



BOARD OF DIRECTORS

February 5, 2026



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Board of Directors Meeting and Annual General Meeting

Thursday, February 5, 2026 at 6:00 p.m.

This meeting will be held fully in person.

The meeting will be live streamed on HCA's You Tube Channel:
<https://www.youtube.com/user/HamiltonConservation>

1. **Welcome** – Lisa Burnside
 - 1.1. Land Acknowledgement
 - 1.2. Appointment of Acting Chair

2. **Election of Officers** – Angela Coleman
 - 2.1. Election Procedures
 - 2.2. Appoint Scrutineers
 - 2.3. Election of 2026 Chair
 - 2.4. Election of 2026 Vice-Chair
 - 2.5. Board Representatives to Budget & Administration Committee
 - 2.6. Board Representatives to Conservation Advisory Board
 - 2.7. Election of Chair to Conservation Advisory Board
 - 2.8. Election Wrap Up

3. **Call to Order** – Newly Appointed Chair

4. **Declarations of Conflict of Interest**

5. **Approval of Agenda**

6. Delegations

7. Consent Items for Applications, Minutes and Correspondence

- | | |
|---|---------|
| 7.1. Permit Applications Summary Report | Page 1 |
| 7.2. Approval of Board of Directors Minutes – December 4, 2025 | Page 7 |
| 7.3. Approved – October 9, 2025 - Conservation Advisory Board Minutes
– for receipt only | Page 17 |
| 7.4. Email Correspondence Regarding ERO, 025-1257, Changes to the Conservation Authorities’
Act, labeled a to am – link to comments embedded on Page | Page 23 |

8. Foundation Briefing

Foundation Chair – André Chabot

9. Member Briefing

10. Business Arising from the Minutes

11. Reports from Budget & Administration Committee and Conservation Advisory Board

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| 11.1. Conservation Advisory Board – December, 11, 2025
(Recommendations) | – Wayne Terryberry | |
| 11.1.1. CA2531 Ecological and Water Resources Monitoring Comprehensive Plan | | Page 327 |

12. Other Staff Reports/Memorandums

Reports to be approved

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| 12.1. Hamilton Conservation Authority – Appointment of Officers under the Conservation
Authorities Act | – Gord Costie | Page 385 |
| 12.2. 2026 Schedule of Meetings | – Lisa Burnside | Page 389 |
| 12.3. Voting Representatives to Conservation Ontario | – Lisa Burnside | Page 391 |
| 12.4. Appointment of Auditors for 2026 Fiscal Year | – Scott Fleming | Page 393 |

Memorandums to be received

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| 12.5 Annual Reporting on CA Permit Review Timelines – January 1, 2025 to December 31, 2025 | – Mike Stone | Page 395 |
| 12.6. Watershed Conditions Report | – Scott Peck | Page 399 |
| 12.7. Conservation Areas Services Update | – Liam Fletcher | Page 405 |

13. New Business

14. In-Camera Items

- 14.1. Confidential Report – BD/Feb 01-2026
(Land Matter)
- 14.2 Confidential Report – BD/Feb 02-2026
(Land Matter)

15. Next Meeting – Thursday, March 5, 2026 at 6:00 p.m.

16. Adjournment

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Report to: Board of Directors

Approved for Circulation By: Lisa Burnside, CAO

Reviewed By: T. Scott Peck, MCIP, RPP, Deputy Chief Administrative Officer/Director, Watershed Management Services

Prepared By: Mike Stone, MCIP, RPP, Senior Manager, Watershed Planning, Stewardship & Ecological Services

Meeting Date: February 5, 2026

Subject: Permit Applications Summary Report

HCA permit applications approved by staff under the *Conservation Authorities Act* and Ontario Regulation 41/24 between the dates of November 22, 2025 to January 23, 2026 are summarized in the following Permit Applications Summary Report (PASR-1/26).

Recommendation:

THAT the Board of Directors receive this Permit Application Summary Report PASR-1/26 as information.

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HAMILTON REGION CONSERVATION AUTHORITY

PERMIT APPLICATION SUMMARY REPORT (PASR 1/26)

HCA permit applications approved under the Conservation Authorities Act and Ontario Regulation 41/24 between the dates of November 22, 2025 - January 23, 2026

File Number	Date Received	Date Permit Issued	Review Days	Applicant Name	Location	Application Description	Recommendation / Conditions
SC/F,C/25/76	26-Nov-25	04-Dec-25	10		1408 to 1465 Highway 8 Lot 2, Concession 2 Stoney Creek	for the installation of new conduit with fibre optic cable and FTG vaults	Approved subject to standard conditions.
SC/F,C/25/85	26-Nov-25	12-Dec-25	17		Regalview Dr Lot 14, 15, Concession 3 Stoney Creek	for the installation of new ductbank	Approved subject to standard conditions.
A/F,C/24/53	22-Jul-24	12-Dec-25	120		820 Sulphur Springs Rd Lot 40, 41, Concession 1 Ancaster	for the construction of a new single-family residence, garage, and septic system, repairs to a former two-storey single dwelling and its conversion to an accessory storage building, and the construction of a new driveway	Approved subject to standard conditions.
D/F,C/25/87	15-Dec-25	19-Dec-25	5		26 Hope St Lot 15, Concession 1 Dundas	for the demolition of a one storey detached dwelling and construction of a two storey detached dwelling	Approved subject to standard conditions.
SC/C/25/88	18-Dec-25	19-Dec-25	3		21 Edgewater Dr Lot 14, Concession BF Stoney Creek	for the proposed basement works and deck replacement	Approved subject to standard conditions.

HAMILTON REGION CONSERVATION AUTHORITY

PERMIT APPLICATION SUMMARY REPORT (PASR 1/26)

HCA permit applications approved under the Conservation Authorities Act and Ontario Regulation 41/24 between the dates of November 22, 2025 - January 23, 2026

SC/F,C,A/25/84	26-Nov-25	19-Dec-25	25		345 Lewis Rd Lot 7, 8, Concession 1 Stoney Creek	for the construction of the track operations readiness facility and installation of a new culvert	Approved subject to standard conditions.
H/F,C,A/25/90	19-Dec-25	22-Dec-25	5		Red Hill Valley Pkwy, near Mud St W Lot 33, 34, Concession 6 Hamilton	to remove accumulated sediment from the main cell of stormwater management pond 117	Approved subject to standard conditions.
H/F,C,A/25/91	19-Dec-25	22-Dec-25	5		Red Hill Valley Pkwy, near Greenhill Ave Lot 33, Concession 4 Hamilton	to remove accumulated sediment from the main cell of stormwater management pond 109	Approved subject to standard conditions.
H/F,C,A/25/92	19-Dec-25	22-Dec-25	5		Red Hill Valley Pkwy, near Queenston Rd Lot 30, Concession 2 Hamilton	to remove accumulated sediment from the main cell of stormwater management pond 112	Approved subject to standard conditions.
D/C/25/93	27-Oct-25	07-Jan-26	74		61 Pimlico Dr Lot 50, Concession 1 Dundas	for the construction of a rear yard patio	Approved subject to standard conditions.

HAMILTON REGION CONSERVATION AUTHORITY

PERMIT APPLICATION SUMMARY REPORT (PASR 1/26)

HCA permit applications approved under the Conservation Authorities Act and Ontario Regulation 41/24 between the dates of November 22, 2025 - January 23, 2026

H/F,C,A/25/86	05-Dec-25	07-Jan-26	35		172 & 178 Rymal Rd W and 1204 West 5th St Lot 16, Concession 8 Hamilton	for the alteration of watercourses and construction of Phase 2 of the Sheldon's Gate residential subdivision	Approved subject to standard conditions.
SC/F,A/25/89	18-Dec-25	08-Jan-26	23		711 North Service Rd Lot 14, Concession BF Stoney Creek	for the proposed dredging works	Approved subject to standard conditions.
A/F,C/25/94	05-Jan-26	14-Jan-26	10		786 Stone Church Rd Lot 54, Concession 3 Ancaster	for the construction of a septic system and associated site alteration	Approved subject to standard conditions.

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Hamilton Region Conservation Authority

Minutes

Board of Directors Meeting

December 4, 2025

Minutes of the Board of Directors meeting held on Thursday, December 4, 2025 at 6:00 p.m., at the HCA main office, 838 Mineral Springs Road, in Ancaster, and livestreamed on YouTube.

PRESENT:

Brad Clark – in the Chair	
Elise Copps	Lisa DiCesare
Susan Fielding	Wayne Terryberry
Alex Wilson	Maureen Wilson

REGRETS: **Jeff Beattie, Craig Cassar, Matt Francis, Mike Spadafora**

André Chabot – Foundation Chair

STAFF PRESENT: **Nancy Arnold, Lisa Burnside, Gord Costie, Marlene Ferreira, Scott Fleming, Liam Fletcher, Brandon Good, Rob Gray, Matt Hall, Nicole Karbusicky, Amanda Martin, Stacey McConnell, Scott Peck, Mike Stone, Erich Talbot, Jaime Tellier, Sandra Winninger**

OTHERS: **Justin Silvia (Conservation Halton)**

1. Call to Order

The Chair called the meeting to order and welcomed everyone present. HCA's Indigenous Land Acknowledgement was read.

2. Declarations of Conflict of Interest

The Chair asked members to declare any conflicts under the Board's Governance Policy. There were none.

3. Approval of Agenda

The Chair requested any additions or deletions to the agenda. Lisa Burnside indicated an Addendum was circulated, which included two items:

- Under number 8, Business Arising from the Minutes, Environmental Registry Posting 025-1257 - Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities, which will appear 8.2 on the agenda
- Under number 12, In-Camera Items, Confidential Memorandum – BD/Dec 03-2025, (Legal matter), will appear as 12.3 on the agenda

BD12, 3563

**MOVED BY: Susan Fielding
SECONDED BY: Lisa DiCesare**

THAT the agenda be approved, as amended.

CARRIED

4. Delegations

There were none.

5. Consent Items for Applications, Minutes and Correspondence

The following consent items were adopted:

- 5.1. Permit Applications Summary Report
- 5.2. Approval of Board of Directors Minutes – November 6, 2025
- 5.3. Approval of Board of Directors Minutes – Special Meeting, November 25, 2025
- 5.4. Approved – September 18, 2025 Budget & Administration Committee Minutes – for receipt only
- 5.5. Correspondence regarding Bill 68/ ERO Notice 025-1257 related to amendments to the Conservation Authorities Act, items labeled a to e.

6. Foundation Briefing

André Chabot, Chair of the Conservation Foundation, reported The Foundation has raised a total of \$22,263 in donations from November 1st to November 30th, 2025. This brings the unofficial total for the fiscal year to \$1,116,681, exceeding the fundraising goal of \$847,300 by 32%. This is due to larger major gift commitments from new corporate partners for Saltfleet Conservation Area. Some gift highlights include:

- \$5,000 from a family foundation in support of trails maintenance
- \$11,000 from our fall fundraising appeal

- \$588 in CAMIS donations

2025 Highlights:

Thanks to the fundraising success and the generosity of donors, the Foundation has granted approximately \$1,000,000 back to HCA to support various projects, including:

- The Saltfleet Wetland and Restoration Project
- The Outdoor Environmental Education Program
- Land Acquisition
- Basadinna Indigenous Signage project in the Dundas Valley
- Capital Improvement projects including the 50 Point Fishing Platform, as well as the Valens Lake Lookout Tower.
- Trail improvement projects including work in the Dundas Valley and Christie Lake

Councillor Clark thanked the Foundation; the Board and staff, for their hard work this year and in exceeding their fundraising goal.

BD12, 3564

MOVED BY: Alex Wilson

SECONDED BY: Elise Copps

THAT the Foundation Briefing be received.

CARRIED

7. Member Briefing

7.1. Saltfleet Conservation Area Wetland Project – Progress Update

Scott Peck provided an overview of the Saltfleet Wetland project, indicating, the purpose of the project was to create a new conservation area in the east end of Hamilton as well as to provide natural hazard attenuation, protecting residents in lower Stoney Creek from watercourse flooding. He indicated that the first wetland was completed in 2022 and since that time, nature has embraced the area: both flora and fauna have taken hold in the new conservation area. The second wetland will be completed this fall and construction on the third wetland, is expected to begin in 2027. The Board indicated their appreciation for this project and its impact on the local community as well as having an impact on climate change.

BD,12 3565

MOVED BY: Wayne Terryberry

SECONDED BY: Lisa DiCesare

THAT the Member Briefing be received.

CARRIED

8. Business Arising from the Minutes

8.1. Motion in response to Bill 68/ERO from HCA Board of Directors

The proposed motion, which was crafted with input from Board members was read. Discussion occurred; concerns regarding the short consultation process as well as frustration regarding the Province's reasoning for the amendments to the Conservation Authorities Act were expressed.

Lisa Burnside advised that staff would share the Board position in a more public friendly version on HCA's digital platforms (website, social media and to our passholders and Foundation) as part of the communication plan.

BD12, 3566

**MOVED BY: Susan Fielding
SECONDED BY: Elise Copps**

THAT the Board of Directors approve the Motion regarding Bill 68/ERO

CARRIED

8.2 Environmental Registry Posting 025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

The proposed comments for the ERO 025-1257 were reviewed. There was significant discussion regarding the proposed amalgamation of conservation authorities with multiple concerns raised. Additionally, a comparison was drawn between this proposed amalgamation and the amalgamation that formed the New City of Hamilton, noting it was an expensive and controversial process. Clarification occurred that Conservation Foundations are separate entities from conservation authorities and won't be amalgamated; there are still unanswered questions on what their focus would be in the new regional model.

BD12, 3567

**MOVED BY: Lisa DiCesare
SECONDED BY: Wayne Terryberry**

THAT the comments as detailed in Appendix A of the report titled "ERO Posting 025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities dated December 4, 2025 be approved; and further,

THAT HCA staff be directed to submit the approved comments to the Ministry of Environment, Conservation and Parks.

CARRIED

9. Reports from Budget & Administration Committee and Conservation Advisory Board

9.1. Budget & Administration Committee – November 20, 2025 (Recommendations)

9.1.1 BA 2541 HCA Reserves Policy

Susan Fielding provided an overview of the staff report indicating that the Policy establishes financial guidelines and controls for the creation, management and use of HCA's financial reserves and reserve funds.

Additionally, the report noted that as the Fifty Point Wetland Project has been fully completed and all related expenditures finalized, staff recommended that this reserve be closed and the remaining \$85,977.72 be transferred to the Saltfleet Conservation Area Wetland Restoration Project Reserve, to support ongoing restoration.

BD12, 3568

MOVED BY: Susan Fielding
SECONDED BY: Lisa DiCesare

THAT the Budget & Administration Committee recommend to the Board of Directors:

THAT the HCA Reserves Policy, dated November 2025, as appended to this report, be approved; and further

THAT the Fifty Point Wetland reserve be closed and unused balance of \$85,977.72 be transferred to the Saltfleet CA Wetland Restoration Project reserve.

CARRIED

9.1.2 Project Technical Advisory Committee – Insurance

Susan Fielding provided an overview of the staff report, indicating that the Committee (PTAC) provides assistance to staff by reviewing and approving funding applications for the Hamilton-Halton Watershed Stewardship Program. The report contained the list of current members to be recognized for insurance purposes.

BD12, 3569

MOVED BY: Susan Fielding
SECONDED BY: Elise Copps

HCA the Budget & Administration Committee recommends to the Board of Directors:

THAT the Project Technical Advisory Committee members be submitted for annual insurance coverage purposes.

CARRIED

There weren't any reports from the Conservation Advisory Board.

10. Other Staff Reports/Memoranda

Reports to be Approved

10.1. Final HCA 2026 Budget

Lisa Burnside presented the report and indicated that the \$20.7M budget document was circulated to the City of Hamilton and Town of Puslinch for comment; none were received. It was noted that in addition as part of the draft budget, the Board requested special funding from the City of Hamilton to support HCA's land acquisition program. However, given the long-term nature of the special land acquisition funding request – and uncertainty regarding future priorities under a potential Western Lake Ontario Regional Conservation Authority – three options were developed for Board consideration before finalizing the budget regarding the special funding to either proceed, table and revisit or request redirection to a city fund. After a lengthy discussion an amendment was proposed to withdraw the special land acquisition funding request until a future date, with Councillor Alex Wilson wishing to be recorded as opposed. The motion to approve the HCA's 2026 budget was passed, as amended.

BD12, 3570

**MOVED BY: Lisa DiCesare
SECONDED BY: Brad Clark**

THAT to withdraw, until a future date, the special land acquisition funding request to the City of Hamilton from the HCA's 2026 budget

CARRIED

Recorded Vote

In favour

**Brad Clark
Elise Copps
Lisa DiCesare
Susan Fielding
Wayne Terryberry
Maureen Wilson**

Opposed

Alex Wilson

BD12, 3571**MOVED BY: Lisa DiCesare
SECONDED BY: Brad Clark**

THAT the 2026 draft budget be formally and finally approved in accordance with the Conservation Authorities Act and Ontario Regulation 402/22, and that the Board direct staff to table the special land acquisition funding request (Option 2 as outlined in the report) and revisit the request in a future budget year once there is greater clarity regarding the Province's proposed regional consolidation.

CARRIEDMemorandums to be Received10.2. Watershed Conditions Report

Scott Peck provided an overview of the memorandum indicating that there were no significant watercourse flooding events, no significant watercourse water safety concerns, and no Lake Ontario shoreline flooding events.

BD12, 3572**MOVED BY: Elise Copps
SECONDED BY: Alex Wilson**

THAT the Memorandum entitled Watershed Conditions Memorandum be received.

CARRIED10.3. Conservation Areas Experiences Update

Brandon Good presented a summary of the memorandum, highlighting progress on construction of the new campground at Valens Lake Conservation Area, completion of the accessible fishing bridge at Fifty Point Conservation Area, installation of wayfinding signs at Christie Lake and Spencer Gorge Conservation Areas and the Christmas programs occurring at Westfield Heritage Village Conservation Area.

BD12, 3573**MOVED BY: Susan Fielding
SECONDED BY: Lisa DiCesare**

THAT the memorandum Conservation Areas Experiences Update be received.

CARRIED

11. New Business

There was none.

12. In-Camera Items**BD12, 3574****MOVED BY: Susan Fielding
SECONDED BY: Lisa DiCesare****THAT the Board of Directors moves *in camera* for matters of law, personnel and property.****CARRIED**

During the *in-camera* session, one personnel matter, one land matter and one legal matter and one were discussed.

**12.1. Confidential Report – BD/Dec 01-2025
(Personnel Matter)**

Marelene Ferriera provided a summary of the report regarding a personnel matter and answered the members' questions.

BD12, 3575**MOVED BY: Alex Wilson
SECONDED BY: Susan Fielding****THAT the confidential report entitled BD/Dec 01-2025 be approved and remain in camera.****CARRIED****12.2 Confidential Memorandum BD/Dec 02-2025
(Land Matter)**

Scott Peck reviewed the confidential memorandum and answered members' questions.

BD12, 3576**MOVED BY: Alex Wilson
SECONDED BY: Wayne Terryberry****THAT the confidential memorandum entitled BD/Dec 02-2025 be received and remain in camera.**

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HAMILTON CONSERVATION AUTHORITY

Conservation Advisory Board

MINUTES

October 9, 2025

Minutes of the Conservation Advisory Board meeting held on Thursday, October 9, 2025 at 4:00 p.m., at the HCA main office, 838 Mineral Springs Road, in Ancaster, and livestreamed on YouTube.

PRESENT:

Wayne Terryberry – in the Chair	
Craig Cassar	Elise Copps
Natalie Faught	Jamie Freeman
Haley McRae	Cortney Oliver
Noah Stegman	

Susan Fielding – Ex-Officio

REGRETS: Tyler Cunningham, Brad Clark (Ex-Officio)

STAFF PRESENT: Madolyn Armstrong, Nancy Arnold, Jonathan Bastien, Lisa Burnside, Gord Costie, Lindsay Davidson, Liam Fletcher, Marlene Ferreira, Matt Hall, Amanda Martin, Jasmine Marinelli, Scott Peck, Mike Stone, Jaime Tellier, Stacey Van Opstal and Sandra Winner

OTHERS: Media – None

1. Welcome

The Chair called the meeting to order and welcomed everyone present.

2. Declaration of Conflict of Interest

The Chair asked members to declare any conflicts under the HCA Administrative By-law. There were none.

3. Approval of Agenda

The Chair requested any additions or deletions to the agenda.

7. Approval of Minutes of Previous Meeting

7.1. Minutes – Conservation Advisory Board June 12, 2025

CA 2521 **MOVED BY: Noah Stegman**
 SECONDED BY: Jamie Freeman

THAT the minutes of the June 12, 2025 Conservation Advisory Board meeting be approved.

CARRIED

8. Business Arising from the Minutes

There was none.

9. Staff Reports/Memorandums

Reports for Recommendation

9.1. HCA's Planning Regulations Policy Document

Mike Stone brought forward the staff report, indicating that following approvals from the Conservation Advisory Board and Board of Directors earlier this year, the document was circulated for comment, to the public as well as the stakeholders. The document will provide staff with direction when reviewing and commenting on land use and planning regulatory matters.

CA 2522 **MOVED BY: Haley McRae**
 SECONDED BY: Natalie Faught

THAT the Conservation Advisory Board recommends to the Board of Directors;

THAT the *Policies for Land Use Planning and Development Regulation in the Watersheds of the Hamilton Conservation Authority (September 2025)* be adopted.

CARRIED

9.2. Final Eramosa Karst Conservation Area Master Plan and Chippawa Rail Trail Management Plan for Approval

Madolyn Armstrong brought forward the staff report and provided a summary of the two documents. Both plans will guide the respective conservation areas, including operations and capital works planned, for the next ten years.

Staff confirmed that the noted operational plan recommended for the Karst caves at Eramosa Karst Conservation Area to help provide a framework for managing and protecting the cave features in the conservation area would be brought to the Conservation Advisory Board in the future once completed.

**CA 2523 MOVED BY: Haley McRae
 SECONDED BY: Noah Stegman**

THAT the Conservation Advisory Board recommends to the Board of Directors;

THAT this report and accompanying Master and Management Plans of September 2025 be received as information for project background and general understanding;

and further

THAT the Eramosa Karst Conservation Area Master Plan and Chippawa Rail Trail Management Plan of September 2025 be approved.

CARRIED

9.3 Water Resources Engineering Monitoring Network – Review and Enhancements

Stacey Van Opstal brought forward the staff report requesting approval to update the Water Resources Monitoring Network, including servers, modernizing gauge data loggers and enhancing opportunities for sharing information to the public.

**CA 2524 MOVED BY: Noah Stegman
 SECONDED BY: Haley McRae**

THAT the Conservation Advisory Board recommends to the Board of Directors;

THAT the *Water Resources Engineering Monitoring Network - Review and Enhancements* staff report be adopted.

CARRIED

10. New Business

There was none.

11. Next Meeting

The next meeting of the Conservation Advisory Board is scheduled for Thursday, December 11, 2025 at 4:00 p.m., at the HCA Main Administration Office – Woodend Auditorium.

12. Adjournment

On motion, the meeting was adjourned.

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Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities (ERO#25-1257)

Comment period: November 7- December 22, 2025 through the ERO posting or by email to ca.office@ontario.ca

This response is provided on behalf of the Board of Directors of the Lower Thames Valley Conservation Authority (LTVCA), board members represent 10 member municipalities within the lower Thames valley watershed.

In the Province's proposal, the LTVCA watershed would be consolidated with seven other Conservation Authorities representing 81 member municipalities to form the Lake Erie Regional Conservation Authority.

ERO Proposal #025-1257 would result in Regional Conservation Authorities that would be incapable of delivering effective programming and be accountable to local municipalities. Although, the LTVCA does support streamlining and standardizing certain areas such as planning and regulations it opposes the plan to consolidate.

If the Province's continues with the plan to consolidate and proceeds with the ERO Proposal, the following are recommendations to create a plan that keeps local accountability and local programming.

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

- Slowing down of the current rushed process to get it right. It took 80 years to create the present conservation authorities – less than 2 months of meaningful consultation in no way will create a workable result.
- Consultation at the watershed level ahead of legislative action ensuring that user pay input into changes.
- Full and transparent cost-benefit analysis of the proposed consolidation and the anticipated additional costs to municipalities and ratepayers for maintaining an overarching Agency, as well as amalgamation costs.
- Identification of an actual problems and concerns that are attempted to be addressed by the significant modifications being put forward (with specific cases/numbers).
- The proposed timeline for implementation of a yet-to-be-determined regional entity of early 2027 is both unrealistic and unnecessarily hurried. A phased approach spanning a period of three-to-four years, coinciding with municipal election cycles allows for a

phased implementation period that would comprehensively address the issues (and potential issues) resulting from amalgamation/consolidation

- A user-interface to a robust and shared permitting system, which is intuitive and facilitates natural hazard assessments, for authority staff and for the commercial/residential development sector, to file applications for clearances and approvals.
- Establishment of smaller sub-region hubs, with a small management team complement to oversee program staff, develop budgets, manage procurement for the sub-region and to secure and manage physical assets.
- Suggest implementing changes through the Ontario Provincial Conservation Agency (OPCA) without changing watershed boundaries for the first 3 year mandate of the OPCA. Determine if provincial concerns can be resolved, and if not, then proceed with amalgamation of CAs.
- Existing Boards should be maintained after October 2026, becoming transition boards of each CA.

Question 2: What opportunities or benefits may come from a regional conservation authority framework?

- Standardized natural hazard mapping products and digital resources to better support local development and flood monitoring as long as provincial funding becomes available as it once was to create this mapping.
- Shared operational technology, resources, best practices, standard operating procedures, policies and protocols.
- The reorganization allows the Province to fully consult with First Nation to develop governance approaches to any new Conservation Authorities that consider First Nations input and their role as rights holders in those watershed organizations.
- Note: All this can be achieved without amalgamation of Conservation Authorities

Question 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?

- An equitable governance model will be very difficult to establish in a regional watershed that is as big as those that are proposed.
- The LTVCA continues to recommend a smaller regional model – perhaps a version of the Source Protection Regions to be able to develop better governance moving forward.
- The existing Conservation Authority model determines representation based on inclusion of each municipality within a watershed area. This is critical and accepted

by rate-payers. This model must move forward to ensure a user say for user pay principal is met.

- A significantly enlarged geographical reach does not provide for a manageable number of people or watershed area, if programs are going to be continued to be offered on a local basis. Direct relationships of residents to board members and staff are critical for local program delivery.
- Municipalities will be unwilling to contribute funding significantly distant of their geographical location. The governance model must ensure local funds are spent locally. The largest budget decision making area (for local programs) should be the existing CA boundaries regardless of the future boundaries of the regional CA.
- A two tiered model should be considered. The model where the current boards are still in place and appointed members of the local boards form the regional board would work. The local boards would prepare local budgets to ensure local programming and the regional board would oversee the standardization and provision of services that should be provided on a larger regional basis.

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

- Significantly increasing the geographical area, far beyond a single watershed, destroys a transparent and consultative budgeting process across member municipalities unless local budgeting is maintained
- Create local watershed sub-regions of the regional authority, to facilitate accountability, transparency and consultative budgeting. The sub-regions, through the sub-regional Boards would be responsible for generating their sub-regional budgets and consulting with their respective municipalities. While ERPs (Enterprise Resource Planning), financial statements/report, and audit function can be centralized to the regions. There are certain aspects of financial planning and management that should remain decentralized and assigned to the sub-regions, such as budgeting for local capital project undertakings, as local staff have superior knowledge of the needs of the sub-region, as opposed to staff at a head office.
- Regional responsibilities in a two tiered structure would have to be budgeted regionally but reviewed locally to maintain a transparent and consultative budgeting process.

Question 5: How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

- Local service delivery creates relationships. The ability to connect with technical staff in-person and particularly during storm/flood events, is especially impactful for both residents and municipal partners. Maintaining a local presence with local expertise,

providing local service is the single most effective way to ensure that relationships with community and stakeholders are maintained.

- Significant funds are raised locally for various projects. This includes the donation of lands by families for the enjoyment of their communities. Assurances that these funds and lands will be utilized for their intended purposes and meet donor expectations is especially key given the current funding model.

December 19, 2025

Ministry of the Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water St, North Tower, 5th Floor
Peterborough ON K9J 3C7

Attn: Public Input Coordinator:

Re: Maitland Valley Conservation Authority Submission to ERO 025-1257 Consultation
(proposed Regional Consolidation of Conservation Authorities)

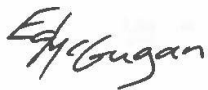
I am writing in response to the Environmental Registry posting ERO 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities.

The Maitland Valley Conservation Authority has reviewed the proposal for consolidation. Our response to the proposal is attached to this letter.

We look forward to working with the Ministry of Environment, Conservation and Parks on a revised proposal for modernizing conservation authorities.

We encourage the Ministry to work collaboratively with conservation authorities, municipalities and other stakeholders to identify an approach that will result in healthy and sustainable watersheds for the people of Ontario.

Sincerely,



Ed McGugan

Chair

cc: Conservation Ontario

cc: Lisa Thompson, MPP for Huron Bruce

cc: Mathew Rae, MPP for Perth Wellington

:

MECP ERO Discussion Questions - MVCA

Response

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

No business case has been developed so there are no details to indicate that there would be **any** advantage to the conservation authorities, or the Province. Experience indicates that amalgamation would:

1. Cost more than the current system to operate.
2. Based on response times from other provincial agencies (MTO, MECP), the customer service response time would likely degenerate from the current days to months.
3. The transition costs are likely to be very high based upon the experience of municipal amalgamations.
4. Adding a whole new agency (Ontario Conservation Agency) looks like adding a whole new, thick layer of red tape.
5. The Ministry of Health requires Health Units to prepare a business case if they are interested in amalgamating. If the business case does not show that there will be an improvement in services and that it will not create efficiencies, then the Ministry will not approve the amalgamation.

Therefore, the key factor for success would be to **not** amalgamate.

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

Business experience indicates that there *might* be some efficiencies gained by reducing redundancies and duplication of administrative roles and tasks. However, large increases in organisation size generally yield a loss in efficiency and effectiveness. Again, the Province will not know if there will be opportunities or benefits until a thorough business case analysis has been undertaken with the Conservation Authorities as active partners in the process.

Therefore, any theoretical benefits are unlikely to be realized in any meaningful manner.

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 municipal representative appointment process?

A basic tenant of taxpayer representation and fiduciary responsibility is that if a municipality is sending tax payer dollars to the Regional Conservation Authority (RCA), then it must have a representative on the Board of the RCA.

Therefore, this is another reason for not proceeding with conservation amalgamation.

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

The budgeting process will naturally become opaque and independent of voters as the Conservation Authorities become much larger.

It is important to remember that municipalities provide the majority of the operational funding for Conservation Authorities, so they need to continue to be directly involved in the budgeting process.

The budgeting process is tied directly to the Programs and Services Agreement that the Province requires Conservation Authorities to enter into with their municipalities. And those municipalities decide which programs they need in their watershed.

Therefore, the taxpayer and voter, would lose the transparency and the consultative aspect of the budgeting process.

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

Those close relationships already exist. Amalgamation would severely weaken them. Especially as there are Members already on the local CA Boards. The calculus is very straightforward. Amalgamation into Regional CAs will weaken and degrade all those relationships.

The collaboration model already in use in the Healthy Lake Huron project (HLH) is much superior to amalgamation. HLH has partners ranging from the Federal and Provincial governments to Counties, Health Units, conservation authorities and community groups. It is already working. At a far lower cost. And at much less risk to the provincial government as everyone is working together and sharing the workload and responsibility.

Therefore, we should strengthen the existing system and improve it by tasking the existing Ministry of Environment Conservation and Parks to co-ordinate regulations, service standards, and funding across the province by working collaboratively with Conservation Authorities to improve the health and safety of watersheds in Ontario.

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19 December 2025

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON K9J 3C7

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

To the Public Input Coordinator:

Thank you for the opportunity to comment on the proposed consolidation of Ontario's Conservation Authorities. I do so in my capacity as President and Senior Scientist of [Wildlife Conservation Society Canada](http://www.wildlifeconservation.org), with expertise in wildlife ecology, watershed health, land-use impacts, and the governance of natural systems. My perspective is informed by decades of applied research and policy engagement at the intersection of biodiversity conservation, climate risk, and evidence-based decision-making.

Ontario's proposal to consolidate its Conservation Authorities into a small number of regional entities, as outlined in this Notice, represents a fundamental restructuring of Ontario's watershed-based governance model. The Notice frames this move as a response to inefficiency, inconsistency, and administrative duplication. However, when assessed against the documented performance of Conservation Authorities, the legislative and regulatory tools already available to the province, and their historical purpose, the efficiency rationale does not withstand scrutiny. Instead, the proposal appears to reflect a governance choice to centralize authority over land-use and development decision-making, reducing the influence of locally governed, watershed-based institutions whose role has been to introduce independent, evidence-based risk considerations into land-use and development decisions.

Why Conservation Authorities Were Designed the Way They Were

Conservation Authorities were created in the mid-20th century in response to widespread watershed degradation and the devastating consequences of poorly-planned development, most visibly demonstrated by catastrophic flooding events. The Conservation Authorities Act deliberately embedded decision-making at the watershed scale, recognizing that hydrology, erosion, flood risk, and ecosystem function do not align with municipal or political boundaries.

This design choice reflected an early understanding that piecemeal approvals and siloed governance produce cumulative impacts that only become visible once damage is irreversible. Conservation Authorities were therefore tasked not only with flood control, but with maintaining and restoring the ecological integrity of entire watersheds. That mandate remains acutely relevant today, as climate change combined with piecemeal development and

intensification of agriculture accelerates extreme weather events and biodiversity loss undermines the resilience of natural systems.

Far from being relics of a bygone era, Conservation Authorities represent one of Ontario's few governance models explicitly designed to integrate land-use planning, hazard management, and ecosystem health at a scale that matches how nature actually works.

The Efficiency Argument Is Not Supported by Evidence

The provincial case for consolidation rests on claims of improved efficiency, consistency, and predictability. Yet no publicly available business case demonstrates that amalgamation is necessary to achieve these goals, or that it would outperform targeted modernization within the existing framework.

Performance data from across the Conservation Authority system show that many authorities already deliver timely, consistent permitting and hazard review services, often exceeding provincially prescribed timelines. In some cases, permit turnaround times are measured in days, not weeks. These outcomes are being achieved through locally embedded expertise, established relationships with municipalities and landowners, and intimate knowledge of watershed-specific conditions.

Importantly, the province already possesses extensive legislative and regulatory authority under the *Conservation Authorities Act*, as amended in recent years, to address the very issues cited as justification for consolidation. These amendments explicitly empower the province to prescribe mandatory programs and services, set province-wide performance standards and timelines, issue binding regulations and ministerial directions, and standardize permitting and technical requirements across Conservation Authorities. The Act also enables centralized tools, including province-wide digital permitting systems, shared data and mapping platforms, and coordinated technical guidance. These mechanisms allow the province to achieve consistency, predictability, and modernization within the existing watershed-based governance model, and several have already been implemented or are actively being advanced. In this context, it remains unclear what additional problem structural amalgamation is intended to solve.

Structural Consolidation Introduces Unassessed Costs and Risks

Structural consolidation, by contrast, introduces significant transition costs and operational risks that have not been acknowledged, let alone assessed. Large-scale amalgamation would require the integration of information technology systems, harmonization of human resources and labour agreements, restructuring of governance and decision-making processes, reconciliation of assets and liabilities, and resolution of legal and contractual obligations across multiple organizations. It would also necessitate rebranding and physical changes across extensive geographies, including signage, public-facing materials, digital assets, and wayfinding on conservation lands, all of which represent real and avoidable expenditures.

Each of these elements entails substantial financial cost, implementation time, and disruption to ongoing services. To date, no cost estimates, funding commitments, or transition plans have been made public, nor has it been clarified whether these costs would be borne by the province

or downloaded to municipalities. Claims of efficiency gains in the absence of a transparent cost-benefit analysis do not constitute evidence-based policy. They are assumptions presented as outcomes.

Local Governance Is a Core Strength, Not an Inefficiency

Conservation Authorities operate through long-term partnerships between municipalities and the province, with municipalities providing the majority of operational funding. This funding structure reflects the reality that watershed services are delivered locally and respond to local priorities, risks, and conditions.

Regional consolidation would inevitably (and likely dramatically) dilute municipal influence and local accountability, replacing them with larger, more distant governance structures. As regional boundaries expand, the risk increases that decision-making becomes less responsive to local flood hazards, erosion risks, agriculture needs, and community priorities, particularly in rural areas.

Watershed-based governance works precisely because it is local, place-based, and accountable to the communities most directly affected by land-use decisions. Removing that proximity in the name of efficiency ignores decades of institutional learning about what actually delivers public safety and environmental protection.

What Is Really Being Centralized

If efficiency and consistency can be achieved without amalgamation, it is reasonable to ask why consolidation is being pursued at all by Ontario at this time. The answer becomes clearer when viewed through the lens of land-use and development decision-making.

Over the past several years, provincial policy direction and legislative changes have increasingly treated Conservation Authorities as regulatory obstacles to be managed rather than as public-interest institutions to be strengthened. This shift is evident in repeated efforts to narrow their mandate, impose prescriptive timelines on permitting, reframe their review functions as sources of delay, and prioritize expedited development approvals in areas where flood, erosion, and wetland risks are well established. As a result, Conservation Authorities' evidence-based role in evaluating development proposals in floodplains, wetlands, and other hazard-prone areas has, at times, come into direct conflict with growth pressures and acceleration-focused planning objectives, particularly where expedited approvals are prioritized.

The proposed restructuring described in this Notice coincides with a series of legislative and regulatory changes over the past five years, including amendments to the Conservation Authorities Act beginning in 2020 and, most recently, the publication this week of rules under the *Special Economic Zones Act, 2025*. Together, these measures expand provincial authority to standardize, streamline, or bypass existing planning and environmental review processes in the interest of expedited development.

When independent, evidence-based decision-making becomes inconvenient, restructuring governance can be an effective way to neutralize it. In this context, Conservation Authorities, municipalities, and watershed communities can reasonably be expected to question whether

structural consolidation is being proposed to resolve an operational problem, or to reallocate decision-making authority away from local and watershed-based governance.

The Risks Ontario Is Taking

Weakening watershed-based governance at a time of escalating climate and biodiversity crises is a high-risk strategy. Conservation Authorities were put in place to prevent precisely the kind of cumulative, incremental damage that results from fragmented approvals and short-term decision-making. They are one of the few institutions designed to integrate flood risk, ecosystem health, and land-use planning in a coherent way.

The real policy choice facing Ontario is not whether to modernize Conservation Authorities, but how. Modernization grounded in evidence would focus on strengthening standards, investing in shared tools, supporting under-resourced authorities, and reinforcing the watershed-based model that has protected communities for generations.

Restructuring without evidence does not solve inefficiency. It shifts control. And in doing so, it risks undermining the very safeguards that protect Ontarians from flooding, erosion, and the long-term consequences of degraded natural systems.

For these reasons, I join many others in urging the province to reconsider whether structural consolidation is the appropriate response to the challenges identified in this Notice. Ontario already possesses the legislative tools and institutional capacity needed to strengthen consistency, performance, and modernization across Conservation Authorities without dismantling watershed-based governance. A more constructive path forward would build on this foundation, working collaboratively with Conservation Authorities, municipalities, and watershed communities to enhance effectiveness while preserving the independence and local accountability that have long been central to protecting people, property, and ecosystems across the province.

I would welcome the opportunity for further discussion on these issues.

Yours sincerely,



Justina C. Ray, Ph.D.
President and Senior Scientist

November 19, 2025

Andrew Dowie
Member of Parliament Windsor Essex
Parliamentary Assistant to the Minister of Environment, Conservation and Parks
Via Email

Re: Proposal to Amalgamate Conservation Authorities

Dear Mr. Dowie:

We are writing to you today regarding the province's intention to amalgamate Conservation Authorities (CA) in Ontario, which will reduce the number of CAs from thirty-six agencies to seven. We question the warrants for such an initiative, and have significant concerns with the proposal, on the basis that it will:

- Adversely impact responsiveness and extend approval times, resulting in significant project delays and confusion; and,
- Convert CAs to a pseudo provincial body, thereby reducing efficiency, as well as local accountability.

Many of our member companies work in the field of, or benefit from, "land development", and over the years have built relationships with the local representatives of the Essex Region Conservation Authority (ERCA). As a local approval agency, they function in a very professional manner and facilitate solutions for compliance with Provincial Policy. When non-routine issues do arise, we feel it is beneficial to have the ability to deal with a local representative that can interpret Provincial Policy and find solutions that suit our local geography and conditions.

In comparison, any time that it is necessary to deal with Provincial agencies such as MNR or MECP, significant delays are realized due to the unfamiliarity of individuals that lack local knowledge. Furthermore, at present there is a good relationship between member municipalities and the local CA. When issues arise where compromises are needed between conflicting requirements, solutions can be efficiently achieved. This is not the experience that has been observed when dealing with provincial agencies.

It is our understanding that ERCA will be amalgamated with seven other CAs to form the Lake Erie RCA. We suspect that the head office of this Regional Authority would be centrally located

in either the London region or Waterloo/Kitchener/Cambridge region. Obviously, this would impact efficiencies, particularly in terms of communications and meetings.

We understand that ERCA's budget is largely paid by the local municipal governments and that, except for an insignificant amount paid towards Source Water Protection, that ERCA is largely "self-funded". What does the Provincial government hope to achieve from the amalgamation process? What are the true objectives of this initiative?

In summary, there seems to be more downside to this proposal than upside. Rather than the proposed amalgamation, this region would prefer to see a return to higher levels of government downloading their responsibilities to the local CA, so that policies and objectives can be more efficiently managed by local individuals that are accountable to their member municipalities, with proper support from higher levels of government. We recall that this was once the case, when ERCA had jurisdiction over such things as the Fisheries Act, Public Lands Act, and natural heritage legislation, and dealt with all relevant legislation as a "one window" approval agency.

We would welcome the opportunity to discuss this initiative with you further.

Yours truly,

A handwritten signature in blue ink, appearing to read "Jim Lyons", with a stylized flourish at the end.

Jim Lyons, Executive Director

Cc. Premier Doug Ford

From: Edda Engel <civinput@newmode.io>

Sent: Sunday, December 14, 2025 11:49 AM

To: Clark, Brad <Brad.Clark@hamilton.ca>

Subject: My view on Stop the Conservation Authority Megamerger: Protect Local Watershed Oversight

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External Email: Use caution with links and attachments

Dear Brad Clark,

I write to you today as a concerned resident of Ontario to submit my strong opposition to the Province's proposal in ERO Notice 025-1257 to amalgamate Ontario's 36 Conservation Authorities into seven large, regional bodies. Instead, I urge you to protect the watershed-based, community-informed governance model that has safeguarded Ontario's waters and communities for decades.

For more than 75 years, Conservation Authorities have enabled municipalities sharing the same watershed to work together to reduce flood risk, protect drinking-water sources, steward natural ecosystems, and prepare for extreme weather. Although the government suggests that consolidation will resolve inconsistencies across Conservation Authorities, restructuring on this scale risks dismantling the very model that makes watershed management effective.

The effectiveness of Conservation Authorities comes from local expertise and governance aligned with watershed boundaries, not administrative regions. Oversized regions push decision-making farther away from the people and communities who know their watersheds best. Decades of monitoring, partnerships, and place-based science cannot be scaled up or replaced by a distant regional or provincial body. Make no mistake - this change will worsen water protections, increase flood risk, and put Ontarians at risk.

Strong, locally informed oversight is essential for public safety. While the government frames consolidation as a solution to inconsistencies across Conservation Authorities, it does not actually resolve these challenges. Diluted local authority and increased provincial control heighten the risk of weaker prevention measures and decisions that are disconnected from

lived watershed realities. Centralization also fails to account for the complexity and diversity of ecosystems and community needs.

It is also important to recognize that the Conservation Authorities Act has already undergone substantial “modernization”. Province-wide standards under Ontario Regulation 41/24 and reinforced mandatory programs under O. Reg. 686/21 have already targeted changes to address concerns related to consistency, transparency, and capacity. Recognizing that recent legislative and regulatory changes have already weakened key environmental protections, we cannot let our last remaining safeguards be further eroded.

There is no justification for sweeping structural changes now. Watershed governance must remain rooted in local realities. Centralizing decision-making into large regional bodies undermines the very principles that keep communities safe and drinking water protected.

I urge MECP staff & Ontario decisionmakers to oppose the proposed consolidation of Ontario’s Conservation Authorities and to speak out publicly against these changes. Failing to act would undermine your responsibility to safeguard the long-term interests of Ontarians, including the communities, waters, and ecosystems that rely on strong, locally grounded watershed governance. Safeguarding water is your responsibility and I trust you will reject these proposed changes in ERO Notice 025-1257.

Edda Engel

[REDACTED]

LOR 1P0

From: [Nature](#)
To: [Sandra Winninger](#)
Subject: FW: Comments on proposed merger of conservation authorities
Date: December 15, 2025 8:37:10 AM

Hamilton Conservation Authority

838 Mineral Springs Road, P.O. Box 81067

Ancaster, ON L9G 4X1

Phone: 905-525-2181

Email: nature@conservationhamilton.ca

www.conservationhamilton.ca



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From: Roland Tanner [REDACTED]
Sent: Sunday, December 14, 2025 7:31 PM
To: Natalie@nataliepierrempp.ca; effie.triantafilopoulos@pc.ola.org; Nature <nature@conservationhamilton.ca>; admin@hrca.on.ca
Subject: Comments on proposed merger of conservation authorities

To: Effie Triantafilopoulos MPP, Natalie Pierre MPP, Halton Conservation Authority, Hamilton Conservation Authority

Please find below my submission regarding the provincial government's planned merger of the current conservation authorities. I would appreciate it if both of Burlington's MPPs also registered my strong opposition to their government's proposals, and my admiration and respect for the excellent work our conservation authorities have done for many decades.

Yours faithfully,

Roland Tanner, [REDACTED]
[REDACTED] L7M 4T1

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----- Forwarded message -----

From: **Roland Tanner** [REDACTED]
Date: Sun, 14 Dec 2025, 7:14 pm
Subject: Comments on proposed merger of conservation authorities
To: <ca.office@ontario.ca>

To whom it may concern,

I strongly oppose the proposed merger of Ontario's conservation authorities into a far smaller number of authorities.

As a former contractor of a conservation authority, but one who has no financial or other incentive to colour my opinion today, I have seen the efficient, effective and worthwhile work that the authorities do to protect our watersheds, to maintain the safety of our communities and to act as stewards of important lands that need be protected for future generations.

The government has failed to demonstrate any evidence that there is a need for mergers, or shown evidence that there is currently duplication of effort or wastage in the existing authorities. Meanwhile so-called "streamlining of approvals" is poorly disguised code for a desire to weaken the environmental protections the conservation authorities are entrusted with maintaining in order to further degrade the limited remaining controls over urban planning and development held by anybody other than the provincial government and the OLT.

There need be no doubt that this change is motivated not by efficiency but by the need to further favour the Progressive Conservative Party's financial backers in the development industry. Developers, and developer profits, are the only sector of society who stand to benefit from this change. It is they alone who have asked for it. It is they alone for whom the majority of truly significant legislation since 2018 has been passed.

Developers have more than adequate powers already to build what they want, when they want, where they want. We have environmental protections to ensure the safety of our communities now and in the future. That is inconvenient for developers, and that is by design.

If the government seriously wants to address delays in development it should ask about the numerous approved developments that remain unbuilt, or address the expensive and massively time consuming OLT appeals processes whereby a large portion of all development proposals have to grind through the appeals process for years, when simply enforcing the official plans already approved by the province would enable development approvals to go through within a matter of months.

