors at this meeting and any follow up discussions to help inform TRCA's submission to the ERO;
- Attend the MECP Regional Engagement Session on December 1, 2025;
- Participate in ongoing engagement with Conservation Ontario, CAs, CTC SPAs, municipal partners and stakeholders, etc.;
- Finalizing TRCA's submission to MECP in response to the ERO; and
- Continue to inform the Board of Directors on any outcomes of engagement meetings with MECP on any new or other provincial initiatives related to the Agency or implementation of the Regional consolidation of CAs.

**Report prepared by: John MacKenzie, Chief Executive Officer, Laurie Nelson, Director, Policy Planning**

**Email: [john.mackenzie@trca.ca](mailto:john.mackenzie@trca.ca); [laurie.nelson@trca.ca](mailto:laurie.nelson@trca.ca)**

**For Information contact John MacKenzie**

**Email: [john.mackenzie@trca.ca](mailto:john.mackenzie@trca.ca)**

**Date: November 26, 2025**

**Attachments: 2**

Attachment 1: Map of Proposed 7 Regional Conservation Authorities

Attachment 2: Map of Proposed Central Lake Ontario Regional Conservation Authority (TRCA)

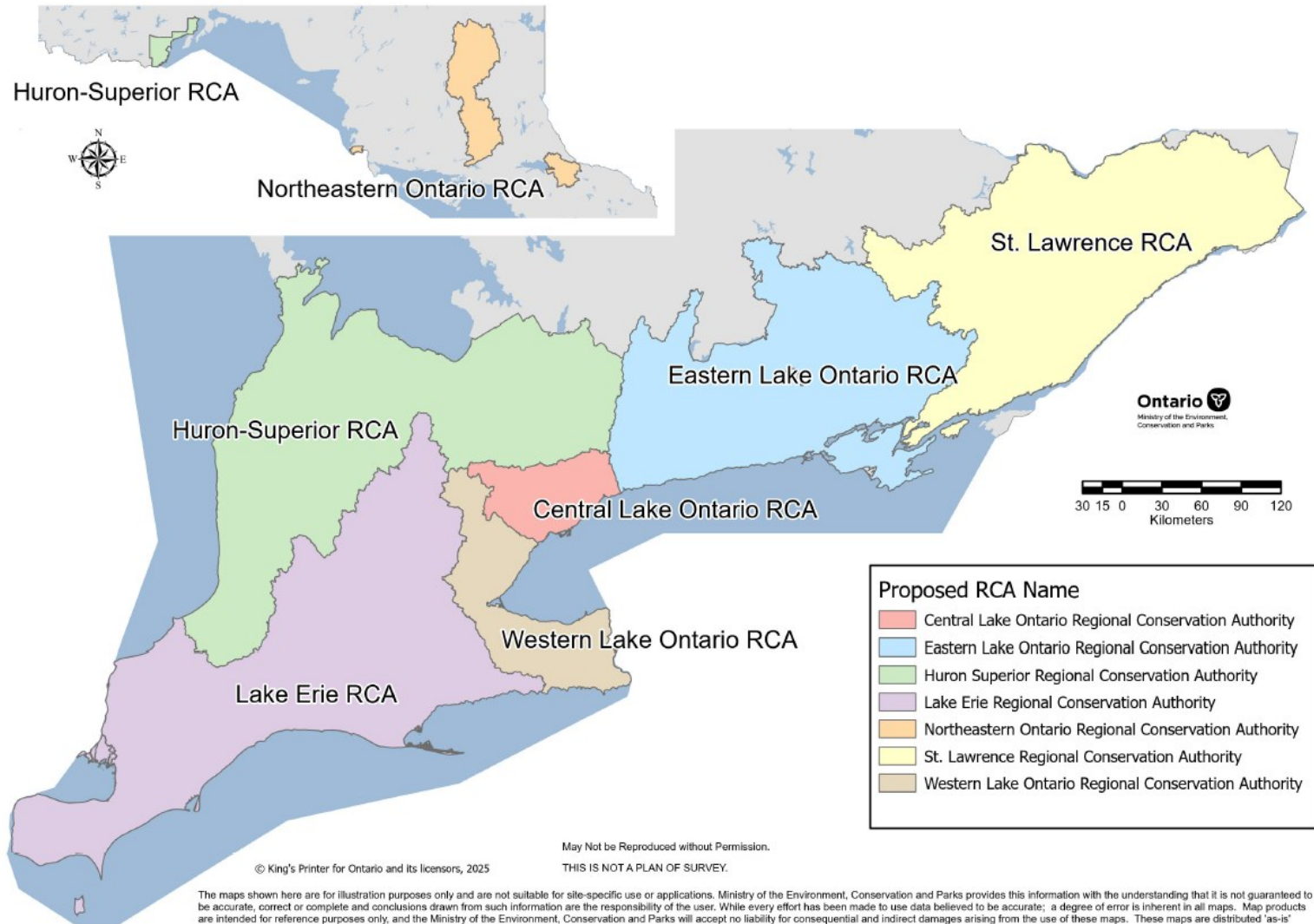
# ATTACHMENT 1

## ATTACHMENT 1: Map of Proposed 7 Regional Conservation Authorities

Maps

Map of Proposed Regional Conservation Authorities

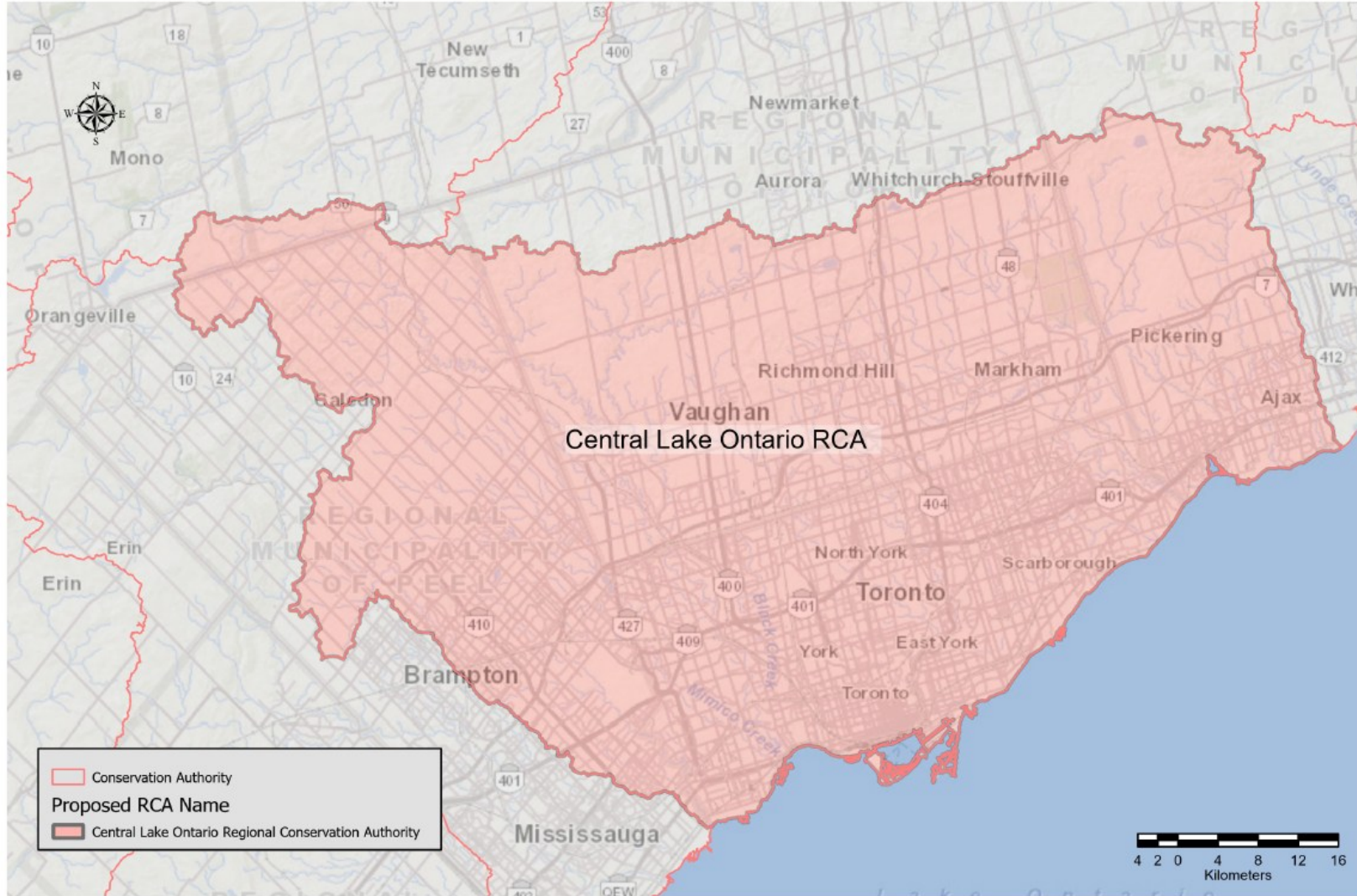
### PROPOSED 7 REGIONAL CONSERVATION AUTHORITIES (RCA)