That broken OMB-LPAT-OLT appeals process, along with developers sitting on approved developments and not building while they wait for the best market, is where literally anything between 2 and 10 years is routinely lost between development application being submitted and actual building taking place. By contrast the entire process of municipal council and conservation

authority approval is handled within a matter of months ... and with strict and shortened time limits now in place that deliberately make the legally required approvals process difficult to undertake with any rigour.

The claimed logic for the mergers is dishonest and malign. The Conservation Authorities do an excellent and essential job and should be left alone to continue to do so.

Yours faithfully,

Roland Tanner, [REDACTED]
[REDACTED], L7M 4T1

CC Natalie Pierre MPP, Effie Triantafilopoulos MPP, Halton Conservation Authority, Hamilton Conservation Authority



From: [Nature](#)
To: [Sandra Winninger](#)
Subject: FW: Hamilton Conservation Authority (HCA) Submission re ERO #025 - 1257
Date: December 15, 2025 12:35:09 PM

Hamilton Conservation Authority

838 Mineral Springs Road, P.O. Box 81067
 Ancaster, ON L9G 4X1

Phone: 905-525-2181

Email: nature@conservationhamilton.ca

www.conservationhamilton.ca



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From: Jim Hudson <jdhudson88@gmail.com>
Sent: Monday, December 15, 2025 12:20 PM
To: Nature <nature@conservationhamilton.ca>
Subject: Fwd: Hamilton Conservation Authority (HCA) Submission re ERO #025 - 1257

Please forward to your Board Chair and Executive Director.

Thank you, Jim Hudson

----- Forwarded message -----

From: **Jim Hudson** <[REDACTED]>
Date: Mon, Dec 15, 2025 at 12:12 PM
Subject: Hamilton Conservation Authority (HCA) Submission re ERO #025 - 1257
To: <ca.office@ontario.ca>

We wish to acknowledge and support HCA's submission in its entirety.

We continue to be members of, and contributors to, HCA, and strongly supportive of their locally-focussed work to protect our valuable natural resources. We fail to see benefits in merging HCA with 3 other Conservation Authorities (CAs) with very different needs to form a "Western Lake Ontario Regional CA". Many of us support our local CAs in the belief they are best equipped to address local

needs. We see such local support declining under the proposed merger.

Please consider other less drastic measures to achieve your goals related to housing and cost reduction. Perhaps you might look at the model the Province of Ontario brought forward in its relatively new Regional Tourism Organization approach. You might improve efficiency and reduce costs without losing the benefits of being sensitive to local needs.

Thank you.

Jim Hudson (Hamilton/Dundas)

--

Jim Hudson

From: [Lisa Burnside](#)
To: [Sandra Winninger](#)
Subject: FW: My view on Stop the Conservation Authority Megamerger: Protect Local Watershed Oversight
Date: December 16, 2025 4:08:22 PM
Attachments: [image001.png](#)

Another for the file

From: Beattie, Jeff <Jeff.Beattie@hamilton.ca>
Sent: December 15, 2025 2:15 PM
To: [REDACTED]
Cc: Coffey, Jackie <Jackie.Coffey@hamilton.ca>; Clark, Brad <Brad.Clark@hamilton.ca>; Lisa Burnside <Lisa.Burnside@conservationhamilton.ca>
Subject: RE: My view on Stop the Conservation Authority Megamerger: Protect Local Watershed Oversight

Hi Colin,

Thanks for reaching out. I completely agree with the disappointment of the plan to amalgamate the CA's in Ontario, and we as a Board (of the Hamilton CA), as well as a City Council, have expressed our dismay over this decision.

I've included Cllr. Brad Clark, HCA Chair, as well as HCA CAO Lisa Burnside on my reply so they might see your letter as well.

Thanks again and my best to you and your family over the Holidays.

Jeff

Jeff Beattie

Councillor – Ward 10

Hamilton City Hall, 71 Main Street West – 2nd Floor, Hamilton, Ontario L8P 4Y5
 Ward 10 Office, Stoney Creek Municipal Service Centre - 777 Highway 8 (Fridays)
 Phone: 905-546-2701 | Email: jeff.beattie@hamilton.ca



From: Colin. Marshall [REDACTED]
Sent: Friday, December 12, 2025 6:35 PM
To: Beattie, Jeff <Jeff.Beattie@hamilton.ca>

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Subject: My view on Stop the Conservation Authority Megamerger: Protect Local Watershed Oversight

External Email: Use caution with links and attachments

Dear Jeff Beattie,

I write to you today as a concerned resident of Ontario to submit my strong opposition to the Province's proposal in ERO Notice 025-1257 to amalgamate Ontario's 36 Conservation Authorities into seven large, regional bodies. Instead, I urge you to protect the watershed-based, community-informed governance model that has safeguarded Ontario's waters and communities for decades.

For more than 75 years, Conservation Authorities have enabled municipalities sharing the same watershed to work together to reduce flood risk, protect drinking-water sources, steward natural ecosystems, and prepare for extreme weather. Although the government suggests that consolidation will resolve inconsistencies across Conservation Authorities, restructuring on this scale risks dismantling the very model that makes watershed management effective.

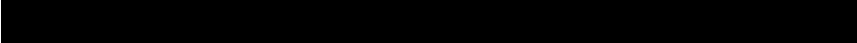
The effectiveness of Conservation Authorities comes from local expertise and governance aligned with watershed boundaries, not administrative regions. Oversized regions push decision-making farther away from the people and communities who know their watersheds best. Decades of monitoring, partnerships, and place-based science cannot be scaled up or replaced by a distant regional or provincial body. Make no mistake - this change will worsen water protections, increase flood risk, and put Ontarians at risk.

Strong, locally informed oversight is essential for public safety. While the government frames consolidation as a solution to inconsistencies across Conservation Authorities, it does not actually resolve these challenges. Diluted local authority and increased provincial control heighten the risk of weaker prevention measures and decisions that are disconnected from lived watershed realities. Centralization also fails to account for the complexity and diversity of ecosystems and community needs.

It is also important to recognize that the Conservation Authorities Act has already undergone substantial "modernization". Province-wide standards under Ontario Regulation 41/24 and reinforced mandatory programs under O. Reg. 686/21 have already targeted changes to address concerns related to consistency, transparency, and capacity. Recognizing that recent legislative and regulatory changes have already weakened key environmental protections, we cannot let our last remaining safeguards be further eroded.

There is no justification for sweeping structural changes now. Watershed governance must remain rooted in local realities. Centralizing decision-making into large regional bodies undermines the very principles that keep communities safe and drinking water protected.

I urge MECP staff & Ontario decisionmakers to oppose the proposed consolidation of Ontario's Conservation Authorities and to speak out publicly against these changes. Failing to act would undermine your responsibility to safeguard the long-term interests of Ontarians, including the communities, waters, and ecosystems that rely on strong, locally grounded watershed governance. Safeguarding water is your responsibility and I trust you will reject these proposed changes in ERO Notice 025-1257.



December 15, 2025

Sent Via Email

Re: Members' Motion - Consultation on the Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

The following resolution was ratified by Council of the City of Greater Sudbury on December 9, 2025:

WHEREAS municipalities have historically established and governed their conservation authorities under the Conservation Authorities Act;

AND WHEREAS municipalities provide approximately 54% of conservation authority funding, while the Province of Ontario provides approximately 5%. (2023 data);

AND WHEREAS for decades Conservation Sudbury and its predecessors have established programs and services to local watershed needs, maintained accountable service standards, and ensured fair and predictable costs for ratepayers;

AND WHEREAS the Authority operates the Lake Laurentian Conservation Area providing access to all visitors at no cost, maintains and operates flood control infrastructure across Greater Sudbury including dams in Copper Cliff and New Sudbury, weirs in Coniston, berms in Dowling and Capreol, and the box culvert under downtown Sudbury;

AND WHEREAS Conservation Sudbury owns and manages extensive lands for conservation, public protection, and recreational purposes, many of which are leased to private operators and to the City of Greater Sudbury for recreational purposes, including Timberwolf Golf Course, Adanac Ski Hill, Rotary Park, Garson Park, Carmichael Park, and portions of Fielding Park;

AND WHEREAS the Provincial Government has proposed the consolidation of Ontario's 36 conservation authorities into 7 large regional conservation authorities (RCAs) overseen by an additional layer of government named the Ontario Provincial Conservation Agency (OPCA), a move that would dilute local governance and put municipal cost distribution in question;

AND WHEREAS in time, the OPCA will levy participating municipalities for some of its operating costs and will collect fees from the RCAs, and Conservation Sudbury, as proposed, would be merged with the authorities operating from offices located in Sault Ste-Marie (SSMRCA), Timmins (MRCA), and North Bay (NBMCA);

AND WHEREAS assets of the existing authorities would be pooled under any new RCA, which would include all lands, buildings, chattels, bank accounts and reserves as well as all loans and other liabilities;

AND WHEREAS the imposition of a new oversight agency lacking local accountability risks creating unnecessary costs for municipalities and authorities alike, adding “red tape” and unnecessary bureaucracy, and thereby undermines an authority’s efficiency and responsiveness to local community needs;

THEREFORE BE IT RESOLVED THAT Council for the City of Greater Sudbury requests that the Government of Ontario consider:

1. Maintaining local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation which would allow appropriate levy decisions, community-focused services, proper management of conservation lands and allocation of reserves to projects and infrastructure in the communities where the funds were raised;
2. Avoid imposing a centralized agency structure that could introduce additional costs, red tape, and bureaucracy, reducing efficiency and responsiveness to local needs;
3. Collaborating with municipalities and conservation authorities to improve consistency, capacity, and program delivery across Ontario without compromising local accountability;
4. Rejecting the proposed “Northeastern Ontario Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257;
5. Requiring the Ministry to directly engage affected municipalities before finalizing consolidation boundaries or legislative amendments.

AND BE IT FURTHER RESOLVED that a copy of this resolution be sent to:

- The Environmental Registry of Ontario Consultations prior to the deadline of December 22, 2025
- The Honourable Todd J. McCarthy, Minister of the Environment, Conservation and Parks
- MPP Peter Tabuns, Official Opposition Critic
- Frances Gélinas, MPP for Nickel Belt
- Jamie West, MPP for Sudbury
- The Association of Municipalities of Ontario
- Conservation Ontario

- All municipalities within the proposed Northeastern Regional Conservation Authority boundary which includes the Cities of Timmins, Sault Ste-Marie and North Bay, as well as Prince Township, the Municipalities of Callander, Calvin, East Ferris, Mattawan and Powassan, the Town of Mattawa and the Townships of Bonfield, Chisholm and Papineau-Cameron
- Nickel District Conservation Authority

Yours truly,



Brigitte Sobush
Manager of Clerk's Services/Deputy City Clerk
c. Members of City Council

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December 15, 2025

Hon. Todd J. McCarthy
Minister of the Environment, Conservation and Parks

Hassaan Basit
Chief Conservation Executive

c/o Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North Tower, 5th floor
Peterborough, ON K9J 3C7

Dear Minister McCarthy and Mr. Basit:

Re: Bill 68 and proposed boundaries for the regional consolidation of Ontario's Conservation Authorities (ERO #025-1257)

Thank you for the opportunity to provide input on the proposed boundaries for the regional consolidation of conservation authorities (CAs).

For more than 60 years, Conservation Halton (CH) has been a trusted and accountable partner to the Province of Ontario and our funding municipalities. Guided by strong fiscal management, operational excellence, and a culture of innovation, we have successfully modernized our programs and services. We are proud to be recognized as an innovative leader and top employer in the region, and are committed to excellence through modern digital solutions, robust governance, and responsive client service standards.

CH appreciates the Province's intent to modernize CAs and increase consistency, transparency, and capacity. While these goals are valid, the proposal does pose some risks that may be addressed through further collaboration and leveraging best practices from high-performing organizations such as CH. Outlined below are select recommendations, with details in the attached ERO response and CH Board Report No. CHB 08 25 01 for your consideration.

Preserve Local Governance, Accountability, and Decision-Making

CH is currently proposed to become part of the Western Lake Ontario Regional Conservation Authority (WLOORCA), which would include 27 lower- and single-tier municipalities. Watershed conditions and community priorities vary significantly across the proposed Regional Conservation Authority (RCA) jurisdiction.

To preserve local governance and decision-making, we recommend that the Province:

- Establish criteria for RCA Board representation that go beyond population size to include factors such as land base and levy contributions.
- Enable the creation of local watershed boards with meaningful authority and accountability integrated to maintain community-informed decision-making.
- Consider RCA-nominated municipal representation on the Ontario Provincial Conservation Agenda (OPCA).
- Ensure CA assets continue to serve local watershed priorities; reserves, infrastructure, and land holdings must be invested in local priorities as determined through existing Board policies.
- Consider reducing the size of RCAs and allow CH to voluntarily consolidate with CAs that have shared boundaries and similar performance and program standards. Alternatively, consider consolidating permitting and planning responsibilities with direct oversight by the OPCA.

Retain Local Expertise and High Performance

We appreciate the Province's priorities for housing and the economy, and the need for more predictable and consistent permit turnaround times for builders, farmers, and landowners. Municipalities, stakeholders, and the public depend on CH's local knowledge and expertise. Any proposed changes must preserve CH's brand and reputation as a customer-centric, accountable, efficient, and solutions-oriented organization, particularly in our permitting and hazard management programs. CH consistently meets or exceeds strategic targets established for development review services; in 2024, CH issued 99% of minor permits within 30 days and 98% of major permits within 90 days. CH's hazard and regulatory mapping is updated annually, and there were no requests for administrative reviews in 2024.

To retain local expertise and high performance, we recommend that the Province:

- Retain local offices to ensure continuity of service and responsiveness.
- Establish CA working groups for key program and service areas and leverage high-performing CAs to develop solutions and best practices across Ontario (e.g., harmonize policies, share best practices, and maintain service standards). Alternatively, the Province may consider an advisory group of key stakeholders and experts to work with the OPCA to facilitate a phased approach to consolidation and effective transition.
- Create a consortium of high-performing CAs with shared services.

Ensure Transparent Budgeting and Sustainable Funding

With strong fiscal principles, CH has worked diligently to minimize reliance on taxpayers and align our budgets with local municipal priorities. We consistently follow municipal guidelines, and 96% of municipal levy supports Provincially-mandated programs. Our parks and recreation programs are fully self-funded, and our permit fees are cost-recovery. CH's self-generated revenues must remain dedicated to local watershed priorities and extensive growth pressures on CH's conservation areas.

To ensure transparent budgeting and sustainable funding, we recommend that the Province:

- Streamline budget approval processes to reduce administrative burden while preserving transparency and municipal engagement. Continue applying *Ontario Regulation 402/22 (Budgeting and Apportionment)* to prevent disruption to municipal budget processes and program funding during and after the transition.
- Develop an equitable apportionment model to prevent cross-subsidization between jurisdictions.
- Maintain existing revenue streams and reserves for local priorities. Allow CH and our municipal partners to establish a local watershed entity with responsibility for key assets (e.g., land, parks, infrastructure) and select programs and services, as well as to maintain current branding.
- Support transition and hazard program modernization costs.

We appreciate the opportunity to share suggestions on how the Province can meet its goals while upholding the high-quality services we deliver to residents, stakeholders, and municipalities.

Sincerely,



Gerry Smallegange
Chair, Conservation Halton Board

Cc:

Halton Region
City of Burlington
Town of Halton Hills
Town of Milton
Town of Oakville
City of Hamilton
Township of Puslinch
Peel Region
City of Mississauga
Conservation Ontario

Encl. Conservation Halton Response to ERO #025-1257: Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities

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

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

Conservation Halton (CH) appreciates the Province of Ontario's goals of standardization, consistency, and enhanced capacity for Conservation Authorities (CAs). We welcome the Province's commitment to strengthening relationships and support for CAs. Key factors that would support the successful transition to any proposed model include:

- **Phased implementation** – Consider phasing the implementation of the standardization and consolidation to areas where support is most needed. Develop a clear and phased implementation plan.
- **Quick wins** – Prioritize quick wins and changes that will have the greatest impact on achieving the Province's goals. Leverage expertise and best practices from high-performing CAs to help identify opportunities for quick wins and areas for improvement.
- **Expert working groups and advisory groups** – Establish working groups with CA staff from key program and service areas to harmonize policies and permit requirements, identify opportunities for regulatory improvements, create standardized procedures and processes, prioritize hazard mapping updates, and integrate data. The Province may also consider an advisory group of key stakeholders to advance the proposal further.
- **Local expertise and services** – Retain local offices to ensure stakeholders continue to access high-quality services, dedicated staff, and open communication channels.
- **Local assets and resources** – Ensure CA assets and resources continue to serve local watershed priorities. Existing CA reserves, infrastructure, and land assets, along with aspects of asset management plans, Board-approved reserve policies, and capital investment plans for facilities and infrastructure, must not be lost. Redistributing well-developed reserves to other jurisdictions could dilute CH's mature asset management program and ability to deliver high-quality services, assets, and resources that the local community values.
- **Local accountability and decision-making** – Maintain a local governance and decision-making model by enabling the establishment of Local Boards based on watershed boundaries or current CA boundaries. This would ensure that the

principles of effective watershed management, which are rooted in bottom-up, community-informed decision-making, are preserved.

- **Financial support during the transition** – Provide financial support during the transition to minimize financial strain on approved CA budgets and continuation of frontline watershed services.
- **Budget processes and revenue streams** – Maintain the current municipal budget process and CA budget and apportionment regulation for 2026 (or as long as necessary) to avoid disruptions. Ensure self-generated revenue streams remain uninterrupted.
- **Change management and communication** – Ensure open communication with CAs, municipalities, and the public, as well as provide change management support to CAs.
- **Regional Conservation Authority boundaries** – Consider including additional criteria for determining Regional Conservation Authority (RCA) boundaries to ensure RCA Board structure and boundaries best reflect the communities they will represent. Additional considerations such as community characteristics (e.g., rural versus urban), overall RCA size and jurisdiction, growth pressures, and watershed resource issues should inform boundary decisions. Consider reducing the size of RCAs and allow CH to voluntarily consolidate with CAs that have shared boundaries and similar performance and program standards. Alternatively, the Province could consider a) consolidating permitting and planning responsibilities with direct oversight by the Ontario Provincial Conservation Agency (OPCA); b) a consortium of high-performing CAs with shared services; or c) allow CH and our municipal partners to establish a local watershed entity with responsibility for key assets (e.g., land, parks, infrastructure) and select programs and services, as well as to maintain current branding.
- **Updated Provincial technical policies and guidelines** – Expedite the delivery of regulatory tools to support hazard management programs and services, and to ensure timely and consistent permit reviews (e.g., technical guides to support permitting and flood hazard mapping).

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

Potential opportunities that may come from the consolidation of CAs include:

- Improved resource-sharing and modernization, particularly for CAs with limited capacity or technical expertise.
- Greater consistency in policies, permitting, planning reviews, hazard mapping, programs, and administrative systems. Shared modelling tools, monitoring databases, and mapping platforms will enhance climate-resilient planning.
- Expanded access (where technically feasible and cost-effective) to parks and open spaces for annual pass holders and visitors, improving the overall experience.

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?

Suggestions related to RCA governance structure include:

- Ensure the criteria for determining RCA Board representation goes beyond population to create a fair structure that reflects the entirety of the RCA. Additional criteria could include land base, community characteristics (e.g., rural versus urban), and/or apportionment contributions.
- Set a maximum number of RCA Board members (e.g., 20-25 members) to ensure the Board is efficient and effective.
- Consider extending the current term of the Board to facilitate a smooth transition.
- Define formal guardrails or governance principles for the OPCA Board to ensure local RCA Board governance and decision-making is maintained. OPCA Board representation should include at least one representative from each RCA.
- Enable the establishment of Local Watershed Boards with meaningful authority. Local Boards could be based on existing CA boundaries and have oversight over select programs or service areas and/or specific geographical areas (e.g., existing drinking water source protection regions).
- Consider RCA-nominated municipal representation on the OPCA Board.

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

Suggestions on maintaining a transparent and consultative budgeting process across member municipalities include:

- Maintain *Ontario Regulation 402/22 (Budget and Apportionment)*, which came into effect for the 2024 budget year, to avoid disruptions to municipal budget processes and program funding during and beyond the transition. This will ensure continuity of services and funding for ongoing programs.
- Streamline the budget approval process and mechanisms to reduce administrative burden while maintaining transparency, as it would be cumbersome and inefficient for the new RCAs to undertake the same level of engagement that current CAs do with every participating municipality (e.g., one RCA may have 25-50 municipalities).
- Standardize the budget framework and ensure early engagement with municipalities. Ensure budgeting is transparent, collaborative, and aligned with service-level expectations.
- Preserve CA self-generated revenues and reserves for local priorities, consistent with existing Board policies.

- Consider creating a transition fund administered by the OPCA to support the costs associated with transition and consolidation based on defined criteria and rules. These costs can be extensive, ranging from legal, insurance and risk, contractual, etc.

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

RCA's can maintain relationships with local communities and stakeholders by:

- Retaining local offices to maintain public and stakeholder access to high-quality services, dedicated staff, and open communication channels.
- Leveraging CH's decades of public trust and name recognition, as well as data and science resources, to build new tools, technologies, and services that would benefit Ontarians (e.g., interactive and predictive hazard and environmental modelling).
- Ensuring continuity of current programs and services (e.g., hazard management, education, parks programming, and events); maintaining high-quality service, communication, and local accountability is essential.
- Engaging consistently with residents, partners, and stakeholders.
- Ensuring open communication with CAs, municipalities, Indigenous partners, and the public, as well as providing change management support to CAs.

From: [Nicole Kupnicki](#)

To: [Chitra Gowda](#); [Adrain Wynands \(SNC Vice Chair/1st Voting Delegate\)](#); [Adrian Cornellisen \(ABCA Vice Chair/1st Voting Alternate\)](#); [Ann Lawlor \(CVC Vice Chair/1st Voting Alternate\)](#); [Bob Chapman \(CLOCA Chair/Voting Delegate\)](#); [Brad Calrk \(Hamilton Chair/Voting Delegate\)](#); [Brian McGillis \(RCCA Chair/Voting Delegate\)](#); [Clare Riepma \(LSRCA Chair/Voting Delegate\)](#); [Colin McLellan \(CVCA Chair/Voting Delegate\)](#); [Dave Barton \(CO Chair\)](#); [Dave Beres \(LPRCA Chair/Voting Delegate\)](#); [Dean Trentowsky \(UTRCA Chair/Voting Delegate\)](#); [Don Kuntze \(Quinte Chair/Voting Delegate\)](#); [Donna Blunt \(Lakehead Chair/Voting Delegate\)](#); [Doug Brunton \(LPRCA Vice Chair/1st Voting Alternate\)](#); [Ed McGugan \(Maitland Chair/Voting Delegate\)](#); [Evan Hickey \(Maitland 2nd Vice Chair/2nd Voting Alternate\)](#); [Gail Little \(NVCA Vice Chair/1st Voting Alternate\)](#); [Gary Oosterhof \(CRCA Vice Chair/1st Voting Alternate\)](#); [Gary Waterfield \(RCCA Chair/Voting Delegate\)](#); [Gene Brahaney \(LTC Chair/Voting Delegate\)](#); [Gerry Smallegange \(Halton Chair/Voting Delegate\)](#); [Greg Grimes \(SCRCA Chair/Voting Delegate\)](#); [Harold Wright \(KRCA Vice Chair/1st Voting Alternate\)](#); [Jacques Massie \(RCCA Vice Chair/1st Voting Alternate\)](#); [Janice Maynard \(Quinte Vice Chair/1st Voting Alternate\)](#); [Jennifer Davidson \(NDCA Vice Chair/1st Voting Alternate\)](#); [Jim Morrison \(ERCA Vice Chair/1st Voting Alternate\)](#); [Jim Vezina \(Lakehead Vice Chair/1st Voting Alternate\)](#); [Joe Torlone \(MRCA Chair/Voting Delegate\)](#); [John Challinor II \(GRCA Chair/Voting Delegate\)](#); [John Metcalfe \(NPCA Chair/Voting Delegate\)](#); [Jonathan Scott \(NVCA Chair/Voting Delegate\)](#); [Kevin Duguay \(ORCA Vice Chair/1st Voting Alternate\)](#); [Kristen Rodrigues \(SCRCA Vice Chair/1st Voting Alternate\)](#); [Kristin Stackerman \(RVCA Vice Chair/1st Voting Alternate\)](#); [Lana Mitchell \(NBMC Vice Chair/1st Voting Alternate\)](#); [Mark Schadenberg \(UTRCA Vice Chair/1st Voting Alternate\)](#); [Matt Duncan \(MVCA Vice Chair/1st Voting Alternate\)](#); [Michael Metcalf \(ORCA Chair/Voting Delegate\)](#); [Michael Palleschi \(CVC Chair/Voting Delegate\)](#); [Michelle Lahaye \(NBMC Vice Chair/Voting Delegate\)](#); [Molly Allaire \(ERCA Chair/Voting Delegate\)](#); [Morgaine Griffin \(CCCA Chair/Voting Delegate\)](#); [Nadia Dubyk \(GSCA Vice Chair/1st Voting Alternate\)](#); [Pat Warren \(KRCA Chair/Voting Delegate\)](#); [Paul Ainslie \(TRCA Chair/Voting Delegate\)](#); [Paul Allen \(SVCA Vice Chair/1st Voting Alternate\)](#); [Paul Buchner \(CCCA Vice Chair/1st Voting Alternate\)](#); [Paul Kehoe \(MVCA Vice Chair/1st Voting Alternate\)](#); [Paul Proderick \(CTCA Chair/Voting Delegate\)](#); [Paul Tiessen \(LTVCA Chair/Voting Delegate\)](#); [Randy Greenlaw \(LSRCA Vice Chair/2nd Alternate\)](#); [Ray Chartrand \(ABCA Chair/Voting Delegate\)](#); [Rhonda Mulcahy \(CLOCA Vice Chair/1st Voting Alternate\)](#); [Robert Uhrig \(GSCA Chair/Voting Delegate\)](#); [Rock Whissell \(MRCA Vice Chair/1st Voting Alternate\)](#); [Ron Zagordo \(SSMRCA Vice Chair/1st Voting Alternate\)](#); [Roy Huetl \(MVCA Chair/Voting Delegate\)](#); [Sandra Hollingsworth \(SSMRCA Chair/Voting Delegate\)](#); [Sharron McMillan \(KCCA Vice Chair/1st Voting Alternate\)](#); [Sherry Hamilton \(LTC Vice Chair/1st Voting Alternate\)](#); [Stephen Kaufman \(NDCA Chair/Voting Delegate\)](#); [Steve Densham \(SNC Chair/1st Voting Alternate\)](#); [Stewart Beatie \(NPCA Vice Chair/1st Voting Alternate\)](#); [Susan Fielding \(Hamilton Vice Chair/1st Voting Alternate\)](#); [Todd Noble \(KCCA Chair/Voting Delegate\)](#); [Tom Hutchinson \(SVCA Chair/Voting Delegate\)](#); [Vicki Mink \(GRCA Chair/Voting Delegate\)](#); [Alison McDonald \(RCCA\)](#); [Brad McNevin \(Quinte\)](#); [Carl Bickerdike \(SNC\)](#); [Carl Jorgensen \(NDCA\)](#); [Chandra Sharma](#); [Chris Darling \(CLOCA\)](#); [Corrina Barrett](#); [David Ellingwood \(CRCA\)](#); [David Vallier \(MRCA\)](#); [Davin Heinbuck \(ABCA\)](#); [Dusty Underhill \(CCCA\)](#); [Elizabeth VanHooren](#); [Erik Downing \(SVCA\)](#); [Janette Loveys Smith \(ORCA\)](#); [Jennifer Vincent \(NVCA\)](#); [John Mackenzie \(TRCA\)](#); [Judy Maxwell \(LPRCA\)](#); [Ken Phillips \(SCRCA\)](#); [Leilani Lee-Yates](#); [Linda Laliberte \(GRCA\)](#); [Lisa Burnside](#); [Mark Majchrowski \(Kawartha\)](#); [Mark.peacock](#); [Phil Beard \(Maitland\)](#); [Rhonda Bateman \(LTC\)](#); [Rob Baldwin \(LSRCA\)](#); [Sally MacIntyre \(MVCA\)](#); [Samantha Lawson \(GRCA\)](#); [Sommer Casgrain-Robertson \(RVCA\)](#); [Tammy Cook](#); [Terri LeRoux \(CVC\)](#); [Tim Lanthier](#); [Tracy Annett \(UTRCA\)](#)

Cc: [Tim Byrne](#); [Abbie Gutteridge \(ABCA\)](#); [Adriana Birza](#); [Ashley Fletcher \(SCRCA\)](#); [Brandi Boardman \(CLOCA\)](#); [Brittany Bell](#); [Debbie Tomas \(SSMRCA\)](#); [Donna Campbell](#); [Eowyn Spencer](#); [Gina Shaule \(NPCA\)](#); [Janice Hagan](#); [Jennifer Bonsall \(MRCA\)](#); [Jessica Kirschner](#); [Josianne Sabourin](#); [Kally Casier \(LTVCA\)](#); [Kerry Jenkins \(NVCA\)](#); [Kim Baldini \(GRCA\)](#); [Kim Duke \(ORCA\)](#); [Kim Squire \(NPCA\)](#); [Leena Eappen \(TRCA\)](#); [Marissa Grondin \(RVCA\)](#); [Melanie Davis](#); [Melanie Dolamore](#); [Melanie O'Riley \(Lakehead\)](#); [Melanie Venne](#); [Michelle Quipp \(Maitland Valley\)](#); [Michelle Sirizzotti \(TRCA\)](#); [Michelle Vigliantini \(UTRCA\)](#); [Nicole Kupnicki](#); [Nicole Sullivan](#); [Rachel Clouthier \(Mississippi\)](#); [Rebecca Morrow \(NBMC\)](#); [Robyn Koutrouliotis](#); [Ronda Boutz](#); [Sandra Wunninger](#); [Chipperfield, Tamara](#); [Tammy Smith](#); [Trish Barnett](#); [Valerie Coleman](#); [Abhijit Datta](#); [Angela Coleman](#); [Bonnie Fox](#); [Jenna Salvatore](#); [Jo-Anne Rzadki](#); [Katie Franken](#); [Kristin Bristow](#); [Lauren McPherson](#); [Leslie Rich](#); [Nekeisha Mohammed](#); [Nicholas Fischer](#); [Nicole Barbato](#); [Patricia Moleirinho](#); [Rick Wilson](#); [Robyn Rumney](#); [Stephanie Reed](#); [Angelo Marignani \(amarignani@citywindsor.ca\)](#); [Bill Dunn](#); [Dayne Malloch \(dcmalloch@hotmail.com\)](#); [Dennis Rogers](#); [Fathers, Frazier](#); [Jason Matyi \(jmatyi@essex.ca\)](#); [Jeff Renaud \(jrenaud@lasalle.ca\)](#); [Jim Morrison \(jmorrisson@citywindsor.ca\)](#); [Joe Bachetti \(jbachetti@tecumseh.ca\)](#); [Katie McGuire-Blais \(kblais@essex.ca\)](#); [Kieran McKenzie \(kmckenzie@citywindsor.ca\)](#); [Larry Verbeke \(lverbeke@leamington.ca\)](#); [Mavor Tracey Bailey \(tbailey@lakeshore.ca\)](#); [Michael Akpata \(makpata@lasalle.ca\)](#); [Molly Allaire \(mallaire@amherstburg.ca\)](#); [Peter Courtney \(pcourtney@amherstburg.ca\)](#); [Ryan McNamara \(rmcnamara@lakeshore.ca\)](#); [Tania Jobin \(tjobin@tecumseh.ca\)](#); [Thomas Neufeld \(TNeufeld@kingsville.ca\)](#)

Subject: Local Association Response and Submissions

Date: December 16, 2025 10:59:02 AM

Attachments: [image001.png](#)
[Ltr HCA To Province re Proposal to Amalgamate Conservation Authorities 11 19 2025.pdf](#)
[WEHBA Letter to ERCA.pdf](#)
[RCS Letter - Proposed Amalgamation of Provincial CAs 11 19 2025.pdf](#)

Sent on behalf of Tim Byrne, CAO and Molly Allaire, Chair:

Good morning,

As we move forward with providing communication to the Province, it is imperative that we reach out to those that we work with, to those that we communicate with on a regular basis regarding the work that we undertake, and those familiar with who Conservation Authorities

are and how we function within watershed decision making processes. Each you of are encouraged to reach out to your networks and have the conversations to inform stakeholders of the potential impacts. This information has been a lot for all of us to digest and those on the “outskirts” may not fully appreciate the nuances and gravity of this path forward. If people are not asked, they will not respond, even on issue that may not touch them directly now, but could in the future. Collectively, we should not be afraid of reaching out to ask questions and secure responses of organizations and groups within our spheres. The actual answers provided will help inform us of directions and decisions we need to make and should provide the facts that Provincial/Ministerial decision-makers need to respond to.

The examples attached above along with others have been provided in some cases without solicitation and in some cases where staff have approached and informed. If we do not proceed with fully informing stakeholders and ensuring that the ERO is responded to, then determinations will be made without any local input.

A letter writing campaign is encouraging, however along with **a formal response to the 5 questions posed directly within the ERO posting is critical** to ensure that the voices and opinions of our stakeholders is actually considered and registered in the event that letters are summarily discarded as not meeting the standard for a sufficient response.

Yours in conservation,
Tim and Moly



NICOLE KUPNICKI, (H)BA, B.Ed, CHRL (she / her)
Essex Region Conservation Authority
360 Fairview Avenue West, Suite 311, Essex, Ontario N8M 1Y6
P. 519-776-5209 x 354 F. 519-776-8688
***I am working remotely. Please call 519-981-4469**
nkupnicki@erca.org www.essexregionconservation.ca

We work flexibly at ERCA. While this email is sent when it is convenient for me, I do not expect a response or action outside of your own regular working hours.

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November 19, 2025

Andrew Dowie

Member of Parliament Windsor Essex

Parliamentary Assistant to the Minister of Environment, Conservation and Parks

Via Email

Re: Proposal to Amalgamate Conservation Authorities

Dear Mr. Dowie:

We are writing to you today regarding the province's intention to amalgamate Conservation Authorities (CA) in Ontario, which will reduce the number of CAs from thirty-six agencies to seven. We question the warrants for such an initiative, and have significant concerns with the proposal, on the basis that it will:

- Adversely impact responsiveness and extend approval times, resulting in significant project delays and confusion; and,
- Convert CAs to a pseudo provincial body, thereby reducing efficiency, as well as local accountability.

Many of our member companies work in the field of, or benefit from, "land development", and over the years have built relationships with the local representatives of the Essex Region Conservation Authority (ERCA). As a local approval agency, they function in a very professional manner and facilitate solutions for compliance with Provincial Policy. When non-routine issues do arise, we feel it is beneficial to have the ability to deal with a local representative that can interpret Provincial Policy and find solutions that suit our local geography and conditions.

In comparison, any time that it is necessary to deal with Provincial agencies such as MNR or MECP, significant delays are realized due to the unfamiliarity of individuals that lack local knowledge. Furthermore, at present there is a good relationship between member municipalities and the local CA. When issues arise where compromises are needed between conflicting requirements, solutions can be efficiently achieved. This is not the experience that has been observed when dealing with provincial agencies.

It is our understanding that ERCA will be amalgamated with seven other CAs to form the Lake Erie RCA. We suspect that the head office of this Regional Authority would be centrally located

in either the London region or Waterloo/Kitchener/Cambridge region. Obviously, this would impact efficiencies, particularly in terms of communications and meetings.

We understand that ERCA's budget is largely paid by the local municipal governments and that, except for an insignificant amount paid towards Source Water Protection, that ERCA is largely "self-funded". What does the Provincial government hope to achieve from the amalgamation process? What are the true objectives of this initiative?

In summary, there seems to be more downside to this proposal than upside. Rather than the proposed amalgamation, this region would prefer to see a return to higher levels of government downloading their responsibilities to the local CA, so that policies and objectives can be more efficiently managed by local individuals that are accountable to their member municipalities, with proper support from higher levels of government. We recall that this was once the case, when ERCA had jurisdiction over such things as the Fisheries Act, Public Lands Act, and natural heritage legislation, and dealt with all relevant legislation as a "one window" approval agency.

We would welcome the opportunity to discuss this initiative with you further.

Yours truly,

A handwritten signature in blue ink, appearing to read "Jim Lyons", with a stylized flourish at the end.

Jim Lyons, Executive Director

Cc. Premier Doug Ford



19 November 2025

**MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON
K9J 3C7**

Attn: Public Input Coordinator

Re: Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

To whom it may concern,

It is our understanding that the consolidation of Ontario's 36 conservation authorities into 7 regional CAs has been brought forward in an effort to operate with greater consistency and streamline the permit process.

As the President of RC Spencer Associates Inc., my engineering firm has been operating in Southwestern Ontario for over 35 years, with hundreds of projects requiring conservation authority approval, primarily in the Essex Region Conservation Authority (ERCA) region. Through my experience, I can substantiate that the input and local expertise of the conservation authority staff have been invaluable in advancing projects through the design and approval stage, with consideration to protect property owners from the dangers of flooding and erosion.

I am very concerned that through the consolidation into regional conservation authorities, the focus will shift toward broad review standards without adequate consideration to our specific local watershed characteristics. The local CA staff have decades of site-specific historical knowledge which they can use to provide informed direction and guidance to ensure that flood risks are mitigated in the most appropriate manner. A shift toward generalized regional standards and review practices will take away from the quality input that we have come to appreciate from our local conservation authorities.

Another significant concern that will inevitably result from the regional approach will be the loss of efficient communication. Through decades of experience with our local conservation authorities, we have built a working relationship where open communication has become normal practice. The approach of larger regional CA offices will result in a disconnect from the local issues and create new layers of administrative burden in assigning projects for review.

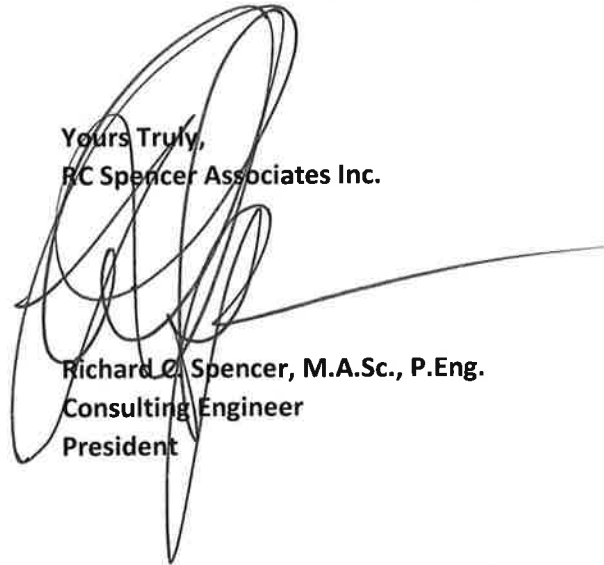


In recent years we have observed the benefits of the CLI-ECA review process introduced in 2023. This framework shifted away from regional ECA review process and transferred the approval authority for municipal sewage and stormwater systems to the local municipalities. This change has resulted in significant improvements to review timelines and approvals.

We feel that the *“Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities”* is moving in the opposite direction. It appears to be shifting the focus away from the local review agencies, that have direct accountability to local municipalities, creating a generalized regional approach which will result in a disconnect from local concerns.

Therefore, it is our recommendation that the permit review and approval process needs to prioritize and acknowledge the value of local review staff with specialized local watershed knowledge. There is a notable advantage to maintaining the current model of local staff presence, which creates a natural accountability in the success of the projects as well as the protection to the property owners from flood risk.

Yours Truly,
RC Spencer Associates Inc.



Richard C. Spencer, M.A.Sc., P.Eng.
Consulting Engineer
President





Ontario
Home Builders'
Association



WINDSOR ESSEX HOME BUILDERS' ASSOCIATION

2880 Temple Dr,
Windsor, ON
N8W 5J5

December 15th , 2025

Andrew Dowie
Member of Parliament, Windsor–Essex
Parliamentary Assistant to the Minister of Environment,
Conservation and Parks
Via Email

Re: Proposed Amalgamation of Conservation Authorities

Dear Mr. Dowie:

On behalf of the Windsor Essex Home Builders' Association (WEHBA), we are writing to share our perspective on the Province's proposal to amalgamate Conservation Authorities (CAs) across Ontario.

Our members are actively involved in residential development throughout Windsor–Essex and regularly work with the Essex Region Conservation Authority (ERCA). Over many years, ERCA has established itself as a highly professional, responsive, and practical local approval agency. The ability to engage directly with knowledgeable local staff—who understand both Provincial Policy and the unique geographic, environmental, and development conditions of our region—has been invaluable in facilitating timely and effective project approvals.

Our primary concern with the proposed amalgamation is the potential loss of this local accessibility. Being able to speak with a local representative who understands Windsor–Essex conditions, municipal priorities, and site-specific challenges has consistently led to better outcomes for all parties. We are concerned that a larger, centralized regional authority could make this type of direct, local engagement more difficult, particularly if decision-making and staff resources are located outside our region.

In our experience, ERCA has demonstrated how Conservation Authorities can work collaboratively with municipalities and industry while still upholding Provincial policy objectives. Their approach has helped resolve non-routine issues efficiently and pragmatically, often avoiding unnecessary delays. In our view, this is a model worth recognizing, and potentially one that other Conservation Authorities across the province could learn from.



We also understand that ERCA is largely funded by its member municipalities, with provincial contribution for only Source Water Protection and Flood forecasting. Given this structure, we respectfully question what efficiencies or improvements the proposed amalgamation is intended to achieve, particularly for regions where the current system is already functioning well.

Rather than a broad restructuring, we believe there may be value in examining how successful local Conservation Authorities—such as ERCA—operate, and whether best practices from these organizations could be applied more widely across Ontario. Preserving strong local knowledge, accountability, and relationships should remain a priority.

WEHBA would welcome the opportunity to discuss this matter further and to share our members' experiences working with ERCA and local municipalities.

Thank you for your time and consideration.

Yours truly,

A handwritten signature in black ink, appearing to read "N. Bolger", is written over a light blue horizontal line.

Norbert Bolger
Chair

Windsor Essex Home Builders' Association

Cc: Premier Doug Ford

The Windsor-Essex Home Builders' Association is the voice of the residential construction industry in our region. WEHBA is 1 of 27 local associations across the province, that comprises the Ontario Home Builders Association, representing 4,000 member companies. The residential construction industry employs over 550,000 workers, paying \$38.8 billion in wages and contributing over \$80 billion in investment value to Ontario's economy (2022). Our members have the vital responsibility to build the housing supply that current Ontario residents are counting on at all stages of their lives and be the voice of future home buyers who want to call our province home.

TOWNSHIP OF EDWARDSBURGH/CARDINAL

k

Resolution Number 2014-339

December 8, 2025

Moved By: _____

Seconded By: Joe Mc

WHEREAS the *Conservation Authorities Act* (1946) enables municipalities to establish Conservation Authorities and appoint locally elected representatives to their Boards, ensuring direct municipal oversight and accountability for programs funded by municipal taxpayers;

AND WHEREAS SNC delivers essential services that support municipal responsibilities, including:

- natural hazard identification and permitting;
- watershed planning and development review;
- flood forecasting, emergency management, and low water response;
- drinking water source protection;
- watershed monitoring, reporting, and technical studies;
- sustainable forestry, agricultural stewardship, and restoration programs;
- management of over 13,000 acres of conservation lands, including lands donated by residents and managed through municipal service agreements;

AND WHEREAS the Township of Edwardsburgh Cardinal is concerned that restructuring may:

- increase red tape and administrative burden;
- impose significant transition costs for HR, IT, land transfers, and governance realignment;
- dilute rural voices within large regional agencies dominated by major urban centres;
- erode donor confidence and affect the stewardship of thousands of acres of locally donated lands;
- disrupt bilingual service delivery in designated municipalities governed by the *French Language Services Act*;

AND WHEREAS SNC already collaborates regionally through successful shared-service models, joint watershed studies, coordinated flood forecasting, agricultural stewardship partnerships, digital permitting, and harmonized technical reviews, demonstrating that modernization and efficiency can be achieved without dismantling local governance structures;

TOWNSHIP OF EDWARDSBURGH CARDINAL

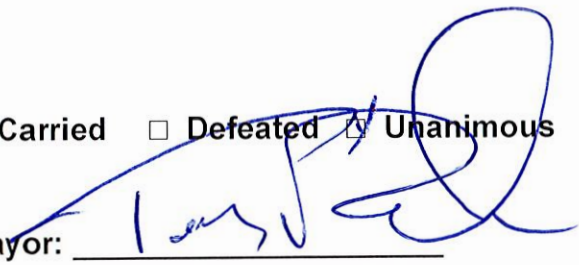
December 8, 2025

NOW THEREFORE BE IT RESOLVED THAT the Council of the Corporation of the Township of Edwardsburgh Cardinal urges the Government of Ontario maintain South Nation Conservation as a local, municipally governed, watershed-based Conservation Authority;

AND FURTHER THAT a copy of this resolution be sent to:

- the Minister of the Environment, Conservation and Parks;
- local MPPs and MPs;
- all municipalities within the South Nation Watershed;
- the Association of Municipalities of Ontario;
- the Rural Ontario Municipal Association;
- Conservation Ontario; and
- all Conservation Authorities in Ontario.

Carried Defeated Unanimous

Mayor: 

RECORDED VOTE REQUESTED BY: _____		
NAME	YEA	NAY
Councillor J. Martelle		
Councillor W. Smail		
Councillor C. Ward		
Deputy Mayor S. Dillabough		
Mayor T. Deschamps		
TOTAL		

December 17, 2025

The Honourable Todd J. McCarthy
Minister of Environment, Conservation and Parks College Park
5th Floor
777 Bay St.
Toronto, ON M7A 2J3
via email : minister.mecp@ontario.ca

Subject: Notice of Council Resolution — Conservation Authorities Act

Dear Honourable Minister McCarthy,

At its regular meeting of December 10, 2025, the Council of the City of Clarence-Rockland passed a resolution regarding the future of Conservation Authorities. The following excerpts reproduce the operative clauses of the resolution; the complete resolution is attached.

NOW THEREFORE BE IT RESOLVED THAT the Council of the City of Clarence-Rockland urges the Government of Ontario to maintain local, municipally governed, watershed-based Conservation Authorities, including South Nation Conservation, to ensure effective natural resource and natural hazard management, transparent local services, and accountability for municipal levy dollars;

AND FURTHER THAT this Council does not support the proposed consolidation boundaries presented in ERO #025-1257 or the creation of a new provincial Conservation Agency without evidence-based analysis, transparent consultation, and clear articulation of impacts to municipal budgets, local service delivery, donor lands, and bilingual obligations;

AND FURTHER THAT this Council encourages the Province to work collaboratively with municipalities and Conservation Authorities to identify opportunities for improved consistency, modernization, and shared-service approaches within the existing watershed governance model.

Thank you for your attention to this matter.