# ATTACHMENT 1 ATTACHMENT 2: Map of Proposed Central Lake Ontario Regional Conservation Authority (TRCA)

Map of Proposed Central Lake Ontario Regional Conservation Authority

## CENTRAL LAKE ONTARIO REGIONAL CONSERVATION AUTHORITY



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## Attachment 2

### Recommendations to Accelerate Informed Decision-Making and Achieve Efficiencies

**1. Support for Enhancing and Adopting Technology and Software including E-Permitting**

TRCA recently developed and implemented a modern and efficient online planning and permitting system that streamlines submission and review processes. TRCA would welcome discussions with the Province on this system with respect to funding and for use of the system by all CAs.

**2. Supporting Software Purchases and Licence Fees**

Most CAs in Ontario are operating with dated systems on the verge of obsolescence (e.g., Lotus Notes) at risk of cyberattack, and with limited to no compatibility with more modern systems typical to other organizations. Costs continue to rise for CAs for maintaining these systems, defending against viruses, and upgrading them through software agreements and licencing. Provincial financial support or coordinated bulk purchasing would assist CAs in more efficiently reporting on finances and performance metrics.

**3. Release of Updated Provincial Guidelines**

Updates to provincial guidance documents would help clarify ongoing issues around consistency, increase certainty, and streamline reviews. For example, an update to the MOE Stormwater Management Planning and Design Manual with integration of Low Impact Development (LID) guidance would enable greater uptake of LIDs across high growth areas. Key provincial technical guidance documents, urgently needing update to reflect modern best, and widely accepted, sustainability practices and to set standards for addressing climate change in stormwater management (SWM) and hazard management, include:

- Great Lakes – Flooding, Erosion and Dynamic Beaches (MNR, 2001)
- River and Stream Systems - Erosion Hazard Limit (MNR, 2001)
- River and Stream Systems - Floodplain Hazard Limit (MNR, 2001)
- Procedures For Approval of New Special Policy Areas (SPAs) And Modifications to Existing SPAs (MNR, 2009)
- Stormwater Management Planning and Design Manual (MECP, 2003)
- (New) Low Impact Development Stormwater Management Guidance Manual (or should be integrated with the SWM Manual and build on TRCA, LSRCA, CVC Sustainable Technology Evaluation Program existing guidance materials)
- (New) Subwatershed Planning Guidance (MECP) (CA Act Working Group product)

#### 4. **Support for Training on Best Practices and the Above Provincial Guidelines**

Lack of awareness about key policy and regulatory matters and implementation guidance is resulting in negative avoidable impacts on the environment and creating confusion related to requirements. Through STEP and other programs, TRCA has conducted training for other CAs, building industry members, and MECP staff. An expanded education program with provincial funding could be built into the rollout of the updated provincial guidance documents. This would lead to better implementation of provincial policy and CA regulatory requirements, reduced re-submissions, faster approvals and less enforcement issues.

#### 5. **Funding and Policy Support for Updated Watershed Plans in Growth Areas and Hazard Mapping (FHIMP)**

TRCA is continually updating flood and erosion hazard mapping, Regulated Area Mapping (annual review and updates), and watershed plans using state of the art monitoring, modeling and analytical tools (e.g. LIDAR, remote sensing, 2D modeling, GIS platforms, climate change analysis, etc.) This work could be applied more broadly with provincial support to accelerate and achieve better decision making across CA jurisdictions.

#### 6. **Establishing BILD-CA Working Groups for All High Growth Areas**

TRCA, LSRCA and more recently HRCA and NVCA work with BILD and other stakeholders along with partner municipalities to exchange information on priority growth areas, programs, studies, plans and projects. These meetings facilitate coordinated, collaborative interactions to improve consistency in policy implementation, technical guidance and allow us to share best practices and highlight model processes and projects together.

#### 7. **Staffing - Incremental Fee Increases Needed (COLA, at minimum) to Maintain High CA/Provincial Service Standards Going Forward**

Despite the Provincial development review fee freeze, TRCA has maintained a full complement of highly trained multi-disciplinary staff, including Water Resources Engineers, Hydrogeologists and Geotechnical Engineers, Ecologists and Planners to expedite approvals. With in-house expertise and a deep understanding of local watersheds, TRCA can make faster decisions without relying on external consultants. TRCA has in-house legal counsel that benefits industry stakeholders when industry and municipal stakeholders are required to enter in legal agreements with TRCA associated with development planning and infrastructure projects (e.g., MZO agreements, Permission To Enter on TRCA lands). TRCA also has Service Level Agreements with provincial, municipal, and other infrastructure providers to provide expertise and timely review of infrastructure projects to support provincial and municipal delivery of necessary infrastructure to support growth and intensification.

**However, we are now at a point where we cannot refill vacancies due to the fee freeze, which will start to impact service delivery. Municipalities**

**charge far more for reviews and do not face such restrictions for cost recoverable reviews. This cap on fee increases for cost recoverable work imposed by the Province should be removed so we can maintain our high service standards, including maintenance of important development review and financial related IT systems and software.**

**8. Mandatory Pre-Consultation and Use of Design Charrettes for Complex Files**

LSRCA and TRCA have for many years encouraged pre-consultation and design charrettes to identify potential challenges early, helping to avoid delays later in the process. These initiatives should be instituted more broadly as they help to clarify requirements and expectations upfront and reduce back and forth revisions while fostering innovative and practical planning and design for more sustainable, resilient communities.

**9. Continued Funding for Flood Remediation and Mitigation as part of Provincial Infrastructure Projects To Support Provincial Priorities in Flood Vulnerable Areas**

Where growth and intensification and infrastructure have been proposed in areas of historical development within the flood hazard, TRCA has worked with our government partners and the development industry to proactively commence studies together to realize opportunities for remediation, mitigation and restoration that reduce risk and increase resiliency. Significant examples include the Toronto Waterfront and Lower Don Lands and strategic growth areas in Brampton (Riverwalk), Vaughan (VMC Black Creek Renewal) and Mississauga (the Dixie-Dundas SPA); this has entailed investments in upgraded culverts and wider span bridges as part of Metrolinx Projects (Concord GO), etc. The **Housing Enabling Water Systems Fund** could be strategically applied where the Province sees the potential for catalyst projects to support and accelerate new development or redevelopment potentially impacted by flood hazards, where remediation and mitigation, based on the findings of environmental assessments and detailed studies, can better protect communities and infrastructure and help to realize safe redevelopment.