Sincerely,

Karine McCulloch
Deputy Clerk

Enclosure: RES2025-105 Resolution to urges the Government of Ontario to maintain local,

CITÉ DE / CITY OF CLARENCE-ROCKLAND

municipally governed, watershed-based Conservation Authorities

CC:

- Ms. Giovanna Mingarelli, Member of Parliament, Prescott—Russell—Cumberland, via email
- Mr. Stephane Sarrazin, Member of Provincial Parliament, Glengarry—Prescott—Russell, via email
- All municipalities within the South Nation Watershed, via email
- The Association of Municipalities of Ontario, via email
- The Rural Ontario Municipal Association, via email
- Conservation Ontario, via email
- All Conservation Authorities in Ontario, via email



CORPORATION OF THE CITY OF
CLARENCE-ROCKLAND REGULAR MEETING

RESOLUTION

Council Regular meeting

Resolution: 2025-105
Title: Resolution to urges the Government of Ontario to maintain local, municipally governed, watershed-based Conservation Authorities
Date: December 10, 2025

Moved by Mario Zanth
Seconded by Carl Grimard

WHEREAS the *Conservation Authorities Act* (1946) enables municipalities to establish Conservation Authorities and appoint locally elected representatives to their Boards, ensuring direct municipal oversight and accountability for programs funded by municipal taxpayers;

AND WHEREAS the municipalities within the South Nation River watershed established South Nation Conservation (SNC) in 1947 to protect people, property, farmland, water resources, and natural systems through a watershed-based model that reflects local geographic, hydrologic, and community needs;

AND WHEREAS municipalities within the SNC jurisdiction currently provide between 25% and 50% of total funding for conservation authority operations, while provincial funding has declined to approximately 3% in recent years;

AND WHEREAS SNC delivers essential services that support municipal responsibilities, including:

- natural hazard identification and permitting;
- watershed planning and development review;
- flood forecasting, emergency management, and low water response;
- drinking water source protection;
- watershed monitoring, reporting, and technical studies;
- sustainable forestry, agricultural stewardship, and restoration programs;
- management of over 13,000 acres of conservation lands, including lands donated by residents and managed through municipal service agreements;

AND WHEREAS on November 7, 2025, the Ministry of the Environment, Conservation and Parks posted ERO #025-1257 proposing to consolidate Ontario's 36 Conservation Authorities into seven regional conservation authorities and to establish a new Ontario Provincial Conservation Agency, with limited consultation and without accompanying cost-benefit analysis or evidence demonstrating the need for this restructuring;

AND WHEREAS Schedule 3 of Bill 68 enables the Province to assume governance authority over regional conservation authorities, raising concerns regarding diminished municipal representation, loss of local decision-making, and centralization of watershed management;

AND WHEREAS municipalities in Eastern Ontario have expressed concern, including the United Counties of Stormont, Dundas and Glengarry, that restructuring may:

- increase red tape and administrative burden;
- impose significant transition costs for HR, IT, land transfers, and governance realignment;
- dilute rural voices within large regional agencies dominated by major urban centres;
- erode donor confidence and affect the stewardship of thousands of acres of locally donated lands;
- disrupt bilingual service delivery in designated municipalities governed by the *French Language Services Act*;

AND WHEREAS Conservation Authorities—including SNC—already collaborate regionally through successful shared-service models, joint watershed studies, coordinated flood forecasting, agricultural stewardship partnerships, digital permitting, and harmonized technical reviews, demonstrating that modernization and efficiency can be achieved without dismantling local governance structures;

AND WHEREAS municipalities rely on SNC's field-based expertise, rapid on-site support, landowner relationships, and local knowledge—services that risk being weakened under a large, centralized regional structure;

NOW THEREFORE BE IT RESOLVED THAT the Council of the City of Clarence-Rockland urges the Government of Ontario to maintain local, municipally governed, watershed-based Conservation Authorities, including South Nation Conservation, to ensure effective natural resource and natural hazard management, transparent local services, and accountability for municipal levy dollars;

AND FURTHER THAT this Council does not support the proposed consolidation boundaries presented in ERO #025-1257 or the creation of a new provincial Conservation Agency without evidence-based analysis, transparent consultation, and clear articulation of impacts to municipal budgets, local service delivery, donor lands, and bilingual obligations;

AND FURTHER THAT this Council encourages the Province to work collaboratively with municipalities and Conservation Authorities to identify opportunities for improved consistency, modernization, and shared-service approaches within the existing watershed governance model;

AND FURTHER THAT a copy of this resolution be sent to:

- the Minister of the Environment, Conservation and Parks;
- local MPPs and MPs;
- all municipalities within the South Nation Watershed;
- the Association of Municipalities of Ontario;
- the Rural Ontario Municipal Association;
- Conservation Ontario; and
- all Conservation Authorities in Ontario.

CARRIED

Karine McCulloch/Deputy Clerk



Réunion régulière du conseil

Résolution: 2025-105

Titre: Résolution pour inciter le gouvernement de l'Ontario à maintenir les offices de protection de la nature locaux, gérés par les municipalités et basés sur les bassins versants

Date: le 10 décembre 2025

Proposée par Mario Zanth

Appuyée par Carl Grimard

ATTENDU QUE la *Loi sur les offices de protection de la nature* (1946) permet aux municipalités de créer des offices de protection de la nature et de nommer des représentants élus localement à leur Conseil d'administration, garantissant ainsi une surveillance directe et une responsabilité municipale pour les programmes financés par les contribuables municipaux ;

ET ATTENDU QUE les municipalités du bassin versant de la rivière Nation Sud ont créé la Conservation de la Nation Sud (CNS) en 1947 afin de protéger les personnes, les biens, les terres agricoles, les ressources en eau et les systèmes naturels grâce à un modèle basé sur le bassin versant qui reflète les besoins géographiques, hydrologiques et communautaires locaux ;

ET ATTENDU QUE les municipalités relevant du territoire de la CNS fournissent actuellement entre 25 % et 50 % du financement total des activités de l'Office de protection de la nature, tandis que le financement provincial a diminué pour atteindre environ 3 % ces dernières années ;

ET ATTENDU QUE la CNS fournit des services essentiels qui soutiennent les responsabilités municipales, notamment :

- l'identification des risques naturels et la délivrance de permis ;
- la planification du bassin versant et l'examen des projets d'aménagement ;
- la prévision des inondations, la gestion des urgences et les interventions en cas de crue ;
- la protection des sources d'eau potable ;
- la surveillance des bassins versants, l'établissement de rapports et les études techniques ;

- les programmes de foresterie durable, de gestion agricole et de restauration ;
- la gestion de plus de 13 000 acres de terres de conservation, y compris les terres données par les résidents et gérées dans le cadre d'ententes de services municipaux ;

ET ATTENDU QUE le 7 novembre 2025, le ministère de l'Environnement, de la Protection de la nature et des Parcs a publié le document Registre environnemental #025-1257 proposant de regrouper les 36 offices de protection de la nature de l'Ontario en sept offices régionaux et de créer une nouvelle agence provinciale de protection de la nature de l'Ontario, après une consultation limitée et sans analyse coûts-avantages ni preuves démontrant la nécessité de cette restructuration ;

ET ATTENDU QUE l'annexe 3 du projet de loi 68 permet à la province d'assumer le pouvoir de gouvernance sur les offices régionaux de protection de la nature, ce qui soulève des inquiétudes quant à la diminution de la représentation municipale, à la perte du pouvoir décisionnel local et à la centralisation de la gestion des bassins versants ;

ET ATTENDU QUE les municipalités de l'Est de l'Ontario, notamment les comtés unis de Stormont, Dundas et Glengarry, ont exprimé leur inquiétude quant au fait que la restructuration pourrait :

- augmenter la bureaucratie et le fardeau administratif ;
- imposer des coûts de transition importants pour les ressources humaines, les technologies de l'information, les transferts fonciers et le réaligement de la gouvernance ;
- diluer la voix des zones rurales au sein des grandes agences régionales dominées par les grands centres urbains ;
- éroder la confiance des donateurs et affecter la gestion de milliers d'hectares de terres données localement ;
- perturber la prestation de services bilingues dans les municipalités désignées régies par la *Loi sur les services en langue française* ;

ET ATTENDU QUE les offices de protection de la nature, y compris la CNS, collaborent déjà à l'échelle régionale grâce à des modèles de services partagés efficaces, des études conjointes sur les bassins versants, la coordination des prévisions d'inondations, des partenariats en matière de gestion agricole, la délivrance de permis numériques et des examens techniques harmonisés, démontrant ainsi que la modernisation et l'efficacité peuvent être réalisées sans démanteler les structures de gouvernance locales ;

ET ATTENDU QUE les municipalités comptent sur l'expertise de terrain de la CNS, son soutien rapide sur place, ses relations avec les propriétaires fonciers et sa connaissance du terrain, autant de services qui risquent d'être affaiblis dans le cadre d'une grande structure régionale centralisée ;

IL EST DONC RÉSOLU QUE le Conseil municipal de la Cité de Clarence-Rockland incite le gouvernement de l'Ontario à maintenir les offices de protection de la nature locaux, gérés par les municipalités et basés sur les bassins versants, y compris la Conservation de la Nation Sud, afin de garantir une gestion efficace des ressources naturelles et des risques naturels, des services locaux transparents et la responsabilité des fonds municipaux prélevés ;

ET DE PLUS QUE le Conseil ne soutient pas les limites de consolidation proposées dans le document Registre environnemental #025-1257 ni la création d'une nouvelle agence provinciale de conservation sans analyse fondée sur des preuves, consultation transparente et articulation claire des répercussions sur les budgets municipaux, la prestation de services locaux, les terres données et les obligations bilingues ;

ET DE PLUS QUE ce Conseil encourage la province à collaborer avec les municipalités et les offices de protection de la nature afin d'identifier les possibilités d'améliorer la cohérence, la modernisation et les approches de services partagés dans le cadre du modèle actuel de gouvernance des bassins versants ;

ET EN OUTRE QUE une copie de cette résolution soit envoyée à :

- le ministre de l'Environnement, de la Protection de la nature et des Parcs ;
- les députés provinciaux et fédéraux locaux ;
- toutes les municipalités du bassin versant de la Nation Sud ;
- l'Association des municipalités de l'Ontario ;
- l'Association des municipalités rurales de l'Ontario ;
- Conservation Ontario ; et
- toutes les autorités de conservation de l'Ontario.

ADOPTÉE

Karine McCulloch/Greffière adjointe

GSCA Submission to ERO Posting 025-1257

December 18, 2025

Via Environmental Registry of Ontario

Subject: Comments on ERO Posting No. 025-1257 – Proposed Boundaries for Regional Consolidation of Ontario’s Conservation Authorities

To Whom It May Concern:

Grey Sauble Conservation Authority (GSCA) appreciates the opportunity to comment on the proposed consolidation of Ontario’s conservation authorities. We share the Province’s objectives of improving efficiency, consistency, and modernization in service delivery. GSCA has already implemented significant improvements, including digital permitting, streamlined processes and enhanced customer service, and we remain committed to advancing these objectives.

However, GSCA does **not support the proposed consolidation into the Huron–Superior Regional Conservation Authority**. This model would create a geographically vast entity (over 23,500 km² and 80 municipalities) combining watersheds with little shared hydrology, climate, or economic alignment.

Such a structure risks:

- **Loss of Local Accountability and Rural Voice:** GSCA currently operates with strong municipal representation and local decision-making. Under the proposed model, local priorities could be overshadowed by urban centres hundreds of kilometers away.
- **Increased Costs and Bureaucracy:** No cost-benefit analysis or feasibility assessment has been provided. Transition costs (IT integration, HR harmonization, rebranding) and additional layers of governance will likely increase municipal cost apportionment and offer little in the way of savings to GSCA’s member municipalities.
- **Reduced Responsiveness:** Larger administrative structures often slow processes, contrary to the Province’s stated goal of streamlining approvals.
- **Disruption of Community Partnerships:** GSCA manages 29,000 acres of land, much of it donated by local residents with the expectation of local stewardship. GSCA also works with a network of dedicated volunteers and partners. Consolidation into a vast regional conservation authorities risks eroding these relationships and the trust that has been built locally.

Member Municipalities

Municipality of Arran-Elderslie, Town of the Blue Mountains, Township of Chatsworth, Township of Georgian Bluffs, Municipality of Grey Highlands, Municipality of Meaford, City of Owen Sound, Town of South Bruce Peninsula

GSCA supports modernization without amalgamation, through:

- Province-wide standards and policies for permitting.
- Provincially developed and updated technical guidelines.
- Refined Key Performance Indicators (KPIs) to ensure that Provincial objectives are being met.
- Shared digital platforms and tools.
- Sustainable provincial funding to enable modernization and service delivery.

Responses to ERO Consultation Questions

1. Key factors for a successful transition and outcome of regional consolidation:

GSCA does not support the proposed regional consolidation of conservation authorities and is firmly of the opinion that the Government's objectives would be better served without adding red-tape and bureaucracy. However, if consolidation proceeds, success depends on:

- Pausing the current consolidation proposal to allow the Ontario Provincial Conservation Agency time to develop a well thought out business plan, including cost-benefit analysis and feasibility assessments.
- Clear provincial leadership and phased implementation to avoid service disruption.
- Retention of local knowledge and staff expertise, which is critical for ongoing program management.
- Retention of local offices and staff, including management, to provide continuance of local partnership, accessibility and front-line service.
- Continuation of locally prioritised and tailored programming to reflect local community needs.
- Transparent governance frameworks that preserve municipal influence and watershed identity.
- Dedicated provincial funding for all transition costs.
- Robust communication strategies to keep municipalities, stakeholders, and the public informed and engaged throughout the process.

2. Opportunities or benefits of a regional conservation authority framework

GSCA is of the opinion that these benefits can be achieved through collaboration, shared systems and voluntary service agreements without the cost and complexity of consolidation. The potential benefits of such service agreements could include:

- Shared technical expertise and modern tools across multiple watersheds.

- Consistent permitting standards and digital platforms that improve predictability for applicants. These should be provided by the Province regardless of consolidation.
- Opportunities for joint procurement and shared services to reduce duplication.

3. Suggestions for governance structure at the regional level

The current governance structure provides the most representative and accountable system by offering each funding partner a meaningful voice at the governance table. GSCA has eight (8) participating municipalities represented by eleven (11) Board Directors appointed from each of the participating municipalities. This system provides a well-balanced structure that allow the participating municipalities the opportunity to design programs and policies that align with local municipal priorities, align with local municipal budgets, and represent the needs of the local community. If the Province proceeds with consolidation, the following governance structure may provide the next best option:

- A streamlined board (10–20 members) with representation grouped by upper-tier municipalities or counties to maintain fairness and efficiency.
- Utilizing the existing Upper Tier and Single Tier frameworks for local governance and apportionment to provide a more manageable option. That is, members of the Regional CA Board would be appointed from local upper tier or single tier municipalities within the Region’s jurisdiction.
- In this model, it is recommended that apportionment would also move to the Upper Tier / Single Tier level.
- Clear protocols for communication between regional boards and municipalities.
- The creation of Regional Boards provides an opportunity to include other community groups within the Board structure, including local Indigenous representation and local industry representation. If this option is considered, it is recommended that the additional representatives would be excluded from budget votes.

4. Maintaining a transparent and consultative budgeting process

The current budget process provides for the most transparent, accountable, accessible and consultative budgeting process as each participating municipality is afforded the opportunity to review draft budgets and representation at the Board table is such that individual municipal input is factored into budget decisions. This will be lost by the proposed consolidation model.

If consolidation moves forward, the following process should be utilized:

- A standardized regional budget framework with clear timelines and assumptions.
- Locally developed operating and capital budgets for each local office that are factored into the regional budget framework. These budgets can be reviewed and presented to sub-regional (local) budget advisory committees to ensure local priorities are considered.

- Publicly accessible budget documents and early consultation aligned with municipal budget cycles.
- Transparent levy apportionment formulas and regular financial reporting to all member municipalities.

5. Maintaining and strengthening relationships with local communities and stakeholders

Relationships with local communities and stakeholders have been developed over years or decades. Unless local offices, staff and leadership are maintained, not only will relationships weaken, they are at risk of disappearing altogether.

- Retain local offices and staff presence to ensure accessibility and responsiveness.
- Maintain clear communication channels and decision-making processes for local issues.
- Preserve local branding and identity to sustain trust and engagement.

Closing Statement

GSCA urges the Province to prioritize modernization through shared standards, tools, and funding rather than large-scale structural amalgamation. We remain committed to working collaboratively to achieve efficiency and consistency while preserving the watershed-based governance model that has served Ontario effectively for decades.

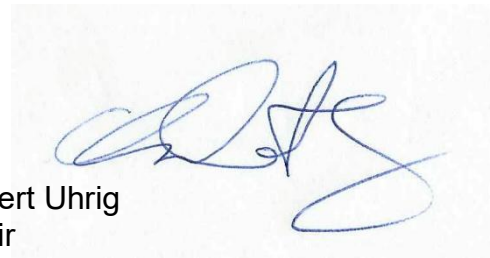
Submitted by:

Grey Sauble Conservation Authority
www.greysauble.on.ca

Thank you,



Tim Lanthier
Chief Administrative Officer
Grey Sauble Conservation Authority



Robert Uhrig
Chair
Grey Sauble Conservation Authority

**Motion No.: FA-25-097
December 17, 2025**

**Moved By: Jon Farmer
Seconded By: Scott Mackey**

WHEREAS the Province of Ontario 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; and

WHEREAS Bill 68 (Schedule 3) has effectively created the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and

WHEREAS the Conservation Authorities Act enables municipalities to establish local conservation authorities, 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 the municipalities within the northern portions of Bruce and Grey Counties established the North Grey Region Conservation Authority in 1957 and the Sauble Valley Conservation Authority in 1958 which amalgamated into the Grey Sauble Conservation Authority (GSCA) in 1985; and

WHEREAS GSCA generates approximately 50 percent of its own revenues and local municipalities provide approximately 43% of total GSCA funding, while the Province of Ontario provides less than 7%; and

WHEREAS under this proposal, the Grey Sauble Conservation Authority (GSCA) would be consolidated into a new “Huron-Superior Regional Conservation Authority” that is over 23,000 square kilometres in size and consists of 80 municipalities; and

WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and

WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated or sold 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 no governance model has been provided to ensure that local municipalities are still able to make local decisions related to the functioning and programs of the conservation authorities; and

WHEREAS no business plan, cost-benefit analysis, or feasibility assessment has been provided to justify the proposed consolidation; and

WHEREAS the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks to address issues related to permitting, by establishing guidance, online permitting platforms and technical standards through legislation that could help build homes; and

WHEREAS the GSCA has already undertaken significant modernization work aligned with provincial objectives, including Information Technology / Information Management, and leveraging technology to streamline planning and permit review processes processing 100% of major permits within the provincial timelines in 2024.

NOW THEREFORE BE IT RESOLVED:

THAT the Board of Directors of the Grey Sauble Conservation Authority calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and

THAT the Board of Directors of the Grey Sauble Conservation Authority does not support the proposed “Huron-Superior Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and

THAT the Board of Directors of the Grey Sauble Conservation Authority affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs. The Council further asserts that restructuring at this scale would erode local decision-making, weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management; and

THAT while the Board of Directors of the Grey Sauble Conservation Authority supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down approach structure without strong local accountability and governance risks creating unnecessary cost, red-tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and

THAT the Board of Directors of the Grey Sauble Conservation Authority urges the Province to strengthen centralized standards, resources, and tools rather than undertaking broad structural amalgamation and to provide sustainable, predictable provincial funding across conservation authorities to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years; and



THAT the Board of Directors of the Grey Sauble Conservation Authority believes that the Province’s proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation; and

THAT the Board of Directors of the Grey Sauble Conservation Authority requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local First Nations before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation; and

THAT this resolution be included in the Grey Sauble Conservation Authority’s ERO response and forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, local MPPs, all of Ontario’s municipalities, conservation authorities, AMO, and Conservation Ontario.

Carried

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December 18, 2025

Andrew Dowie

Member of Provincial Parliament Windsor–Tecumseh
Parliamentary Assistant to the Minister of the Environment, Conservation and Parks
Legislative Assembly of Ontario

Re: Proposed amalgamation of conservation authorities

Dear Mr. Dowie,

On behalf of Invest WindsorEssex, thank you for the opportunity to consider and provide feedback regarding the Province’s proposal to consolidate Ontario’s 36 Conservation Authorities into seven regional entities, including the proposed creation of a “Lake Erie Regional Conservation Authority.”

As the lead economic development agency for Windsor-Essex, Invest WindsorEssex is focused on ensuring our region remains competitive, business-friendly and well positioned to attract and retain investment. While we recognize the Province’s objective of improving efficiency and streamlining processes, we have concerns that the proposed restructuring may unintentionally undermine the local responsiveness and coordination that are critical to economic growth in Windsor-Essex.

Windsor-Essex competes nationally and globally for major industrial, manufacturing and infrastructure investments. A key differentiator for our region is the strength of local collaboration and the ability for investors and site selectors to access knowledgeable partners quickly. Locally informed decision-making, particularly in the early stages of site identification and project planning, is essential to maintaining project momentum and investor confidence.

The proposed governance model would centralize authority across a geographic area representing approximately 80 municipalities and spanning more than 300 kilometres. From an economic development perspective, this scale risks diluting local accountability and making it more challenging to advocate effectively for Windsor-Essex’s unique economic, environmental, and infrastructure priorities.

Investors consistently emphasize the importance of predictable timelines and direct access to technical expertise. Centralizing permitting and approvals in distant regional offices may create additional layers of process rather than efficiencies, increasing the risk of delays for projects that support job creation, housing supply, and strategic infrastructure development.

Windsor-Essex has seen first-hand the economic value of locally based conservation authority expertise. Early and ongoing collaboration with the Essex Region Conservation Authority has played a critical role in advancing transformative projects, including the NextStar Energy battery plant, the

Windsor-Essex Acute Care Hospital and major industrial investments at Windsor International Airport. These projects benefited from timely, solutions-oriented collaboration that supported both environmental protection and economic outcomes.

Invest WindsorEssex supports the Province’s broader objective to modernize regulatory systems and advance the “Get It Done” agenda. However, we believe these goals are best achieved through a model that preserves local decision-making and leverages established regional expertise.

Accordingly, we support a pause in the implementation of consolidated conservation authority boundaries to allow for meaningful consultation with municipalities, Indigenous communities, industry stakeholders and economic development partners. Ensuring that local responsiveness is maintained is essential to safeguarding Windsor-Essex’s competitiveness and ability to deliver timely, investment-ready opportunities.

Thank you for your consideration of this important matter and for your continued advocacy on behalf of Windsor-Essex. We would welcome the opportunity to discuss this further and to work collaboratively toward an approach that supports both environmental stewardship and sustained economic growth.

Sincerely,



Gordon Orr
Chief Executive Officer



From: [Lisa Burnside](#)
To: [Sandra Winninger](#)
Subject: FW: Government of Ontario's Proposal to Amalgamate Conservation Authorities
Date: December 18, 2025 1:21:19 PM
Attachments: [20251217 Joint Response Review of Proposed Amalgamation of CAs Final Draft For Endorsement.pdf](#)

Dear former colleagues and friends of Conservation Authorities,

Please find attached our submission in response to the provincial government's proposal to amalgamate Ontario's 36 conservation authorities to 7 regional conservation authorities (ERO No. 025-1257).

We firmly believe that drastic changes to the structure and governance of conservation authorities will compromise their overall effectiveness and threaten the foundational principles guiding their operations. Accordingly, we seek to garner broad support for requesting the government pause their proposal and consult with municipalities and conservation authorities prior to any modification to ensure any changes are both considered and advantageous.

Please review our response and let us know if you would like to add your name to the signatory page. If you agree, kindly provide your past title and whether you are "retired" or "former". We also request that you share our response widely with former colleagues, CA members, GMs/CAOs, source protection committee chairs, and conservation authority branch staff as well as municipalities for their endorsement as well. Our aim is to gather as many signatures as possible **by 4:00 p.m. on Friday, December 19, 2025**. Please send your endorsement to Janet Stavinga at [REDACTED]. Note that we will properly address and format the letter before it is submitted on Monday.

Yours in conservation,
Barb Veale
Barb Anderson
Bryan Howard
Deb Martin-Downs
Rob Messervey
Paul Lehman
Janet Stavinga
Mike Walters
Get [Outlook for Mac](#)

Letter 1 – Proposed Distribution List – Addresses and Emails are being compiled

Premier Doug Ford

Hon. Todd J. McCarthy, Minister of the Environment, Conservation and Parks

Hon. Rob Flack, Minister of Municipal Affairs and Housing

Hon. Jill Dunlop, Minister of Emergency Preparedness and Response

Hon. Peter Bethlenfalvy, Minister of Finance

Hon. Mike Harris, Minister of Natural Resources

Hon. Andrea Khanjin, Minister of Red Tape Reduction

Hon. Lisa M. Thompson, Minister of Rural Affairs

c.c. Hassaan Basit, Chief Conservation Officer
Marit Stiles, Leader of the Official Opposition, Leader, New Democratic Party of Ontario
John Fraser, Leader, Liberal Party of Ontario
Mike Schreiner, Leader, Green Party of Ontario
Association of Municipalities of Ontario
Rural Ontario Municipal Association

Letter 2 - ERO Posting

Public Input Coordinator, Conservation and Source Protection Branch, Ministry of the Environment, Conservation and Parks (related to the ERO posting)

Dear Premier and Ministers,

We, the x undersigned individuals, have dedicated decades of service to local science-based and integrated water resource management through our efforts with Conservation Authorities (CAs) across Ontario. We appreciate the opportunity to respond to the proposed consolidation of Conservation Authorities outlined in [ERO #025-1257](#) and further detailed in [Schedule 3 of Bill 68](#), and urge you to proceed with care and caution.

The proposed restructuring appears to lack an evidence-based approach and business case. Its development was without input from those most affected by the changes – the CAs and their member municipalities. To succeed, we believe a transformative initiative of this scale requires the effective and meaningful engagement of all partners throughout the process.

Although this proposal originated within the Ministry of the Environment, Conservation and Parks, the proposed consolidation of Ontario's 36 CAs into 7 regional CAs, as proposed, raises substantial questions that relate to the mandates and the responsibilities of several other Ontario government ministries. These include Municipal Affairs and Housing, Emergency Preparedness and Response, Natural Resources, Rural Affairs, and Finance.

We remind provincial decision makers that watershed management in Ontario was initiated to address major water challenges like flooding, drought, erosion, and poor quality. Under the leadership of Premier George Drew, during and immediately after WW2, Ontario's Progressive Conservatives introduced the *Conservation Authorities Act* in 1946. This was a visionary and nonpartisan act as part of the nation-building efforts following WW2. Modelled after the Tennessee Valley Authority and Ohio Conservancy Districts, the act enabled municipalities to voluntarily form watershed partnerships for managing land and water.

The Act was based on three key principles:

1. **Watershed Based Management:** Resource management is most effective when organized by watershed units.
2. **Local Initiative:** Communities within a river basin could form CAs
3. **Provincial-Municipal Partnership:** Municipalities forming CAs could receive provincial funding and technical support.

From 1946 to 1979, 36 conservation authorities were established by municipalities, in large part due to the strong support among subsequent Ontario Progressive Conservative Premiers, including Leslie Frost (1949-61), John Robarts (1961-71) and William Davis (1971-85).

Municipalities contribute financially and make decisions through appointed representatives to the Board. The Board identifies local resource management needs, endorses programs specifically designed to meet these needs, and, through partnerships with all levels of government and others, delivers on-the-ground projects. This governance approach has shown

strong results. CAs carry out watershed management initiatives valued at more than \$300 million each year, meeting the priorities of local municipalities and the Ontarians they serve.

Together, CAs continue to:

- Significantly reduce flooding and erosion through structural and non-structural approaches, including dams and berms, wetland protection and enhancement, land acquisition, reforestation, and regulatory and planning tools. CAs operate and maintain 900 dams, dykes, channels and other erosion control structures along rivers and shorelines valued at \$3.8 billion in 2019 dollars. Water and erosion control infrastructure managed and maintained by CAs helps to avoid more than \$150 million annually (2022 dollars) in damages to properties.¹
- Improve water quality in Ontario's rivers by operating multi-purpose dams to maintain steady water flow in the summer and help increase Ontario's climate resilience by offering nature-based solutions to rehabilitate degraded landscapes and wetlands.
- Manage and own 150,000 hectares of natural areas, including forests, wetlands, areas of natural and scientific interest, recreational lands, natural heritage and cultural sites, and land for flood and erosion control within each of their watersheds. Among these lands are approximately 500 Conservation Areas, with more than 300 publicly accessible. These public treasures make up approximately 80,000 hectares. These lands protect important natural features, provide recreational opportunities for people to enjoy, such as hiking, canoeing, camping, snowshoeing and many other outdoor activities, as well as living classrooms for schools, nature groups, and others to explore and learn about nature. Over six million Ontarians visit these areas each year.²
- Develop a governance framework that allows each authority to design customised decision-making approaches and implement specific initiatives that address their unique watersheds and concerns. This governance model has been internationally recognized, with the Grand River and Lake Simcoe Region Conservation Authorities both winning the Theiss International River Prize for exemplary river management.³

On June 27, 2025, we welcomed the appointment of the province's Chief Conservation Executive. This appointment appears to signal a renewed provincial commitment to Conservation Authorities (CAs) and offers an opportunity to strengthen collaborative and professional relationships between the province, CAs, and member municipalities. Such a partnership recognises the vital role that CAs play in supporting the health and well-being of Ontarians.

¹ 2022. [Conservation Ontario. 2022 Provincial Budget Consultation.](#)

² Conservation Ontario. [Conservation Authorities are Ontario's Second Largest Landowners.](#)

³ International River Foundation. Theiss International River Prize. [2000 Grand River Conservation Authority](#) and [2009 Lake Simcoe Region Conservation Authority.](#)

Then, on November 6, 2025, further changes to the *Conservation Authorities Act*, leading to the creation of the Ontario Provincial Conservation Agency (OPCA), as part of Bill 68, the [Plan to Protect Ontario Act \(Budget Measures\) 2025](#), were made. Through these amendments, the OPCA has the potential to advance the core objectives of the *Conservation Authorities Act* by assuming responsibilities previously managed by the first-ever Conservation Branch, established in 1944. This includes providing policy and technical direction to Conservation Authorities (CAs), thereby promoting greater consistency in addressing resource-related issues across the province – a need that has remained unmet for several decades. Some of the undersigned have served in the Conservation Authorities Branch,⁴ and would welcome the opportunity to share relevant historical context and experience with staff at the new agency.

However, we believe that the consolidation plan presents significant risks to the continuity and effectiveness of watershed management practices that have been carefully developed and refined over the past eighty years. We are deeply concerned that the loss of local expertise and the reduction of community representation in decision-making processes could undermine Ontario's ability to respond effectively to environmental challenges. Furthermore, the proposed restructuring may adversely impact collaborative relationships with municipalities, Indigenous communities, and local stakeholders, who have played an essential role in shaping sustainable water resource strategies throughout the province.

We seek clarification on the issues the Government of Ontario intends to address through the proposed consolidation of CAs. Should the focus be on the housing crisis, it is essential to acknowledge that this issue arises from a range of complex factors, with CAs being an inconsequential barrier to the issue. In fact, of the fifty-five recommendations cited in the [Report of the Ontario Housing Affordability Task Force \(2022\)](#), for improving access to housing in Ontario, CAs are not mentioned as an impediment. Rather, CAs overall have repeatedly shown themselves to be excellent and responsive problem solvers throughout their history.

It is our view that merging CAs may divert senior leadership at these organizations and their member municipalities, requiring significant attention to administrative and logistical matters related to establishing regional entities. This process could hinder the ability of CAs to fulfill essential mandated programs, including flood protection for communities and capacity for local hazard management.

We offer the following 16 recommendations in the spirit of collaboration and enhancement of client service, watershed management, and natural hazard management in Ontario.

RECOMMENDATIONS

We recommend that the Government of Ontario implement the following:

⁴ The Conservation Branch evolved into the Conservation Authorities Branch in 1962 and remained so until 1980.

- 1. Renew a Collaborative and Collegial Governance Relationship with Municipalities and Conservation Authorities.** The creation of the new Ontario Provincial Conservation Agency (OPCA) provides a unique opportunity to rekindle the relationship with CAs and municipalities. The goal of this renewed relationship is to ensure that future decisions honour the legacy established by Progressive Conservative predecessors. These decision makers demonstrated foresight in enabling the formation of CAs through strong municipal-provincial partnerships to address natural resource challenges affecting economic growth and development by promoting restorative conservation initiatives for the people of Ontario.

Resource issues resulting from changing landscapes and climate will continue to emerge. The key to successfully managing outcomes depends on ongoing collaboration among the Ontario government, municipalities, and conservation authorities.

We understand that the OPAC shall consist of at least five and not more than 12 members appointed by the Lieutenant Governor in Council, who shall form the independent Board of Directors for the Agency. This independent Board will oversee the activities of the OPCA. Consequently, it will be important that this Board work collaboratively with CAs and the Board Members to ensure decisions impacting CAs are based on knowledge of programs and services such that they remain effective and efficient.

- 2. Reduce Regulatory Fragmentation.** Both provincial and federal governments have created overlapping, sometimes conflicting legislation, each with its own administrative process. This complexity increases costs and inefficiency and doesn't always achieve the intended results. CAs, as service providers, often sit at the intersection between the public and government and may be mistakenly viewed as part of the problem.
- 3. Support Efficient Planning and Permitting by Updating Provincial Technical Guidelines and Shared Service Tools.** Update provincial technical guidelines and shared service tools to foster consistency among CAs, rather than initiating structural amalgamation. The province already has the authority and tools to work directly with CAs. Any effort to regionalize permitting must not create delays or reduced access to technical expertise.
- 4. Pause the Approval of the Proposed Regional Consolidation.** The OPCA, in conjunction with municipalities, CAs, and Conservation Ontario, should fully evaluate whether modernization goals could be achieved through enhanced provincial coordination, standardized approaches, and digital integration delivered through the new OPCA, without substantive restructuring of the existing CAs.
- 5. Explore Alternative, Right-sized Regional Models.** Work with municipalities, CAs and Conservation Ontario, and other interested parties, through a meaningful and effective

engagement process to consider smaller, more focused regional models that improve efficiency while preserving local knowledge and relationships, and effective and fair municipal representation. These discussions should also include voluntary regional collaboration units to ensure policy, practice, fees and expertise/staffing are shared where needed. Voluntary regional CA collaborations already exist; however, no provincial resources are allocated to facilitate this collaboration.

- 6. Conduct a Cost-Benefit Analysis.** A cost-benefit analysis should be completed before any amalgamations are proposed. If this was done, it has not been made public. Nor has the province provided any details on how the CA funding model would work with the proposed amalgamation. This review will also need to show the optimal size and boundaries of any new regional CAs to maximize cost savings and other potential benefits while minimizing impacts. It is recommended that if warranted, one region be consolidated first, where the identified need is greatest and interest is high, to ensure implementation is successful.
- 7. Preserve Local Municipal Governance and Decision Making.** A single board representing 30 – 80 municipalities will dilute local voices. Any governance model must ensure meaningful local representation that balances rural and urban priorities and interests, so that watershed priorities are focused on priority resource issues and community needs. Further, the scope and meaningfulness of CA Boards should not be diminished by the provincial oversight and authority of the OPCA.
- 8. Protect and Empower Local Conservation Efforts.** Centralized decisions may not address local challenges and may inadvertently weaken well-functioning systems through administrative complexity and diluted oversight. We believe that it is important to safeguard locally developed services, since adopting a regional model could decrease service quality, cause a loss of specialized knowledge, or limit community access for residents. Local staff best understand their watershed's conditions and needs, making them vital for public safety, environmental protection, and effective community services. Local CA staffing and watershed-specific expertise should be preserved, while maintaining the service improvements achieved since the negotiation of the Memoranda of Understanding between CAs and their member municipalities in 2024.
- 9. Adhere to the Principles of Integrated Watershed Management.** Since every watershed differs in hydrology, geology, topography, and land use, each faces distinct challenges. Decisions regarding watershed management should be informed by science, geography, and local hydrological conditions, rather than by broad regional or administrative boundaries. Expansion of boundaries will complicate planning, permitting, emergency management, and municipal collaboration.
- 10. Protect and Enhance Local Hazard Management Capacity and Continuity of Infrastructure Operations.** The protection of property and management of natural hazards are intrinsic to many of the multi-disciplinary plans and policies of municipalities

across Ontario. CAs operate and maintain 900 dams, dykes, channels, and other erosion control structures along rivers and shorelines valued at \$3.8 billion in 2019 dollars. Water and erosion control infrastructure managed and maintained by CAs helps to avoid more than \$150 million annually in damages to properties.⁵ Many of these structures are coming to the end of their design life and will require significant investment to ensure that the infrastructure continues to provide the protections now and into the future, with considerations for climate change.

The management of this infrastructure requires local expertise and knowledge, and 24/7 operational readiness. Further, operation of these structures is supported by municipal levies.

CAs' regulation of natural hazardous areas is essential for emergency preparedness and prevention, reducing risk to life and property, protecting flood and erosion control infrastructure, and increasing resiliency to climate change.

11. Enhanced Provincial Investment required to Support Critical Water and Erosion Control Infrastructure. In 2020/21, the province approved \$10 million in Water and Erosion Control Infrastructure (WECI) funding for 68 projects across 21 conservation authorities. Investments in this critical infrastructure recognized the benefit to local communities across the province and ultimately, Ontario's economic recovery.⁶ Despite the program being oversubscribed by almost two-fold in 2020/2021, with an estimated total project cost of more than \$19 million for 102 project submissions from 30 CAs across the province in 2020/2021, the funding levels were subsequently returned to \$5M.

Continued and adequate investment in both current and future infrastructure is essential for the effective management of flooding and erosion moving forward. Further, this funding will need to recognize the disparate resources across the province and provide flexibility to meet the state-of-good-repair requirements for this essential infrastructure.

12. Preserve Locally Acquired Assets – CAs are responsible for owning or managing 150,000 hectares of natural areas, including forests, wetlands, areas of natural and scientific interest, recreational lands, natural heritage and cultural sites, and land for flood and erosion control within each of their watersheds. In some cases, thousands of hectares have also been donated to CAs with the expectation of local stewardship. Regionalization risks breaking that trust. Further, agreements will need to be updated or

⁵ 2022. [Conservation Ontario. 2022 Provincial Budget Consultation.](#)

⁶ [Letter from Water and Erosion Control Infrastructure Committee on the Need for Reallocation of In-Year Water and Erosion Control Infrastructure \(WECI\) Funds to Kathy Woeller, Director, Integration Branch, Regional Operations Division, MNRF, dated April 23, 2020.](#)

renegotiated with a new entity. Decisions regarding these lands and resources should remain with the local communities who use and maintain them.

This point also applies to the Foundations and Boards of Directors that have been established to secure donations and private endowments for parks, trails and other stewardship initiatives. The proposed CA amalgamations could easily stifle CAs' ability to raise funds for local initiatives.

Many CAs also have reserve funds that have accumulated over decades through contributions by local municipalities and their taxpayers. It would be inequitable and unfair for these reserves to be distributed using a regional amalgamation model. Financial reserves created over decades through contributions by municipalities to their respective CAs must be retained.

13. Reinvest Provincial Funding in Conservation Authorities. The CA model has achieved tremendous successes across Ontario. However, we acknowledge that CAs' ability to deliver relevant programs to address resource challenges may vary in scope and intensity from one watershed to another, influenced by elements such as climate, landscape features, geology, water movement, patterns of water consumption as well as the local population, level of municipal support and provincial funding, and their ability to generate income from fees, land rental, and other sources.

By restoring and modernizing the annual provincial transfers to CAs that were halved in 2019 and have remained unchanged since that time, the OPCA could improve the capacity of all CAs to provide comparable services and ensure that flood and watershed management tools and infrastructure are repaired, restored and modernized to meet the challenges of the future.

14. Preserve Source Water Protection Areas and Regions. Following the Walkerton inquiry, Justice O'Connor made 121 recommendations on a wide range of areas related to protecting drinking water. These recommendations are the building blocks of Ontario's drinking water protection framework. Justice O'Connor's first recommendation was that drinking water should be protected by developing watershed-based source protection plans. The proposed consolidation splits and/or merges several existing source protection areas. Any proposed amalgamations of CAs must respect this fundamental premise of watershed-based source protection efforts and the governance model for source protection areas.

15. Fully Fund Transition Costs by the Province. The consolidation of 36 CAs to 7 will result in substantial unfunded costs, including IT integration, HR restructuring, renaming/rebranding, land title work, asset transfers, and legal harmonization. We anticipate that substantial costs will be incurred, and vital conservation initiatives will likely be postponed or discontinued due to a shift in focus. Care must be taken to ensure

that this does not happen. Municipalities should not be responsible for the impact or costs of any provincial restructuring efforts.

16. Fully Fund the Provincial Conservation Agency by the Province. Bill 68 empowers the OPCA to recover its operational and staffing costs to implement its mandate as described in the legislation. Although not specifically stated, we are concerned that the recovery of these costs and expenses will be borne by CAs through member municipalities and levies. This will create an excessive financial strain for municipalities and will run counter to the principle of municipal-provincial partnerships for conservation. Municipalities should not carry the burden of this new agency.

The rationale and concerns that underpin these recommendations are outlined in the attached Appendix.

We highly encourage the Government of Ontario to pause making rapid, drastic, costly, and irreparable changes to the structure of CAs. Rather, we ask that provincial decision makers carefully weigh the advantages and disadvantages of this proposal with input from CAs, municipalities, and other stakeholders. For effective hazard management and conservation improvements in Ontario, major changes must have the backing of those responsible for carrying them out. The safety and well-being of Ontarians must come first.

Yours in conservation,

Deborah Martin-Downs
Retired CAO
Credit Valley Conservation

Barbara Veale
Retired Acting CAO
and Senior Director
Watershed Management and
Climate Change
Conservation Halton

Rob Messervey
Retired CAO
Kawartha Region CA
Former GM, Lower Trent
Region CA
Former Manager of the
Provincial Conservation
Authorities Program, MNR

Mike Walters
Retired CAO
Lake Simcoe Region CA
Retired

Paul Lehman
Retired GM
Mississippi Valley CA

Barbara Anderson
Retired MNR and MOECC
Policy/Programs

Bryan Howard
Former CA Resources
Manager/General Manager

Janet Stavinga
Former Mayor of Goulbourn
Township and
Ottawa City Councillor
Former Chair
Mississippi-Valley Source
Protection Committee
Former Vice-Chair
Rideau Valley CA

Appendix – Our Key Concerns

Uncertainty about the Relationship between OPAC, Municipalities and CAs

[Schedule 3 of Bill 68](#) states that the OPAC shall consist of at least five and not more than 12 members appointed by the Lieutenant Governor in Council, who shall form the independent Board of Directors for the Agency. This independent Board of Directors will oversee the activities of the OPCA. If OPCA is funded by CAs via their municipalities then how do they retain control of how the agency impacts the work and budget of the CA?

The creation of the new Ontario Provincial Conservation Agency (OPCA) provides a unique opportunity to rekindle the relationship with CAs and municipalities. However, there is insufficient information to effectively comment on how OPAC and its associated Board of Directors will interact with CAs, their respective Boards and municipalities.

Nevertheless, the unfolding of this relationship will need to be based on the principles of good governance, while fostering collaboration to ensure CAs programs and services continue to be effectively and efficiently delivered.

Resource issues resulting from changing landscapes and climate will continue to emerge. Time will be of the essence to respond swiftly, as it has been frequently in past decades with more climate related flood events. The key to successfully managing outcomes is ongoing collaboration among the Ontario government, municipalities, and conservation authorities.

Insufficient Evidence to Support Consolidation

The proposal to consolidate 36 CAs to 7 regional CAs is not supported by any evidence-based rationale or business case, cost-benefit analysis, or transition work and funding plan for the amalgamation. The timeframe provided for such a change is incredibly short, which greatly increases the likelihood of failure.

For decades, the CA model has fostered successful watershed programs which have reduced potential flood and erosion losses, restored damaged ecosystems, protected drinking water, and improved water quality. The strength of the model lies in the emphasis on local decision making, collaborative partnerships, and on-the-ground programs. While amalgamations have occurred in the past, they have been at the request of municipalities, and there have been shared resource issues within similar watersheds.

This is not the first instance in which the province has suggested the significant consolidation of CAs. In 1989, the Ballinger Report (also referred to as the Ballinger-Hopcroft Report) was submitted to the government by Mr. Bill Ballinger, MPP and Parliamentary Assistant to the Minister of Municipal Affairs and Housing under the David Peterson administration. The review was prompted by concerns regarding disparities in the capacity and expertise among Conservation Authorities, inconsistencies in program standards and delivery—particularly in plan review and permitting—as well as varying funding levels across authorities.

Following extensive consultations throughout Ontario, the report put forward a recommendation to reduce the number of CAs from 33 to 19. Further recommendations addressed redefining

core mandates, modernizing governance, and restructuring the provincial-municipal funding relationship. Although there was some provincial support for recommendations related to the core mandate and funding, the report did not ultimately receive provincial approval. The process was stalled by factors such as an impending provincial election and increased recessionary pressures.

Additionally, there was significant opposition from municipal leaders regarding amalgamation, most notably from Wardens and Mayors in eastern and southwestern Ontario, who expressed concerns over potential losses of autonomy and local decision-making authority in watershed management priorities. Similar reactions from the municipal sector may again pose challenges to any proposal advocating for the regionalization or consolidation of CAs.

The proposed amalgamation covers vast areas with different landscapes, water systems and resource management issues and priorities. The proposal creates more questions than answers, such as:

- What specific problems are you trying to solve through the amalgamation, and why is this proposal the only alternative put forward?
- What governance model will regional CAs use? How much influence will each municipality have in decisions?
- What is the process for setting municipal levies? If a CA generates most of its budget through its own revenues, will it be required to support other CAs that are merged with it? How will the haves and the have nots be treated through this process and how will that impact their capacity?
- How will the CA charitable foundations be impacted? Will they need new Letters Patent?
- What are the anticipated costs associated with amalgamation, and which parties are responsible for funding it?
- How will the Source Protection Areas (SPAs) operate, given that the proposed amalgamation splits several SPAs and merges others?

Loss of Local Watershed Management Governance and Oversight

The proposal to move towards a regional watershed-based framework for CAs in Ontario by consolidating 36 CAs to 7 regional CAs runs counter to the founding principles of the *Conservation Authorities Act* in 1946. Specifically, resource management is most effective when organized by watershed units, and communities within a river basin could form CAs with provincial backing if they chose to collaborate. CAs deliver programs and services to address local watershed needs on behalf of municipalities. Municipalities risk losing effective and meaningful control over locally funded assets, dams, conservation lands, and permitting decisions.

While provincial communications maintain that nothing will change – that CAs will retain leadership over local programs and services, and that regional CA Boards will continue to exercise comprehensive governance – including the responsibility to approve budgets – the mandate of the newly established OPCA encompasses a much broader range of authority. Without a blueprint, we remain skeptical of the understanding and true intent of this amalgamation.

The OPCA's mandate includes direct oversight of CA governance, operations, and delivery of programs and services. In practice, this means the Agency will systematically assess the effectiveness of CAs, undertake regular monitoring and evaluation of their financial performance, and play a central role in guiding strategic planning activities. Importantly, the OPCA is empowered to issue binding directives as well as recommended guidance to CAs, thereby shaping both compliance and best practices across the sector.

It is critical to note that the OPCA's jurisdiction is not limited solely to provincially mandated programs such as natural hazard management and source protection. Rather, the scope of its oversight extends to all CA programs and services. This includes initiatives delivered on behalf of municipalities, as well as those programs and services independently developed by local Boards to meet specific watershed challenges and community needs. The wide-ranging nature of this oversight signals a significant expansion of provincial involvement in local watershed management and governance.

While CA Boards may retain governance over CAs, the scope and meaningfulness of their role could be diminished by the provincial oversight and authority of the OPCA. Despite assurances from the province that this will not happen, there is no evidence or any details as to how this local representation will be maintained. This absence of detail about how OPCA, CAs, and municipalities will work together raises questions about transparency and contributes to further uncertainty.