**10. Integrated CA Regulatory and Planning Act Approval Process**

In its plan input and plan review roles, TRCA provides input to help ensure that Planning Act decisions are consistent with provincial natural hazard policy and to raise awareness of regulatory permitting matters that affect the risks related to natural hazards. TRCA staff are engaged in a range of complex planning and permitting matters, including SPAs, MZOs and OLT matters and can share their experience, expertise and best practices for coordinating planning and permitting roles. This could be operationalized as part of a broader CO/CA training session on navigating the current legislative and regulatory landscape to optimize outcomes that achieve shared objectives.

**11. Inter-agency Teams for High Priority Economic Development Projects and Complex Files, including involving the Province on files within Special Policy Areas (SPAs)**

The approval timing for many high priority infrastructure or development projects can be impacted by a lack of clarity of information requirements including information required and provided to achieve federal, provincial and local approvals in addition to CA municipal, and utility approvals. There have been exceptional situations that TRCA has participated in where the Province, via agencies such as Waterfront Toronto, the Office of the Provincial Development Facilitator, or a lead ministry or agency has taken a leadership role to bring proponents together with all of the relevant agencies in an organized way towards achieving time sensitive outcomes. Using a better coordinated inter-agency approach could be a way for the Province to show leadership on high priority economic development initiatives.

**12. Leveraging of Capacities of Other CAs to Support Reviews**

In areas where there is a lack of CA review capacity, other partner CAs with such capacities and experience could potentially provide mutual aid / technical support subject to certain conditions (e.g., reviews for others not impacting service delivery in their home CA). TRCA already does this for partner CAs across Ontario via agreements and the OPCA could help further encourage this.

**13. Support for CAs Providing Comments to Approval Authorities on Natural Heritage Matters under the Planning Act and Environmental Assessment Act, if municipally requested**

In high growth areas, concern has been expressed by the development industry, and municipalities, particularly 905 municipalities in our jurisdiction (e.g., delays, loss of expertise, etc.) resulting from the restriction on CAs to provide natural heritage reviews. The Provincial restriction results in municipalities having to hire consultants with added time and cost or add new staff complement to their municipality when they previously leveraged partner CAs at a lower cost for review. Restoring the ability for CAs to enter into MOUs with municipalities to provide this service should be explored, and/or there could be an update to the Mandatory Programs and Services regulation to integrate a CA natural heritage lens into the natural hazard management role in both planning and permitting.

**14. Support for Scaling Up TRCA's Nature-Based Solutions Restoration Prioritization Tool**

Provincial investment could help to scale up TRCA's Integrated Restoration Prioritization program work, and water balance mitigation projects, across Ontario to inform the work of municipalities and CAs to achieve the most efficient and impactful science-based restoration of watersheds.

**15. Providing the Same Powers to CA Officers as Provincial Park Wardens through Pilot Projects**

This will improve CAs' ability to protect our important ecological and recreational parks and greenspaces within our communities. Further, it can assist the Province and municipal partners to better protect lands in areas where CAs are currently managing Provincial lands (e.g., Richmond Hill, Vaughan, Toronto Tommy Thompson Park, etc.) without having similar compliance tools to MECP Provincial Park Wardens appointed under the Provincial Parks and Conservation Reserves Act.

**16. Exemptions from Liability for Existing and New flood Infrastructure for CAs on par with Municipalities' Statutory Liability Provisions to Better Enable CA Assumption While Lowering Risk**

Exemptions from liability for flood infrastructure for Conservation Authorities, comparable to those provided to municipalities, would reduce legal risk and enable CAs to more confidently own, operate, and assume responsibility for new and existing flood infrastructure. This would also allow CAs to consider taking on stormwater management (SWM), low-impact development (LID), and other flood-related infrastructure on CA lands. Providing statutory liability protections similar to those in the *Municipal Act*, would place CAs on more equal footing with municipalities and increase flexibility to accommodate infrastructure that supports watershed and flood risk management objectives, without exposing CAs to disproportionate liability.