Scale of Proposed Regional CAs is Impractical

The regional CAs, as proposed, are geographically vast, ranging in some cases from 18,500 km² to 25,000 km². One of the proposals goes so far as to merge the Lakehead Region Conservation Authority (LRCA) into a new “Huron–Superior Regional Conservation Authority,” a region that stretches more than 1,300 kilometres south and includes municipalities as far away as southern Ontario.

Compounding the proposed vast geography, these new regional authorities are proposed to serve anywhere between 28-81 municipalities. We assert that the proposed entities are excessively large to ensure effective and equitable municipal representation or efficient watershed management. Moreover, certain areas possess distinct geographical characteristics and concerns, potentially leading to uneven allocation of resources or efforts across the suggested regions.

Larger Regional Bureaucracies Reduce Efficiency Gains

The proposed amalgamation is likely to disrupt service delivery, potentially hindering the province's progress toward economic development and growth. Based on our experience, the current CA structures are responsive because they stay informed about initiatives and issues, understand local stakeholders, and can resolve problems quickly and efficiently. Large regional organizations may result in longer review times, lower standards of service, and diminished collaboration with developers, lake associations, and local governments. Compounding this regionalization will be another level of oversight created through the OPCA, potentially creating even more bureaucratic barriers.

Sacrificing the Key Principle of Integrated Watershed Management

CAs were designed to align with watershed boundaries, rather than municipal boundaries, so they can address hazards and resource issues specific to each drainage basin. Since every watershed differs in hydrology, geology, topography, and land use, each faces distinct challenges.

CA staff have also developed vital local expertise that informs their work, from flood forecasting and warning to environmental restoration programs, which must be maintained if CAs are consolidated. Consolidation would not automatically harmonize services across regions because watershed needs and priorities vary.

Expansion of boundaries will complicate planning, permitting, emergency management, and municipal collaboration.

Challenging the Myth of Inefficiencies

Despite CAs having responded effectively to the last six years of provincially directed changes, addressing concerns for timeliness and focus on core mandates, the province continues to cite inefficiencies as the primary rationale for amalgamation. We maintain that this assumption should be critically examined, considering the available evidence.

In 2019, to ensure consistency in annual reporting for CA permit reviews, Conservation Ontario implemented a standardized template and framework for monitoring review timelines. Benchmarks were established, setting a standard of 30 days for minor permits and 90 days for major permits, thereby promoting uniform reporting across all CAs. In recent years, CAs have invested substantially in new database software and process enhancements to maintain high-quality development review services.

The 2024 annual report presents data on permits received as of April 1, 2024, in accordance with the updated legislative and regulatory framework. During this period, over 7,180 permits were issued by the 36 CAs. Ninety-six percent (96%) of these permits were issued within the required timelines.⁷ Further, some CAs also have longstanding reciprocal staff-sharing

⁷ Conservation Ontario. 2024. Annual Report. Conservation Impact. Valuing Positive Contribution through Conversation. Pg. 11.

arrangements with other CAs to ensure no interruption in service and no permit delays. There are occasional inefficiencies, as is typical in any agency, but these are now exceptions rather than the standard.

Need For Provincial Guidance

We recognise that there may be inconsistencies in the decisions made by CAs regarding permit applications and related planning matters under the CAA and Ontario Regulation 41/24. However, we believe that the provision of more robust technical guidance at the provincial level would be of greater benefit to achieving consistency among CAs, rather than initiating structural amalgamation.

For instance, the province has been asked over several years for direction on when and how Regional Control facilities should be used to support new development and manage stormwater and flooding. CA's still await guidance on this issue. Similarly, CAs have requested provincial technical and policy guidance regarding flood spill management in existing urban areas and on establishing access standards for flood hazard zones. This guidance has not yet been forthcoming to date and would be very beneficial also in addressing those consistency issues noted elsewhere in this document. These are just two examples of many policy challenges that face CAs around regulating natural hazard areas and managing natural hazards.

Regulatory Fragmentation Continues

Both provincial and federal governments have created overlapping, sometimes conflicting legislation, each with its own administrative process. This complexity increases costs and inefficiency and doesn't always achieve the intended results. New issues are generally met with more laws, adding to regulatory burdens that can hinder the economy and affect landowners. CAs, as service providers, often sit at the intersection between the public and government and may be mistakenly viewed as part of the problem.⁸ Red tape reduction needs a true examination of where laws, regulations and policies are conflicting, inconsistent or outdated.

Risks to Property and Management of Hazards and Dam Infrastructure

The protection of property and management of hazards is intrinsic to many of the multi-disciplinary plans and policies of municipalities across Ontario. CAs collectively manage flood and erosion control infrastructure requiring local expertise and knowledge, and 24/7 operational readiness. The work of CAs, in conjunction with their municipal partners, helps our province prepare for and respond to the impacts of climate change, ultimately becoming more resilient for the future. The proposed consolidation may jeopardize local natural hazard management capacity, locally stationed staff, and continuity of infrastructure operations.

⁸ Conservation Ontario, 2012. Watershed Management Futures for Ontario. Conservation Ontario Whitepaper.

CAs' regulation of natural hazardous areas is essential for emergency preparedness and prevention, reducing risk to life and property, protecting flood and erosion control infrastructure, and increasing resiliency to climate change.

The Financial Accountability Office of Ontario [warned in 2022](#) that more extreme rainfall associated with climate change will continue to increase the risk of flooding, straining public infrastructure expenses. That same year, the [Auditor General](#) also warned that the majority of municipalities in Ontario are unable to map urban flood risk due to a lack of data, expertise and funding.

Parts of Southern Ontario are experiencing [an increase](#) of two to three more heavy rainfall days per year on average. As floods increase in frequency and intensity, [homeowners' insurance costs are rising](#), creating significant financial challenges for many families.

Flooding is [Ontario's costliest natural hazard](#) and is expected to become [an even bigger threat](#) in the future. Any recommended changes to CAs should enhance their capacity to reduce flood risks and safeguard both life and property. However, it is unclear how the proposed consolidation would accomplish this goal.

Lag in Water and Erosion Control Infrastructure Investments

CAs operate and maintain 900 dams, dykes, channels and other erosion control structures along rivers and shorelines valued at \$3.8 billion in 2019 dollars. Water and erosion control infrastructure managed and maintained by CAs helps to avoid more than \$150 million annually in damages to properties.⁹ Many of these structures are coming to the end of their design life and will require significant investment to ensure that the infrastructure continues to provide the protections now and into the future, with considerations for climate change.

The Ministry of Natural Resources (MNR) provides financial support to critical Water and Erosion Control Infrastructure (WECI). This program provides funding to support up to 50% of project funding for watershed studies, dam and channel maintenance and repairs. The program is delivered through a municipal – provincial – conservation authority partnership. The province provides project funding of \$5M, matched by another \$5M from municipalities, and then implemented by the CAs.

For many years, this funding was capped at \$5 million, yet the program was oversubscribed. In 2020, the WECI Committee, among others, advocated for the province to make further investments in this critical infrastructure, given the benefit to local communities across the province, and ultimately, Ontario's economic recovery.¹⁰

⁹ 2022. [Conservation Ontario. 2022 Provincial Budget Consultation.](#)

¹⁰ [Letter from Water and Erosion Control Infrastructure Committee on the Need for Reallocation of In-Year Water and Erosion Control Infrastructure \(WECI\) Funds to Kathy Woeller, Director, Integration Branch, Regional Operations Division, MNRF, dated April 23, 2020.](#)

In 2020/21, the province approved \$10 million in WECl funding for 68 projects across 21 CAs. Despite the program being oversubscribed by almost two-fold in 2020/2021, with an estimated total project cost of more than \$19 million for 102 project submissions from 30 CAs across the Province in 2020/2021, the funding levels returned to \$5M. This funding is inadequate for future water and erosion control infrastructure needs.

Continued and adequate investment in both current and future infrastructure is essential for the effective management of flooding and erosion moving forward.

Breaking Trust – Risks to Locally Acquired Assets

Conservation Authorities are responsible for owning or managing 150,000 hectares of natural areas, including forests, wetlands, areas of natural and scientific interest, recreational lands, natural heritage and cultural sites, and land for flood and erosion control within each of their watersheds. Of these lands, there are approximately 500 Conservation Areas, with more than 300 that are publicly accessible. These public treasures make up approximately 80,000 hectares. These lands protect important natural features, provide recreational opportunities for people to enjoy, such as hiking, canoeing, camping, snowshoeing and many other outdoor activities, as well as living classrooms for schools, nature groups, and others to explore and learn about nature. Over six million Ontarians visit these areas each year.¹¹

In some cases, thousands of these hectares have been donated to CAs with the expectation of local stewardship. Agreements will need to be updated or renegotiated with a new entity. Regionalization risks breaking that trust. Decisions regarding these lands and resources must remain with the local communities who use and maintain them.

This point also applies to the Foundations and Boards of Directors that have been established to secure donations and private endowments for parks, trails and other stewardship initiatives. The proposed CA amalgamations could easily stifle CAs' ability to raise funds for local initiatives. To further complicate matters, each Foundation has its own letter patent and Board of Directors.

Many CAs also have reserve funds that have accumulated over decades through contributions by local municipalities and their taxpayers. It would be inequitable and unfair for these reserves to be distributed using a regional amalgamation model. Financial reserves created over decades through contributions by municipalities to their respective CAs must be retained.

Continuation of the Disproportionate Funding Model

The proposed amalgamation materials have been silent on how the regional CA model will be funded. This is an essential piece of the puzzle – without which the full implication of the

¹¹ Conservation Ontario. [Conservation Authorities are Ontario's Second Largest Landowners.](#)

proposal cannot be evaluated. Today, the typical breakdown of funding sources for Conservation Authorities is as follows¹²:

- Municipal levies – 53%
- Self-generated revenue – 35%
- Provincial grants & Special Projects – 8%
- Federal Grants or Contracts – 4%

However, the actual proportion of funding can differ significantly across the 36 Conservation Authorities. For example:

- Essex Region Conservation Authority relies on non-levy funding for approximately 70 percent of its operating budget, drawing from self-generated revenue, grants, and foundation support.
- Conservation Halton, in its 2025 total budget, indicates that only 2% of the funding is from the province and 19% from municipalities. Self-generated revenue, grants, and other sources minimize the impact on the municipal levy.
- Conservation Sudbury receives just over 20 percent of its budget through provincial and federal transfers and grants, while less than 25 percent is sourced from self-generated revenue.
- Grand River Conservation Authority occupies an intermediate position, with under 40 percent of its funding provided by municipal levies and about 50 percent obtained from self-generated revenue.
- To the east, municipal levies for the Rideau Valley Conservation Authority account for 54% of the funding, with the province contributing 5%. Municipalities within the region of the Mississippi Valley Conservation Authority fund approximately 68% of the annual operating budget, compared to a combined provincial and federal contribution of 5%.

The CA model has achieved tremendous successes across Ontario. However, we acknowledge that CAs' ability to deliver relevant programs to address resource challenges may vary in scope and intensity from one watershed to another, influenced by elements such as climate, landscape features, geology, water movement, patterns of water consumption as well as the local population, level of municipal support, and their ability to generate income from fees, land rental, and other sources.

CAs that have a small population base may lack sufficient funding to hire subject matter experts to competently deliver some programs, including programs mandated by the Province of Ontario, such as administering provincial regulations, undertaking hazard modelling and mapping, and undertaking technical watershed studies and analysis.

¹² Conservation Ontario. [Typical breakdown of funding sources for Conservation Authorities.](#)

Historically, provincial funding was initially the primary source of revenue for CAs, including shared funding for infrastructure projects. However, in 1995, under the leadership of Premier Mike Harris, Ontario's Progressive Conservatives drastically reduced provincial funding to CAs as part of its "Common Sense Revolution," slashing the budget for conservation programs from \$50 million to \$8 million annually, and limited it to hazard management. This significant cut severely impacted operations, leading CAs to lay off 20–60% of their staff and making it more difficult to continue the same level of investment and activity, including flood management, stewardship and watershed management. These cuts also disproportionately impacted smaller CAs with more rural municipalities, as the previous funding formula that was in place allowed rural CAs to access a higher proportion of funding for necessary projects from the province, equalizing the playing field.

Ultimately, despite these enormous financial challenges, CAs pivoted to secure alternative local funding sources once the province allowed CAs to start charging fees. This new financial situation also meant that municipalities had to reassess which watershed-based programs to retain. Although many activities were curtailed, programs continued with the assistance of partnership arrangements with local environmental groups or adjacent CAs. Municipalities also became the primary funder of managing natural hazards and many striking agreements with their CAs to support their environmental needs.

Since that time, municipalities have come together through our 36 CAs to address aging dams, manage natural hazards, enhance land conservation, provide water data and flood warnings to landowners, while also delivering on local stewardship programs and outdoor education initiatives.

Without a commitment of additional provincial funds and a shared approach to facilitate program development and the proposed CA amalgamations, plans to strengthen the work of CAs will be at risk.

Through a reinvestment in provincial funding, the OPCA has the opportunity to improve the capacity of all CAs to provide comparable services and ensure that flood and watershed management tools and infrastructure are repaired, restored and modernized to meet the challenges of the future.

Achievements of Source Protection Plans at Risk

In June 2000, following the tragic incident of bacterial contamination of the water supply in Walkerton, Ontario, in May 2000, the Government of Ontario established a public inquiry – known now as the Walkerton Inquiry. Following the Walkerton inquiry, Justice O'Connor made 121 recommendations on a wide range of areas related to protecting drinking water. These recommendations are the building blocks of Ontario's drinking water protection framework.

Justice O'Connor's first recommendation was that drinking water should be protected by developing watershed-based source protection plans.¹³

Conservation Authorities stepped up again to protect Ontarians. Under the [Clean Water Act, 2006](#), 19 local multi-stakeholder source protection committees were established, guiding source water protection efforts in source protection areas across Ontario. The 38 source protection areas are based on Ontario's 36 CAs, the Severn Sound Environmental Association, and the Municipality of Northern Bruce Peninsula. Some of the source protection areas are grouped into larger source protection regions.

The Committees were supported by the Conservation Authorities' Boards of Directors, which, under the *Clean Water Act*, are referred to as "Source Protection Authorities." The Committees, working in collaboration with CAs, gathered science-based technical knowledge on which informed consensus-based decisions were made. Policies were developed in an open and consultative manner that continue to be effective, economical and appropriate for local communities. This supporting role by Conservation Authorities in source water protection continues to this day.

The proposed amalgamation of the 36 CAs to 7 does not reference how Source Water Protection Areas (SPAs) and Regions will be maintained. For example, Credit Valley Conservation (CVC) is currently part of the CTC (Credit Valley, Toronto and Region-Central Lake Ontario), Source Protection Region (SPR). This proposal would see the Credit Valley Conservation Authority carved off from the CTC SPR and combined with Halton-Hamilton SPR and Niagara SPR. This configuration would cross the boundaries of three existing SPRs, potentially creating administrative and jurisdictional issues and undermining the principal recommendation advanced by Justice O'Connor twenty-five years ago.

Any proposed amalgamations of CAs must respect this fundamental premise of watershed-based source protection efforts and the governance model for source protection areas.

Amalgamation Costs to be Transferred to Municipalities

The amalgamation of 36 CAs to 7 regional CAs will likely result in substantial unfunded costs, including IT integration, HR restructuring, renaming/rebranding, land title work, asset transfers, and legal harmonization. These costs are unknown but have the potential to be substantive (in the hundreds of millions of dollars) when one considers the amalgamation expenses in 2001 associated with the creation of the new cities of Ottawa, Hamilton and Greater Sudbury with expanded areas and populations.

By February 2001, the province decided that forcing amalgamation was too politically costly; in response to those affected municipalities, the province had to subsequently provide transition funding of \$31 million to Hamilton and \$108 million to Ottawa.¹⁴ The O'Brien report, which recommended the amalgamation of the City of Greater Sudbury, estimated the transition costs

¹³ Ontario. [Source Protection. Drinking Water Protection Framework](#)

¹⁴ CBC News. [Province pays out to ease amalgamation headaches](#). February 2001.

would be around \$10 million and suggested the province should cover them.¹⁵ Any proposed amalgamation would also detract from implementing on-the-ground programs.

Although the existing Toronto and Region CA is not proposed to be amalgamated with any other CA, it too will still see substantial transition costs associated with rebranding to its new proposed name, Central Lake Ontario Regional Conservation Authority – a needless expense.

Municipalities should not be responsible for the impact or costs of any provincial restructuring efforts.

New Provincial Agency Will Impose Additional Costs

Bill 68 empowers the OPCA to recover its operational and staffing costs to implement its mandate as described in the legislation. While not specifically stated, we are concerned that recovery of OPAC's costs will be borne by CAs through municipal levies. This will create an excessive financial strain for municipalities and will run counter to the principle of municipal-provincial partnerships for conservation.

Further, what say would CAs have in the budget and control for the agency? As the OPCA is a provincial agency, its budgetary expenditures should be borne by the provincial government.

The province has also been silent on whether it intends to issue a direction to CAs to reallocate their current funding levies from Conservation Ontario (CO) to this new Agency. Such a direction would place CO in an untenable position. CO was established in 1981 to engage and support Conservation Authorities in matters of common interest and to shape effective policy relating to Conservation Authorities. CO is directed by a Council comprised of appointed and/or elected municipal officials from the 36 Conservation Authorities Boards of Directors and Conservation Authorities staff to ensure representation across the range of CAs and their unique circumstances.

To do this, they maintain technical expertise in most of the functions of the CAs and facilitate collaborations and working groups of technical experts in an effort to address consistency and issues across CAs.

How would even as few as 7 regional CAs effectively engage with the agency or other provincial ministries without an umbrella organization? Will the agency assume that role?

As the OPCA is a provincial agency, its budgetary expenditures should be borne by the provincial government.

¹⁵ Ontario Ministry of Municipal Affairs and Housing (1999). **Report to the Minister of Municipal Affairs and Housing on Local Government Reform for Sudbury**. Toronto, ON: Queen's Printer for Ontario.

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CANTON D'ALFRED ET PLANTAGENET
TOWNSHIP OF ALFRED AND PLANTAGENET

December 18, 2025

The Honourable Todd J. McCarthy
Minister of Environment, Conservation and Parks College
Park 5th Floor
777 Bay St.
Toronto, ON M7A 2J3
via email : minister.mecp@ontario.ca

Subject: Bill 68 and Proposed Consolidation of Conservation Authorities

Dear Honourable Minister McCarthy,

At its special meeting of December 16, 2025, the Council of the Township of Alfred and Plantagenet passed a resolution regarding the future of Conservation Authorities. The complete resolution is attached. The following excerpts reproduce the operative clauses of the resolution:

BE IT RESOLVED THAT the Council of the Township of Alfred and Plantagenet calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities, ensuring strong municipal representation in decisions related to levies, service delivery, land management, and community-focused program outcomes.

BE IT FURTHER RESOLVED THAT while the Township of Alfred and Plantagenet supports provincial objectives related to consistent permitting standards, shared services, and digital modernization, the imposition of a top-down centralized agency risks increasing cost, red tape, and administrative complexity while reducing accountability and responsiveness to local watershed needs.

BE IT FURTHER RESOLVED THAT the Township of Alfred and Plantagenet supports balanced approaches to improving capacity, efficiency, and technical expertise across conservation authorities and request that the province work collaboratively with

municipalities and existing conservation authorities to evaluate where strategic consolidation—if any—is appropriate, effective, and financially sustainable.

BE IT FINALLY RESOLVED THAT a copy of this resolution be sent to the Ontario Minister of the Environment, Conservation and Parks; local MPs and MPPs; the Association of Municipalities of Ontario; the Rural Ontario Municipal Association; and all municipalities and conservation authorities in Ontario.

Thank you for your attention to this matter.

Sincerely,



Julie Prud'homme,
Municipal Clerk

Enclosure: Resolution 2025-264 -South Nation Conservation -Response to Bill 68 -
Conservation Authority Changes

CC:

- Ms. Giovanna Mingarelli, Member of Parliament, Prescott—Russell—Cumberland, via email
- Mr. Stephane Sarrazin, Member of Provincial Parliament, Glengarry—Prescott—Russell, via email
- All municipalities within the South Nation Watershed, via email
- The Association of Municipalities of Ontario, via email
- The Rural Ontario Municipal Association, via email
- Conservation Ontario, via email
- All Conservation Authorities in Ontario, via email



Agenda Number: 6.2.
Resolution Number 2025-264
Title: South Nation Conservation -Response to Bill 68 – Conservation Authority Changes
Date: Tuesday, December 16, 2025

Moved by: Antoni Viau
Seconded by: Jean-Pierre Cadieux

Response to Bill 68 – Conservation Authority Changes

WHEREAS the *Conservation Authorities Act* (R.S.O. 1990, c. C.27) enables municipalities to establish conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of Board Members and the provision of annual municipal levies to support mandatory and non-mandatory programs and services;

AND WHEREAS the municipalities within the South Nation River watershed established South Nation Conservation (SNC) in 1947 to protect people, property, farmland, water resources, and natural systems through a watershed-based model that reflects local geographic, hydrologic, and community needs;

AND WHEREAS municipal governments currently provide between 25% and 50% of total conservation authority funding, while the Province of Ontario provides approximately 3%;

AND WHEREAS municipalities have, for decades, governed their respective conservation authorities to ensure that programs, services, fee structures, permitting processes, and public service delivery remain aligned with local watershed needs and accountable to ratepayers;

AND WHEREAS conservation authorities collectively own and manage significant public lands across Ontario, including lands donated by local residents with the expectation that they would be protected, stewarded, and governed locally for the long-term public good;

AND WHEREAS Bill 68 proposes the creation of a new Ontario Provincial Conservation Agency—a Crown corporation that would assume governance responsibilities and consolidate Ontario’s 36 conservation authorities into seven regional authorities, with municipal cost apportionment and governance structures yet to be defined;

AND WHEREAS the Province already holds the authority to set provincial standards, regulations, and expectations for conservation authority operations under the *Conservation Authorities Act* and through the Ministry of the Environment, Conservation and Parks;

BE IT RESOLVED THAT the Council of the Township of Alfred and Plantagenet calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities, ensuring strong municipal representation in decisions related to levies, service delivery, land management, and community-focused program outcomes.

BE IT FURTHER RESOLVED THAT while the Township of Alfred and Plantagenet supports provincial objectives related to consistent permitting standards, shared services, and digital modernization, the imposition of a top-down centralized agency risks increasing cost, red tape, and administrative complexity while reducing accountability and responsiveness to local watershed needs.

BE IT FURTHER RESOLVED THAT the Township of Alfred and Plantagenet supports balanced approaches to improving capacity, efficiency, and technical expertise across conservation authorities and request that the Province work collaboratively with municipalities and existing conservation authorities to evaluate where strategic consolidation—if any—is appropriate, effective, and financially sustainable.

BE IT FINALLY RESOLVED THAT a copy of this resolution be sent to the Ontario Minister of the Environment, Conservation and Parks; local MPs and MPPs; the Association of Municipalities of Ontario; the Rural Ontario Municipal Association; and all municipalities and conservation authorities in Ontario.



Julie Prud'homme, Clerk

Carried

No. du point à l'ordre du jour: 6.2.
No. de la résolution 2025-264
Titre: Conservation de la Nation Sud -Réponse au projet de loi 68 – Modifications aux offices de protection de la nature
Date: le mardi 16 décembre 2025

Proposée par: Antoni Viau
Appuyée par: Jean-Pierre Cadieux

Réponse au projet de loi 68 – Modifications aux offices de protection de la nature

ATTENDU QUE la *Loi sur les offices de protection de la nature* (L.R.O. 1990, chap. C.27) permet aux municipalités d'établir des offices de protection de la nature et que, lorsque les municipalités choisissent de créer de tels offices, elles assument la responsabilité de leur gouvernance et de leur financement par la nomination de membres au conseil d'administration et par la fourniture de contributions municipales annuelles afin de soutenir les programmes et les services obligatoires et non obligatoires;

ET ATTENDU QUE les municipalités du bassin versant de la rivière Nation Sud ont créé la Conservation de la Nation Sud (CNS) en 1947 afin de protéger les personnes, les biens, les terres agricoles, les ressources en eau et les systèmes naturels grâce à un modèle basé sur le bassin versant qui reflète les besoins géographiques, hydrologiques et communautaires locaux ;

ET ATTENDU QUE les gouvernements municipaux fournissent actuellement entre 25 % et 50 % du financement total des offices de protection de la nature, tandis que la province de l'Ontario en fournit environ 3 %;

ET ATTENDU QUE les municipalités, depuis des décennies, gouvernent leurs offices de protection de la nature respectifs afin de s'assurer que les programmes, les services, les structures tarifaires, les processus d'autorisation et les services au public demeurent alignés avec les besoins locaux des bassins versants et imputables aux contribuables;

ET ATTENDU QUE les offices de protection de la nature possèdent et gèrent collectivement d'importantes terres publiques à travers l'Ontario, y compris des terrains donnés par des résidents locaux avec l'attente qu'ils seraient protégés, gérés et gouvernés localement pour le bien public à long terme;

ET ATTENDU QUE le projet de loi 68 propose la création d'une nouvelle Agence ontarienne de protection de la nature — une société de la Couronne qui assumerait les responsabilités de gouvernance et regrouperait les 36 offices de protection de la nature de l'Ontario en sept offices régionaux, sans que la répartition des coûts municipaux et les structures de gouvernance ne soient encore définies;

ET ATTENDU QUE la province détient déjà le pouvoir d'établir des normes, des règlements et des attentes provinciales pour les opérations des offices de protection de la nature en vertu de la *Loi sur les offices de protection de la nature* et par l'entremise du ministère de l'Environnement, de la Protection de la nature et des Parcs;

QU'IL SOIT RÉSOLU QUE le Conseil du Canton d'Alfred et Plantagenet demande au gouvernement de l'Ontario de maintenir des offices de protection de la nature locaux, indépendants, régis par les municipalités et fondés sur les bassins versants, assurant une forte représentation municipale dans les décisions liées aux

contributions, à la prestation de services, à la gestion des terres et aux résultats des programmes axés sur la communauté.

QU'IL SOIT ÉGALEMENT RÉSOLU QUE, bien que le Canton d'Alfred et Plantagenet appuie les objectifs provinciaux liés à l'harmonisation des normes d'autorisation, aux services partagés et à la modernisation numérique, l'imposition d'une agence centralisée, de haut en bas, risque d'augmenter les coûts, la bureaucratie et la complexité administrative, tout en réduisant la transparence et la capacité de répondre aux besoins locaux des bassins versants.

QU'IL SOIT ÉGALEMENT RÉSOLU QUE le Canton d'Alfred et Plantagenet appuie des approches équilibrées visant à améliorer la capacité, l'efficacité et l'expertise technique des offices de protection de la nature et demandent à la province de travailler en collaboration avec les municipalités et avec les offices de protection de la nature existants pour évaluer où une consolidation stratégique — le cas échéant — serait appropriée, efficace et financièrement viable.

QU'IL SOIT ENFIN RÉSOLU qu'une copie de cette résolution soit envoyée au ministre ontarien de l'Environnement, de la Protection de la nature et des Parcs; aux députés fédéraux et provinciaux locaux; à l'Association des municipalités de l'Ontario; à l'Association des municipalités rurales de l'Ontario; ainsi qu'à toutes les municipalités et à tous les offices de protection de la nature de l'Ontario.



Julie Prud'homme, Greffière

Adoptée



CORPORATION OF THE MUNICIPALITY OF SOUTH HURON

322 Main Street South P.O. Box 759

Exeter Ontario

N0M 1S6

Phone: 519-235-0310 Fax: 519-235-3304

Toll Free: 1-877-204-0747

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December 18, 2025

Via email: todd.mccarthy@pc.ola.org

Minister of Environment, Conservation and Parks
5th Floor
777 Bay Street
Toronto, ON M7A 2J3

Dear Hon. Todd McCarthy,

Re: Response to Bill 68- Proposed New Ontario Provincial Conservation Agency

Please be advised that South Huron Council passed the following resolution at their December 15, 2025, Regular Council Meeting:

516-2025
Moved By: Ted Oke
Seconded by: Aaron Neeb

That South Huron Council endorses the Upper Thames Conservation Authority's draft Municipal Resolution regarding response to Bill 68 - Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities; and

That the draft resolution be updated to name the Municipality of South Huron, and circulated to the Ministry of Environment, Conservation and Parks, MPP Thompson, AMO, ROMA, area indigenous communities, all municipalities in Ontario, Conservation Ontario and all Conservation Authorities in Ontario as follows:

Whereas the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, 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 the Municipality of South Huron established the Upper Thames River Conservation Authority (initially formed in 1947) and Ausable Bayfield Conservation Authority (initially formed in 1946); and

Whereas local municipalities currently provide approximately 35% of total conservation authority funding, while the Province of Ontario provides approximately 2% (2026 budget); and

Whereas municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and

Whereas conservation authorities collectively own and manage thousands of acres of land. Many of these properties were entrusted to the UTRCA 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 Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined; and

Whereas the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

Now Therefore be it Resolved That the Council of the Municipality of South Huron calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and

Further That while the Municipality of South Huron supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and



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Further That the Municipality of South Huron supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives; and

Further That a copy of this resolution be sent to:

- the Ontario Minister of Environment, Conservation, and Parks,
- local MPPs,
- Association of Municipalities of Ontario,
- Rural Ontario Municipal Association,
- area Indigenous communities,
- all municipalities,
- Conservation Authorities, and
- Conservation Ontario.

Result: Carried

Respectfully,

Kendra Webster, Legislative & Licensing Coordinator

Municipality of South Huron

kwebster@southhuron.ca

519-235-0310 x. 232

Encl.

cc: MPP, Hon. Lisa Thompson, lisa.thompson@pc.ola.org; AMO, resolutions@amo.on.ca; ROMA, roma@roma.on.ca; area indigenous communities; all municipalities in Ontario; Conservation Ontario, info@conservationontario.ca; all Conservation Authorities in Ontario

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LOWER TRENT CONSERVATION

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Registered Charitable Organization No. 107646598RR0001

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON
K9J 3C7

December 17, 2025

RE: ERO number 025-1257

This letter is from the Board of Directors of the Lower Trent Region Conservation Authority (LTC) in response to ERO number 025-1257 “Proposed boundaries for the regional consolidation of Ontario’s conservation authorities”.

The Board of Directors is against the proposed consolidation of 36 conservation authorities into seven large regional conservation authorities. As outlined in the posting the purpose for the creation of the Ontario Provincial Conservation Agency (OPCA) and the proposed consolidation of conservation authorities is to modernize, streamline and standardize processes and applications for operations.

The Lower Trent Conservation Board of Directors are in favour of modernization, streamlining and standardization of processes and operations. We welcome the opportunity to be provided with e-permitting software, standardized financial and human resources management software and other applications that would create efficiencies across all 36 authorities. We do not believe that a consolidation is required to achieve these goals.

The development of Key Performance Indicators is also welcomed by Lower Trent Conservation. We are confident that staff can meet targets put forward by the OPCA. Last year alone, Lower Trent Conservation met mandated targets under O. Reg. 41/24 for issuing permits upon receipt of complete permit applications with an overall average of 7.32 days, which includes an average of 7.45 days for major permits and 6.88 days for minor permits.

To summarize, the process for consolidation is not necessary for improvements to be delivered by conservation authorities. The provision of common software applications would increase the operational efficiencies of conservation authorities and allow fair comparisons to be illustrated.

The haste at which the consolidation is being proposed appears rushed and does not provide a framework for the processes to occur by January 2027. We believe that more information is required and widely consulted upon before any consolidation is finalized.



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In addition, if the proposed consolidation, is completed prior to the delivery of standardized software will create a disruption in service delivery and regular operations whilst staff are learning the new operational processes. These processes are required to be implemented prior to any consolidation to allow for a smoother transition.

The Lower Trent Region Conservation Authority requests that the consolidation be paused until the current configuration of 36 conservation authorities be given the opportunity to establish operations utilizing the modernization tools and new standards as proposed.

And further, that a longer timeline be considered to address governance, financial, guidelines and directives before the proposed consolidation is considered. And the development of a clear transition plan be prepared collaboratively with a representative working group to outline expectations and timelines.

One of the primary concerns with the proposed consolidation is the loss of local representation at the Board of Director/municipal level. The area represented by the Eastern Lake Ontario Region Conservation Authority would amalgamate seven conservation authorities into one region and includes 48 municipalities. There is no model for governance outlined in the ERO posting. The request to provide feedback on a proposed regional governance model would necessitate a regional representational model based on existing county and/or regional governments. Having regional representation in our watershed area would have to include upper tier municipalities not participating in regional government. The voice of local municipalities will be lost under a proposed consolidation model including their ability to pay.

The representation of municipal board members leads directly into the question of how to maintain a transparent and consultative budgeting process across member municipalities. Municipalities fund more than 50% of local budgets and their input is invaluable in determining, maintaining and enhancing local programs to meet the needs of the local communities. The proposed consolidation will not be truly consultative nor conducive for transparency as there will be less exposure to budget planning and participation from the local level.

The proposed consolidation has been presented in a manner that will amalgamate financial and capital assets of each individual conservation authority into the regional conservation authority. Property assets are owned by the local conservation authorities and were either donated by local families and organizations or acquired through the assistance of local municipal governments. Other assets include buildings, equipment, vehicles, etc. Our municipal partners fund ongoing maintenance and replacement of these capital assets. The financial stability of each conservation authority varies across the region, and their priorities differ based on local input.



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The Lower Trent Region Conservation Authority requests that all capital asset management plans, as approved by the Board of Directors, are considered as priority in any regional budgeting process for continuity of local operations.

And further, that all costs associated with the modernization and any transition to the proposed consolidation be paid for by the province and not downloaded to the municipalities.

Access to staff and programs at a local level is necessary to fulfill the mandate of conservation authorities. Local knowledge, experience and expertise are required to meet requirements of planning and regulations. Local expertise is also required to meet the conditions of local memorandums of understanding with our municipal partners. Under the proposed consolidation there exists the potential to lose local expertise and watershed knowledge with the loss of staff due to the uncertainties brought about by this proposed consolidation and the loss of local Boards of Directors.

The Lower Trent Region Conservation Authority requests that all local conservation authority offices remain open for access by municipal partners and the public to promote local delivery of all required services.

And further, that the province provides a letter to each conservation authority for distribution to staff reinforcing the importance of staff members to deliver programs and services which could assist with slumping staff morale, maintain service levels, and counteract the lack of direct messaging to date.

Conservation authorities have been present in local communities for decades and have built strong and binding relationships with municipalities, community groups, First Nations and residents. These relationships remain strong because of the presence of the local conservation authority in neighbourhoods and participation in local programs and activities. Maintenance of these relationships are imperative to the success of watershed programs and services. Comments received by municipal partners indicate that working under a regional model will likely slow down approvals and affect municipal timelines for planning and regulations.

The Lower Trent Region Conservation Authority recommends maintaining the current local offices as stated earlier and further that local naming and brand identity remain intact.



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Registered Charitable Organization No. 107646598RR0001

The mapping as depicted for the proposed Eastern Lake Ontario Region Conservation Authority is incorrect. The northern limit of the Lower Trent Region Conservation Authority requires correction to reflect the legal and operational boundary.

Sincerely,

Gene Brahaney, Chair
Lower Trent Region
Conservation Authority

Sherry Hamilton, Vice-Chair
Lower Trent Region
Conservation Authority



December 19, 2025

AA-031-25

Via E-mail: ca.office@ontario.ca

Ministry of the Environment, Conservation and Parks
 Conservation and Source Protection Branch
 300 Water St, North Tower, 5th Floor
 Peterborough ON K9J 3C7

**Re: Cataraqi Region Conservation Authority Submission to ERO 025-1257
 Consultation (proposed Regional Consolidation of Conservation
 Authorities)**

I am writing in response to the Environmental Registry posting ERO 025-1257, Proposed boundaries for the regional consolidation of Ontario's conservation authorities. Cataraqi Region Conservation Authority (Cataraqi Conservation) offers the following responses to the list of question within the posting, as well as some additional comments about the proposed changes to the Conservation Authority business model.

Thank you for the opportunity to comment on this proposal.

Sincerely,

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 Conservation Ontario
 all Conservation Authorities

Encl.: Cataraqi Conservation Submission to ERO 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities



**Cataraqi Region Conservation Authority
(Cataraqi Conservation)**

Response to

ERO#025-1257

**Proposed boundaries for the regional consolidation
of Ontario's conservation authorities**

Submission: Written Submission
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Overview of Cataraqui Conservation Comments

On November 7, 2025, the Ontario government posted ERO #025-1257 seeking feedback on proposed boundaries for consolidation of Ontario's 36 conservation authorities into regional conservation authorities, and the criteria applied to inform proposed boundaries.

Cataraqui Region Conservation Authority (Cataraqui Conservation) has and will continue to work closely with the Province, municipalities and colleagues at other conservation authorities to improve transparency, efficiency, fiscal responsibility, and partnerships. Over the last several years, Cataraqui Conservation has been adaptable and innovative to ensure compliance with other legislative amendments to the Conservation Authorities Act and Regulations.

However, Cataraqui Conservation **does not support the proposed consolidation into the St Lawrence Regional Conservation Authority**. We believe there are better approaches such as shared services, collaboration, harmonization and modernization, which can realize the stated objectives without risk of significant disruption to continued program delivery and value for money.

Cataraqui Conservation proposes that:

- Consolidation be paused
- A workplan be developed by OPCA to translate goals for consistency, modernization and efficiency into actionable steps for CAs; consideration of cost-benefit and reasonable implementation timelines should be undertaken
- Existing conservation authorities remain in place with the current governance model that allows oversight by elected municipal representatives of programs and services tailored to the geography and communities of the local watershed
- OPCA works with CAs to update technical guidelines and prepare province-wide standards and policies for permitting, as well as a digital permitting platform
- Key performance indicators be set to ensure that Provincial objectives are being met
- Hazard mapping projects and technology improvements be supported with a sustainable provincial funding share
- Clusters of CAs work jointly to establish shared services agreements for administrative and corporate functions to achieve efficiency through common platforms, policies, procurement, and methodology

Some key matters of interest to Cataraqui Conservation should consolidation proceed include: the role of municipalities in governance and representation in the new larger regions; transition of financial and land holdings; budget process and municipal apportionment; and program and services continuation.

ERO Questions and Responses

1. Key factors for a successful transition and outcome of regional consolidation:

Cataraqui Conservation does not support the proposed regional consolidation of conservation authorities. Consolidation would entail complex and expensive legal, operational and human resource processes. Transition costs could far outstrip any savings from efficiencies or modernization.

In recent years, the Province has used legislation, regulations, technical rules, guidance, and policies to effect changes to CA focus, natural hazard review, and other aspects of CA business. It would be possible for the Province's desired outcomes to be achieved through specific provincial directives and collaborative work among existing conservation authorities in contrast to consolidation into new regional bodies.

CA Staff have developed a detailed understanding of local watersheds which guides their work, whether flood forecasting and warning, hazard mapping, operating flood control infrastructure, monitoring watershed conditions, or designing restoration and stewardship programs. This critical local knowledge and understanding will need to be valued and preserved to ensure effective program delivery if CAs are consolidated.

If consolidation proceeds, then success depends on:

- Development of a business plan, including timelines, cost-benefit analysis, steps and milestones, KPIs and service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures
- Phased implementation that does not negatively impact service delivery and also respects available financial and staff resources
- Revisiting the groupings of CAs within the proposed regional conservation authorities to better align with stated watershed selection principles; consider groupings with smaller geographic areas than current proposal and are similar in character
- On-going consultation and collaboration with municipalities and conservation authority Boards and staff
- Governance framework that allows each municipality to be represented and fulfill fiduciary responsibility to their constituency
- Retention of local knowledge and staff expertise
- Continuation of programs and services tailored to local priorities and needs

- Retention of local offices and staff, including management, for front-line service and fostering of relationships with local organizations, volunteers and municipal staff
- Continued emphasis on protecting life and reducing property damage from flooding and erosion throughout watershed management, development review, plan input, and other CA activities
- Support for municipal partners, the development community, and landowners with timely, reliable services;
- Focus on enhancing the economic, environmental and community health of the watershed;
- Provision of meaningful opportunities for people to connect at the local level

2. Opportunities or benefits of a regional conservation authority framework

In our opinion the Province's objectives can be achieved through shared systems, collaboration and voluntary service agreements between CAs. Service agreements could have the benefits of:

- Using modern tools across multiple watersheds with shared resources and technical expertise
- Joint procurement and shared staffing positions
- Simple governance using existing CA Boards to approve budgets, policies and projects under agreements and joint operational management by CA staff
- Programs that are currently offered on a local scale could be expanded to a regional scope
- Technical expertise could be shared to enhance development review, watershed monitoring, flood forecasting, and operation of water and erosion mitigation infrastructure

If consolidation proceeds, then opportunities or benefits may include:

- OPCA in collaboration with CAs, AMO and Conservation Ontario could update Provincial policies and standards, leading to reduced inconsistencies and consistent implementation outcomes
- Technical expertise could be shared toward floodplain mapping and development review

3. Suggestions for governance structure at the regional level:

The proposed consolidation would see each regional CA with a substantially larger number of municipalities in nearly all cases. For example, under the current representation formula in s.2(2) of the CA Act, the Board of the new St Lawrence Regional Conservation Authority would have over 70 municipal representatives from more than 40 member municipalities. A Board with so many members would clearly not function effectively.

An effective governance model would:

- Maintain the current local CA Board structure
- Continue current representation formula to ensure a direct line of communication, and a degree of accountability, for all municipalities
- Local CA Boards would then each be entitled to appoint a set number of representatives to a regional management board

Category 2 and Category 3 programs and services function by mutual agreement between CAs and municipalities. These services address watershed issues and local needs, are governed by Board representatives from our member municipalities and are funded by a combination of municipal apportionment, fees and grants. Given that these services are by agreement and are not funded with Provincial transfers, the oversight role of the OPCA should not be extended to this portion of CA business.

4. Maintaining a transparent and consultative budgeting process:

The proposed creation and operation of a new provincial Agency could be expected to have considerable costs. Given that the proposed Agency would have the power to recover costs from the Regional CAs, municipalities are very concerned that funding of the OPCA will be apportioned to regional CAs, and hence member municipalities, without municipal input.

Levy capacity and the tax base of municipalities varies from watershed to watershed, which has been considered pragmatically in the local decisions of each CA Board about service levels, fees and budgets over the years. Sudden changes in the allocated amount of apportionment to municipalities based on new CVA percentages within the consolidated regions or services not previously accessed may create financial hardship; a phased transition would assist in this shift.

During consolidation, it would be necessary to transfer the assets, land holdings, liabilities, contracts, agreements, etc. from the existing CAs to the new entity. protecting watershed reserves, infrastructure, and land assets. Many municipalities are concerned how locally funded reserves, land assets and long-term capital

programs will be treated within a consolidated structure. The costs (legal, labour), effort to determine financial position of each CA and time required to accomplish these tasks could be significant and highly contentious. Support will be needed to facilitate discussions, calculations and fair valuation for the municipal partners.

Utilizing service agreements as contrasted to consolidation could have the benefits of:

- Avoiding unnecessary transition costs
- Tailoring programs and services to portions of the watershed where needed and allocating the costs to the benefitting CA
- Joint procurement and shared staffing positions that can be billed back out to the benefitting CA

If consolidation proceeds, then budgeting should be done on a subregional level:

- Local offices would prepare portion of budget with review by local committee following a modified version of the budgeting process under O. Reg. 402/22
- Proposed subregional budgets and apportionments could then be proposed to the regional CA for final approval
- This would allow for the continuation of a familiar budgeting process within a new structure

5. Maintaining and strengthening relationships with local communities and stakeholders:

CAs are very responsive and accessible to partners, clients and the public while providing a high level of personalized customer service. There are concerns that if CAs are consolidated, then service levels, access to staff and relationship building would not be feasible or sustainable over the large geographic extent and number of clients within the proposed regional CAs. Currently staff are highly visible in the watershed, meet people on-site, attend events, present to groups and interact with visitors at our conservation areas. Strong relationships have been established with municipal colleagues and community groups.

Sustaining relationships with local stakeholders could be supported by the following actions:

- Maintain local presence in governance through continuation of Boards that approximate current CA watershed extents
- Maintain local offices and delivery to ensure CAs remain responsive to local needs
- Continue with local brand identity, infrastructure, programming, and staffing
- Decision makers within the proposed centralized permitting system should be based within the watershed area served to have efficient travel for site visits, access for clients and familiar with the local community and knowledge of local conditions
- Facilitate continued business relationship between CAs and the Foundations and Friends groups that volunteer and provide funding on a local basis

Thank you for the opportunity to review and provide comments on the Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257).

Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025

and

***Proposed boundaries for the regional consolidation of Ontario's conservation
authorities, [Environmental Registry of Ontario](#) posting #025-1257
Catfish Creek Conservation Authority Response***

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

A successful transition and outcome in regional conservation authority consolidation hinges on several interconnected factors that must be managed with strategic attention and realism. At the core is the establishment of a clear purpose and shared vision among all participating organizations. When goals are well-defined and collectively endorsed, consolidation efforts tend to be focused and cohesive. However, if early vision-setting is rushed or dominated by only a subset of partners, the result can be misaligned priorities, stakeholder resistance, and decision-making gridlock.

Strong governance and leadership are equally critical. Effective boards and executive teams can maintain momentum, provide clarity during uncertainty, and reinforce accountability. Conversely, weak governance structures, those with unclear mandates, unbalanced representation, or inconsistent oversight can exacerbate inter-organizational tensions and leave staff without clear direction. Poor leadership during consolidation risks eroding morale, slowing integration, and undermining public confidence.

A well-structured change-management approach underpins the entire process. It ensures that operational alignment, policy harmonization, and technical-system integration unfold in an orderly and predictable manner. Without such an approach, consolidations often suffer from duplicated efforts, inconsistent procedures, and costly delays. Transparent, ongoing communication with staff, municipalities, Indigenous communities, and local stakeholders is essential to prevent misinformation and maintain trust. Failure to engage these groups early and consistently can lead to confusion, perceived loss of local control, and diminished community support.

Cultural integration often underestimated, is another major determinant of success. Conservation authorities may differ significantly in their organizational norms, decision-making styles, and service philosophies. A thoughtful approach to blending these cultures promotes collaboration and reduces friction. If ignored, cultural mismatches can create internal conflict, resistance to new processes, and the loss of key personnel who feel their values or identity are being sidelined.

Human-resources planning must be clear, fair, and transparent. Staff need certainty around job roles, reporting structures, and opportunities for growth. Without careful planning, consolidation can generate anxiety, disrupt workflows, and contribute to turnover, which threatens continuity of services and the retention of institutional knowledge. Financial transparency is equally important; a consolidated organization must develop a budgeting approach that covers both ongoing operations and transition

costs. Hidden or underestimated financial pressures can result in service cuts, strained municipal relationships, or reduced investment in core environmental programs.

Respecting local watershed identity and community relationships is fundamental to preventing service disruption and maintaining public trust. Conservation authorities are often closely tied to local environmental issues, historical partnerships, and community-based programming. Consolidation risks diluting this local presence or creating perceptions of centralization and detachment, especially if decision-making becomes more distant from watershed-level realities.

Robust data-management standards, consistent performance metrics, and harmonized regulatory processes support fairness and operational efficiency. They enable consistent service delivery across the newly formed jurisdiction. Without them, staff may rely on differing data sets, incompatible methods, or contradictory interpretations of regulations, leading to inconsistent decisions, stakeholder frustration, and potential legal challenges.

Strong risk-management practices, including contingency planning and scenario analysis, help an organization anticipate challenges such as budget overruns, system failures, or climate-related emergencies during the transition period. Weak risk planning, however, can leave the organization vulnerable to disruptions that jeopardize its credibility and ability to meet statutory responsibilities.

Building capacity for staff training, professional development, and knowledge transfer is crucial to maintaining operational resilience. Consolidation often brings new technologies and workflows that staff must quickly adapt to. Neglecting training can result in knowledge gaps, reduced service quality, and inefficiencies during the transition.

Leveraging modern technology, shared GIS platforms, digital permitting systems, and centralized information portals can streamline operations and improve collaboration. Yet technological integration is frequently one of the most complex and costly aspects of consolidation. Incompatible legacy systems, cybersecurity concerns, and insufficient IT support can impede progress and frustrate users.

Clear decision-making protocols and dispute-resolution mechanisms provide internal stability when multiple perspectives and priorities converge. Without them, disagreements may escalate, slowing progress and eroding trust among staff, partners, and board members.

Finally, consolidation must include an ongoing process of monitoring, evaluation, and adaptive management. This allows the organization to refine policies, respond to community feedback, and adjust to changing environmental conditions. However, if

monitoring is neglected or treated as a formality, the organization risks repeating early missteps, failing to meet service expectations, and losing accountability to the public and its municipal partners.

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

A regional conservation authority (RCA) framework offers a wide range of opportunities and benefits by enabling truly coordinated watershed management across multiple municipalities and jurisdictions. At its strongest, this model supports environmental protection at the natural scale of ecological processes rather than political boundaries. By aligning planning, monitoring, and restoration activities across entire watersheds, RCAs can address interconnected issues such as water quality, habitat fragmentation, and hydrologic changes more effectively than individual municipalities acting independently. However, achieving this level of integration requires complex coordination, and if inter-municipal priorities conflict or data standards differ, early planning efforts may be slowed or diluted.

One of the most significant advantages of a regional framework is improved flood and stormwater management. Managing infrastructure, floodplain mapping, natural assets, and hydrologic systems holistically reduces downstream impacts and helps prevent piecemeal solutions that merely shift risk rather than reduce it. Yet, this also introduces challenges: differing municipal expectations, local political pressures, and uneven levels of pre-existing infrastructure investment can make it difficult to establish equitable cost-sharing models. Some communities may feel they are paying more than they gain, potentially leading to tensions over funding and capital priorities.

Economically, consolidation can generate efficiencies by reducing duplication of environmental services, centralizing administrative functions, standardizing procurement, and sharing specialized resources such as technical staff or monitoring equipment. These efficiencies can free funds for frontline environmental work. However, potential cost savings are not guaranteed. Transition periods often bring temporary cost increases, such as integrating IT systems, harmonizing staff compensation, or aligning policies which may strain budgets if not anticipated. Additionally, larger regional structures sometimes risk becoming less nimble, with slower decision-making or administrative overhead that offsets anticipated efficiencies.

A regional RCA framework can also strengthen policy consistency and regulatory enforcement. Uniform standards for development review, permitting, and conservation planning reduce confusion for landowners, developers, and municipalities while helping ensure environmental protection is consistent across the watershed. Yet, establishing

uniform standards may require reducing local flexibility, which can be contentious in communities with unique landscapes, development pressures, or political priorities. The process of harmonizing formerly distinct regulatory systems can also be time-consuming, potentially delaying development approvals or generating frustration among stakeholders.

Scientific and technical capacity is another key benefit. Consolidation pools specialized expertise, hydrologists, ecologists, climate modelers, planners, GIS analysts creating a more robust and interdisciplinary technical foundation. This leads to better-informed decisions and more sophisticated watershed modeling. However, attracting and retaining highly skilled staff can be challenging if consolidation creates uncertainty about roles or if the regional authority's compensation structure cannot compete with larger municipalities or private-sector employers.

Unified structures also enhance data sharing and analysis. Standardized monitoring protocols and centralized databases strengthen evidence-based policies, improve trend detection, and support cohesive watershed-reporting systems. The downside is that integrating legacy data systems, formats, and software platforms can be complex and costly. Inconsistent historical datasets may limit comparability across regions, requiring significant effort to reconcile before meaningful analysis is possible.

The RCA model naturally encourages stronger partnerships with municipalities, Indigenous communities, NGOs, conservation groups, academic institutions, and local stakeholders. Collaboration becomes easier when engagement is coordinated at a regional scale, allowing for larger research initiatives, broader stewardship programming, and more coherent public education strategies. Nevertheless, regionalization may create concerns about loss of local identity, reduced community-level input, or less accessible staff. Indigenous partners may question whether regional systems adequately respect treaty rights, local governance structures, or place-based knowledge unless engagement is proactive and meaningful.

From a governance perspective, a regional authority can reinforce transparent decision-making through coordinated strategic planning and unified long-term capital investment strategies. This improves accountability and helps ensure that investments are prioritized based on watershed-level needs rather than political boundaries alone. Still, governance structures that become too centralized, or that do not adequately balance representation across municipalities risk creating perceptions of inequity or “dominance” by larger urban areas. If governance reforms are poorly designed, they may weaken local advocacy or reduce responsiveness to community-specific concerns.

A regional framework also expands potential funding opportunities. Larger organizations can access broader grant programs, attract multi-partner investments, and leverage

economies of scale in fundraising. However, there is a risk that smaller or rural municipalities may feel overshadowed in funding allocation, or that grant-driven priorities could divert attention from essential but less “visible” watershed work.

Finally, an RCA enhances long-term resilience to climate change by coordinating risk assessment, emergency planning, natural asset management, and resource allocation across the watershed. This integrated approach supports biodiversity, protects vulnerable ecosystems, and increases community resilience to extreme weather and flooding. Nevertheless, the success of such initiatives depends heavily on political stability, consistent funding, and the organization's ability to adapt quickly. Large regional entities may face bureaucratic delays or competing internal priorities that hinder rapid response, posing challenges in a context where climate impacts are becoming more frequent and severe.

Ultimately, a RCA framework provides a more cohesive, efficient, and future-ready model for managing natural resources at the watershed scale, but it also introduces structural, financial, and cultural challenges that must be thoughtfully addressed. When designed with clear goals, inclusive governance, strong local engagement, and careful implementation planning, the benefits can far outweigh the risks. When these elements are neglected, consolidation can generate tension, reduce service quality, or weaken the very environmental protections it aims to strengthen.

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 well-structured governance framework for a regional conservation authority (RCA) must balance local representation, technical expertise, Indigenous involvement, and operational efficiency. It should be designed to reflect watershed realities while also ensuring that municipal, community, and ecological priorities are addressed in an equitable and accountable manner. Representation formulas can be based on watershed population, geographic distribution, watershed characteristics, municipal funding contribution, or a hybrid of these factors. This helps ensure that both densely populated urban areas and smaller rural or upper-watershed communities have an appropriate voice. Careful design is essential, as disproportionate representation either overweighting large municipalities or overprotecting small ones can undermine trust, strain decision-making, and weaken the integrity of watershed-scale planning.

To strengthen scientific, policy, and regulatory quality, optional seats may be reserved for provincial liaisons or independent environmental experts. Such roles can offer non-partisan guidance on environmental science, provincial legislation, climate projections, watershed modeling, and ecosystem restoration. While these positions are valuable,

they must be carefully positioned to avoid perceptions of undue provincial influence or conflicts with municipal autonomy.

Incorporating advisory or voting seats for Indigenous representatives, watershed stakeholders, local agricultural organizations, landowner groups, or community members can further enhance transparency and legitimacy. Indigenous participation is particularly important, as it embeds traditional knowledge, land stewardship principles, treaty considerations, and rights-based governance into the RCA's decisions. These seats should be supported with proper engagement protocols, honoraria, and culturally appropriate governance practices to avoid tokenism and ensure meaningful involvement.

Municipal representatives should be formally nominated by their councils and serve staggered terms of two to four years, balancing continuity with periodic renewal of perspectives. A structured board orientation program is essential, covering the RCA's statutory mandate, fiduciary responsibilities, conflict-of-interest rules, environmental planning authority, long-term capital obligations, and overall governance expectations. Without this orientation, municipal delegates may struggle to separate local political pressures from their fiduciary obligation to the entire watershed. Ongoing professional development refreshers on conservation legislation, natural hazards, climate resilience, equity frameworks, and financial governance helps board members maintain informed oversight as the environmental and regulatory landscape evolves.

Leadership positions, including chair and vice-chair, should rotate on a fixed schedule (e.g., every two years) to prevent concentration of influence and ensure diverse leadership perspectives. These roles should be reinforced by clear bylaws, a robust code of conduct, transparent meeting procedures, and an independent mechanism for conduct investigations or dispute resolution. This reduces the risk of political interference, undocumented decision-making, or governance breakdowns during periods of conflict.

A system of standing committees finance and audit, planning and permitting, conservation and restoration, governance and human resources, and Indigenous engagement provides deeper oversight and allows board members to specialize in strategic areas. Committees should have written terms of reference, annual work plans, and publicly accessible minutes. Regular internal reviews of committee performance and workload ensure they remain effective, balanced, and aligned with strategic priorities.

To strengthen internal accountability and operational clarity, the governance framework should include:

- Conflict-of-interest safeguards, including mandatory disclosure, recusal rules, and annual declarations.
- Transparent appointment and recruitment processes, especially for expert or community seats.

CCCA Environmental Registry Posting 025-1257 Submission – (Dec 19/25)

- Annual board self-evaluations and peer assessments, measuring effectiveness, ethics, and strategic focus.
- Annual performance reviews of the CAO, aligned with key performance indicators and strategic-plan progress.
- Clearly defined delegations of authority, distinguishing board-level strategic decisions from operational decisions reserved for senior management, helping prevent micromanagement and governance creep.

External accountability is equally important. RCAs should provide regular reporting to municipalities, Indigenous partners, the public, and the province, including:

- Annual watershed condition reports
- Audited financial statements
- Climate risk assessments and natural hazard updates
- Strategic plan progress reports
- Capital project dashboards and budget forecasts
- Publicly accessible board and committee minutes

Such transparency promotes public trust, demonstrates responsible stewardship of funding, and ensures that stakeholders understand how decisions support long-term watershed resilience and service delivery.

A strong governance framework must also incorporate adaptive management principles. As the watershed, community expectations, climate risks, and regulatory environment evolve, the structure must remain flexible enough to adjust representation formulas, committee mandates, or decision-making protocols. Periodic third-party governance reviews can provide objective assessments and recommendations for improvement.

Taken together, this comprehensive governance model cultivates transparent, accountable, inclusive, and expertise-driven decision-making. It positions the regional conservation authority to manage complex watershed-scale priorities while maintaining a strong and respectful relationship with municipalities, Indigenous governments, local communities, and key environmental stakeholders. Ultimately, such a structure ensures that the RCA remains resilient, credible, and effective in fulfilling its environmental protection and public service mandate.

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

Maintaining a transparent and consultative budgeting process within a RCA requires proactive communication, structured multilevel engagement, standardized financial practices, and a culture of openness. A well-functioning budgeting cycle not only strengthens relationships with member municipalities but also reinforces public trust,

demonstrates fiscal responsibility, and ensures that watershed priorities are aligned with available resources.

The process should begin with early, collaborative pre-budget consultations involving all member municipalities. This stage includes providing detailed projections of operational requirements, capital expenditures, anticipated growth pressures, inflationary impacts, regulatory changes, and emerging watershed risks. Sharing this information months before formal budget approval allows municipalities to incorporate anticipated levies into their own fiscal planning cycles. Early engagement also enables the RCA to flag emerging issues such as new provincial mandates, updated floodplain mapping standards, invasive species pressures, or climate-adaptation priorities that may significantly affect future resource needs.

Structured engagement mechanisms are essential. Regular joint meetings, financial workshops, or technical working groups provide municipal representatives with opportunities to ask questions, identify local priorities, and explore options for shared service delivery. These sessions must be inclusive, data-driven, and supported with clear explanations of cost drivers. They are also valuable for communicating why certain investments such as asset rehabilitation, hydrologic modeling, digital permitting systems, or natural infrastructure restoration are required and how they contribute to long-term community and environmental resilience. Presenting multiple scenarios or funding pathways allows municipalities to understand trade-offs and evaluate different levels of investment.

Transparency is reinforced by publishing draft budgets, detailed supporting documents, levy formulas, and clear rationales for significant changes. Making these materials publicly accessible helps reduce political uncertainty, dispel misconceptions, and provide councils, Indigenous communities, stakeholders, and residents with the information needed to assess how public funds are being used. Public consultations or open houses may further strengthen trust by allowing community members to ask questions and better understand watershed-wide challenges.

A consistent framework for cost-sharing, reserve management, asset management planning, and expenditure reporting is essential to ensure fairness and predictability. This includes:

- Clear rules for apportioning operating and capital levies
- Documentation of how reserves are built, used, and replenished
- Standardized asset lifecycle forecasting for infrastructure, equipment, and natural assets
- Comparisons of municipal contributions relative to service levels, watershed conditions, and local benefit
- Explanations of how inflation, population growth, and climate impacts influence long-term financial requirements

Standardized financial models such as multi-year operating budgets, 10–20-year capital forecasts, and scenario-based planning create stability and allow municipalities to anticipate future commitments. These models help identify potential funding gaps early, reducing the likelihood of unexpected levy spikes or emergency capital requests.

To further strengthen transparency and performance accountability, the budget process should be tied to clear, measurable indicators. Linking financial investments to environmental outcomes, service-delivery improvements, regulatory performance, and risk-reduction metrics helps demonstrate the value of public investment. Examples include metrics related to flood-risk reduction, water-quality improvement, restoration acreage, permitting service times, or climate-resilience upgrades. When these indicators are publicly reported, they provide a concrete demonstration of how funds translate into meaningful watershed improvements.

Accessibility is equally important. Developing plain-language budget summaries, infographic-style explanations, and public-facing financial dashboards ensures that key information is comprehensible to non-specialists. This approach helps residents, Indigenous communities, community groups, and local stakeholders understand how their contributions support watershed health, natural hazard management, and conservation programming.

Finally, transparency does not end with budget approval. Maintaining confidence in the RCA's financial integrity requires ongoing, predictable communication throughout the fiscal year, including:

- Quarterly financial updates
- Mid-year budget adjustments or reallocations, with explanations
- Risk assessments identifying emerging financial pressures
- Updates on capital project progress and cost variances
- Post-year evaluations comparing planned vs. actual results
- Performance reports linking spending to outcomes

This continuous cycle of monitoring, reporting, and adjustment ensures that the budgeting process remains adaptive, accountable, and aligned with evolving watershed conditions and municipal expectations. By integrating early consultation, structured collaboration, standardized reporting, accessible communication tools, and robust performance tracking, the RCA can maintain strong fiscal stewardship and reinforce long-term confidence in its governance, financial practices, and environmental mandate.

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

RCA can maintain and strengthen relationships with local communities and stakeholders by fostering authentic engagement, transparent communication, and collaborative partnerships all grounded in local identity, cultural context, and place-based ecological knowledge. As RCAs grow in scale or transition to regional models, it

becomes even more important to ensure that communities do not feel distanced from decision-making or disconnected from their local watershed issues.

A foundational element is regular, proactive communication that responds to the unique character of each sub-watershed or municipality. Outreach must be multi-channel and locally tailored. Newsletters, social media updates, local radio interviews, community newspapers, town-hall meetings, and watershed-specific events help keep residents informed about projects, monitoring results, policy updates, and environmental trends. Tailoring communication to local conditions for example, focusing on shoreline erosion in lakefront communities or agricultural runoff concerns in rural areas ensures that messages remain relevant and grounded in lived experience. Without this customization, communication risks becoming generic or overly regional, weakening community engagement and reducing trust.

Strong relationships also depend on structured opportunities for shared decision-making. Establishing advisory committees or working groups with municipal representatives, Indigenous governments, environmental organizations, agricultural groups, developers, recreational users, and local stewardship networks ensures that governance reflects diverse and locally informed perspectives. These groups can be further localized through sub-watershed advisory panels, which allow community members to identify issues, priorities, and practices specific to their region. This structure prevents smaller communities from feeling overshadowed by larger municipalities and ensures that watershed-wide strategies incorporate local nuance.

Meaningful engagement also requires creating hands-on participation opportunities. Volunteer planting days, stream cleanups, shoreline restorations, invasive-species removals, and habitat enhancement projects help residents develop a sense of ownership and connection to their natural environment. Citizen science programs such as water-quality sampling, species monitoring, and community mapping empower residents to contribute data and deepen ecological understanding. These participatory initiatives cultivate stewardship, enhance ecological literacy, and help bridge the gap between technical watershed planning and community experience. Without such opportunities, public engagement may remain theoretical rather than tangible.

Education is another critical pillar. Place-based learning initiatives, including school partnerships, youth leadership programs, community workshops, field demonstrations, and guided watershed tours, help residents understand the local landscape and its vulnerabilities. They also highlight the distinct hydrologic, ecological, and cultural conditions within each community. This approach strengthens public awareness about flood risks, natural hazards, biodiversity, climate adaptation, and the role of conservation authorities in local protection. When done well, education fosters long-term stewardship and counters misinformation. When neglected, communities may misunderstand conservation authority responsibilities or underestimate environmental threats.

Transparency is essential for sustaining trust. Making operational information, budgets, permitting decisions, monitoring results, restoration progress, and watershed report cards, openly available demonstrates accountability. Localized reporting, such as municipality-specific dashboards or sub-watershed summaries, helps residents see how conservation actions translate into local improvements. Transparent communication about challenges such as funding limitations, regulatory changes, or climate impacts also builds credibility and prevents assumptions that decisions are made without community input.

Strong relationships also rely on responsive, two-way communication. RCAs must acknowledge community concerns quickly, follow up with clear information, and adjust programs based on feedback when appropriate. Whether responding to landowner inquiries, resolving conflicts about property impacts, or addressing local environmental issues, responsiveness sends a clear message that the authority values community knowledge and lived experience. Conversely, delayed or opaque communication can erode trust and fuel perceptions that decisions are made “from the center” without regard for local realities.

Celebrating shared successes further strengthens relationships. Publicly recognizing community champions, Indigenous leadership, youth contributions, volunteer groups, and multi-partner achievements reinforces the collaborative nature of watershed stewardship. These celebrations build momentum, inspire ongoing participation, and highlight the tangible benefits of partnership-based conservation.

Maintaining place-based identity is especially important in a regional framework. Even within a consolidated RCA, each watershed community has distinct environmental challenges, cultural histories, governance preferences, and expectations for service delivery. Respecting these differences through local service hubs, community liaisons, region-specific programming, and adaptive communication approaches—helps ensure that consolidation does not dilute local voice or identity

By prioritizing authentic engagement, grounding communication in local identity, and offering accessible avenues for direct involvement, regional conservation authorities can cultivate strong, enduring, community-based partnerships. These relationships not only enhance public trust but also strengthen resilience, improve environmental outcomes, and ensure that watershed stewardship remains rooted in the people and places it serves.

6) What absolutely cannot be lost through the consolidation to Regional Conservation Authorities?

Through consolidation into Regional Conservation Authorities (RCAs), it is essential that certain core elements be preserved to ensure both ecological effectiveness and enduring community trust. Above all, local watershed autonomy and identity must remain central. Autonomy expressed through community voice, place-based decision-making, and localized operational presence is not a secondary consideration; it is the

foundation on which conservation authorities were built. Even within a larger regional structure, each watershed carries its own history, ecological patterns, stewardship culture, and social fabric. These distinct identities must remain visible, respected, and empowered within governance systems, day-to-day operations, and public-facing programming.

Local watershed knowledge is equally critical. The ability of staff to draw on site-specific understanding of wetlands, groundwater recharge zones, flood-prone corridors, erosion hotspots, fish and wildlife habitats, agricultural drainage patterns, and culturally significant lands is what enables effective, credible, place-based management. This knowledge is rooted not only in technical training but also in decades of experience held by local staff, Indigenous communities, landowners, stewardship groups, and volunteers. Consolidation must not flatten or homogenize this expertise. Instead, the RCA must embed institutional structures such as sub-watershed teams, local offices, or community liaisons that safeguard the autonomy and integrity of local ecological knowledge.

Strong relationships with municipalities, landowners, Indigenous nations, stewardship organizations, and volunteers form the backbone of conservation success. These relationships were built over many years through trust, collaboration, conflict resolution, and consistent presence on the ground. A regional model should reinforce these relationships, not dilute them, by ensuring staff remain physically and relationally connected to local communities. Municipal partners must continue to receive tailored support that reflects their unique priorities, risks, infrastructure needs, and political environments. Without these relationships and the autonomy to nurture them, community engagement, project delivery, and environmental stewardship would be severely weakened.

Regulatory and service continuity is another cornerstone of autonomy and public confidence. Development permitting, plan review, conservation enforcement, hazard identification, watershed monitoring, and flood forecasting must remain predictable, responsive, and grounded in local conditions. Any disruption in these services risks environmental harm, development delays, and erosion of municipal trust. Preserving institutional memory, watershed-specific datasets, and decades of monitoring results ensures that the new regional structure can make decisions that are historically informed, scientifically robust, and locally accountable. This continuity supports climate resilience and protects communities from natural hazards work that cannot be done effectively without local authority and expertise.

Local identity, branding, and stewardship programming must also be preserved so that communities continue to feel ownership over their watershed and its care. This includes maintaining sub-watershed advisory groups, volunteer networks, heritage initiatives, education programs, and youth engagement activities tied to specific rivers, forests, conservation areas, and cultural sites. These programs are not peripheral; they are essential expressions of community autonomy and stewardship. When residents see

their watershed reflected in decisions, programs, and communications, they remain invested partners in conservation.

Financial accountability and transparent reporting to member municipalities remain essential components of autonomy. Clear budgeting processes, levy explanations, and spending rationales must reflect local needs, contribution patterns, and project priorities. Municipal partners need assurance that consolidation will not centralize resources at the expense of smaller or rural communities. Autonomy in financial transparency helps protect the integrity of local investments and ensures that every community sees tangible, watershed-specific outcomes from its contributions.

In essence, consolidation should be designed to enhance coordination, improve efficiency, and expand technical capacity without sacrificing the local autonomy, knowledge, relationships, and identity that define the conservation authority model. Autonomy is not an obstacle to regional coordination; it is the mechanism that ensures regional systems remain grounded in the realities of each watershed. A well-designed RCA must therefore function as a network of empowered local units operating within a cohesive regional framework.

The goal is a stronger, more capable regional system that still feels local, familiar, accessible, and responsive, where each watershed retains the authority, presence, and identity necessary to serve its communities and ecosystems effectively. Autonomy is everything: it is the anchor that keeps conservation work meaningful, trusted, and deeply rooted in the landscapes and people it exists to protect.

7) Local concerns

Local communities and stakeholders often express significant concerns during consolidation discussions concerns that go far deeper than simple administrative adjustments. At the heart of these concerns is a strongly held belief that “bigger isn’t better,” especially when it comes to watershed management, environmental protection, and community relationships. Many communities value the existing conservation authority model precisely because it is local, nimble, place-based, and deeply informed by on-the-ground expertise. Consolidation threatens to disrupt this core strength.

One of the most pervasive fears is that representation will be diluted within a larger regional board. Municipalities worry their voice will become one among many, weakening their ability to influence decisions that directly affect their neighbourhoods, infrastructure, and locally significant natural areas. Smaller municipalities are especially concerned that their distinct challenges such as rural flood risks, agricultural drainage needs, shoreline erosion control, or wildlife corridor protection could be overshadowed by the priorities of larger urban centres. Under a regional lens, local nuance risks being lost, and with it, the ability to tailor responses to unique watershed conditions.

Communities also express legitimate concerns about service continuity and responsiveness. In the current system, local conservation authorities provide permitting,

hazard monitoring, enforcement, flood forecasting, and conservation area maintenance with an understanding that is highly contextual and site-specific. Residents and municipalities alike worry that consolidation could centralize or standardize these services in ways that reduce responsiveness. They fear slower permitting decisions, delayed hazard assessments, or reduced field presence just when climate change is increasing the urgency of quick, informed action.

A major risk of consolidation is the potential loss of embedded local expertise. Existing conservation authorities rely on staff who know the watershed intimately: historical flooding patterns, aging culverts and berms, localized erosion hotspots, cumulative effects of development, long-standing landowner relationships, and ecological trends shaped over decades. This kind of place-based knowledge cannot be replicated quickly, nor can it be effectively centralized. During consolidation, staff may be reassigned, spread thin over a larger region, or even lost altogether. This creates real knowledge gaps that jeopardize environmental outcomes, risk management, and long-term watershed resilience.

Local stewardship programs and volunteer-based initiatives are also at risk. Many communities fear that the unique character of their local programs could be diluted or replaced by generic, region-wide offerings. Neighbourhood tree plantings, creek cleanups, school field trips, Indigenous land-based learning, and citizen science projects often succeed because they are tailored to the specific natural and cultural landscape. A larger regional authority may struggle to maintain program frequency, diversity, or relevance at the local scale. When local engagement weakens, so does the sense of ownership and stewardship that communities feel toward their waterways and natural areas.

Financial transparency is another major concern. Municipalities want clear, accountable budgeting processes, and they worry that consolidation may obscure how levies are allocated or redistribute resources away from smaller watersheds. Many fear that efficiencies promised through “economies of scale” will not materialize, and that instead they could end up paying more for fewer localized services. The argument that “bigger saves money” is not supported by experiences in other sectors, where consolidation often increases overhead costs, administrative layers, and complexity while reducing accessibility and responsiveness.

Perhaps the deepest concern is that consolidation may shift decision-making toward top-down regional priorities, replacing long-standing local relationships, local branding, and locally relevant environmental initiatives with a centralized identity that feels disconnected from the community. Conservation authorities have spent decades building trust with residents, farmers, businesses, Indigenous communities, and municipalities. That trust is rooted in local presence, local identity, and local autonomy. Consolidation risks weakening these relationships by creating greater distance between decision-makers and the communities they serve.

All of this points toward a central truth that communities understand clearly:

Local conservation authorities are effective precisely because they are local.

Individual watershed authorities offer intimate knowledge, agility, accountability, and direct relationships that cannot simply be scaled up or recreated regionally. Bigger systems often become more bureaucratic, less transparent, and more distant—while smaller, community-rooted authorities remain responsive, adaptive, and trusted.

Therefore, the argument is not simply about resisting change; it is about protecting what works. The existing framework composed of individual, place-based conservation authorities has proven effective for decades because it integrates scientific expertise with local wisdom, governance, and stewardship. Rather than consolidating, many communities argue for strengthening existing authorities, improving collaboration where beneficial, and investing in local capacity.

In watershed management, as in many community-centered services, bigger is rarely better if it comes at the cost of local identity, local expertise, and local voice. The goal should be to enhance coordination without erasing the deeply rooted, community-based strengths that define conservation authorities.

A stronger future for watershed protection means building on what already works, not replacing it with a larger, less personal system that risks losing the very qualities that made conservation authorities successful in the first place.

December 11, 2025

Response to ERO # 025-1257, Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Advancing Conservation Authorities AND Meeting the Goals of the Province of Ontario

The Nickel District Conservation Authority (NDCA, o/a Conservation Sudbury) appreciates the opportunity to provide comment on the above posting to the Environmental Registry. In response to the proposal of consolidating the four authorities in the northeast, this Authority agrees with the Northern Ontario Large Urban Mayors (NOLUM) whose letter is attached.

Distinct and Distant - The history of Conservation Sudbury includes the merger of two smaller adjacent authorities in 1973, a move that was voluntary and initiated by the municipalities of the day. The proposed consolidation of four authorities in distant watersheds is incomparable. The distances between the jurisdictions are vast and none of the watersheds are shared. This includes four discrete Source Protection Areas.

Simple Governance Model - None of the municipalities in northeastern Ontario currently have more than one conservation authority. There is no duplication or administrative overlap. In Timmins and Greater Sudbury, there are currently one-to-one relationships. Consolidation will therefore increase the complexity of relationships between municipalities and authorities. Any assumption that additional or centralized leadership by an agency is required or desired, is antithetical to the very nature of conservation authorities that came into being by cooperation of local municipalities. In Greater Sudbury, the governance of the conservation authority is as highly efficient as one could want. Since there exists a one-to-one ratio, City Council appoints all seven of the Members to the Conservation Sudbury board; five from within its ranks and two from residents who apply to be considered, typically following each municipal election.

Expertise Challenges – Being funded by smaller municipalities means no northeastern authority can boast an abundance of in-house professionals. On average, there are fewer than one staff with a professional designation per authority, allowing no opportunity for balancing expertise or capacity. Introducing equalization payments to allow northern authorities to attract and retain the needed experts is one approach. This would speed up plan reviews and permitting, bolster the study and mapping of natural hazards and support the local economy.

Lean and Effective – A desire to ensure that conservation authorities can “reduce duplicative administrative costs, free-up resources for frontline conservation, and better align conservation authorities’ services with provincial priorities on housing, the economy, infrastructure and climate resilience” is reasonable. Given that northern authorities operate on lean budgets, becoming highly efficient has not been an option. There are no administrative-only positions at any of the authorities and all positions are “front line” to varying extents.

With respect to the provincial housing and economy priorities, Conservation Sudbury’s performance, achieved through its working relationship with the City of Greater Sudbury, speaks for itself. In a typical year, staff screen ~ 1000 building permit applications referred by the City’s building services division. Staff have access to the back end of the City’s online permitting portal built on the Accela platform that is in use in several jurisdictions across the province. Most (>85%) of these permit reviews are cleared quickly and rarely exceed the City’s 5-day and 10-day benchmarks. Approximately 5% of the applications screened will receive a streamlined letter of permission with a map of the regulated area and natural hazards on the parcel where work is proposed. The remaining applications, between 7 and 8%, are deemed to require a permit under Section 28 of the CA Act. Over 90% of those will be issued within 15 working days following the receipt of a complete application.

In the past five years staff have recommended not issuing a permit less than once annually on average. This is testament to an ability to work with proponents and the municipality to find solutions and the results are telling. In July of this year the Province [awarded](#) the City of Greater Sudbury with \$1.52 million for achieving 80% or more of its provincial housing target; in fact the City saw work on 840 residential units breaking ground, achieving 265% of its target, and the [trend continues](#).

Turnaround times and permit fees are not constraints to development in Greater Sudbury, where a shortage of skilled labour and higher material and construction costs are challenging. The unemployment rate in Greater Sudbury is lower than provincial and national rates, the housing market is one of the hottest in the country, and the [economic outlook](#) is bright.

If a single permitting platform is desired, then adopting the *Conservation Authority Content Management System* (CACMS) developed by Central Lake Ontario Conservation Authority (CLOCA) is recommended. This system is already in place and has proven to be effective. Procuring this system and providing it to all authorities would be most cost-effective, have fewer challenges, and could be up and running

quickly. This system was purpose built for conservation authorities and includes many desirable features including:

- CA Regulation Workflow
- Timeline Tracking
- KPI Tracking
- Robust search functionality
- Document classification
- Data retention policies
- Cloud deployment
- Plan Review Workflow
- Online permit integration
- Reports and status dashboards
- Violations Section
- Task Management
- Site Inspection
- MS Outlook Integration
- Forms and Reports customization
- Integration with Web GIS

With respect to infrastructure needs, investment in flood control infrastructure continues annually by leveraging locally derived reserves to maximize provincial and federal funding opportunities. Since 2015 over \$5 million in grants were invested into local dams and flood channels, increasing the value of the authority's fixed assets by over \$4 million.

Climate change resilience in a community can be highly related to flood control infrastructure but Conservation Sudbury's efforts in this respect go beyond fixed assets. As part of the city's regreening efforts, over 1 million trees have been planted on conservation lands out of the more than 10 million in the region. In addition, nearly 600 000 more have been planted by the Authority on private lands in partnership with Trees Ontario / Trees Canada as part of the 50 Million Trees program.

Furthermore, floodplain mapping has been advanced in Greater Sudbury's watersheds. Updating natural hazard mapping is the most important work that an authority can do to complement municipal adaptation efforts. Currently three floodplain studies covering more than 200 square kilometres are in the final year of completion, and a small watershed in the Greater Sudbury's south end recently saw new mapping adopted. On this front, the MNR's assistance in providing updated technical guidance would be highly appreciated by all authorities and especially so in complex scenarios where 2-D and spill modelling are required.

Supporting Local is Best - An authority's strategic direction is not a matter for centralization. The Minister, through regulation, has recently provided clear guideposts that authorities must operate within. All authorities acknowledge and deliver on mandatory programs (Category 1) and undertake other programs deemed locally important through municipal agreements (Category 2 / 3). How the delivery of

programs and services are prioritized must be a localized decision that considers capacity, funding and demand. Where “have not” municipalities are unable to fund authority functions adequately, introducing equalization grants would lift capacity and expertise serving those communities. This could easily be administered by enhancing the units that the province already has. Provincial oversight is already in place through two ministries. The Ministry of Natural Resources (MNR) oversees the transfer payment agreements related to natural hazards including flood management and water and erosion control infrastructure. Conservation authorities are heavily integrated into the provincial surface water monitoring network alongside their provincial and federal counterparts. Recent changes have the MECP overseeing the conservation authority portfolio, building upon its significant role related to drinking water source protection. Investing in these two ministries would have a direct and positive effect on conservation authority operations by providing contemporary policy direction, and technical guidance.

The Minister has proposed a list of solutions and advancements that can be of benefit to existing conservation authorities. Some have these have been touched upon above and could be actioned by the OPCA as proposed. These include:

- Development and implementation of a standardized and centralized system for processing applications for permits issued by authorities
- Development and implementation of digital strategies and shared services to support the operations... programs and services
- Support strategic investment in programs and services provided by authorities
- Oversee and evaluate the financial performance of authorities to ensure long-term operational and capital financial sustainability
- Guide and evaluate the strategic planning by authorities to ensure alignment with provincial objectives
- Promote consistent policies, standards and fees for programs and services provided by authorities
- Assess and report on the effectiveness of authorities in furthering the conservation, restoration, development and management of natural resources

Without exception, the initiatives listed above can be effectively implemented at existing conservation authorities without any consolidation. The Government of Ontario, through the Ministry of Environment Conservation and Parks (MECP) is enabled, through the CA Act, to establish legislation, regulations, and standards without the consolidation of authorities, i.e. without restructuring the existing governance model.

Fiscally Responsible? - Consolidation may find minimal savings in administrative costs such as audit and banking fees however all other costs would remain. The process of amalgamating several legal entities will not be without costs that small northern municipalities will not bear. Currently all northeastern Ontario authorities achieve a high degree of cost-effectiveness through participating in large, pooled plans for expenses such as benefits and insurance that are based not on a per entity basis but per employee or per asset. All authorities can participate in the province's Vendor of Record program *Doing Business* where preferred pricing is available through standing offers on expenses including cleaning products, cellular communications, vehicles, etc. In short, the efficiencies that may be found through economies of scale in a larger organization are already in place through arrangements made via Conservation Ontario, member municipalities or the Province itself.

With reference to the proposed equalization of expertise across the proposed RCAs, there will be a need for a regional authority in the northeast to increase in-house expertise by hiring staff with certain skillsets, especially those directly related to natural hazards including, for example, wetland hydrology, fluvial geomorphology, hydraulic engineering, and geoscience. This injection of expertise would increase the capacity of authorities and reduce project review and approval times but would also significantly increase human resources budgets and the costs directly related to their tools and technology. As an alternative, investments into MNR / MECP or Conservation Ontario could support a shared-service model for existing conservation authorities with expertise deficits. This approach would allow localised services to persist and enhance the ability to support the management of the risks of natural hazards.

Let's Work Together - In closing, Ontario can reach its housing and infrastructure goals faster and more effectively by building upon, and not dismantling, the proven strength of local conservation authorities.

A collaborative model that respects northern Ontario realities, meets provincial expectations, and safeguards proven long-standing public safety standards, can deliver without sacrificing local identity or trust. By supporting existing governance instead of starting from scratch, let's work toward an approach that accelerates approvals, strengthens community confidence, and ensures growth without compromising the safety of people and property nor the natural spaces we all enjoy.

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December 12, 2025

RE: Conservation Sudbury position regarding the regional amalgamation of Ontario's conservation authorities as proposed through Environmental Registry Notice 025-1257

The following resolution was passed at the Nickel District Conservation Authority's meeting of December 11, 2025.

Resolution no. 2025-75

Moved by: Jennifer Davidson

Seconded by: Joscelyne Landry-Altman

WHEREAS municipalities have historically established and governed their conservation authorities under the *Conservation Authorities Act*;

AND WHEREAS municipalities provide approximately 54% of conservation authority funding, while the Province of Ontario provides approximately 5%. (2023 MECP data);

AND WHEREAS for decades Conservation Sudbury and its predecessors have established programs and services to local watershed needs, maintained accountable service standards, and ensured fair and predictable costs for ratepayers.

AND WHEREAS the Authority operates the Lake Laurentian Conservation Area providing access to all visitors at no cost, maintains and operates flood control infrastructure across Greater Sudbury including dams in Copper Cliff and New Sudbury, weirs in Coniston, berms in Dowling and Capreol, and the box culvert under downtown Sudbury;

AND WHEREAS Conservation Sudbury owns and manages extensive lands for conservation, public protection, and recreational purposes, many of which are leased to private operators and to the City of Greater Sudbury for recreational purposes, including Timberwolf Golf Course, Adanac Ski Hill, Rotary Park, Garson Park, Carmichael Park, and portions of Fielding Park;

AND WHEREAS the Provincial Government has proposed the consolidation of Ontario's 36 conservation authorities into 7 large regional conservation authorities (RCAs) overseen by a new layer of bureaucracy named the Ontario Provincial Conservation Agency (OPCA), a move that would dilute local governance and put municipal cost distribution in question;

AND WHEREAS in time, the OPCA will levy participating municipalities for some of its operating costs and will collect fees from the authorities, and Conservation Sudbury, as proposed, would be merged with authorities operating from offices located in Sault Ste-Marie (SSMRCA), Timmins (MRCA), and North Bay (NBMCA);

AND WHEREAS assets of the existing authorities would be pooled under any new regional authority, that would include all lands, buildings, chattels, bank accounts and reserves as well as all loans and other liabilities;

AND WHEREAS the imposition of a new oversight agency, lacking local or public accountability, risks creating unnecessary costs for municipalities and authorities alike, adding “red tape” and unnecessary bureaucracy, and undermines an authority’s efficiency and responsiveness to local community needs;

THEREFORE, BE IT RESOLVED THAT the Government of Ontario:

1. Maintains local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation that allow appropriate levy decisions, community-focused services, proper management of conservation lands and allocation of reserves to projects and infrastructure in the communities where the funds were raised;
2. Avoids imposing a centralized agency that will introduce additional costs, red tape, and bureaucracy, reducing efficiency and responsiveness to local needs;
3. Delays any decision to consolidate conservation authorities to allow: a) an assessment of the need for consolidation, and a complete cost analysis to the Authority and municipality, b) for meaningful engagement needed to address the concerns and risks of the proposed consolidation, c) for the review of alternative consolidation models and processes that would result in better outcomes related to Provincial priorities
4. Collaborates with municipalities and conservation authorities to improve consistency, capacity, and program delivery across Ontario without compromising local accountability;
5. Maintains existing land (property) and financial reserves to be used within, and for the benefit of, Greater Sudbury in which these originated and were improved upon.
6. Rejects the proposed “Northeastern Ontario Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257.
7. Requires the Minister to directly engage affected municipalities before finalizing any consolidation boundaries or any other legislative amendments impacting their conservation authorities.

AND BE IT FURTHER RESOLVED that a copy of this resolution be sent to:

- The City of Greater Sudbury
- The Environmental Registry of Ontario Consultations prior to the deadline of December 22, 2025
- The Honourable Todd J. McCarthy, Minister of the Environment, Conservation and Parks
- MPP Peter Tabuns, Official Opposition Critic
- Frances G  linas, MPP for Nickel Belt
- Jamie West, MPP for Sudbury
- The Association of Municipalities of Ontario
- Conservation Ontario
- All municipalities within the proposed Northeastern Regional Conservation Authority boundary that includes the Cities of Timmins, Sault Ste-Marie and North Bay, as well as Prince Township, the Municipalities of Callander, Calvin, East Ferris, Mattawan and Powassan, the Town of Mattawa and the Townships of Bonfield, Chisholm and Papineau-Cameron.

4 December 2025

The Honourable Todd McCarthy
Minister of the Environment, Conservation and Parks
5th Floor
777 Bay St.
Toronto, ON M7A 2J3

Subject: Bill 68, Schedule 3 - Conservation Authority Amalgamations and Regional Boundaries

Dear Minister McCarthy,

We, the Northern Ontario Large Urban Mayors (NOLUM), are writing to provide feedback on the proposed consolidation of the northeastern Ontario conservation authorities and the regional boundaries envisioned.

As the Ministry-provided material correctly states, Conservation Authorities are organized based on watersheds. The proposed regional conservation authority boundaries for northeastern and northwestern Ontario do not align with this principle. The two proposed regional conservation authorities involving Northern Ontario are the only non-contiguous agglomerations of watersheds. This does not create the same efficiencies for the other regional conservation authorities.

We recognize that there are significant concerns regarding conservation authorities in Southern Ontario. Unfortunately, the solution proposed to address this Southern Ontario issue will create real and significant harm to a system that is functioning well in Northern Ontario.

The proposed regional boundaries cover vast, disconnected territories and include many small communities, leading to significant governance challenges. There are also huge financial considerations, as substantial reserves are set aside in our conservation authorities, paid for by residents, for future community infrastructure.

We are confident our conservation authorities will be happy to work collaboratively with the new Ontario Provincial Conservation Agency and utilize the shared digital platforms, common standards, and technical resources envisioned.

Our conservation authorities are lean organizations that are accountable, transparent, and provide efficient permit approvals and community services. The proposed regional model for Northern Ontario will not eliminate red tape and has the distinct potential to result in the opposite outcome of increased bureaucracy. For Northern Ontario, this is a situation of, "if it ain't broke, don't fix it."

NOLUM looks forward to collaborative discussions that enable our conservation authorities to continue in their current form, recognize the geographic realities of Northern Ontario, and establish protocols that will enable them to meaningfully engage with the new Ontario Provincial Conservation Agency.

We thank you for the opportunity to provide this feedback and look forward to working with your Ministry on this matter in the future.

Sincerely,



Michelle Boileau, Mayor of Timmins



Ken Boshcoff, Mayor of Thunder Bay



Peter Chirico, Mayor of North Bay



Paul Lefebvre, Mayor of Greater Sudbury



Matthew Shoemaker, Mayor of Sault Ste Marie

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Friday, December 19, 2025

Sent through ERO 025-1257 Posting Online

ca.office@ontario.ca

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON K9J 3C7
Canada

RE: Essex Region Conservation Authority submission to ERO Posting 025-1257

The purpose of this submission is to provide the feedback of the Essex Region Conservation Authority (ERCA) Board of Directors to the ERO. This is in addition to the letter sent from the ERCA Board of Directors by email to Minister McCarthy, dated November 19, 2025.

Essex Region Conservation Authority was formed in 1973 and is one of 36 conservation authorities across the province of Ontario. For over 50 years, ERCA has been working with local municipalities, local watershed residents, First Nations, and local stakeholder groups (both environmental and development-focused) to ensure that the Essex region is protected from natural hazards, has systems in place to provide accurate and timely information and data in the event of emergencies (i.e. a flood), provide programs and services to enhance our shared goals for the watershed region and ensure responsible development to protect life and property.

Essex Region Conservation Authority's boundaries largely mirror the Source Protection Area. The area includes all watersheds out letting to Lake St. Clair, the Detroit River and Lake Erie bounded by the western watershed extent of the Lower Thame Region Conservation Authority (the western extent of the Thames River watershed). The topography of the Essex Region is unique in the province with flat, low-lying land, impermeable soils, rapid runoff response, aggressive shoreline erosion, and reaches of the watershed that have experienced significant flooding and damaging erosion. Managing these challenges requires technical expertise that exists within the current structure of our organization and staff who are fully experienced with the challenges of our landscapes. ERCA's position is that issues, that as yet are not fully articulated by the province, most likely stem from lack of stable provincial funding that was previously provided for historically.

There is no need for the province to undertake boundary amendments to achieve yet, unspecified provincial objectives. Current, agreed-to matrices determined in consultation with the province and Conservation Ontario are being met and or exceeded by the Essex Region Conservation Authority. We are currently operating a digital database that fully meets the provincially identified requirement for permitting that the province has identified as outstanding.

ERCA has strong relationships with our local Indigenous communities, none of which have been consulted as part of this proposed regional entity. Should regional conservation authority consolidation be considered, it must include meaningful and lawfully required consultation with Indigenous communities. To date, Caldwell First Nation and Walpole Island First Nation have not been consulted. Without this consultation, consideration for a potential consolidation is at risk as it overlooks important cultural, environmental, and legal considerations.

A provincial model of consolidating conservation authorities into significant regions, largely ignoring local watershed extents, risks undermining locally informed decision-making essential for effective watershed management.

ERCA is accountable to our local ratepayers through a governance model that represents both urban and rural municipalities through an engaged 19 member Board of Directors with representation from 9 member municipalities. The makeup of this Board provides for full, local transparency and accountability. Shifting from a local governance model to a proposal for regional appointments diminishes accountability. ERCA is a strong proponent of the "user-pay" principle and expecting that municipalities would pay for reduced input and access does not meet this standard. The voice of all member municipalities is an important consideration at the Board level as our members undertake their responsibilities as stewards of our watershed in unanimity.

Below are the requested responses to the questions posed in ERO#025-1257:

Q1. What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

- Consultation at the watershed level ahead of legislative action by parliament ensuring that a ground-up consensus determination of the future configuration of a specific watershed extent or district has been undertaken.
- Full and transparent cost-benefit analysis of the proposed amalgamation and the anticipated additional costs to municipalities and ratepayers for maintaining an overarching Agency, as well as amalgamation costs.
- Identification of an actual problem and concern that is attempted to be addressed by the significant modifications to conservation authority boundaries being put forward.
- Replacement of historic levels of provincial funding to support both mapping and technical work, and programs and services.
- The proposed timeline for implementation of a yet-to-be-determined regional entity of early 2027 is both unrealistic and unnecessarily hurried. A phased approach spanning a period of three-to-four years, coinciding with municipal election cycles allows for a phased

implementation period that would comprehensively address most of the issues (and potential issues) resulting from amalgamation/consolidation.

- A user-interface to a robust and shared permitting system, that is intuitive and facilitates natural hazard assessments, for authority staff and for the commercial/residential development sector, to file applications for clearances and approvals.
- Cost savings for taxpayers should be part of the value proposition, as a trade-off for potentially reduced or altered levels of service, due to lack of accessible staff at the local level.
- The province has not provided a rationalization (cost-benefit or otherwise) for the significant reduction in the current conservation authority compliment. Undertaking a measured, science-based, transparent evaluation of proposed boundaries over a acceptable time frame could address many of the current pain-points which have been identified.
- Additionally, no prudent person will accept 'redeployment' of senior administrative staff to front-line service, as being viable, warranted or appropriate. Transparency will be demanded by the stakeholders and the Province should be transparent and honest regarding job losses rather than spin a 'redeployment' narrative that is absurd at best.
- Establishment of smaller sub-region hubs, with a small management team complement to oversee program staff, develop budgets, manage procurement for the sub-region and to secure and manage physical assets.
- A fair and equitable path forward for members of the various bargaining units within the affected conservation authorities, vis a vis the dovetailing of seniority and consistency of wages and benefits (i.e. ERCA CUPE Local 3784). Consider application of the PSLRTA to ensure fairness for all represented members.
- Little to no consideration has been given to the status of potential regional conservation authorities as it relates to current conservation authorities with Foundations actively supporting and fundraising for objects of the original conservation authority (i.e. impacts of restricted donations, donations of land, potential issues with Canada Revenue Agency, etc.).

Q2. What opportunities or benefits may come from a regional conservation authority framework?

- Standardized natural hazard mapping products and digital resources to better support local development and flood monitoring.
- Shared operational technology, resources, best practices, standard operating procedures, policies and protocols.
- Elimination of duplicative and costly administrative and governance expenses.
- Potential for temporary redeployment of technical expertise, as required.
- The above largely exists within the existing framework as conservation authority staff currently sit on various working groups, share information within their respective portfolios, and seek opportunities for projects/funding benefiting regional projects and can be formalized with joint operational agreements established between groups of existing conservation authorities.

Q3. 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 existing Conservation Authority model to determine representation based on population extents is understood by municipal membership and accepted by rate-payers. It defines representation and this model should be the consideration for future representation.
- A significantly enlarged geographical reach does not provide for a manageable number of board members, satisfying accepted appropriate representation.
- Municipalities would be unwilling to contribute funding significantly distant of their geographical location. This destroys the concept of a local watershed principle. The phrase “no taxation without representation” although an American axiom is appropriate in consideration.
- A Hybrid Model could be considered for the potential for an amalgamated Conservation Authority. This model ensures geographic coverage through sub-regions or county representation while guaranteeing seats for major urban centers. Budget decisions could continue to incorporate CVA-weighted voting to maintain fiscal equity.

Key Features:

- Sub-regional/county seats for broad watershed coverage
- Urban seats for large municipalities/cities such as Windsor, London, Guelph, Brantford, based on population
- Actual stakeholder seats for Indigenous and agricultural sector representation (numbers to be determined)
- Weighted voting for budgets based on CVA

Q4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

- Significantly increasing the geographical reach, far beyond a single watershed, could be interpreted as an additional provincial-level tax.
- Modifications to the watershed principle may need to be considered, accounting for a population base that would generate the necessary capacity to support local programming, administrative responsibility and a sustainable organizational structure.
- Create 3-4 sub-regions of the regional authority, to facilitate accountability, transparency and consultative budgeting. The sub-regions, through the sub-regional Finance & Advisory Boards would be responsible for generating their sub-regional budgets and consulting with their respective municipalities. While ERPs (Enterprise Resource Planning), financial statements/report, and audit function can be centralized, there are certain aspects of financial planning and management that should remain decentralized and assigned to the sub-regions, such as budgeting for local capital project undertakings, as local staff have superior knowledge of the needs of the sub-region, as opposed to staff at a head office.

Q5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

- Relationships can only be maintained with physical presence. As has been observed during Covid-19, digital platforms allow for typical transactional functions, however, the ability to connect with technical staff in-person and particularly during storm/flood events, is especially impactful for both residents and municipal partners. Maintaining a local presence with local expertise providing local service is the single most effective way to ensure that relationships with community and stakeholders are maintained.

- Utilize the sub-regions with regional managers and technical experts who can liaise with and support the needs of the local communities and stakeholders directly.
- Significant funds are raised locally for various projects through the efforts of our charitable Foundation. Assurances that these funds will be utilized for their intended purposes and meet donor expectations is especially key given the current funding model.

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

Submission: Final Written Submission

Organization Name: Conservation Ontario

Date: Wednesday, December 17, 2025

Contact Name: Angela Coleman, General Manager

Conservation Ontario: ERO Questions and Responses

The purpose of this submission is to provide the collective feedback of the 36 Conservation Authorities (CAs) who are the members of Conservation Ontario.

To prepare this submission we have taken input from: elected officials, Indigenous community members, board members, municipalities, CA and municipal leadership and staff, businesses, concerned citizens, environmental groups, agricultural groups, and other partners.

In an organization as diverse as Conservation Ontario, there are a range of opinions, which reflect: local preferences, circumstances, and watershed needs. This diversity is accommodated by the current structure of CAs and is a strength of the current model.

Members are concerned that this would be lost by the ERO Proposal. By consolidating to seven CAs, the result would be organizations too large to deliver effective governance, oversight, and accountability to municipal funders and their residents and taxpayers.

Based on these consultations, we report that a majority of our members:

- support the broad goals of the government of achieving better outcomes;
- oppose the changes outlined in the ERO Proposal as a means of achieving those goals; and,
- support continued evolution of the system and prefer alternatives to the Proposal that would result in voluntary consolidation, supported by adequate business rationale and time for meaningful consultation, including with First Nations/Indigenous rights holders.

In the alternative, should the government decide to proceed with the ERO Proposal, we recommend measures to mitigate risks inherent in this ERO Proposal.

This includes an innovative model whereby the “back office” operations of the CAs would be consolidated, as contemplated by the ERO Proposal, but local boards would be retained for accountability and decision-making.

In keeping with our culture of decision-making, we have encouraged individual CAs to send their own submissions commenting on their local circumstances and preferences, and these should be reviewed together with this submission to gain an understanding of the range of local CA perspectives across Ontario.

Conservation Ontario represents the interests of its members and remains committed to effective partnership with the Province to achieve effective, modernized outcomes for local, watershed-based conservation and resource management.

Thank you for the opportunity to provide feedback.

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

a. Ensuring support for regional CA boundaries

Support from key partners, specifically, municipalities, is key to the ongoing success of CAs in Ontario.

Conservation authorities, municipalities, and Conservation Ontario remain concerned that the scale of the proposed regional consolidation may be too large to preserve successful watershed management in Ontario.

To deliver on its mission, a new regional conservation authority model must be grounded in fundamentals of effective watershed management, including:

- protecting life and reducing property damage from flooding and erosion;
- supporting municipal partners, the development community, and landowners with timely, reliable services;
- enhancing the economic, environmental, and community health of the watershed;
- providing meaningful opportunities for people to connect at the local level; and,
- meeting the demands of a rapidly growing population at a time of climate pressure.

If regionalization stretches teams too broad, we risk losing:

- on-the-ground expertise;
- local environmental conditions and records (e.g. localized infrastructure flooding);
- relationships and funding support from: municipalities, Indigenous communities, donors, businesses, the agricultural community, watershed residents, and other partners;
- real-time responsiveness during storms and emergencies;
- support from the scientific community; and,
- effective oversight and buy-in from municipal funding partners.

To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, CAs must be appropriately accountable.

- The principle of “pay for say” should be reflected in the design of new CAs, as it is today.
- The proposed catchment area of the proposed consolidated CAs would, in many cases, combine almost 100 municipalities, stretching oversight and “pay for say” beyond what is workable and undermining confidence in the governance of CAs.
- Additionally, the proposed Huron-Superior consolidated CA includes a northern CA with southern CAs; the north should stay with the north for shared policy, cultural and geographic reasons.

Recommendation 1: That the Province consider achieving modernization goals through the current 36 CA corporations using: legislative and regulatory amendments, technological solutions, and compliance verification.

Recommendation 2: That the Province demonstrate the statutory objects of the CAs can be effectively delivered within the proposed new regional boundaries.

Recommendation 3: That the Province collaborates with an implementation working group including: Association of Municipalities of Ontario (AMO), Conservation Ontario, CAs, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.

b. The Proposal risks delaying performance improvements currently under way

The proposed changes risk undermining the implementation of provincial improvements that have already been introduced.

In recent years, the Province has significantly changed the role of CAs in land use planning matters as part of its broader initiative to build more homes faster. Insufficient time has passed to fully implement and evaluate the impact of recent amendments on development outcomes. Given the volume and speed of legislative changes, industry stakeholders are still processing the effect and significance of various legislative changes.

All stakeholders, including the development industry, benefit from certainty. The Proposed Consolidation will introduce additional unknowns and new processes at an already uncertain time in the market.

c. If implemented, the Proposal would benefit from a measured and predictable rollout

Slowing the pace of consolidation would permit the Province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion.

Guidance may be taken from the Province's experience with municipal amalgamation in the 90s and 2000s to ensure that any proposed consolidation of CAs is well-timed and efficiencies at the local level are evaluated prior to implementing structural changes.

Recommendation 4: That the Province consider a longer implementation timeline to fully address: board governance and appointment frameworks; funding mechanisms, allocations & reserve structures; and service continuity matters. Phasing standards, guidelines, and directives across all CAs, *before any consolidation* (should consolidation be required at all), offers greater stability and predictability.

This approach minimizes multiple significant changes occurring at the same time, reducing risks of disruption to program delivery, and creating conditions for better outcomes and buy-in.

Recommendation 5: That a stable, clear, transition plan be prepared collaboratively with the implementation working group. To minimize potential disruptions, this plan should consider: service standards, points of contact, permitting continuity measures, board and staff communications, staff retention measures, and costs.

Recommendation 6: That transition costs for any consolidation be fully funded by the Province.

d. Retention of staff

During organizational consolidation, staff retention is a critical issue that significantly impacts the success of integration.

Key challenges include cultural misalignment, job redundancy, changes in leadership, lack of communication, and disruption to routine ways of delivering programs and services. To address these issues, a focus on clear communication, employee engagement, and support is required.

Retaining staff and preserving local watershed knowledge is critical to the success of regional CA consolidation. This knowledge is rooted in a deep understanding of historic and current land uses, cultural connections to watersheds, and the community values, needs, and stewardship priorities that shape local decision-making.

Recommendation 7: That staff retention strategies be prepared in cooperation with Conservation Ontario and CAs and communicated to effectively manage any proposed consolidation, and further that, engaging existing leadership be a key priority. Should this Proposal, or parts of it, be implemented, stability and engagement of leadership are essential to minimize service disruptions and maintain staffing levels.

Recommendation 8: That the Province provide a letter to each CA (or that can be shared by Conservation Ontario) to provide to staff to reinforce the importance of staff working at Ontario's 36 CAs to maintain staffing, service levels, certainty, and morale.

e. Measuring and monitoring outcomes

The expressed purpose of the consolidation is to reduce overlap and increase efficiency. The Province should develop metrics to measure the impact of consolidation on development outcomes.

Recommendation 9: That the Province measures and monitors impacts of this Proposal.

f. Support and capacity for municipalities

Many municipalities do not have in-house capacity to perform watershed planning or other environmental services that are undertaken by CAs. This includes review of development applications that involve environmental considerations and municipal environmental projects.

For example, smaller municipalities often rely on the expertise of the local CA where land use planning matters intersect with questions related to the natural environment.

Recommendation 10: Conservation Ontario is identifying municipalities that rely on the services of CAs in this specific way to ensure that these relationships can be maintained within the new, proposed structure. We encourage collaboration with the Province, AMO, municipalities, and CAs to identify current risks and new opportunities.

Recommendation 11: That the Province evaluates and considers programs and approvals that can be done faster and more efficiently at the local level, on a fee for service basis, to reduce red tape in Provincial approvals.

2. What opportunities or benefits may come from a regional CA framework?

a. Ensuring consistent standards

Across the Province, CAs have developed policies based on provincial guidance documents (e.g. the Ministry of Natural Resources and Forestry Erosion Hazard Guidelines). Outdated frameworks and standards can lead to different interpretations, development approvals and outcomes across the Province. Provincial approvals of policies, guidance, and standards have not kept pace with modern needs.

Recommendation 12: That the Province update Provincial policies and standards together with AMO, Conservation Ontario, CAs, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

b. Additional investment

Additional investment is required to ensure key deliverables, such as floodplain mapping, are technically defensible and proactively in place for all watersheds across Ontario.

Municipal, regional, and federal governments have been key partners with the Province in this space for many years.

Recommendation 13: That the Province invests stable, adequate, multi-year funding into CA programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

c. Pooling of resources and collaboration between technical experts

Effective watershed governance relies on strong connections to local needs, priorities, and knowledge, which then guide natural hazard management, shape infrastructure decisions, strengthen watershed health, stewardship programs, and community partnerships.

Specific knowledge of the local watershed and environment is integral to the ability of CAs to carry out their permitting function under the *Conservation Authorities Act*. Bringing experts from across CAs together may provide greater opportunities for collaboration, specialization, and information sharing as well as pooling resources. Consolidation of CAs is not required to achieve this outcome; however, a more centralized system and investment of baseline resources are required.

Recommendation 14: That an integrated digital platform that connects the fundamental strengths of multiple CAs, across multiple offices and disciplines, be developed to deliver enhanced watershed programming in Ontario.

3. Do you have suggestions for how governance could be structured at the regional CA level, including suggestions around board size, make-up and the municipal representative appointment process?

a. Subregional Appointment Bodies

Currently, there are 36 CAs, each representing varying numbers of municipalities, ranging from as few as 1 to as many as 39. Subsection 2(2) of the *Conservation Authorities Act* sets out the number of representatives that each municipality may appoint as members. Unless the Minister permits otherwise, at least 70 per cent of a municipality's appointees to a CA are required to be selected from among members of the municipal council.

Under the proposed consolidation, each regional CA would represent a larger number of municipalities, ranging from 35 to over 100 municipalities per authority.

To provide a manageable governance structure, changes to the *Conservation Authorities Act* are anticipated to reduce the number of municipal appointees to the regional CA. Absent

changes to the governance structure, this will cause some municipalities to lack representation at the regional CA level.

One potential solution to avoid entirely disenfranchising many municipalities is to create a tiered governance structure whereby regional CAs are authorized to establish one or more subregional councils.

The Regional CA would have the power to appoint representatives from member municipalities to the subregional council.

This ensures a direct line of communication, and a degree of accountability, between municipalities that do not have a direct appointee on the regional CA and the regional CA itself.

Such subregional councils would be responsible for exercising the powers and duties and performing functions that have been delegated to the subregional council by the Regional CA with respect to matters relating to that part of the Regional CA.

This model has proven successful in the past when it was applied to municipal community council structures created at the time of amalgamation to solve the problem of ensuring that local decisions were made by local councillors in newly amalgamated Municipalities.

While this is a potential model, we re-state that the current system does a much better job of providing accountability, local buy-in, and pay for say.

Recommendation 15: That any proposed modernization efforts maintain strong connections to local priorities, local expertise, and municipal perspectives. Achieving the right balance between centralized oversight and meaningful local involvement and support is essential for successful, ongoing, watershed management in Ontario.

b. Transparent appointment process

The criteria for appointments to regional CAs should be consistent and transparent across the Province while accounting for regionality.

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

Best practices exist across Ontario's 36 CAs. If any changes are implemented towards a regional CA model of governance, subregional budgeting is important.

a. Subregional budgeting

Subregional councils within the proposed regional CA could continue to follow a modified version of the budgeting process under O. Reg. 402/22. The proposed subregional budgets and apportionments could then be proposed to the regional CA for final approval.

The regional CA could have the authority to approve the budgets or amend and approve the budgets (similar to a Library Board budget or a Police Board Budget). This would allow for the continuation of a familiar budgeting process within a new structure.

Another key factor to consider during the transition to consolidation is protecting watershed reserves, infrastructure, and land assets. Many watershed municipalities and CAs are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within a consolidated structure.

Recommendation 16: That should any proposed consolidation proceed, subregional approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level.

5. How can regional CAs maintain and strengthen relationships with local communities and stakeholders?

a. Maintain local presence in governance and delivery

The implementation of sub-regional watershed councils described above would ensure continued presence of a local voice in priority setting and decision-making. In addition, subregional offices must be maintained to ensure CAs remain responsive to local needs (e.g. bilingualism). This includes offices, brand identity, infrastructure, programming, and staffing.

Permitting decisions related to development are generally made at the local level. For example, under the *Building Code Act, 1992*, each municipality is required to appoint a Chief Building Official who is an independent officer responsible for administering building permits.

The Ontario Superior court has stated, "It is central to the role played by CBOs that they know the character of their community and the local conditions."⁴ Decision makers within the proposed centralized permitting system should be familiar with the local community and attention should be paid to ensuring adequate knowledge of local conditions.

b. Stakeholder outreach

Communication of any meaningful changes must be shared with regional watershed municipalities and other interest holders, such as the development/homebuilders' sectors, the agricultural sector, and other groups that require approvals or receive deliverables from various programs and services. This level of planning is essential because the proposed boundaries represent major watershed restructuring and the merging of multiple complex organizations that require coordinated efforts that should not be rushed.

c. Comprehensive Communication Strategy

A clear, well-coordinated communication strategy is essential to support any potential transition. Strategies must provide timely and accessible information on the new regional boundaries, updated points of contact, any changes to permitting or operational processes, and how municipal relationships and responsibilities will function throughout the transition period.

Early outreach to municipalities, Indigenous communities, landowners, agricultural groups, developers, and other key interest holders will help set expectations and reduce uncertainty. Personalized engagement, including town halls, small-group stakeholder meetings, and one-on-one conversations with municipal representatives, provide opportunities to address region-specific questions and reinforce local connections.

Announcement of the parameters of subregional or watershed councils to maintain stability and function during the transition are also essential.

Additional Comments:

Ontario Provincial Conservation Agency

Conservation Authorities and Municipalities have expressed concern about the proposed governance structure of the OPCA.

As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, CAs, and therefore municipalities, will be required to fund all or a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities may ultimately contribute all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, its priorities, or its strategic direction.

For municipalities that rely heavily on CA guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence.

Not only would this be a precedent-setting method for funding a provincial agency, it establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

Recommendation 17: That the Ontario Provincial Conservation Agency be funded by the Province of Ontario rather than funds levied from municipalities and the local property tax base.

Thank you for the opportunity to review and provide comments on the *Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257)*. Conservation Ontario represents the interests of its members and remains committed to effective partnership with the Province to achieve effective, modernized outcomes for local, watershed-based conservation and resource management.

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Nottawasaga Valley
Conservation Authority

4 December 2025

By EMAIL

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

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

Dear Minister McCarthy,

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Scott', with a stylized 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;

The purpose of this submission is to provide the feedback of the Nottawasaga Valley Conservation Authority (NVCA) Board of Directors to the ERO. This is in addition to the letter sent from the NVCA Board of Directors by email to Minister McCarthy, dated December 4, 2025.

The NVCA is comprised of 18-member municipalities. While each Board member represents their individual municipality, they come together as the NVCA Board of Directors to speak collectively on matters related to the Authority. The positions expressed by the NVCA as a whole may differ from those of individual municipalities; this does not negate or diminish either perspective, but reflects the distinct strengths, roles, and responsibilities of both.

This is an important initiative that deserves careful consideration and meaningful consultation. These decisions will have a major influence on how programs, projects, and priorities move forward at both the local and regional levels. Thoughtful engagement and collaboration are key to ensuring changes are proportionate to the problems they are meant to address.

Should the government decide to proceed with the ERO Proposal, we request further evaluation of models that are more geographically coherent, cost-effective, and locally accountable alternative to advance the government’s priorities of efficiency, red-tape reduction and timely housing delivery.

Alternative models for evaluation:

- **Focus on efficiencies, modernizing, and standardizing - existing boundaries should be maintained (for 3 yrs):** address the province’s goals through the Ontario Provincial Conservation Agency using the existing CA structure. This significantly advances the government’s priorities of efficiency, red-tape reduction, and timely housing delivery while being geographically coherent, supports pay-for-say, and is locally accountable. This model also allows time for proper consultation on where consolidation makes sense.
- **Federated model** that balances local autonomy with shared governance and resources across regions.
 - Governance:
 - Federated regional board: A representative body composed of delegates from each CA to funding mechanisms, policy, strategic priorities, joint programs, and shared services (GIS, IT, data management, legal, HR, training, reporting)

- Local board: pay-for-say representation, operational leadership of programs specific to local watersheds (e.g. flood management, stewardship, education)
- Central secretariat/administration: Housed at the Regional board level to support governance, shared services, evaluation/reporting, and to liaise with Agency.
- Benefits:
 - Advances govt priorities: Reduced duplication of services, harmonized performance standards and policies, scalable without losing local engagement/accountability.
 - Local Decision-Making: Each Conservation Authority (CA) retains control over programs tailored to its watershed.
 - Shared Standards & Frameworks: A central/regional body sets standards for fees, regulation mapping, reporting, compliance, etc.
 - Collaborative Resource Pooling: Authorities share expertise, technology, and funding for large-scale projects.
- **Amalgamate if necessary but not necessarily amalgamate**: Identify where amalgamation and increased resource sharing would be most beneficial, by implementing a Key Performance Indicators (KPI) and business case evaluation of existing CAs. These CAs amalgamate into the regional model first, allowing evaluation and exploration of service enhancements, challenges and opportunities through greater regionalization.
- **Right-sized regions**: While the NVCA does not believe the consolidated is needed to achieve the province's stated objectives, there may be situations where this makes business sense and is necessary. If the province is set on consolidation of all CAs, thought should be given to consolidate those conservation authorities with contiguous watersheds, for example draining to Georgian Bay/N. Lake Huron (SVCA, GSCA, and NVCA) and South Lake Huron (ABCA and MVCA) 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

ERO Questions and Responses

1. What do you see as Key Factors to support a successful transition and outcome of the regional CA consolidation?

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes including establishment of the Agency, that do not require disruptive system wide overhaul and that further exploration of these would be of value.

Regional CA boundaries

Support from key partners/funders, specifically municipalities, is key to the ongoing success of CAs in Ontario. NVCA is concerned that the scale of the proposed regional consolidation is too large to preserve successful watershed management in Ontario.

Conservation authorities must be grounded in the fundamentals that ensure effective watershed management, which include:

- protecting life and reducing property damage from flooding and erosion
- supporting municipal partners, the development community, and landowners with timely, reliable service
- maintaining service levels, networks, and local knowledge in rural Ontario to meet and balance the demands of a largely rural landscape with a potentially dominant urban area (north end of the GTA brought in as part of the LSRCA)
- enhancing the economic, environmental, and community health of the watershed
- providing meaningful opportunities for people to connect with nature
- empowered to act locally, without needing to seek approvals from a centralized provincial agency to ensure timely and responsive decisions.

If the province proceeds with a regional conservation authority approach as proposed, the following matters need to be considered.

- Prioritize changes where the business case and KPI improvements demonstrate justification for such changes.
- Maintain local staff and staff relationships at CAs throughout the province. Successful transition will depend on clarity about what stays local and what becomes regional. This is especially true in rural CAs like NVCA.
- Maintain organizational charitable status
- Ensure municipal agreements are protected.
 - Maintain agreements with local clubs or volunteer organizations as partners to maintain recreational and operational programs with local CAs.

- Maintain municipal partnerships with the new model regarding funding applications or joint projects which serve a specific local need (e.g. Cat 2)
- Recognize local and regional differences between CAs and adapt programming and staffing accordingly.
- Continue to offer local programs and service delivery beyond those that are provincially legislated.
- Clearly communicate what the sustainable funding model is both throughout the transition period and ongoing thereafter.
- Development of a fee structure that is responsive and reflective to the region (ex. Parking, event, permits, planning, etc.).
- Develop mechanisms to deliver consistent, secure, and equitable funding to ensure consistency in delivery and performance across all CAs.

With these points in mind, the province may wish to consider

A pause or a longer implementation timeline

That the Province consider achieving modernization goals through the establishment of the Agency in collaboration with the current 36 CA corporations using existing legislative and regulatory powers, technological solutions, key performance indicator reporting, etc. Should, after at least 3 years, if this approach is not making sufficient progress to address concerns, then launch meaningful, transparent consultation on consolidating CAs.

Slowing the pace of consolidation would permit the province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion. A longer implementation timeline allows time to fully address: board governance and appointment frameworks; funding mechanisms, allocations & reserve structures; and service continuity matters. Phasing standards, guidelines, and directives across all CAs, before any consolidation (should consolidation be required at all), offers greater stability and predictability.

Amalgamate, if necessary, but not necessarily amalgamate

By implementing a KPI evaluation of existing CAs, it might be possible to identify where amalgamation and increased resource sharing may be most beneficial. These CA amalgamations present an opportunity to explore service enhancements, challenges and opportunities through greater regionalisation. Assuming justified, these benefits could then be phased in through broader amalgamation. This would allow for an evidence-based approach to transition, without system-wide risk and potential costly errors that would be difficult to reverse.

Phased in transition approach and clear communication

There needs to be a clear transition plan to reduce the risk of service disruptions during the transition process that is developed in collaboration with Conservation Ontario (CO), member municipalities and CAs. This plan must provide a detailed roadmap that clearly outlines timelines, milestones, and phasing. During the transition phase, the province will need to clearly identify roles and responsibilities during the “in-between” period that recognizes and factors in the complexity of merging eight CAs into one Huron-Superior regional CA; this will take time as processes, software, governance, visual identity, and staffing will all need time to adjust to this change.

During organizational consolidation, staff retention is a critical issue that significantly impacts the success of integration. Key challenges include cultural misalignment, job redundancy, changes in leadership, lack of communication, and disruption to routine ways of delivering programs and services. To address these issues, regular communication from the Province to CA staff with a focus on employee engagement and support is required. Retaining staff and preserving local watershed knowledge is critical to the success of the new regional CAs. This knowledge is rooted in a deep understanding of historic and current land uses, cultural connections to watersheds, and the community values, needs, municipal and stewardship priorities that shape local decision-making.

Protecting existing CA reserves, land assets, and infrastructure

Many watershed municipalities and the NVCA are concerned that locally funded reserves, land assets, and long-term capital programs will be compromised under the proposed Regional Conservation Authority (RCA) structure. The current proposal dissolves existing CAs and transfers all reserves, land holdings, and infrastructure to the new Regional CA corporation without clear safeguards, creating a material risk that assets built over decades through local investment could be diverted to broader regional priorities.

Without safeguards, municipal and the public trust could be eroded due to a perception of a lack of transparency and accountability in how local reserves, land holdings, and infrastructures are managed, and a heightened risk of breaching donor restrictions and municipal agreements that were established to ensure local benefit. This lack of clarity is already having a real-time impact as donors are hesitant to contribute due to unknowns regarding future ownership. These gaps could undermine confidence in the governance and integrity of the new regional CA structure. To address this the province should consider legislative changes to require binding transition and asset protection agreements between the new RCA and originating CAs.

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

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes that do not require disruptive system wide overhaul and that further exploration of these would be of value.

Consolidation offers the potential for **a more equitable distribution of resources**, enabling smaller or rural municipalities access to specialized expertise that may have been constrained by local budgets or staffing limitations. Achieving this balance requires careful attention to governance and funding principles. A key challenge lies in ensuring the largest financial contributors do not disproportionately drive priorities, while smaller, rural municipalities continue to feel heard, supported, prioritized, and represented. Without safeguards, there is an inequity risk where urban municipalities dominate or see limited local benefit to themselves which creates inequity. To mitigate this, a federated governance model should be adopted – one that guarantees meaningful participation from all municipalities and reflects diverse regional priorities. Complementing this structure with subregional offices that keep operational decision-making connected to local needs, ensuring that consolidation strengthens collaboration without eroding fairness, representation, or autonomy.

Despite these challenges, a regional model can **support strong local representation and responsiveness** when designed thoughtfully. Consolidating too many areas into one very large authority can create new challenges, such as distance from local issues, slower decision-making, and difficulty maintaining community/industry relationships; therefore, finding a balanced approach is essential. Size is a very important consideration.

Harmonizing permitting and planning policies and fee structures is not just about efficiency – it's about fairness and predictability. A top down provincially directed approach may not be well supported. Rather, collaborative harmonization gives municipalities and stakeholders a real voice in shaping standards that work for everyone. While harmonization brings efficiencies and stabilities, flexibility must remain at the core, especially for critical issues like flood management, where local geography and risk demand local knowledge and a tailored response. Clear service expectations, such as defined response times, local points of contact, and accessible public information, ensures that a larger agency stays responsive and connected to communities. Consistent, yet flexible to watershed realities, permitting requirements, fees, and timelines creates confidence for municipalities, developers, and the public, enabling better planning and reducing costly delays. By using its (proposed) authority to set directives that reinforce these principles, the provincial Agency can deliver both predictability and clarity. This approach strengthens customer

service because staff operate with common tools and guidance, while subregional offices remain scaled to support meaningful local engagement and decisions. Ultimately, planning and permitting harmonization done right means watershed communities receive equal support without sacrificing the flexibility needed to address unique local challenges.

The establishment of the Agency creates a significant opportunity to **modernize service delivery while ensuring fairness** across all Conservation Authorities. By centralizing permitting systems, GIS platforms, mapping services, KPIs & reporting, and public portals under the Agency with sustainable funding, every CA—regardless of size or funding—gains access to high-quality tools and expertise. Smaller CAs that currently struggle with outdated mapping or limited technical capacity would benefit from shared resources, reducing inequities and improving service consistency. Centralized supports also streamline processes for municipalities, developers, and the public, making permitting faster, clearer, and more predictable. However, success will depend on a sustainable funding model. The infrastructure and technical supports required to deliver these services are not inexpensive, and without predictable, long-term provincial investment, the benefits of modernization and equalization cannot be fully realized. A well-designed funding framework ensures that efficiencies are achieved without compromising service quality or creating new inequities. Ultimately, this approach combines efficiency with equity, freeing local staff to focus on community engagement and site-specific needs while the Agency provides the backbone of modern, standardized services.

The regional model supports a **shared services administrative framework** where subject matter experts deliver specialized internal functions such as HR, IM/IT, data management, finance, procurement, etc. Consolidating these roles allows for more consistent attention to organizational requirements, including compliance with health and safety legislation, and risk management practices. Within a federated governance structure, these shared services would operate at the regional level, ensuring efficiency and consistency, while sub-regional offices focus on operational delivery and local implementation. This approach maintains the benefits of centralized expertise without losing the flexibility needed to respond to community-specific needs.

Caveat: These improvements could be achieved—at a lower cost and with less disruption—through provincial direction to the existing 36 CAs, without consolidation. In this scenario, the Agency would still house and manage centralized supports such as permitting systems, GIS platforms, KPIs, and standardized public portals, while the current CA structure remains intact with centralized shared services under contract to CAs at an appropriate regional scale. This approach offers modernization benefits without the structural changes and costs that full consolidation would require.

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?

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes including establishment of the Agency, that do not require disruptive system wide overhaul and that further exploration of these would be of value.

To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, CA governance models must be appropriately accountable.

- Deliver consistent, predictable, and accountable decisions across the regional jurisdiction.
- The principle of “pay-for-say” should be reflected in the design of new Regional CAs, as it is today.
- Protect the voices of small, rural, and agricultural municipalities.
- Ensure local priorities continue to be addressed.
- The proposed catchment area of the proposed consolidated Huron-Superior RCA combines more than 80 municipalities, joining rural areas in central and northern Ontario with the Greater Toronto Area, this approach risks stretching oversight and “pay-for-say” beyond what is workable and undermining confidence in the governance of Regional CAs.
- To avoid concentration of influence, no single municipality should be able to dominate board decisions.
- The new Board should contain elected officials only, representative of the region. Shorter board terms could be introduced to promote shared leadership, especially in cases where several municipalities are represented through a single grouped seat.
- Municipalities grouped into regional groups based on existing CA boundaries (and possibly linked to sub-regional governance structures).
- The Board would retain independent responsibility for the budget, hearings, staffing decisions, policy approval, and overall governance authority, ensuring that while the Board operates within a regional framework, it is not subject to direct control by the Provincial Agency, preserving local accountability and decision-making autonomy. If the Provincial Agency holds significant authority over regional conservation authorities, boards risk losing meaningful decision-making power and local accountability. This makes it far less likely that qualified individuals will be willing to serve on regional boards, as the scope for meaningful decision-making and local accountability would be substantially constrained. Clear articulation of roles and authorities will be essential to avoid undermining board capacity, local engagement, and accountability.

An option is a governance structure that reflects a **federated model** balancing regional consistency with local representation and accountability. This approach ensures that decision-making is collaborative, transparent, and responsive to diverse municipal interests while maintaining alignment with provincial directions and standards. This federated model respects municipal autonomy while creating a unified regional approach to conservation, it promotes collaboration across jurisdictions, reduces duplication, and ensures that decisions reflect both local needs and broader watershed priorities.

- Regional board: A representative body composed of delegates from each CA (sub-regional office) to direct funding mechanisms, policy, strategic priorities, joint programs, and shared services (GIS, IT, data management, legal, HR, training, reporting)
- Local board: pay-for-say representation, operational leadership of programs specific to local watersheds (e.g. flood management, stewardship, education)
- Central secretariat/administration: Housed at the Regional board level to support governance, shared services, evaluation/reporting, and to liaise with Agency.

Benefits:

- Advances govt priorities: Reduced duplication of services, harmonized performance standards and policies, scalable without losing local engagement/accountability.
- Local Decision-Making: Each Conservation Authority (CA) retains control over programs tailored to its watershed.
- Shared Standards & Frameworks: A Agency or regional body sets standards for fees, regulation mapping, reporting, compliance, etc.
- Collaborative Resource Pooling: Authorities share expertise, technology, and funding for large-scale projects with appropriate safeguards in place

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

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes including establishment of the Agency, that do not require disruptive system wide overhaul and that further exploration of these would be of value.

The province needs to implement a sustainable funding model for the Agency that **does not** direct levy from regional CAs, CAs, regions, or municipalities.

A transparent municipal 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. Where portions of municipalities are in different conservation authority jurisdictions, consideration could be given to geo-referencing property tax assessment roll numbers so that the apportionment calculation is based on current value assessment (CVA) in a watershed rather than the percentage of geographical area applied to the municipality's total CVA.

Similar to how CAs manage this now, budget documents should be public, easy to understand, and shared early to align with municipal budget cycles. Multiple engagement options—such as council presentations, virtual workshops, written feedback, and one-on-one briefings—ensure fair participation for all municipalities. Reporting back on input, publishing accessible annual business plans, financial reports & performance indicators, and clearly distinguishing costs and revenues for Categories 1, 2, and 3 programs reinforce transparency and accountability.

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

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes including establishment of the Agency, that do not require disruptive system wide overhaul and that further exploration of these would be of value.

The size of each regional authority is critical: if the conservation authority becomes too large, municipalities risk being under-represented, and their specialized watershed needs, such as agricultural programs/issues, localized flooding concerns, or unique outdoor experiences and priorities, can become diluted within a large administrative structure. Municipalities want assurance that scaling up will not cause their distinct issues to be overshadowed by larger population centres or to become a lesser priority due to the increased diversity of issues and competing interests that will inevitably exist within a much larger jurisdiction. A balanced, right-sized regional framework preserves this visibility and ensures that local concerns remain central to decision making. Key considerations include the ability to:

- Successful transition will depend on clarity about what stays local and what becomes regional. Maintaining watershed offices, expertise in local issues and knowledge, ability to maintain on the ground presence, and consistent points of contact ensures that residents, businesses, farmers, and municipalities can easily

access staff who understand their watershed's specific conditions and community priorities.

- Ensure municipal agreements are protected.
- Maintain agreements with local clubs or volunteer organizations to help maintain both recreational and operational roles in partnership with CA staff.
- Partner with municipalities on funding applications or joint projects which serve a local need.
- Recognize local and regional differences between CAs and adapt programming and staffing accordingly.
- Continue to offer local programs and service delivery beyond those that are provincially legislated.

Many smaller or rural municipalities do not have in-house capacity to perform watershed planning or other environmental services that are undertaken by CAs. This includes review of development applications that involve environmental considerations and municipal environmental projects. For example, smaller municipalities often rely on the expertise of the local CA where land use planning matters intersect with questions related to the natural environment. Identify municipalities that rely on the services of CAs in this specific way to ensure that these relationships can be maintained within the new, proposed structure. We encourage collaboration with the Province, Association of Municipalities of Ontario (AMO), municipalities, and CAs to identify current risks and new opportunities. That the Province evaluates and considers programs and approvals that can be done faster and more efficiently at the local level, on a fee for service basis.



December 19, 2025

SENT ELECTRONICALLY

RE: Quinte Conservation Board of Directors position on the regional consolidation of Ontario's 36 Conservation Authorities

Dear Minister McCarthy,

Please be advised that the following resolution QC-25-92 was passed at the Quinte Conservation Authority Regular Board Meeting held on December 18, 2025:

WHEREAS the Ministry of the Environment, Conservation and Parks have 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 a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the Conservation Authorities Act; and

WHEREAS under this consolidation proposal, the Quinte Conservation (QC) would be merged into a new "Eastern Lake Ontario Regional Conservation Authority" together with Central Lake Ontario CA, Kawartha Region CA, Otonabee Region CA, Ganaraska Region CA, Lower Trent Region CA, Crowe Valley CA and forming a single organization stretching from Oshawa, Kawartha Lakes, Hastings County, Tyendinaga Mohawk Territory and areas within Lennox & Addington; and

WHEREAS QC, in 1994 amalgamated the Napanee Region Conservation Authority, Moira River Conservation Authority and Prince Edward Region Conservation Authority forming a 6000 square kilometer jurisdiction to provide integrated services for 18 municipalities, including flood forecasting, planning and regulations, communications, education, stewardship, source water protection and enabling services that are fully supported by our municipal partners; and

WHEREAS the QC Board of Directors acknowledges and supports the province's goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology

but find the proposed “Eastern Lake Ontario Regional Conservation Authority” configuration would:

1. Create a geographically vast and administratively complex entity, joining northern, rural and fast-growing south-eastern municipalities through the province with little shared watershed connection or economic alignment;
2. Dilute or eliminate the local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they serve;
3. Generate substantial transition expenses – including Human Resources, 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 principle of “value for money, cost containment and service continuity”; and
4. Risk greater uncertainty and delay for developers, builders and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it more difficult for applicants to obtain timely local advice, resolve condition issues or expedite housing and infrastructure approvals that support the province’s “Build Faster” agenda; and

WHEREAS consistent policies, and resources across the existing conservation authorities’ boundaries could be achieved through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks or Conservation Ontario; and

WHEREAS conservation authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. In the case of QC, this vision has proved a successful model for over 75 years; and

WHEREAS QC, in 1994 amalgamated the Napanee Region Conservation Authority, Moira River Conservation Authority and Prince Edward Region Conservation Authority forming a 6000 square kilometer jurisdiction to provide integrated services for 18 municipalities, including flood forecasting, planning and regulations, communications, education, stewardship, source water protection and enabling services that are fully supported by our municipal partners; and

WHEREAS QC, with the guidance and support of our 18 member municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. QC has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through QC's Strategic Plan and our Asset Management Plans; and

WHEREAS conservation authorities across the province operate efficiently by working in close partnership with member municipalities. This structure enables resources to be directed toward on-the-ground initiatives that advance our mandate while addressing local community needs, achieving an effective balance in scale, management and service delivery; and

WHEREAS being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, our staff and Board are responsive and accountable to the needs of the watershed community, while meeting or exceeding provincial service standards. Our staff and Board are reachable through publicly available contact information. Local governance and direction combined with local service provision allows QC to continue to be responsive to our community; and

WHEREAS the QC Board of Directors recognizes that the staff of QC serves a multitude of Eastern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, and being surrounded by the Bay of Quinte, Lake Ontario and a number of local lakes, with properties subject to coastal erosion and flood-prone areas, which would be ill-served by a larger overarching administrative structure extending over more than 16,000 square kilometres;

THEREFORE, BE IT RESOLVED:

THAT, the Quinte Conservation Board of Directors does not support the proposed "Eastern Lake Ontario Regional Conservation Authority" boundary configuration as outlined in Environmental Registry Notice 025-1257; and

THAT, meaningful modernization can occur within the current watershed-based governance framework; and

THAT, the QC Board of Directors endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely home construction; and

THAT, the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Eastern Ontario before finalizing any consolidation boundaries or legislative amendments; and

THAT, a forthcoming ERO response at the approval of the QC Board of Directors be forwarded to the Environmental Registry of Ontario consultations; and

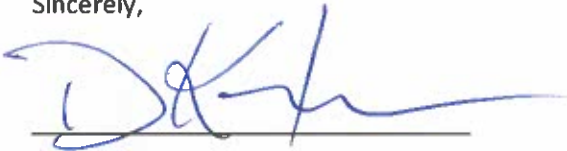
FURTHER THAT, a letter from the Chair containing this resolution, and ERO response, be forwarded to:

- Minister Todd McCarthy, Ministry of the Environment, Conservation and Parks; and
- Ministry of the Environment, Conservation and Parks (CA Office); and
- Hassan Basit, OPCA Chief Conservation Executive; and
- MPP Tyler Allsopp (Bay of Quinte); and
- MPP Ric Bresee (Hastings-Lennox and Addington); and
- MPP John Jordan (Lanark-Frontenac-Kingston); and
- Warden Bob Mullins, Hastings County
- Warden Nathan Townsend, Lennox and Addington
- Warden Gerry Lichty, North Frontenac
- Mayor Steve Ferguson, Corporation of Prince Edward County
- Association of Municipalities of Ontario; and
- Rural Ontario Municipal Association; and
- Conservation Ontario;
- All 36 Conservation Authorities in Ontario; and
- 18 local municipalities within Quinte Conservation.

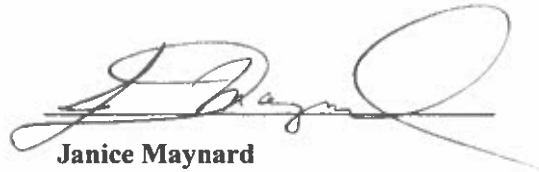
CARRIED - UNANIMOUSLY

Thank you for the opportunity to engage in this discussion and provide constructive feedback and advocacy on this matter.

Sincerely,



Don Kuntze
Chair
Quinte Conservation Board of Directors



Janice Maynard
Vice - Chair
Quinte Conservation Board of Directors

Cc:

Ministry of Environment, Conservation and Parks (CA Office)
Hassan Basit, Chief Conservation Executive (Ontario Provincial Conservation Agency)
MPP Tyler Allsopp (Bay of Quinte)
MPP Ric Bresee (Hastings-Lennox and Addington)
MPP John Jordan (Lanark-Frontenac-Kingston)
Warden Bob Mullins, Hastings County
Warden Nathan Townsend, Lennox and Addington
Warden Gerry Lichty, North Frontenac
Mayor Steve Ferguson, Corporation of Prince Edward County
Association of Municipalities of Ontario
Rural Ontario Municipal Association
Conservation Ontario
36 individual Conservation Authorities in Ontario
18 local watershed municipalities within Quinte Conservation

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Submitted by: Quinte Conservation Board of Directors and staff

Date: December 19, 2025

Address: 2061 Old Highway # 2, Belleville, ON, K8N 4Z2

Email address: bmcnevin@quintecoservation.ca

Phone Number: 613-968-3434 ext. 103

Introduction

Quinte Conservation is one of 36 conservation authorities across the province of Ontario. Formed in 1947, we have spent over seven decades working with local municipalities, local watershed residents and local stakeholder groups (agriculture, environmental, special interest, etc.) to ensure that the Quinte region is protected from natural hazards, has systems in place to provide accurate and timely information and data in the event of emergencies (i.e. a flood), provide programs and services to enhance our shared goals for the watershed region and ensure responsible development to protect life and property.

Quinte Conservation's boundaries are the same as the Quinte Source Protection Area. This area includes the watersheds of the Moria, Napanee and Salmon Rivers and all of Prince Edward County. Staff provide valuable services to all municipalities in the Quinte Source Protection Area, including risk management services and consultation for local development in vulnerable areas.

The province can achieve its objectives by providing performance metrics, policy alignment, and technological support without restructuring boundaries. Effective oversight does not require dismantling watershed-based governance, which is essential for maintaining local expertise and responsiveness. Quinte Conservation consistently exceeds provincial expectations through transparent service standards, online permit dashboards, and performance reporting.

Quinte Conservation adheres to Conservation Ontario's Client Service Standards for permit reviews and planning applications. All conservation authorities operate under the same regulations, including pre-consultation requirements, application protocols, and timelines mandated by O. Reg. 686/21, which also requires annual reporting.

Over the past three years (2022–2024), Quinte Conservation issued 1,109 permits with an average turnaround of 14 days. This

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timing is well within provincial guidelines of 30 days for routine permits and 90 days for major permits. Delays typically stem from external parties such as landowners, developers, and other agencies, not conservation authorities. Provincial claims of delays in reviews by conservation authorities overlook regional differences between rural areas and the GTA.

To ensure efficiency and transparency, Quinte Conservation maintains a client service standard and offers tools such as online booking for pre-consultations, digital permit portals, interactive regulated area maps, technical checklists, and published fee schedules. Fees are locally calibrated and reflect regional economic conditions.

A uniform provincial model of consolidating conservation authorities into regions risks undermining locally informed decision-making essential for effective watershed management. Quinte Conservation's unique geology and watershed-specific risks require tailored studies and approaches. The authority actively participates in provincial working groups, shared service agreements, and initiatives to streamline processes. Our position is that issues largely stem from chronic underfunding, not organizational inefficiencies.

A successful transition and outcome of regional conservation authority consolidation must include meaningful and legally required consultation with Indigenous communities. Our watershed includes an Indigenous community, Mohawks of the Bay of Quinte, and we manage creeks and rivers that flow through their territory. To date, they have not been consulted regarding these changes. Proper engagement and fulfillment of the duty to consult are critical to respecting Indigenous rights, building trust, and ensuring that decisions reflect the interests of all communities impacted by watershed management. Without this, the transition risks overlooking important cultural, environmental, and legal considerations.

Specific to shared services, Quinte Conservation has provided engineering support to neighboring authorities, administers the WISKI Hub for 11 authorities, and collaborates directly with builders and landowners to mitigate flooding, erosion, and infrastructure risks. Our standards meet development needs while maintaining flexibility for local conditions. The regulations team is well-organized, engaging technical staff early to ensure timely reviews. Quinte Conservation follows provincially approved hearing guidelines for regulatory matters and aligns with Conservation Ontario's policies for plan review and permitting. Pre-consultation meetings and site visits further reduce uncertainty and delays.

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Quinte Conservation employs advanced technology for data management and flood risk mitigation, including the WISKI database, a widely used system across Ontario, also utilized by provincial ministries. Our leadership in flood forecasting is supported by strategic watershed positioning, which provides critical lead time for warnings. Planned enhancements include installing flow gauges on urban creeks through capital asset funding.

Significant investments have been made in GIS platforms and Open Data Hubs, offering public access to LiDAR, aerial imagery, and geospatial datasets. In collaboration with municipalities, we have completed extensive floodplain mapping projects using state-of-the-art hydrologic and hydraulic modeling. Our Open Data Hub provides real-time access to watershed data, floodplain maps, water levels, and source protection information.

The primary barrier to consistent technological capacity across conservation authorities is chronic provincial underfunding. Standardization can be achieved through targeted provincial investment in shared platforms rather than administrative reorganization. Quinte Conservation and its partners already operate sophisticated modeling tools that often exceed provincial capabilities. These tools rely on local technical expertise to ensure timely, accurate decisions. Centralization would compromise data quality, slow reviews, and weaken emergency responses during extreme weather events.

Our permitting and planning process is fully automated and streamlined, with electronic delivery to applicants and municipalities for expedited service. Staff expertise and collaboration through provincial committees ensure best practices are consistently applied. While technology is critical, effective risk management ultimately depends on experienced professionals, a strength that smaller authorities maintain through deep institutional knowledge and cooperative networks such as the WISKI Hub and regional flood forecasting groups.

Quinte Conservation underwent amalgamation in the mid-1990s, consolidating three authorities into one. Today, we deliver integrated services for 18 municipalities, including flood forecasting, planning and regulations, communication, stewardship, Bay of Quinte Remedial Action Plan monitoring, water monitoring for provincial programs, education, source water protection and enabling services supported by our municipal partners. Quinte Conservation's jurisdiction is straightforward as a result of this amalgamation provides cost efficient administrative services over a large geographical region.

Our operations already minimize duplication through centralized platforms such as OnBase, GIS, and WISKI, which streamline

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workflows and reduce redundancies. Detailed budgets and capital asset management plans are prepared annually, reviewed by municipal partners, and approved by our board of directors to ensure transparency, accountability, and efficient resource allocation.

Shared services provided by Quinte Conservation further enhance efficiency such as providing engineering support to neighboring authorities, sharing software licenses, and leveraging bulk purchasing for benefits and insurance. Eliminating local administrative functions would not guarantee savings; in fact, it could increase municipal costs if responsibilities shift to municipalities or require costly provincial services.

Local governance ensures municipal priorities are represented and aligned with watershed needs.

Centralizing administration would create a larger, costlier bureaucracy, undermining the lean, scaled model that smaller authorities rely on. Our current structure is highly efficient, with staff often performing multiple roles to maximize value for taxpayers.

Quinte Conservation operates under rigorous accountability measures. Annual reports, strategic plans, audited financial statements, and multi-year asset management plans are publicly available on our website.

Client feedback and performance reviews are integral to our service commitments, complemented by regular public engagement through open houses and consultations. Mandatory reporting under the Conservation Authorities Act, provincially mandated transition plans, and board meetings open to the public are essential to ensure transparency and compliance.

Local governance is a cornerstone of accountability. Our board of directors, comprised 100% from elected municipal officials, provides strong democratic oversight. Reducing local governance would diminish accountability and increase costs for taxpayers. With the proposed changes, local governance decisions will be lost. This proposals would remove the local voice for many of our smaller communities. For example, it would be unrealistic that all 18 of Quinte Conservation municipalities would have a seat at a new regional board. Therefore smaller municipalities such as Tweed, Centre Hastings, Tyendinaga, Central Frontenac, Deseronto, Addington Highlands, Tudor and Cashel, etc. will lose their ability to make local decisions for

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their communities.

Quinte Conservation Board of Directors passed a resolution that:

- Oppose the changes outlined in the ERO regarding consolidation; and
- Oppose the formation of the Eastern Lake Ontario Regional Conservation Authority; and
- Support the broad goals of the province in achieving better outcomes.

CA Name: Quinte Conservation	
What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?	<p>Consolidation of conservation authority boundaries will not lead to a successful transition. The province can achieve service standards through the current 36 CA organizations by using legislative and regulatory amendments, technological solutions, and compliance checks.</p> <p>Local offices are the key to supporting local needs, knowledge, and expertise. This will ensure travel costs remain efficient, for both fleet and employees.</p> <p>Consolidation would require merging multiple IT systems, security protocols, asset databases, HR and payroll systems, GIS platforms, and finance software. The scale of integration risk is very high and could have long lasting impacts on service delivery. Conservation Authorities recognize that there is a need for standardized administrative processes, but this can be accomplished without creating instability that will certainly ensue with consolidating boundaries.</p> <p>It is important to recognize that there is significant risk when combining GIS data, land holding information, stewardship records, historic compliance information, permitting databases as we have experienced during the provinces transfer of property data to an</p>

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	<p>electronic system. The loss of data and inaccuracies in transfer of information can cause significant financial liabilities.</p> <p>Quinte Conservation has partnerships, funding relationships, municipal agreements and a variety of self-generated revenue streams which will be negatively impacted by forcing a consolidation model that takes away the local watershed-based approach. Aligning all budgets and reporting frameworks would be extremely challenging and could reduce local accountability. Staff uncertainty, potential job changes, and time spent on reassigning roles could disrupt operations and limit our ability to provide core mandated work in a timely fashion. Local communication initiatives are imperative to the success of messaging. Consolidated messaging will lose local relevance and make it unclear for watershed residents and impacted communities. Communities need to know where and who they can contact for watershed services, development permits, and local watershed programs.</p> <p>Specialized local ecological knowledge cannot easily be transferred or preserved through large-scale mergers, which could have long-term impacts on flood forecasting and warning, stewardship, development reviews, dam operations, and all operational responsibilities of Quinte Conservation.</p> <p>A successful transition must prioritize watershed based management and continuity of existing commitments under the Canada Ontario Agreement (COA). The Bay of Quinte is an Area of Concern (AOC) under the Great Lakes Water Quality Agreement due to historical water quality issues, including excessive phosphorus loading, degraded fish and wildlife habitat and other impairments. The proposed consolidation map did not take the Bay of Quinte watershed into consideration and splits the Bay between two regions near Napanee, which may have implications for integrated management depending on how consolidation occurs. Quinte Conservation supports the Bay of Quinte Remedial Action Plan through its long-standing monitoring program, which is essential for tracking</p>
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Proposed boundaries for the regional consolidation of Ontario’s conservation authorities

[ERO#025-1257](#)

Discussion Questions ++

	<p>progress toward delisting the Area of Concern and meeting COA objectives. To maintain the integrity of monitoring and reporting, Quinte Conservation will need to continue monitoring outside the proposed regional boundaries. Even though the Bay of Quinte is undergoing redesignation, the Phosphorus Management Plan is designed to outlive the AOC designation and will need to continue.</p> <p>Proper land management will ensure the Bay of Quinte remains healthy, and Quinte Conservation’s programs and regulations provide this critical support. The Provincial and Federal governments have already invested significant resources into restoring the Bay of Quinte, and poor land management practices, such as inadequate oversight of regulations and weak integration with municipal planning, could reverse decades of progress. Maintaining local “boots on the ground” is essential to protecting water quality, and sustaining the benefits of our governments’ investment.</p> <p>Quinte Conservation is recommending that the province take a pause on consolidation and use the objects and powers of the OPCA to implement standards across the network. This can be achieved without unnecessary consolidation. Provide the tools, policies and directives to the 36 conservation authorities and let us show the province that we can meet their new standards. This may also lead to voluntary mergers/amalgamations of conservation authorities that see value in the proposition. Forcing consolidation will lead to undesirable relationships between the province and the impacted parties (conservation authorities and municipalities).</p>
<p>What opportunities or benefits may come from a regional conservation authority framework?</p>	<p>Quinte Conservation sees very limited value in consolidating our watershed into a region that will have 48 municipalities, 16,000 square kilometers area (about the size of Lake Ontario) and an unknown governance structure. It is our position that consistent standards, improved investment by the province, and collaboration of resources and services can be accomplished without consolidation. With appropriate funding into conservation authorities instead of investing millions of taxpayer dollars into</p>

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	<p>consolidation, the province can significantly improve the funding relationship between CA's, municipalities and the province. From a corporate services perspective, one potential benefit might be the ability to share purchasing strength on few high-cost items, such as enterprise software licenses. This can be accomplished through the OPCA without consolidation. CAs already share technical expertise but can formalize these agreements to ensure transparency. Forced consolidation will increase administrative burden and reduce the capacity for on-the-ground impact.</p> <p>Having shared service agreements among conservation authorities could benefit regions without formal consolidation and could include:</p> <ul style="list-style-type: none"> • Capacity for leveraging funding through government cost shared/grant programs; • Standardization of Commercial Forest operations, by adopting global Forest certification standards (i.e. Ontario Woodlot Association - Forest Certification Program and/or Sustainable Forest Licenses on Crown Land). • Forest Certification opens opportunities for carbon offset revenue. • Standardized parking gate system at Conservation Areas to generate revenue specifically for reinvestment into Conservation areas. • Sharing strengths amongst the collective Conservation Authorities existing professional expertise; • Greater public outreach through communications. • Streamlined legal expertise and/or resources. • Standardization of policies, procedures, compliance, HR processes, and systems.
<p>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</p>	<p>Effective and transparent governance works best with smaller, focused bodies. For these reasons, the only appropriate governance model is the one we have now, local conservation authorities with direct municipal representation. Quinte Conservation represents 18 municipalities with a board of elected officials. Municipal representation from each of our 18 municipalities ensures that each member has input and a voice at every meeting. The current model of budget distribution and weighted vote for approval</p>

Proposed boundaries for the regional consolidation of Ontario’s conservation authorities

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<p>municipal representative appointment process?</p>	<p>ensures that this local pay for local say model is transparent and works to the benefit all our local municipalities and watershed residents. Currently municipalities support greater than 50% of the revenue for Quinte Conservation; they pay the most and should have the most say. Proportional representation based on population has been successful in the current system, but removing smaller municipalities entirely would be problematic. A new board structure should not introduce bias by favoring larger municipalities or appointments made primarily by the province. Doing so risks silencing democratic voices from smaller communities, which play a critical role in land-use planning and environmental stewardship. Their input is essential to balanced governance, protecting Ontario’s resources, and maintaining watershed integrity.</p> <p>Local priorities could easily be overshadowed by population-dense municipalities, leading to inequitable decision-making. Appointment processes would likely become disconnected from local concerns and funding commitments, making it harder to ensure accountability.</p> <p>From a corporate services perspective, a regional CA framework would create serious governance challenges. Representation would need to include all municipalities, resulting in an extremely large and unwieldy board.</p>
<p>Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?</p>	<p>From a finance and budget perspective, a regional framework would create serious challenges. Budgeting would need to account for very different levy models, asset portfolios, risks, and municipal financial capacities. A consolidated budget would quickly become complex, less transparent, and less meaningful for local councils. Consultation would likely become superficial for smaller municipalities, since they would no longer have direct input into local priorities. Preparing multiple regional budget scenarios would require significant administrative resources, reducing efficiency rather than improving it.</p>

Proposed boundaries for the regional consolidation of Ontario’s conservation authorities

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	<p>A transparent budgeting process is only possible when local conservation authorities remain intact. Maintaining local staff will need to be a priority to maintain transparency and prevent loss of accountability.</p>
<p>How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?</p>	<p>From planning and regulation, source water protection, water resources, monitoring and corporated services, strong local relationships depend on staff being visibly present in communities, municipalities, and regional projects. Large regional entities make it difficult to maintain the personal connections that encourage volunteerism, donations, stewardship partnerships, and municipal trust. Communication also needs to be tailored to local ecology, risks, and concerns, which is not possible at a regional scale.</p> <p>Consolidation could undermine relationships with landowners, Indigenous partners, and municipalities.</p> <p>Maintaining a local presence will be the most important part of any change. Watershed residents, local municipal partners, stakeholder groups rely heavily on the branding of Quinte Conservation. Any change to naming and/or branding may have an impact on the success of the OPCA and provincial government.</p> <p>Quinte Conservation has a strong partnership and relationship with the Mohawks of the Bay of Quinte. We work together on a variety of initiatives including wetland health assessments, fish habitat projects, monitoring and stewardship initiatives that provide for a positive working relationship through the Bay of Quinte Remedial Action Plan and continue to build trust through meaningful consultation and collaboration.</p>
<p>What absolutely cannot be lost through the consolidation to Regional Conservation Authorities?</p>	<p>Responsiveness to local municipalities is critical, as is the ability to support local programming, education, and land protection initiatives. Losing any of these would significantly weaken our capacity to deliver on our mandate. Local source water</p>

Proposed boundaries for the regional consolidation of Ontario’s conservation authorities

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	<p>protection programming, water resources (dam operations, flood forecasting and warning) and planning and regulations are essential to keeping our communities safe.</p> <p>Local decision-making must remain intact, along with the local ecological knowledge that staff bring. Control over local levies and accountability to municipalities is essential. Staff expertise tied to specific geographies and watersheds cannot be replaced. Equally important are the networks that support our work, including local volunteers, stewardship partnerships, and relationships with Indigenous communities. The integrity of GIS, forest carbon, and land management data must be preserved.</p> <p>The forest carbon offset program may be affected as some private companies do not want to invest in the government agencies.</p> <p>Ontario’s current watershed-based management system has been in place for over 75 years, and it has consistently proven successful in protecting and managing the province’s natural resources. Moving away from this approach risks losing the deep local knowledge and relationships that have been critical to its success. This foundation of local knowledge and community trust absolutely cannot be lost. Any restructuring must preserve the principles that have made Ontario’s conservation authorities a model for integrated resource management, such as local presence, local expertise, and strong community relationships. Without these, the effectiveness of watershed management and the protection of Ontario’s natural resources are at risk.</p>
Local concerns	<p>Geographic and economic differences within our newly consolidated area. The newly proposed area is vast. Belleville is being grouped with Oshawa, and there are local concerns that costs could rise to match those in the Greater Toronto Area. This would place an undue burden on local municipalities and residents who operate under very different economic conditions.</p>

Proposed boundaries for the regional consolidation of Ontario's conservation authorities

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	<p>Loss of local governance. Grouping Quinte Conservation with regions like Oshawa does not reflect the significant differences in geography, geology and watershed characteristics. Management strategies that work for urbanized areas may not be appropriate for rural mixed landscapes.</p> <p>Administrative capacity would be absorbed by restructuring instead of watershed protection. The Bay of Quinte is designated Area of Concern under the Great Lakes Water Quality Agreement and it will require specialized management approaches to ensure that it does not degrade to historical conditions. Its ecological, cultural, and economic significance requires tailored strategies that differ from those used in other watersheds. Increased costs for IT integration, severances, harmonization of pay bands, software unification, and legal/HR processes.</p> <p>The Quinte region includes significant karst landscapes, which present unique local challenges for water management, groundwater protection and development planning. These characteristics differ from the proposed consolidated area and geographical areas like Oshawa, requiring specialized strategies that can not be standardized across the proposed larger grouping.</p> <p>Risk of losing local talent due to uncertainty, burnout, or reorganization. Loss of local expertise. Reduction in streamlined and effective customer service for planning, permitting, risk management services, stewardship, and public inquiries.</p> <p>Loss of trust with local municipalities who rely on efficient, personalized service. Fragmented or incomplete data during amalgamation undermines informed decision making.</p>
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December 19, 2025

By E-mail

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

RE: Kawartha Conservation Board Submission on the Proposed Regional Consolidation of Conservation Authorities, ERO Notice #025-1257

Dear Minister McCarthy,

On behalf of the Kawartha Conservation Board of Directors, we are writing to share the Board's perspective on Environmental Registry of Ontario Posting #025-1257, informed by discussions at its meetings on November 27 and December 18, 2025. The Board recognizes the Province's objectives under Bill 68, to strengthen oversight, consistency, and modernization across conservation authorities through the Ontario Provincial Conservation Agency and the proposed transition toward a regional watershed-based framework.

The proposed consolidation model includes the creation of an Eastern Lake Ontario Regional Conservation Authority, which would result in the consolidation of Kawartha Conservation with several neighbouring conservation authorities and would represent a significant change to governance structures, service delivery models, financial frameworks, land management responsibilities, and municipal oversight.

We support the Province's generally stated objectives, including the use of digital permitting systems, consistent policies and standards, and enhanced use of technology. Kawartha Conservation already demonstrates strong performance in these areas, including meeting or exceeding provincial service standards, participating in staff-sharing initiatives, operating within a fully digital permitting environment, and advancing digital transformation—reflecting many of the efficiencies sought through the provincial initiative.

Substantial concerns and risks have been identified with the proposed consolidation or amalgamation, particularly with respect to the loss of local decision-making authority, reduced municipal representation, uncertainty around transition funding, asset ownership considerations, potential service disruption, and impacts on locally delivered programs. The scale of the proposed Eastern Lake Ontario region raises additional challenges related to maintaining effective community relationships and ensuring services remain responsive to local watershed conditions.

The importance of meaningful consultation and engagement with municipalities, conservation authorities, and stakeholders prior to any decisions being finalized cannot be understated. In particular, the Board notes that many of the Province’s desired outcomes—such as improved consistency, efficiency, and modernization—can be advanced through the existing watershed-based governance framework, supported by the Ontario Provincial Conservation Agency (OPCA), without the disruption and destabilization inherent in large-scale structural consolidation, and counter to the Province’s goals of advancing the housing priority, streamlining service, and reducing red tape.

Similarly, the importance of effective, ongoing two-way communication between conservation authorities and the OPCA is critical as the Agency initiates and fulfills its evolving mandate. Regular dialogue, shared implementation guidance, and collaborative problem-solving would support consistent interpretation of provincial direction, reduce implementation risks, and ensure that operational experience and local watershed knowledge inform policy development and modernization efforts.

A transparent, comprehensive cost-benefit analysis of alternative approaches should be undertaken as a first step to inform decision-making in any transition model that may be contemplated in the future. Where any transition is determined to be beneficial, it should be supported by a clearly defined and phased transition plan. Full provincial financial support is critical for any mandatory transition efforts to ensure continuity of programs and services and to avoid disruption to municipalities and communities.

Accordingly, we urge the Province to consider the benefits of a measured “pause” of the consolidation proposal put forward to allow the OPCA to complete its initial three-year term, undertake meaningful engagement with conservation authorities, and assess the urgency and necessity of consolidation or amalgamation of conservation authorities through an evidence-based approach. This would include clearly identifying issues, providing effective communication and feedback to conservation authorities to address any issues and if necessary, consider alternative models that would more effectively advance provincial priorities related to efficiency, red-tape reduction, and timely housing delivery.

Attached is a resolution passed by the Kawartha Conservation Board of Directors at their meeting held on December 18, 2025, and our detailed comments regarding ERO Notice #025-1257. For further information, please feel free to contact the undersigned.

Sincerely,



Pat Warren
Chair



Mark Majchrowski
Chief Administrative Officer

Enclosures: *Kawartha Conservation Board Resolution #157/25, December 18, 2025*
 Kawartha Conservation ERO #025-1257 Submission Comments



**KAWARTHA
CONSERVATION**

Discover · Protect · Restore

- cc. *The Conservation Authorities Office, Ministry of the Environment, Conservation and Parks*
Hassaan Basit, Ontario's Chief Conservation Executive
Peter Tabuns, MPP, Critic, Environment, Conservation and Parks
Local Members of Provincial Parliament:
Laurie Scott, Haliburton-Kawartha Lakes-Brock
Dave Smith, Peterborough-Kawartha
Local Watershed Municipalities
The Association of Municipalities of Ontario, and the Rural Ontario Municipal Association
Conservation Ontario and all Conservation Authorities in Ontario

KAWARTHA CONSERVATION BOARD OF DIRECTORS MEETING #10/25 (DECEMBER 18, 2025)

RESOLUTION #157/25

MOVED BY: MARK DOBLE

SECONDED BY: TRACY RICHARDSON

RECOGNIZING THAT, the Province of Ontario has posted Environmental Registry of Ontario (ERO) Posting #025-1257 proposing the consolidation of Ontario’s 36 Conservation Authorities into 7 Regional Conservation Authorities; AND,

RECOGNIZING THAT, the proposed Eastern Lake Ontario Regional Conservation Authority would consolidate Kawartha Conservation with Central Lake Ontario, Otonabee, Ganaraska, Lower Trent, Crowe Valley, and Quinte Region Conservation Authorities, resulting in significant changes to governance, service delivery, financial structures, land management, and municipal oversight; AND,

RECOGNIZING THAT, the Kawartha Conservation Board acknowledges and supports the Province’s goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology; AND,

CONSIDERING THAT, Kawartha Conservation consistently meets or exceeds provincial service standards, participates in staff-sharing initiatives with neighbouring conservation authorities, regularly reports on performance, are engaged in a fully digital permit application framework, and are engaged in digital transformation activities, mirroring many of the efficiencies the Province seeks; AND,

CONSIDERING THAT, the proposed consolidation raises substantial concerns and risks related to local decision-making authority, municipal representation, transition funding, asset ownership, service disruption and the protection of local programs; AND,

CONSIDERING THAT, there is a need for meaningful consultation and engagement with stakeholders to address identified concerns and risks of the proposed consolidation or amalgamation; AND,

CONSIDERING THAT, there is a need to undertake a full cost-benefit analysis of any consolidation or amalgamation models or alternatives; AND,

CONSIDERING THAT, the objects of the Ontario Provincial Conservation Agency (OPCA) can accomplish the same goals and objectives without consolidation of conservation authorities and without the service disruption and interference that would come with amalgamation; AND,

CONSIDERING THAT, meaningful modernization can occur within the current watershed-based governance framework;

THEREFORE, BE IT RESOLVED THAT, the Kawartha Conservation Board does not support the proposed “Eastern Lake Ontario Regional Conservation Authority” boundary configuration as outlined in Environmental Registry Notice 025-1257; AND

THAT, the Kawartha Conservation Board of Directors requests the Province of Ontario to pause any decision to consolidate or amalgamate conservation authorities to allow:

- the OPCA to complete its first 3-year term and a subsequent assessment of the need for consolidation
- for meaningful engagement needed to address the concerns and risks of the proposed consolidation
- for the review of alternative models and processes that would result in better outcomes that advances the government’s priorities of efficiency, red-tape reduction and timely home construction, AND;

THAT, the commentary provided for in the staff report be endorsed and submitted to the Province of Ontario as Kawartha Conservation’s comments regarding Environmental Registry Posting 025-1257, AND;

THAT, the resolution be forwarded to:

- Minister of the Environment, Conservation and Parks and his Opposition critics
- Ministry of the Environment, Conservation and Parks (CA Office);
- Ontario’s Chief Conservation Executive, Hassaan Basit;
- Local Members of Provincial Parliament
- Conservation Ontario
- all municipalities within Kawartha Conservation’s watershed and conservation authority municipalities.

Recorded Vote:

Municipality	Name	Governance Role	Vote Decision
Township of Cavan-Monaghan	Byrne, Gerry	Director	Yes
City of Kawartha Lakes	Doble, Mark	Director	Yes
Municipality of Trent Lakes	Franzen, Peter	Director	Yes
Region of Durham, Township of Brock	Pettingill, Cria	Director	Yes
Region of Durham, Municipality of Clarington	Rang, Lloyd	Director	Absent
City of Kawartha Lakes	Richardson, Tracy	Director	Yes
Region of Durham, Township of Scugog	Rock, Robert	Director	Absent
Region of Durham, Township of Scugog	Wright, Harold	Vice-Chair	Yes
City of Kawartha Lakes	Warren, Pat	Chair	Yes

UNANIMOUSLY CARRIED *(of members present)*

Kawartha Conservation ERO #025-1257 Submission Comments

(December 19, 2025):

The following submission outlines Kawartha Conservation’s comments in response to Environmental Registry of Ontario Posting #025-1257, which seeks input on the proposed regional consolidation of conservation authorities. These comments are informed by discussions of the Kawartha Conservation Board of Directors and reflect both governance oversight and operational experience delivering conservation authority programs and services at the watershed scale.

Kawartha Conservation recognizes the Province’s objectives of improving consistency, efficiency, and modernization across the conservation authorities. The comments below are intended to be constructive and informed by local accountability and operational experience, to assist the Province in evaluating transition models that achieve these objectives while maintaining effective governance, accountable service delivery, fiscal prudence, and strong municipal partnerships.

The responses that follow are structured to directly address the questions posed in the ERO posting and focus on practical considerations related to the proposed transition of the conservation authority framework.

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

Evidence-based decision-making before implementation

- The Province’s objectives related to consistency, efficiency, and speed of service can be advanced immediately within the existing 36 conservation authority framework through provincially led standards, shared tools, staff collaboration, and digital permitting systems. These measures should be implemented and evaluated first, allowing for work processes to be aligned, performance to be determined and testing of the assumption that efficiencies are to be gained through consolidation.
- Decisions regarding any potential structural change must be informed by a rigorous cost-benefit analysis (transition and steady-state), consistent with standard public-sector business practice. This analysis must meaningfully involve municipalities and conservation authorities, who understand both the operational realities and local service impacts. Structural change should not proceed where substantive, demonstrable gains cannot be clearly established.
- Where challenges or inefficiencies are identified, alternative approaches—such as shared services, regional collaboration agreements, or targeted functional integration—should be explored and exhausted before any consideration of consolidation.

Stable provincial transition funding and clear “who pays” rules

- Any provincially directed modernization initiatives must be accompanied by stable, multi-year provincial funding to avoid cost pressures being downloaded onto municipalities and ratepayers.
- Clear and transparent rules regarding “who pays” are essential. New provincial initiatives, including those associated with the Ontario Provincial Conservation Agency (OPCA), should not introduce additional financial burdens during periods of transition or change.

Service-continuity

- Protecting uninterrupted delivery of natural hazard management, permitting, planning, and environmental services must be a foundational consideration. Demonstrated service improvements through the implementation of standards and standardization objects of the OPCA should precede any structural change.
- The uncertainty associated with major structural reform presents a significant risk to workforce stability, recruitment, and retention. Disruption to experienced staff undermines the Province’s objectives related to efficiency, timeliness, and service quality.
- Any change initiative must explicitly prioritize continuity of service, institutional knowledge, and organizational capacity.

A “local by design” operating model

- Municipal support and confidence are critical to success in the conservation authority model. Without strong municipal buy-in, risks include fiscal uncertainty, reduced effectiveness, and erosion of accountability. Maintaining strong local governance relationships is critical to the success of conservation authorities.
- Ontario’s watersheds and conservation authority jurisdictions are geographically large and diverse. Effective service delivery requires local offices, local staff, and locally informed decision-making. Centralized models are not well-suited to regions that require extensive travel and have variable watershed conditions.
- It is imperative to have local offices and local people to facilitate effective programs and services. This is key for the delivery of natural hazard programming, permitting and planning for the community as well as other services provided, where people can physically interact with local staff who know the area and can provide informed answers.
- Preserving place-based knowledge through local watershed teams and advisory structures with real influence is essential to maintaining service quality and public trust.
- Meaningful engagement with communities, municipalities and conservation authorities should occur at the watershed scale to ensure local conditions, risks, and priorities are understood and reflected in any provincial initiatives.

Standards first, consolidation second

- If consistency and performance improvement are the primary objectives, the Province should first finalize, fund, and implement provincial service standards, consistent policies, shared digital platforms, and performance metrics.
- The direction-making authorities outlined in Bill 68—covering standards, IT, procurement, training, asset management, and strategic planning—provide ample tools to achieve consistency without requiring consolidation.
- Only after these measures are fully implemented and evaluated should any further structural changes be contemplated, and only where clear, incremental value can be demonstrated.

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

Potential benefits of partnering and sharing staff between conservation authorities include:

- Improved access to specialized expertise (e.g., hydrogeology, geomorphology, legal and complex planning files) through shared service arrangements and voluntary staff mobilization during peak demand periods such as floods, major development cycles or significant weather events impacting properties.
- Efficiencies through shared corporate services (IT licensing, fleet, insurance, purchasing).
- Enhanced regional-scale scientific collaboration for broader watershed analysis, climate resilience planning, and cumulative effects assessment—while recognizing the importance of strong local-scale science and community-specific knowledge.

It is important to note that many of these benefits already occur today through voluntary inter-authority collaboration. We have shared staff historically with other authorities related to specialized IT, engineering and ecology on a long-term basis, and partner with other conservation authorities on a variety of geographically scalable projects (regional to local community) where it makes demonstrable sense to do so (e.g. planning, engineering, hydrogeological, IT and Risk Management Official expertise). The sharing of staff would be made easier through templated agreements. Any proposed changes must therefore demonstrate clear net new benefits beyond what can already be achieved through shared services and supported standards.

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?

Any governance framework must:

- preserve strong local representation for municipalities and taxpayers,
- remain strategically effective, and
- maintain equitable representation

Models that significantly dilute local voice or create excessively large, symbolic boards risk being cumbersome and ineffective. Governance approaches should prioritize clarity of roles, accountability, and meaningful municipal participation.

Where broader coordination is required, networked governance models—retaining strong local boards with defined roles while enabling strategic coordination—may offer a more balanced and effective approach than full consolidation.

Consideration should be given to Indigenous participation in governance structures.

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

Clear, standardized budget reporting

- Annual budget documents should continue to clearly identify program and service costs, capital needs, asset management requirements, and service outcomes in a consistent and comparable format.

Separation of funding streams

- The budget presentation should clearly distinguish:
 - provincially-directed costs (Agency directions)
 - provincial supports for programs and services
 - municipal supports for programs and services
 - locally delivered programs and capital works.

Guardrails to protect local priorities

- Policies must ensure that locally funded priorities and assets cannot be reallocated without municipal agreement, protecting investments made by municipalities in their own communities.

Predictable and local consultation

- Budget consultation processes must be structured, timely, and aligned with municipal budget cycles, including multi-year forecasts (e.g. 3 or 5 year) to support municipal financial planning and stability.

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

Keep local presence real

- Maintain local offices, local staff, and local contact points for programs and services. These points of contact are essential to effective service delivery and community trust.

Protect watershed identity and place-based knowledge

- Through consistency measures, a “one system, many watersheds” model will emerge with the OPCA efforts for standardization. A tangible sense of place must be identifiable to a community or municipality, with actions or plans tied to that same space.
- While standardization allows for greater consistency, flexibility must remain to address local conditions and support positive innovations for specific contexts. It is this creativity and customer service-oriented outlook that conservation authorities are known and appreciated for.

Strengthen transparency and accountability locally

- Communications, reporting, and performance measures should be clearly tied to local communities and watersheds, enabling municipalities and residents to understand outcomes that affect them directly

Additional Comments:

Support tied to Guidance

At this time, the principal gap in direction relates to the timely identification, interpretation, and resourcing of common provincial standards. Many of the Province’s stated objectives—such as uniformity, improved service delivery, and consistent application of standards—can be meaningfully advanced within the existing conservation authority framework, provided that these standards are finalized, clearly articulated, and adequately supported for administration by the Agency.

While significant legislative changes have been introduced in recent years, provincial guidance and implementation support would assist conservation authorities in achieving consistent interpretation and application across jurisdictions. Strengthened communication, transitional guidance, and shared tools would reduce variability in processes and outcomes, addressing many of the challenges put forward.

Focusing the OPCA's first term on common tools, standards, and guidelines would deliver the greatest gains toward the Province's objectives of consistency and housing delivery. Allowing conservation authorities time to implement these measures and meet defined targets is more effective than undertaking structural change simultaneously. A 3-year focus on these efforts, aligned with the OPCA's first term, would support effective implementation and evidence-based assessment.

Development of Guidelines, Policies and other Resource materials

To ensure that provincially developed policies, guidelines, and implementation tools remain scientifically sound and locally relevant, their development would benefit from structured consultation with conservation authorities, municipalities and other stakeholders that possess detailed, place-based knowledge of these systems. Early and ongoing engagement in the determination of such materials would help ensure that provincial direction is practical, evidence-based, and responsive to local hydrologic, geomorphic, and land-use conditions, thereby supporting consistent application while avoiding unintended regional or community-level impacts.

Boundary Alignment Considerations

It is recommended that conservation authority boundaries be aligned, to the greatest extent possible, with the best science available for delineating watershed boundaries to avoid duplicative administrative layers. Advancements in technology have enabled more defensible watershed-based frameworks and would help reduce administrative duplication, support coherent watershed management, and enhance consistency in planning, implementation, and oversight.

Governmental Transparency

The OPCA should be accountable to the public as well as to stakeholders that are responsible for funding their operation. Transparency measures identified in the Conservation Authorities Act for current conservation authority governance should be mirrored by the OPCA (public meetings, agendas, minutes, membership, etc.). Similarly, financial transparency to conservation authorities as a financial stakeholder in the OPCA is needed, tied to annual reporting on outcomes of the levy support. Representation on the OPCA board, particularly if apportionment provisions are enacted would represent an open, transparent and accountable governance model.

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RECEIVED aa
DEC 22 2025

CONSERVATION

DECEMBER 2025

RE - " ERO # 025 - 1257 "

PUBLIC INPUT COORDINATOR
MECP CONSERVATION AND SERVICE PROTECTION BRANCH
300 WATER STREET
PETERBOROUGH ON.
K9J 3C7

I, BARRY DYMENT, -- [REDACTED] -- L9H 7N7
EMAIL [REDACTED] TELEPHONE NUMBER [REDACTED]
IS TELLING YOU THAT I WAS QUITE UPSET RECEIVING THIS LETTER.

- TO PUT IT MILDLY THIS ATTEMPT TO CHANGE LOCAL CONSERVATION AUTHORITIES INTO A
- VERY, VERY, VERY LARGE OFFICE SET WELL AWAY FROM LOCAL ONE'S IS DEFINITELY IN MY
- OPINION A VERY, VERY, VERY BAD AND TERRIBLE MISTAKE.

NO ONE KNOWS THE TREES / FLOWERS / WILD LIFE / LANDSCAPES / RIVERS / STREAMS /
WATERFALLS LIKE THE PEOPLE WHO LIVE IN AND AROUND THEM DAY AFTER DAY AND YEAR AFTER
YEAR.

NOTE NOTE NOTE NOTE ----- DO NOT DO NOT MAKE CHANGES TO THIS VALUABLE
LOCAL RESOURCE.

AGAIN I HAVE TO SAY THAT ATTEMPTS TO CHANGE TO A LARGE SCALE OVERSEER IS, TO PUT IT
MILDLY - A VERY, VERY, STUPID, STUPID IDEA.
BELIEVE ME - I AINT AS DUMB AS I LOOK - BUT - HAVE YOU LOOKED IN THE MIRROR ????

A COPY OF THIS LETTER IS BEING SENT TO
HAMILTON CONSERVATION AUTHORITY
838 MINERAL SPRINGS ROAD
ANCASTER ON. L9G 4X1

UNFORTUNATELY YOURS BARRY DYMENT

Barry Dymont

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Member Municipalities

Township of
Adelaide-Metcalf

Municipality of
Brooke-Alvinston

Municipality of
Chatham-Kent

Township of
Dawn-Euphemie

Township of
Enniskillen

Municipality of
Lambton Shores

Municipality of
Middlesex Centre

Village of
Newbury

Village of
Oil Springs

Town of
Petrolia

Town of
Plympton-Wyoming

Village of
Point Edward

City of
Sarnia

Municipality of
Southwest Middlesex

Township of
St. Clair

Municipality of
Strathroy-Caradoc

Township of
Warwick

St. Clair Region Conservation Authority: Environmental Registry of Ontario (ERO) Responses

Proposed boundaries for the regional consolidation of Ontario’s Conservation Authorities (ERO #025-1257)

This response is provided on behalf of the St. Clair Region Conservation Authority (SCRCA). The SCRCA represents 17 member municipalities and 148,000 residents in its approximately 4,100 square kilometer watershed in southwestern Ontario. The SCRCA watershed is proposed to be consolidated with 7 other Conservation Authorities representing 81 member municipalities to form the Lake Erie Region Conservation Authority.

ERO Proposal #025-1257 would result in a Regional Conservation Authority (RCA), void of meaningful local representation to deliver effective governance and accountability to municipal funders and their ratepayers. The SCRCA:

- Supports the desired goal of achieving better service outcomes;
- Opposes the changes outlined in the ERO Proposal as a means of achieving those goals;
- Supports continued modernization of existing practices and policies but prefers alternatives to the Proposal that would consider voluntary consolidation that is supported by adequate business rationale, sound and third-party peer reviewed financial analysis and meaningful, open consultation rather than proscribed controlled input to the Ministry.

While the SCRCA supports the proposed provincial investments in technology, standardization and modernization, the proposed RCA framework would create complexities and risk local municipal representation and decision-making, local expertise, and delivery of programs and services. Considering the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the SCRCA does not support the proposed RCA framework. If the government decides to proceed with the ERO Proposal, it is imperative that there are measures in place to mitigate risks that are inherent in consolidations of this size.

1. Key Factors for a Successful Transition and Outcome

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

Preserve Local Municipal Governance and Decision-Making

With 81 local municipalities, the proposed Lake Erie Region Conservation Authority would make it incredibly challenging to have meaningful local municipal representation, particularly for smaller and rural communities. The SCRCA’s board maintains a respectful balance between urban and rural representatives that reflect the diverse nature of the watershed.

As the largest contributor to Conservation Authority budgets, municipalities must continue to have the same equitable representation and voice they are afforded today. Municipalities must maintain a meaningful voice at all levels of Conservation Authority governance and decision-making, to ensure local issues and concerns are not lost. Support from key partners, specifically

municipalities, is key to the ongoing success of Conservation Authorities in Ontario.

To deliver on its mission, a new Regional Conservation Authority model must be grounded in fundamentals of effective watershed management, including:

- Protecting life and reducing property damage from flooding and erosion;
- Supporting municipal partners, the development community, and landowners with timely, reliable services;
- Enhancing the economic, environmental, and community health of the watershed;
- Providing meaningful opportunities for people to connect at the local level;
- Meet the demands of a rapidly growing population at a time of climate pressure.
- If regionalization stretches teams too broadly, there is a risk of losing the ability to design and deliver environmental programs and services tailored to the unique needs of each watershed and responsive to municipal and community priorities;
- Local, on-the-ground expertise;
- Critical knowledge of local environmental conditions and historical records (e.g., localized flooding impacts);
- Strong relationships and funding support from municipalities, Indigenous communities, donors, businesses, the agricultural community, watershed residents, and other partners;
- Real-time responsiveness during storms and emergencies and other urgent events;
- Engagement and support from the scientific community;
- Effective oversight and buy-in from municipal funding partners;
- To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, Conservation Authorities must be appropriately accountable;
- The principle of “pay for say” should be reflected in the design of new Conservation Authorities, as it is today. The proposed catchment area of the proposed consolidated Lake Erie Regional Conservation Authority would combine more than 80 municipalities, stretching oversight and “pay for say” beyond what is workable and undermining confidence in the governance of Conservation Authorities.

Recommendation 1:

That the Province consider achieving modernization goals through the current 36 Conservation Authority corporations using legislative and regulatory amendments, technological solutions and compliance verification.

Recommendation 2:

That the Province demonstrate the statutory objects of the Conservation Authorities can be effectively delivered within the proposed new regional boundaries.

Recommendation 3:

- a) That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.
- b) Avoid Delaying Performance Improvements Currently Underway
The proposed changes risk undermining the implementation of provincial improvements that have already been introduced. In recent years, the Province has significantly changed the role of Conservation Authorities in land use planning matters as part of its broader initiative to build more homes faster. Insufficient time has passed to fully implement recent amendments and evaluate their impact on development outcomes. Given the volume and speed of legislative changes, industry stakeholders are still processing the effect and significance of various legislative changes. All stakeholders, including the development industry, benefit from certainty. The proposed consolidation will introduce additional unknowns and new processes at an already uncertain time in the market.

c) Provide Dedicated Provincial Funding for the Transition

A cost-benefit analysis of the proposed consolidation should be completed and properly evaluated by member municipalities. There would be substantial costs associated with merging eight Conservation Authorities into one Regional Conservation Authority, including but not limited to:

- Information technology and data system integration,
- Human resources and union harmonization (two Conservation Authorities within the proposed Lake Erie Region are unionized with different unions while the other six are not),
- Fee and policy alignment,
- Corporate service model consolidation,
- Potential need for rebranding, signage, and legal transitions, and
- Asset and liability assessment.

It is unacceptable to require member municipalities to fund these costs while diminishing their influence. They must not be burdened with the expense of mandated consolidations. Without a rigorous cost-benefit analysis proving that large-scale consolidations will reduce costs and enhance service, the risks clearly outweigh any potential benefits.

d) Protect and Enhance Existing Service Levels

Local Conservation Authority staff attend site visits and face-to-face meetings and know the local geography and political landscape. Despite increasing levels of development in the watershed, SCRCA continues to issue permits within the provincial guidelines. Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. Consolidating and potentially centralizing offices could reduce responsiveness, delay decisions, and weaken local expertise and connection to the community.

e) Ensure Financial and Legal Due Diligence

Each Conservation Authority in the proposed region has vast landholdings, complex assets (e.g., water control infrastructure), financial assets and liabilities, foundations, legal proceedings, and unique local agreements. A thorough financial and legal due diligence analysis is necessary to assess restrictions and complexities on transferring these assets from local control to regional oversight and/or ownership.

f) Maintain Local Conservation Authority Board beyond 2026

Slowing the pace of consolidation would permit the Province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion. Guidance may be taken from the Province's experience with municipal amalgamation in the 1990s and 2000s to ensure that any proposed consolidation of Conservation Authorities is well-timed and efficiencies at the local level are evaluated prior to implementing structural changes.

Recommendation 4:

That the Province consider a longer implementation timeline to fully address:

- Board governance and appointment frameworks; funding mechanisms, allocations, and reserve structures; and service continuity matters.
- Implementing consistent standards, guidelines, and directives across all Conservation Authorities in a phased manner, prior to any consolidation (if required) would improve stability and predictability.
- This approach reduces the risk of program delivery disruptions by avoiding multiple significant changes at the same time, thereby supporting improved outcomes and greater buy-in.

Recommendation 5:

That a stable, clear, transition plan be prepared collaboratively with the implementation of a working group. To minimize potential disruptions, this plan should consider:

- Service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures.
- The existing Conservation Authority Boards should remain in place beyond 2026. The local Conservation Authority board could inform a comprehensive cost-benefit analysis on consolidation and help outline the

most effective level of strategic consolidation to achieve both provincial and local objectives with municipal input. Local input and buy-in will be imperative to the success of any new framework.

2. Potential Opportunities or Benefits

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

The provincial proposal for regional consolidation does not include enough information to effectively evaluate the benefits.

- a) **Ensure Consistent Standards**
Funding that would be directed into the consolidation costs mentioned above would be better spent on front-line resources that would improve consistency and modernize tools and resources equitably across all Conservation Authorities. Provincial funds directed to improved mapping, technical guidance, policy development and e-permitting services would have immediate benefits across the province. Provincial efforts and funding should be directed to these goals within the existing Conservation Authority framework.
- b) **Provide Additional Investment**
Additional investment is required to ensure mandatory programs and services are supported. The projected cost of the new Ontario Provincial Conservation Agency is significantly higher than the current transfer payments provided by the Province to the 36 Conservation Authorities.

Recommendation 6:

That the Province update Provincial policies and standards together with the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

Recommendation 7:

That the Province invests stable, adequate, multi-year funding into Conservation Authority programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

3. Governance Structure Considerations

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) **Reduce the Geographical Area of the Proposed Consolidation.**
In developing the proposed Regional Conservation Authorities, the Province made its decision to form watershed-based jurisdictions, avoiding what it viewed as administrative duplication and balancing expertise. However, this resulted in geographically vast regions that do not account for existing working relationships between Conservation Authorities and municipalities. Other criteria should be weighted, including existing working relationships between Conservation Authorities and municipalities, and the urban versus rural balance. The success of the Conservation Authority governance model has always been that local representatives make local decisions. The geographic size of the region needs to be reduced to protect that principle.
- b) **Create a Governance Model that is Functional and Fair**
Applying current legislative population formulas would produce a Lake Erie Regional Conservation Authority Board of 120 members, which is unrealistic. A Board of this size risks a loss of local perspectives and challenges in achieving timely, responsive decisions. However, a board that is too small would have the same impact. A reasonable balance needs to be achieved. There will be a loss of local municipal representation in this framework.

- c) **Maintain Municipal Appointment Authority and Add Indigenous Appointments.**
Appointments to the Regional Conservation Authorities must remain municipal to ensure transparency, accountability, and local alignment. Appointments to the Ontario Provincial Conservation Agency should include municipal appointments from each of the Regional Conservation Authority boards. A new structure provides an opportunity for appointments to include Indigenous representation on Conservation Authority Boards as a vital step towards strengthening partnerships and ensuring programs reflect diverse perspectives. This representation would deepen cultural connections, enhance decision-making, and align with previous recommendations to create more inclusive and effective governance.

Recommendation 8: That the Conservation Authority Board should be:

- Maximum 25 members;
- Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand;
- Structured to preserve meaningful local influence including Indigenous representation to strengthen partnerships and ensure programs reflect diverse perspectives.

4. Maintaining a Transparent and Consultative Budgeting Process

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

- a) **Engage Municipalities in Budget Development**
Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Variations in land type, fee structures, property assessment, and asset conditions must all be accounted for. Another key factor to consider is protecting watershed reserves, infrastructure, and land assets. Watershed municipalities are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within the proposed consolidated structure.
- b) **Ensure Fair Apportionment**
Municipalities risk subsidizing areas with a smaller tax base. Local apportionment should be able to be directed to local assets.
- c) **Fully Fund the Transition Provincially**
Costs for integration, including but not limited to information technology, human resources, capital, data, governance and potential rebranding are extensive and must not fall to municipalities.

Recommendation 9:

That should any proposed consolidation proceed, existing watershed approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level and the transition costs be funded provincially.

5. Maintaining and Strengthening Local Relationships

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

- a) **Retain Local Presence**
Local offices and staff are essential for timely permitting, program delivery, flood forecasting and warning operations, environmental monitoring, community engagement, and effective stewardship. It is imperative that local knowledge be retained, and decisions reflect local conditions.

b) Protect Local Programs

Locally delivered conservation authority programs such as tree planting, stewardship services, environmental monitoring, education, community partnerships, and parks are rooted in community identity. They must be preserved.

c) Preserve Community Access to Greenspace

Municipalities rely on SCRCA lands for recreational opportunities. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities.

Recommendation 10:

That assurances are made to confirm the retention of local offices in order to continue delivering current programs locally.

Additional Comments

In addition to the comments provided in response to the questions in the ERO posting, the SCRCA is concerned about the governance structure of the Ontario Provincial Conservation Agency (OPCA). As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, Conservation Authorities and, therefore, municipalities, will be required to fund all or a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities will ultimately contribute all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, priorities, or strategic direction. For municipalities that rely heavily on Conservation Authority guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence. Not only would this be a precedent-setting method for funding a provincial agency, it establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

Summary of St. Clair Region Conservation Authority Recommendations

Recommendation 1:

That the Province consider achieving modernization goals through the current 36 Conservation Authority corporations using legislative and regulatory amendments, technological solutions and compliance verification.

Recommendation 2: That the Province demonstrate the statutory objectives of the Conservation Authorities can be effectively delivered within the proposed new regional boundaries.

Recommendation 3:

That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.

Recommendation 4:

That the Province consider a longer implementation timeline to fully address board governance and appointment frameworks; funding mechanisms, allocations, and reserve structures; and service continuity matters. Phasing standards, guidelines, and directives across all Conservation Authorities before any consolidation (should consolidation be required at all) offers greater stability and predictability.

Recommendation 5:

That a stable, clear, transition plan be prepared collaboratively with the implementation of a working group. To minimize potential disruptions, this plan should consider:

- Service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures.
- The existing Conservation Authority Boards should remain in place beyond 2026.

Recommendation 6:

- That the Province update Provincial policies and standards together with Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

Recommendation 7:

- That the Province invests stable, adequate, multi-year funding into Conservation Authority programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

Recommendation 8: That the Conservation Authority Board should be:

- Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand;
- Structured to preserve meaningful local influence including Indigenous representation to strengthen partnerships and ensure programs reflect diverse perspectives.

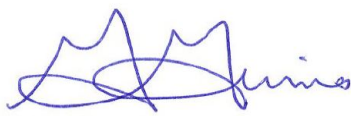
Recommendation 9:

- That should any proposed consolidation proceed, existing watershed approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level and the transition costs be funded provincially.

Recommendation 10:

- That the Province upholds the commitment to retain local Conservation Authority offices to deliver programs currently offered to the communities they currently serve.

Respectfully submitted,



Greg Grimes, Chair



Kristen Rodrigues, Vice Chair

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December 16, 2025

Hon. Todd McCarthy
Minister of the Environment, Conservation and Parks
Via Email todd.mccarthy@pc.ola.org

Re: Amalgamation of Conservation Authorities - Bill 68

Please be advised the Council of the Municipality of Chatham-Kent, at its regular meeting held on December 15, 2025, supported the following resolution regarding the above noted matter.

WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, 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 the Municipality of Chatham-Kent (through its original municipalities) established the Lower Thames Valley Conservation Authority and St Clair Region Conservation Authority (both initially formed in 1961);

AND WHEREAS local municipalities currently provide over 50% of total conservation authority funding, while the Province of Ontario provides approximately 5%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of acres 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 Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Council of the Municipality of Chatham-Kent calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND FURTHER THAT while the Municipality of Chatham-Kent supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND FURTHER THAT the Municipality of Chatham-Kent supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives.

AND FURTHER THAT a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of Ontario, the Rural Ontario Municipal Association, and all municipalities and Conservation Authorities in Ontario.

Sincerely,

Judy Shantz, CMO
Director Municipal Governance/Clerk

C
Local MP and MPPs
Association of Municipalities of Ontario
Rural Ontario Municipal Association
Ontario Municipalities
Conservation Authorities in Ontario

November 19, 2025

Ministry of the Environment, Conservation and Parks
Attention: Hon. Todd McCarthy, Minister
College Park, 5th Floor,
777 Bay St.,
Toronto, Ontario
M7A 2J3

Sent via email todd.mccarthy@ontario.ca

**Re: Resolution of Essex County Council In Support of Member
Municipalities Vis-à-vis Bill 68**

The Council of the Corporation of the County of Essex held a meeting on Wednesday, November 19, 2025. At said meeting, Council raised the matter of the proposed changes to Conservation Authorities under Bill 68, and subsequently passed the following resolution:

343-2025

Moved By Sherry Bondy

Seconded By Gary McNamara

That Essex County Council direct Administration to send a letter to the Ministry of Environment, Conservation and Parks (MECP), in support of the lower-tier municipalities with jurisdiction over the Essex Region Conservation Authority (ERCA), outlining the importance of local administrative resources, board representation and maintaining existing relationships with the local conservation authority following the Minister's review under current proposed legislation; and,

That said letter include copies of the letters received from the municipalities of Essex County; and,

That the letter be forwarded to the seven lower-tier municipalities of the County of Essex, the City of Windsor, the Township of Pelee, ERCA, local MPPs, Association of Municipalities of Ontario (AMO), and the Western Ontario Warden's Caucus (WOWC).

Carried Unanimously

Resolution of Essex County Council In Support of Member Municipalities Vis-à-vis Bill 68

November 19, 2025

As such, please find attached letters from the County of Essex Member municipalities, being the Town of Amherstburg, Town of Essex, Town of Kingsville, Municipality of Lakeshore, Town of LaSalle, Municipality of Leamington and the Town of Tecumseh.

The County is committed to fostering an open and productive relationship with the Province as you navigate and work through the process of modernizing legislation and programs. If you wish to discuss the Bill 68 proposed amendments with Essex County Warden, Hilda MacDonald, or if clarification regarding this correspondence is required, please contact the undersigned.

Regards,



Katherine J. Hebert
County Clerk

CC:

- Andrew Dowie, MPP Windsor-Tecumseh, Parliamentary Assistant to the Minister of the Environment, Conservation and Parks
andrew.dowie@pc.ola.org
- Anthony Leardi, MPP Essex, Deputy Government House Leader, Parliamentary Assistant to the Minister of Health anthony.leardi@pc.ola.org
- Hon. Trevor Jones, MPP Chatham-Kent-Leamington, Minister of Agriculture, Food and Agribusiness trevor.jones@pc.ola.org
- Association of Municipalities of Ontario Robin Jones, President
amopresident@amo.on.ca Brian Rosborough, Executive Director,
brosborough@amo.on.ca
- Western Ontario Wardens' Caucus Kate Burns Gallagher, Executive Director
kate@wowc.ca Amy Martin, Chair chair@wowc.ca
- Sandra Zwiers, Chief Administrative Officer, County of Essex
szwiers@countyofessex.ca
- Clerks of the Town of Amherstburg, Town of Essex, Town of Kingsville, Municipality of Lakeshore, Town of LaSalle, Municipality of Leamington, Town of Tecumseh

Resolution of Essex County Council In Support of Member Municipalities Vis-à-vis Bill 68

November 19, 2025

- Steve Vlachodimos, City Clerk & Licence Commissioner - City of Windsor
svlachodimos@citywindsor.ca
- Jude Malott, Deputy Treasurer/Clerk - Township of Pelee
jude.malott@pelee.ca
- Tim Byrne, Essex Region Conservation Authority tbyrne@erca.org



December 10, 2025

Attn: The Honourable Todd J. McCarthy
Minister of Environment, Conservation and Parks
Essex Region Conservation Authority
777 Bay Street, 5th Floor
Toronto, ON M7A 2J3

Re: Letter of Support for ERCA's Opposition to the Conservation Authority Consolidation

Dear Honourable Minister McCarthy,

On behalf of the Town of Amherstburg Council, I am writing to convey our support for the Essex Region Conservation Authority's (ERCA) position and to share our concerns regarding the Province's proposed consolidation of conservation authorities. We believe this initiative could have significant implications for local municipalities and the vital environmental services provided by conservation authorities.

Smaller municipalities typically lack the specialty staff resources to provide the expertise that local conservation authorities have provided for decades. With the proposed conservation authority consolidation, additional expenses will be incurred as part of many Planning Act applications to ensure compliance with applicable legislation. This means both the developer and the municipality will pay more to implement the proposed legislative change. The burden will particularly be felt by smaller and rural municipalities that have many natural features that require protection and also to ensure that development can safely occur for the future users of buildings in areas subject to natural hazards.

We are concerned that consolidation would eliminate the local expertise provided by ERCA. Their knowledge of the area's history, flooding patterns, and erosion issues is critical to informed decision-making. Our strong relationship with ERCA enables efficient communication and quick permit turnaround. Under consolidation, we anticipate longer wait times, reduced access to staff, and delays that could frustrate municipalities, builders, and residents. Increased uncertainty for developers may lead to disputes, further delaying permits beyond Ontario Building Code timelines.

Please be advised that Council of the Town of Amherstburg, at its meeting held on Monday, November 24, 2025, passed the following resolution:

Resolution: 20251124 – 010

Moved By: Councillor Allaire
Seconded By: Councillor Pouget



That:

1. The Town of Amherstburg submit comments to the Environmental Registry of Ontario (ERO) expressing its opposition to the Province's proposed conservation authority consolidation, supporting the rationale and concerns outlined in the Essex Region Conservation Authority (ERCA) resolution, and further expressing the Town's concern that such consolidation may result in additional financial and operational burdens being downloaded onto municipalities.
2. This correspondence be sent to all neighbouring municipalities and Essex County Council.

The Mayor put the Motion.

Motion Carried

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Michael Prue". The signature is written in a cursive style.

Michael Prue, Mayor
Town of Amherstburg

Cc: City of Windsor
County of Essex
Municipality of Lakeshore
Municipality of Leamington
Town of Essex
Town of Kingsville
Town of LaSalle
Town of Tecumseh



BY EMAIL

December 19, 2025

Essex Region Conservation Authority
360 Fairview Avenue West
Essex, ON N8M 3G4
Email: admin@erca.org

Re: Opposition to Proposed Consolidation of Conservation Authorities

At its Regular Council Meeting held on December 1, 2025, Council supported a notice of motion on the Opposition to the Proposed Consolidation of Conservation Authorities.

R25-12-544

Moved By Councillor Matyi
Seconded By Mayor Bondy

Whereas the Essex Region Conservation Authority (ERCA) Board of Directors has adopted a formal resolution outlining significant concerns with the proposed “Lake Erie Region” boundary configuration, citing issues related to geographic coherence, local accountability, transition costs, service continuity, and the unique hydrological and environmental characteristics of the Essex Region; and

Whereas the Town of Essex places a high priority on effective watershed management, timely permitting, coordinated hazard mitigation, and the protection of local residents and property from flooding, sheet flooding, shoreline erosion, and other natural hazards; and

Whereas it is essential that municipalities understand the potential impacts of the proposed restructuring on frontline services, local permitting, environmental protection, and long-term watershed planning in our region.



Now Therefore, be it Resolved That Council direct Administration to prepare and send a letter to the Essex Region Conservation Authority (ERCA) expressing the Town of Essex's support for the ERCA Board's position regarding the proposed Conservation Authority consolidation as outlined in Environmental Registry Notice 025-1257 and that this resolution be circulated to ERCA member municipalities for their information; and

That Council direct the Town's Clerk to submit the Town's comments to the Province's consultation portal for Environmental Registry Notice 025-1257 by December 22, 2025.

Carried

We trust you will find this satisfactory. If you have any questions or comments, please feel free to contact the undersigned.

Yours truly,

A handwritten signature in black ink, appearing to read "jmall", written in a cursive style.

Joseph Malandrucolo
Director, Legal and Legislative Services/Clerk
jmalandrucolo@essex.ca

Enclosure

cc:

Honourable Doug Ford
County of Essex
Municipality of Lakeshore
Municipality of Leamington
Town of Amherstburg
Town of Kingsville
Town of LaSalle
Town of Tecumseh



December 10, 2025

The Honourable Doug Ford
Premier of Ontario
Legislative Building, Queen's Park
Toronto, ON M7A 1A1
Via Email: premier@ontario.ca

Re: Opposition to Proposed Consolidation of Conservation Authorities

Council of the Town of LaSalle, at its Regular Meeting held Tuesday, December 9, 2025 passed the following resolution:

324/25

Moved by: Councillor Renaud
Seconded by: Councillor Seguin

“That the correspondence dated November 19, 2025, from the Town of Kingsville concerning its opposition to the proposed consolidation of Ontario’s conservation authorities be supported;
And that a letter of support be forwarded to Premier Ford.”

Carried.

Please consider this letter as confirmation of the Town of LaSalle’s support of the above matter.

Yours Truly,

Jennifer Astrologo
Director of Council Services/Clerk
Town of LaSalle
jastrologo@lasalle.ca

Encl. Resolution of Town of Kingsville RE: Opposition to Proposed Consolidation of Conservation Authorities

cc: (via email) County of Essex
Essex Region Conservation Authority



2021 Division Road North
Kingsville, Ontario N9Y 2Y9
Phone: (519) 733-2305
www.kingsville.ca

November 19, 2025

Honourable Doug Ford, Premier of Ontario
Via Email: premier@ontario.ca

Public Input Coordinator
Via Email: ca.office@ontario.ca

Dear Premier Ford,

Re: Opposition to Proposed Consolidation of Conservation Authorities

Please be advised that at its Regular Meeting held Monday, November 17, 2025, the Council of the Corporation of the Town of Kingsville passed the following resolution respecting the matter referenced in the above subject line:

195-11172025

Moved By: Councillor Neufeld

Seconded By: Councillor Patterson

Whereas the Conservation Authorities Act, 1990 (the "Act"), originally enacted in 1946, was established to allow municipalities to form conservation authorities that are equipped to develop and deliver local, watershed-based conservation, restoration and natural resource management programs on behalf of the province and municipalities;

And whereas there are thirty-six (36) conservation authorities in Ontario, each of which is distinct and reflects the unique environmental, geographic and community needs of its watershed;

And whereas on October 31, 2025, the Minister of the Environment, Conservation and Parks announced the Government's intention to introduce legislation which would amend the Act to create the Ontario Provincial Conservation Agency and consolidate Ontario's 36 conservation authorities into seven (7) regional conservation authorities.

Now therefore be it resolved that the Council of the Corporation of the Town of Kingsville:

- Wishes to formally state that it opposes the consolidation of Ontario's conservation authorities without knowing the full financial and operational impact to municipalities and the conservation authorities; and,

- Directs the Acting Clerk to forward a copy of this resolution to the Honourable Doug Ford, Premier of Ontario, the Honourable Minister of the Environment, Conservation and Parks, Todd McCarthy, the Honourable Rob Flack, Minister of Municipal Affairs and Housing, Anthony Leardi, MPP, Essex, Lisa Gretzky, MPP Windsor West, Andrew Dowie, MPP Windsor-Tecumseh, Trevor Jones, MPP Chatham-Kent-Leamington, AMCTO, AMO and all Ontario Municipalities.

Carried.

Please accept this correspondence as an official confirmation of Council's decision with respect to the same. Any questions may be directed to the undersigned.

Sincerely,



Angela Toole
Acting Manager of Municipal Governance/Clerk
519-733-2305 ext. 223
atoole@kingsville.ca

cc. Honourable Todd McCarthy, Minister of the Environment, Conservation and Parks
Honourable Rob Flack, Minister of Municipal Affairs and Housing
Anthony Leardi, MPP, Essex
Lisa Gretzky, MPP, Windsor West
Andrew Dowie, MPP, Windsor-Tecumseh
Trevor Jones, MPP, Chatham-Kent-Leamington
Essex Region Conservation Authority
Conservation Ontario
AMCTO
AMO
All Ontario Municipalities

December 18, 2025

The Honourable Todd J. McCarthy
Minister of Environment, Conservation and Parks
Essex Region Conservation Authority
777 Bay Street, 5th Floor
Toronto, ON M7A 2J3

RE: Opposition to the Proposed Consolidation of Ontario's Conservation Authorities

Dear Minister McCarthy,

On behalf of the Municipality of Lakeshore, I am writing to provide formal municipal feedback and to express our opposition to the proposed regional consolidation of Ontario's conservation authorities.

The Municipality of Lakeshore is currently a member of both the Essex Region Conservation Authority (ERCA) and the Lower Thames Valley Conservation Authority (LTVCA). While these authorities provide similar categories of services, they operate within distinct watershed systems and geographic contexts. Their localized governance and technical expertise enable timely, informed decision-making that reflects the specific environmental, land-use, and development conditions within their respective jurisdictions.

The proposed consolidation into a "Lake Erie Regional Conservation Authority," encompassing more than 80 municipalities across a broad and diverse geographic area extending as far north as Dufferin County, raises significant concerns. The scale of this proposed authority is inconsistent with effective watershed-based management and risks diminishing local accountability, responsiveness, and service quality.

Lakeshore has not experienced administrative duplication or inefficiencies through its participation in both ERCA and LTVCA. To the contrary, the two authorities work collaboratively where appropriate while maintaining a clear focus on their individual watersheds. From our perspective, this model supports efficiency, strong municipal relationships, and effective service delivery. A single authority of this size would likely create service gaps, delay Planning Act responses, and challenge the ability to meet provincially mandated timelines and housing objectives.

The Municipality supports the Province’s objective of ensuring consistent access to technical expertise and capacity across conservation authorities. However, we do not believe amalgamation is the appropriate mechanism to achieve this outcome.

Conservation authorities have demonstrated that shared services, inter-authority collaboration, and targeted provincial investment can address capacity challenges without compromising local governance or watershed-specific knowledge. Centralization also risks weakening the effectiveness of Source Protection Committees by distancing decision-making from the local conditions and stakeholder relationships that are essential to identifying risks and developing practical, locally informed policies.

The proposed implementation timeline further heightens these concerns. Introducing significant structural changes during a municipal election year, with no overlap for newly appointed council members, risks the loss of institutional knowledge and disruption to service continuity—particularly for smaller municipalities that rely heavily on conservation authority expertise.

In light of ongoing regulatory and policy changes affecting land use planning, environmental protection, and housing delivery, it is increasingly important that municipalities retain access to locally governed conservation authorities with deep, watershed-specific expertise. The Municipality of Lakeshore respectfully urges the Province to reconsider the proposed consolidation and to work collaboratively with municipalities and conservation authorities to pursue alternative approaches that strengthen capacity and consistency while preserving effective local governance and watershed-based management.

Thank you for your consideration of the Municipality of Lakeshore’s position. We would welcome the opportunity to continue this dialogue and to work constructively with the Province toward solutions that support both environmental protection and responsible growth.


Sincerely,


Mayor Tracey Bailey
Municipality of Lakeshore



**Hilda MacDonald
Mayor**

Municipality of Leamington

 519-326-5761

 mayor@leamington.ca

 MayorHildaMacDonald

OFFICE OF THE MAYOR

December 2, 2025

Ministry of the Environment, Conservation and Parks
5th Floor, 777 bay Street
Toronto, Ontario
M7A 2J3

Attn: The Honourable Todd McCarthy, Minister of the Environment,
Conservation and Parks

Dear Sir:

**Re: Opposition to Proposed Boundaries for the Regional
Consolidation of Ontario's Conservation Authorities**

Please be advised that at its meeting held on November 28, 2025,
Leamington Council passed the following resolution respecting the matter
referenced in the above subject line:

No. C-267-25

Moved by: Deputy Mayor Verbeke
Seconded by: Councillor Latam

**That Council direct the Mayor to send a letter to the Ministry of the
Environment, Conservation and Parks regarding opposition to the
proposed boundaries for the regional consolidation of Ontario's
Conservation authorities.**

Carried

Please accept this correspondence as an official confirmation of Council's
decision with respecting to same.

Sincerely

Hilda MacDonald, Mayor



The Corporation of the Town of Tecumseh

December 1, 2025

Honorable Doug Ford, Premier of Ontario

By Email: premier@ontario.ca

Public Input Coordinator

By Email: ca.office@ontario.ca

Dear Premier Ford,

Re: Opposition to Proposed Consolidation of Conservation Authorities

The Council of the Town of Tecumseh, at its regular meeting held Tuesday, November 25, 2025, gave consideration to a resolution passed by the Town of Kingsville, dated November 19, 2025, on the Opposition to the Proposed Consolidation of Conservation Authorities. The Town of Kingsville has requested support regarding their said resolution, a copy of the resolution is enclosed.

At their meeting, Tecumseh Council passed the following resolution:

“Motion: RCM - 284/25

Moved by Deputy Mayor Joe Bachetti
Seconded by Councillor Alicia Higgison

Whereas the *Conservation Authorities Act, R.S.O. 1990, c.C.27* (the “Act”), originally enacted in 1946, was established to allow municipalities to form conservation authorities that are equipped to develop and deliver local, watershed-based conservation, restoration and natural resource management programs on behalf of the province and municipalities;

And whereas there are thirty-six (36) conservation authorities in Ontario, each of which is distinct and reflects the unique environmental, geographic and community needs of its watershed;

And whereas on October 31, 2025, the Minister of the Environment, Conservation and Parks announced the Government’s intention to introduce legislation which would amend the Act to create the Ontario Provincial Conservation Agency and consolidate Ontario’s 36 conservation authorities into seven (7) regional conservation authorities.

Now Therefore Be It Hereby Resolved:

That the Council of The Corporation of the Town of Tecumseh wishes to formally state that it opposes the consolidation of Ontario's conservation authorities without knowing the full financial and operational impact to municipalities and the conservation authorities;

And that Council directs the Clerk to forward a copy of this resolution to the Honorable Doug Ford, Premier of Ontario; the Honorable Minister of the Environment, Conservation and Parks, Todd McCarthy; the Honorable Rob Flack, Ministry of Municipal Affairs and Housing; Anthony Leardi, MPP; Essex, Lisa Gretzky, MPP Windsor West; Andrew Dowie, MPP Windsor-Tecumseh; Trevor Jones, MPP Chatham-Kent-Leamington; Association of Municipal Managers, Clerks and Treasurers of Ontario, Association of Municipalities of Ontario and all Ontario Municipalities.

Carried.”

Please consider this letter as an official confirmation of the Town of Tecumseh's support of the resolution. Any questions may be directed to the undersigned.

Yours very truly,



Robert Auger, LLB
Director Legislative Services & Clerk

RA/gj
Attachment

1. Town of Kingsville Resolution dated November 19, 2025
- cc. Honorable Todd McCarthy, Minister of the Environment, Conservation and Parks
Honorable Rob Flack, Minister of Municipal Affairs and Housing
Anthony Leardi, MPP, Essex
Lisa Gretzky, MPP, Windsor West
Andrew Dowie, MPP, Windsor-Tecumseh
Trevor Jones, MPP, Chatham-Kent-Leamington
Essex Region Conservation Authority
Conservation Ontario
Association of Municipal Managers, Clerks and Treasurers of Ontario
Association of Municipalities of Ontario
All Ontario Municipalities

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December 19, 2025

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North Tower, 5th Floor
Peterborough, ON
K9J 3C7

Via Email: ca.office@ontario.ca

Re: ERO#025-1257 Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Kettle Creek Conservation Authority (KCCA) is one of Ontario's 36 conservation authorities and is governed by a Board of 10 municipally appointed members from 7 municipalities. The Board reviewed the "Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities" in concert with Schedule 3 of Bill 68 which outlines the creation of the new Ontario Provincial Conservation Agency (OPCA).

KCCA acknowledges the province's continued recognition of the vital role that conservation authorities play in delivering watershed management across Ontario and the province's commitment that Conservation Authorities (CAs) will continue to provide not only their important work in natural hazards, but the full range of programs and services such as tree planting, stewardship, environmental monitoring and outdoor recreation. Conservation Authorities are recognized worldwide for excellence in watershed management and public safety.

Overall, the proposal to consolidate 36 CAs into 7 regional CAs lacks sufficient detail or assurances on how local decision-making, knowledge, and community involvement will be preserved in a regional model. The proposed scale of consolidation introduces significant risk that the community-based framework upon which CAs were founded, rooted in responsiveness to the community, local municipal governance and watershed-scale decision making, could be fundamentally and permanently diminished.

Without a detailed cost-benefit analysis, meaningful consultation with municipalities and stakeholders, and a clear transition/implementation plan, the risks associated with consolidation at the proposed scale outweigh the potential benefits. Without this critical information, the proposal may unintentionally lead to higher short and long-term costs, reduced service efficiencies and slower approval for natural hazards plan input, review and permitting – areas where CAs, like KCCA, are currently meeting or exceeding provincial guidelines.

KCCA remains committed to modernization and continues to pursue efficiencies and economies of scale but never at the risk of local program delivery. We welcome provincial investment in the future of watershed management, including e-permitting, updated technical guides and sustainable funding for mapping and natural hazard infrastructure. However, it remains unclear why these improvements cannot be achieved within the existing CA framework.

KCCA's Board of Directors encourages the province to work collaboratively with municipalities, local conservation authorities and community partners to determine whether consolidation, at any scale, is the most strategic and effective approach to achieve both provincial and local objectives.

The *Conservation Authorities Act (1946)* envisioned agencies built on municipal-provincial partnership, watershed-based planning and strong local involvement. As Ontario considers the future state of CAs, it is essential that local governance, local representation, local staff and local programming be retained.

Please find attached Appendix 1: KCCA's Official Comments on ERO #025-1257. For further clarification or discussion, please contact the undersigned.

Sincerely,

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

Todd Noble
Chair, KCCA Board of Directors

Encl. Appendix 1 – KCCA's Official Comments on ERO #025-1257

1. Key Factors for a Successful Transition and Outcome

Comment	Explanation
<p>Preserve Local Municipal Governance and Decision-Making</p>	<p>A foundational principle of the <i>Conservation Authorities Act</i> (1946) is that municipalities create and govern their own conservation authorities. KCCA was formed in 1965 and currently has 7 member municipalities represented by 10 municipally appointed Board members. The watershed boundary is 520 km² encompassing the City of London’s rural southern edge, the majority of the City of St. Thomas and the rural Municipalities of Thames Centre, Middlesex Centre, Central Elgin, and the Townships of Southwold and Malahide.</p> <p>Under the proposed Lake Erie Regional Conservation Authority, 8 CAs and 81 municipalities would be merged into a ~20,000 km² region. Kettle Creek would represent roughly 3% of the land base with its rural municipalities being overshadowed by larger urban centres. If Board representation remains population-based, municipalities in the Elgin–Middlesex region could see their guaranteed representation reduced to a single shared seat, undermining their current level of influence over local watershed priorities.</p> <p>Recent changes to the <i>Conservation Authorities Act (CA Act)</i> strengthened local accountability through municipal agreements. In the Kettle Creek watershed, all member municipalities agreed to financially support tree planting and environmental monitoring programs. Regionalization risks diluting this autonomy. As the largest outside contributor to CA budgets, municipalities must continue to have the same equitable representation and voice they are afforded today. Meaningful municipal representation must be protected at every level of decision-making in the future.</p>
<p>Regional Representation on OPCA</p>	<p>Bill 68 grants the Ontario Provincial Conservation Authority (OPCA) broad directive-making authority across governance, strategy, budget, and operations of regional conservation authorities. However, there is no indication that the OPCA Board will have municipal or regional representation that balances urban and rural communities. Consideration should be given to ensure appointments to the OPCA represent municipalities from across Ontario.</p>

Comment	Explanation
<p>Provide for Greater Transparency and Consultation</p>	<p>The CA Act already outlines a clear process for amalgamation that includes public notice, municipal involvement and a two-thirds majority vote. The current proposal bypasses these safeguards.</p> <p>Launching the new governance model with a 2027 implementation date gives insufficient time for municipal councils, CAs or residents and stakeholders to evaluate impacts, assess risk or propose alternatives.</p> <p>If the goal of consolidation is to improve consistency, free up resources for front-line conservation and provide faster service, these objectives can be met within the existing CA framework through shared services, technological advancements (i.e. e-permitting) and policy alignment.</p> <p>KCCA supports modernization efforts for the natural hazards program areas and is ready to collaborate.</p> <p>If strategic amalgamation of CAs is required to further modernize CAs it should be done using the consultative process outlined in the Act – mainly at the bequest of the involved municipalities and with ample opportunity for the public and other stakeholders to contemplate the desired and undesired outcomes and have meaningful input into the proposed boundaries.</p>
<p>Provide Dedicated Provincial Funding for the Transition and OPCA</p>	<p>There would be substantial costs associated with merging 8 CAs into the Lake Erie Regional CA including but not limited to:</p> <ul style="list-style-type: none"> • IT and data system integration • HR and union harmonization (2 CAs within the proposed Lake Erie Region are unionized while the other 6 are not) • Fee and policy alignment • Corporate service restructuring • Rebranding, signage • Legal transitions • Asset and liability assessment <p>Municipalities should not be expected to absorb these expenses while simultaneously losing influence over governance.</p>

Comment	Explanation
	<p>Further, as outlined in Bill 68, the OPCA has the ability to apportion costs to regional CAs and charge fees. Municipalities through the RCAs should not be expected to fund the OPCA, a provincially mandated agency. The OPCA and its services should be fully funded by the Province in the short and long-term.</p>
<p>Protect and Enhance Existing Service Levels</p>	<p>Local CA staff are able to attend site visits, hold face-to-face meetings and know the local geography, stakeholders and political landscape. Despite increasing levels of development in the area, KCCA issues 100% of permits within the provincial guidelines and on average is issuing permits within 7-10 days of receiving a complete application. The local municipalities also rely on having a dedicated KCCA staff contact.</p> <p>Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. A larger bureaucratic structure will often increase delays, reduce responsiveness, weaken local expertise and reduce “boots on the ground” capacity.</p> <p>CAs are more than just regulatory agencies, they are part of the community. Working with the watershed community, KCCA plants 50,000 trees, creates wetlands, establishes tallgrass prairies, manages invasive species and engages over 2,000 students through outdoor education events every year. The delivery of this local programming is based on community relationships built over time and associated with a network of local assets. For instance, local tree planting programs will be more difficult to operate if local infrastructure such as coolers are not maintained and local staff are not retained to provide one-on-one support to landowners.</p>
<p>Financial and Legal Due Diligence</p>	<p>Each CA in the proposed region has vast landholdings, complex capital assets (i.e. water control infrastructure), financial assets and liabilities, conservation foundations, ongoing legal proceedings and unique local agreements. A thorough financial and legal due diligence analysis is necessary to assess restrictions and complexities on transferring these assets from local control to regional oversight.</p> <p>Each CA also has reserves that have been carefully curated to account for local programs and services including asset management. There should be assurance that these reserves will be protected in any consolidation and only be assigned to their original intended local use. Local reserves should remain</p>

Comment	Explanation
	<p>within the original watershed and serve the local need for which it was intended.</p> <p>Local buying power cannot be lost in the regional model. In a regional model, local accounting firms, banks, IT companies, engineering firms, and countless local service providers may lose business if the OPCA or RCA is directing large-scale regional procurement policies and centralized purchasing.</p>
<p>Maintain Local CA Board Beyond 2026</p>	<p>Local input and buy-in will be imperative to the success of any new framework. Therefore, the existing CA Boards should remain in place beyond 2026 and the pace of any proposed consolidation should be staged.</p> <p>The local CA Boards, with municipal input, could help outline the most effective level of strategic consolidation to achieve both provincial and local objectives. Local CA boards would be able to provide guidance and ensure that local assets are protected and accounted for through the transition to any new regional model.</p> <p>Moreover, with guidance and resources from the OPCA, the existing CA Boards could work toward achieving short term goals of consistent policies and improved mapping while simultaneously planning for the more complex transition to a regional framework. This would allow for incremental changes and provide time for staff and stakeholders to acclimatize to the culture change gradually rather than changing long-standing relationships and working arrangements overnight.</p> <p>Keeping current CA Boards and staging consolidation in well-defined phases with transparent consultation will help to retain experienced staff.</p>

2. Potential Opportunities or Benefits

Comment	Explanation
<p>Provincial Investment</p>	<p>KCCA has long supported shared services where economies of scale can be achieved. This commitment is demonstrated through the <i>Long Point Region Conservation Authority and Kettle Creek Conservation Authority Co-Operative Efficiency Study</i> completed in 2010. The study led to several successful shared service initiatives, including shared GIS services, joint studies, collaborative funding applications, and stewardship projects. Another example is the Elgin Clean Water Program, a collaborative initiative between CAs within Elgin County. Administrated by KCCA, and delivered locally in each watershed by KCCA, LPRCA, CCCA and LTVCA, the Elgin Clean Water Program has provided ~\$1,000,000 to over 350 projects since 2012 - proving that collaboration can occur without consolidation.</p> <p>Centralized policy development and training related to the natural hazards program was also identified as an achievable shared service in the KCCA LPRCA Efficiency Study that could improve consistency with provincial guidelines and enhance customer service. However, provincial technical guides that would inform consistent policy development were under review and unavailable – and remain unavailable today.</p> <p>Improvements to the delivery of hazard planning, plan input and permitting could be realized without consolidation if the province or OPCA provided the following:</p> <ul style="list-style-type: none"> • Updated Provincial Technical Guides • Consistent flood standards for all CAs • Adequate funding to regularly update flood and regulation mapping <p>If the province’s overall goal is to improve approval timelines and create greater consistency, investments would have greater impact by strengthening front-line resources within the existing framework. Directing provincial funds toward updated mapping, technical guidance, coordinated policy development and modernized e-permitting tools would generate immediate and province-wide benefits.</p>

3. Governance Structures Considerations

Comment	Explanation
<p>Reduce the Geographical Area of the Proposed Consolidation</p>	<p>When developing the proposed regional CAs, the province based decisions on watershed-based jurisdictions, administrative duplication and balancing expertise. This approach has created regions that are geographically too vast and do not account for existing working relationships between CAs and municipalities. Additional criteria should have been considered including established working relationships between CAs and municipalities, and the differing needs of rural and urban communities.</p> <p>A core strength of the existing CA governance model is that local decisions are made by municipal representatives who understand their community’s unique issues and have a vested interest in the CA budget. To protect service levels and meaningful decision making, the geographic scope of the Lake Erie Regional CA needs to be significantly reduced.</p> <p>A more scoped consolidation of CAs in the Lake Erie Region would have a better economy of scales and preserve local decision-making without increasing bureaucracy.</p>
<p>Create a Governance Model That Is Functional and Fair</p>	<p>Applying current legislative population formulas would produce a Lake Erie Regional CA Board of approximately 120 members, which is unmanageable and ineffective. A Board of this size risks a loss of local perspectives and challenges in achieving timely, responsive decisions. There is a loss of local municipal representation in the proposed consolidation.</p> <p>A workable Board should be:</p> <ul style="list-style-type: none"> • Large enough to represent watershed municipalities, yet small enough to operate efficiently; • Balanced in terms of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demands • Structured to preserve meaningful local influence and maintain strong communication with local watershed communities. <p>Based on the current proposed regional boundaries, creating a functional Board with under 30 members would be unachievable. A reduced geographical consolidation would be required for a functional Board.</p> <p>KCCA advocates that the existing CA boards should remain in place to guide modernization efforts, including shared services and ultimately through any transition period of required consolidations. In the</p>

	<p>short-term, existing CA boards can work with the OPCA to inform modernization of services such as e-permitting while simultaneously evaluating the most appropriate consolidation of CAs that maintain the same level of municipal representation and local service delivery and reduce administrative duplication.</p>
<p>Hybrid Regional Governance Model</p>	<p>A governance model similar to the Lake Erie Source Protection Region allows for shared services and expertise between CAs while simultaneously protecting local autonomous decision making and governance. The Lead Source Protection Authority already informs the Source Water Protection program in concert with local autonomous source protection authorities (SPA). This model could be extended to other provincially mandated programs and services. With proper provincial funding, and oversight from the OPCA, the Lead SPA can provide technical expertise, resources and policies to the SPAs on mandated programs and services for delivery at the local level. However, the SPAs would remain autonomous and control budget and policies for non-mandated programs and services protecting local service delivery.</p> <p>In a hybrid regional model, CAs would continue to be governed by local Boards made up of representatives from member municipalities. The CAs would name representatives (Chair and Vice Chair) to a Regional Board that would govern the delivery of the mandated programs and services and act as the Region’s Hearing Board under the guidance and expert staff of the Lead CA.</p> <p>A hybrid regional model where a lead CA and regional board oversee certain mandatory program areas while autonomous local CA boards oversee non-mandatory local service delivery provides the consistency the province is advocating for and the protection of local decision making and programming that must be retained.</p>
<p>Maintain Municipal Appointment Authority</p>	<p>Based on the funding municipalities provide to CAs, in any size of consolidation, municipalities must retain full authority to appoint representatives to regional conservation authorities to ensure accountability, transparency, and strong alignment with local priorities. Section 8 of the <i>Conservation Authorities Act</i> (“Grouping of municipalities”) should remain intact, allowing smaller municipalities to jointly appoint a representative when needed.</p> <p>Appointments to the Ontario Provincial Conservation Agency should include municipal appointments from each of the RCA boards to ensure local perspectives remain connected to provincial decision-making.</p>

4. Maintaining a Transparent and Consultative Budgeting Process

Comment	Explanation
Fully Fund the Transition Provincially	<p>Integration costs associated with consolidation, including IT, HR, capital, data, governance, and branding, will be extensive and must not fall to municipalities. Municipalities already fund approximately 30% of CA total budgets and in the case of KCCA over 70% of the natural hazards program areas. KCCA has self-funded flood mapping updates and regulatory map updates with reserves and funding proposals to keep the municipal apportionment within target. Adding costs of integration and OPCA operational costs on the municipal apportionment will tax already burdened municipalities. Integration costs could be minimized if the province chose first to concentrate on building consistency within the natural hazards program under the existing framework and provided the necessary resources to achieve this in an accelerated timeline. The province should fully fund the OPCA and all consolidation costs.</p> <p>Smaller CAs such as KCCA have unique funding models that are not seen elsewhere in the province. For instance, KCCA does not currently charge planning fees; planning costs are partially recouped through a Special Levy to member municipalities to ensure stable program funding. Any consolidation process must account for these unique models. Should planning fees be introduced to align with other CAs, the shift would require clear and early communication with the public.</p>
Ensure Fair Apportionment and Local Accountability	<p>There is a risk that larger municipalities could end up subsidizing areas with a smaller tax base. Any apportionment model must allow municipalities to see their contributions directed to the assets and services within their local area. This is more achievable with a smaller, more strategic consolidation.</p> <p>Each subwatershed (e.g., Grand, Kettle, Catfish, Upper Thames etc.) should remain responsible for an annual budget reported independently within the regional framework. This maintains fiscal transparency for municipalities and stakeholders and ensures that local communities can clearly see the value of their investments.</p>
Engage Municipalities in Budget Development	<p>Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Variations in land type, fee structures, property assessment, and asset conditions must all be accounted for.</p>

	<p>Within KCCA’s current watershed jurisdiction, municipal budgeting processes vary greatly, with some but not all using a four-year budget cycle. The complexity of streamlining CA budgets into the municipal budget process with the same level of input and consultation as is currently used would be difficult to navigate. Smaller regional consolidation would allow for municipalities and CAs to continue to work together on building right-sized budgets for local program delivery.</p> <p>To ensure communities can clearly see their contributions and benefits, each current watershed should maintain its own operating budget and produce watershed-level reporting. This transparency reinforces municipal trust and demonstrates continued value at the local level.</p>
<p>Maintain Local Procurement and Accountability for Purchasing</p>	<p>CAs were built on and thrive on the local community connections including the procurement of local services. Even under a regional model, local staff/field offices should maintain control over their own annual operational budgets and have the ability to source local goods and services. Each subwatershed in the proposed Lake Erie region (Grand, Kettle, Catfish, Upper Thames etc.) should be accountable for an annual budget within the regional framework and be reported separately on the Financial Statements and annual reports to ensure that municipalities and stakeholders can see value for their money and local communities.</p>

5. Maintaining and Strengthening Local Relationships

Comment	Explanation
<p>Retain a Strong Local Presence</p>	<p>Local offices and staff are fundamental to timely permitting, effective operations, meaningful community engagement, and on-the-ground stewardship. Maintaining local expertise ensures that decisions reflect the unique environmental conditions of each watershed, municipal priorities and community expectations. Under a regional model, local field offices must continue to manage their own programs and services, with locally raised funds, such as campground revenues, staying within the local watershed. Local hiring practices should also remain in place to preserve community knowledge and relationships.</p>
<p>Protect Local Programs</p>	<p>Locally delivered conservation authority programs such as tree planting, environmental education, outdoor recreation and stewardship are rooted in community identity. They must be preserved.</p> <p>Member municipalities within the KCCA watershed reviewed the categorization of KCCA’s programs and services and supported the current level of programming including agreements approving municipal funding for Category 2 and 3 programs such as tree planting and environment monitoring. Local municipalities should retain their ability to direct funds to local CA programming.</p> <p>Long-standing partnerships with schools, stewardship groups, service clubs, trail associations, and local contractors are also foundational to conservation work.</p>
<p>Preserve Community Access to Greenspace</p>	<p>Many municipalities depend on CA lands for public recreation because acquiring new green space is cost prohibitive. Centralizing decision-making or altering asset ownership could jeopardize access. Decisions related to land management, recreation, and asset disposition must continue to be driven by local needs, not regional or provincial priorities that may be disconnected from community realities.</p>

December 22, 2025

Via email to ca.office@ontario.ca

MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON
K9J 3C7

Dear Minister McCarthy and Chief Conservation Officer Basit:

Environmental Registry Ontario Posting No. 025-1257
Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Thank you for the opportunity to provide comments on ERO No. 025-1257 regarding the proposed boundaries for the regional consolidation of Ontario's conservation authorities.

The Lake Simcoe Region Conservation Authority (LSRCA) shares the Province of Ontario's vision for improving service delivery, increased efficiencies, improved governance while committing to working collaboratively to achieve mutually desired outcomes. At the same time, we recognize that achieving these outcomes will require careful planning, clear direction, and significant coordination to address the many operational, financial, and governance considerations involved.

The following feedback regarding the questions posed in ERO No. 025-1257 is the culmination of thorough consideration of the Province's proposal and meaningful consultation with senior staff and our Board of Directors. This collaborative approach reflects our commitment in ensuring that practical implementation challenges are addressed.

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

To identify key factors for a successful transition, we considered both the strategic and operational requirements necessary to achieve the proposed objectives. Our feedback reflects practical insights to ensure that these recommendations are grounded in experience and informed by governance best practices.

Provincial Direction and Leadership

- Early, consistent provincial guidance on mandate, expectations, governance structure, and transition objectives.

- Clear understanding of the operational role the Ontario Provincial Conservation Agency (OPCA) provides for existing conservation authorities and proposed Regional Conservation Authorities (RCA).

Governance Structure and Transition Planning

- Designated and/or established leadership teams are critical for success.
- Clearly defined roles and responsibilities for leadership teams with shared vision and defined decision-making authority.
- Province-wide transition plan with clear sequencing of milestones.
- Regional transition Board comprised of representatives from each of the existing conservation authorities within each respective RCA. This transition board may act as the bridge between the existing Boards, RCA leadership team, and the OPCA.
- Robust change management and communication strategies for staff, partners, municipalities, and the public.

Organizational Understanding and Integration

- Early assessment of organizational structures, staff complement, and technical capacities. Each conservation authority offers a range of skills and depth that needs to be fully evaluated and emboldened ensuring successful implementation.
- Harmonization of human resources policies, job descriptions, benefits, health and safety programs, and work arrangements.
- Salary grids, permitting and planning fee structures, and other related financial aspects need to be evaluated and measured within the local and regional cost of living and affordability considerations.
- Integration of information technology systems, financial platforms, and cybersecurity measures. Clear understanding of short- and long-term requirements and transition needs.

RCA and Source Protection

- Harmonization of RCA and Source Water Protection (SWP) boundaries and programs should be considered through the proposed consolidation process with clear understanding of challenges and opportunities.
- The South Georgina Bay – Lake Simcoe SWP region poses a unique challenge as a large portion of this region is not included in any conservation authority boundary.

Financial Strategy and Transparency

- Clear approach to transition financing, levy impacts, and reserve treatment, and assets.
- Funding for transition costs.
- Provincial co-funding to ensure equitable governance.

Understanding Local and Regional Priorities, Issues and Opportunities

- Developing a thorough understanding of local and watershed issues, priorities and opportunities is critical.
- Understanding the local issues, priorities and opportunities will allow for the development of a full understanding of what may be consolidated into, or is consistent with, a regional focus.
- Ignorance of local concerns, issues or voices can easily create distrust, lack of participation, conflict, and lack of stakeholder or municipal support.

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

In considering the opportunities and benefits of regional consolidation, we focused on how a unified framework could enhance governance, capacity, and service delivery. The following points highlight the potential for improved efficiency, stronger partnerships, and long-term strategic alignment.

Consistent and Transparent Governance

- A standardized upper-tier governance model will improve transparency, oversight, and strategic decision-making across watersheds. We encourage the province to consider amending the *Conservation Authorities Act* to designate the Counties as the member in the RCAs. For example, this proposed governance model would effectively change the proposed Huron-Superior RCA from approximately 80 municipalities to 15. This model proposes that counties, separated cities, and regional municipalities are the RCA members. This creates a stronger peer-to-peer relationship and greatly assists in efficient budget process for the RCA, while reducing the workload at the lower tier municipal level.
- Reduced complexity for municipal partners through fewer conservation authorities, less duplication, and more consistent policy direction.
- Opportunities may exist to expand RCA jurisdiction into areas not currently within the jurisdiction of an existing conservation authority or RCA.

Enhanced Regional Capacity and Leadership

- Greater ability to attract, retain, and coordinate senior leadership and technical expertise.
- Strengthened relationships with provincial and federal partners through a unified structure.

Strategic and Long-Term Planning Benefits

- Region-wide alignment of priorities and watershed strategies and opportunities for merging of locally driven issues or priorities.

- Improved ability to measure and report outcomes consistently across larger geographies. In the context of the proposed Huron-Superior RCA, an example of this is broader linkage to the Lake Huron and the Great Lakes programs.
- Consistent service standards and delivery.

Economies of Scale and Innovation

- Shared investments in technology and modernization. Examples may include LIDAR, software licensing, records management, asset management, and flood warning.
- Capacity-building programs and knowledge transfer opportunities across the RCA.
- Stronger relationships with larger NGOs and stakeholder groups. As an example, a regional task force with the land development and housing industry could focus on best practices, solutions transfer across the RCA, develop consistent technical standards, and much more.
- Larger potential target audience for foundations and fundraising initiatives to raise funds for both locally focused and regional programs.

Expansion of Conservation Authority Jurisdiction

- The RCA framework may allow for future expansion of conservation authority jurisdiction within Ontario. An example would be expansion from Lake Simcoe through to Georgian Bay, allowing for recognized connection to Lake Huron.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level?

In developing recommendations for governance structure, we considered models that balance representation, transparency, and efficiency. Our prompts focus on ensuring fair municipal representation and strong decision-making capacity within a regional framework.

Board Composition

- Municipal composition and representation are an absolute must. We recommend a board composition of 12 - 20 members representing the member municipalities.
- Consideration of staggered terms for board members to ensure a level of consistency over time.
- One Board chair and two Vice-Chairs with specific term limits and recommend a requirement that each of those positions must come from different primary watersheds within the region (eg. Saugeen, Lake Simcoe, Maitland).

Fairness and Transparency

- Mechanisms to ensure balanced geographic representation and prevent voting blocs.
- Clear communication protocols between regional boards and participating municipalities.

Budget Equity Representation

- The proposed Huron-Superior RCA represents a large region with significant differences in size and economic stature of member municipalities. A clearly defined system for voting regarding budget that reflects the scale of the member municipalities must be implemented similar in construct to what is currently prescribed for conservation authorities.

Clarify OPCA's Governance and Oversight

- Detailed clarity is required to fully understand the relationship of the OPCA's oversight of the RCAs, as well as its role as the agent for the government.
- Representation from across the seven proposed RCAs is encouraged.
- Clarity of reporting structure for CAO/CEOs of the RCAs under the OPCA is required.

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

Our feedback emphasizes the importance of transparency and consistency to maintain trust among member municipalities and for local ratepayers. These recommendations aim to ensure clarity in levy amounts, equitable cost-sharing, and strong provincial support for transition funding.

OPCA / Provincial Expectations

- Consistent provincial co-funding to support equitable governance and reduce municipal concerns over subsidizing provincial responsibilities.
- Strong financial and technical support for financial transition is a must.
- The province is strongly encouraged to work with the RCAs to provide detailed clarity and timeframes for all finance and budgeting expectations.
- Timely information that supports RCA budgeting processes such as apportionment is a must. Clarity around apportionment is also a must as it evolves, as there is the potential for apportionment values to increase/decrease for municipalities based on RCA composition and other factors.

Unified Budget Framework

- A single, region-wide budgeting framework with standardized assumptions, timelines, and reporting expectations.
- Regional budget oversight led by a central finance team with significant input across all local operational areas and program areas.

Transparency Measures

- Regular financial reporting at the regional level to all participating municipalities. This may include, as example, a detailed budget companion document indicating revenue and expenditure across all program areas and be expanded to provide local focus.
- During the financial transition, also ensure detailed reporting and transparency to all municipalities within the RCA (participating or not).
- Clear communication on levy requirements and benefit apportionment for all Category 1 programs and services.
- Establish clear expectations and guidelines for developing budgets and agreements for Category 2 and 3 programs to assist in transparency, consistency, and accountability.

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

When considering how to maintain strong local relationships, we focused on preserving watershed identity and ensuring meaningful engagement within a regional model. Our recommendations reflect the need for clear communication, advisory structures, and processes that keep local priorities visible and respected.

Accessibility

- The proposed RCAs generally are large geographic regions with local conservation authority offices within their respective watersheds. It is critical for the RCA leadership team to be accessible across the RCA. Establishing trust and respect is critical for the RCA to succeed and thrive. Accessibility means being available and being in the local office or the local municipality to address issues or specific topics as often as possible. Solely governing or leading from a “regional office” will not be acceptable and therefore requires support from the OPCA to ensure accessibility is a clear expectation.

Clear, Early Communication

- Regular updates to municipalities, stakeholders, and the public on governance changes and regional decision-making structures.

Preserving Local Identity

- Maintain all local current conservation authority offices as principal locations for access and information for watershed residents and other stakeholders.
- Consider the concept of a local advisory body to advance local watershed priorities and issues.
- Transparent processes for municipal input and engagement.

Decision Making

- Decision making is a critical element for success. Where possible, local decision making should be maintained and supported. Whether a permit approval, purchase order, or land management decision, a clearly defined decision-making process is required. Challenging decisions can utilize the full breadth of the RCA staff capacity when required.

Other Considerations

While regional consolidation offers clear opportunities, the success of this initiative depends on more than structural changes. It requires significant investment in planning, resources, and coordination. Without early and consistent provincial leadership, clear governance frameworks, and robust financial strategies, there is a risk that efficiencies and improved service delivery may not materialize as intended.

Harmonizing organizational systems, policies, and cultures across multiple authorities will be a complex process. Areas such as integrating information technology platforms, aligning human resources practices, managing transition costs, and ensuring consistent, holistic communications with staff and the public will require careful planning and support. Conservation authorities have advanced numerous initiatives to modernize planning and permit review processes. The recent LEAN review, along with similar reviews undertaken by other conservation authorities, should be considered and utilized to provide additional insights that inform strategic decisions related to organizational streamlining and consolidation. Rebranding efforts will also need to be coordinated thoughtfully to maintain clarity and confidence throughout the transition, helping to avoid delays and sustain staff engagement.

Maintaining strong local relationships and ensuring watershed-specific priorities remain visible within a regional model will require intentional planning and engagement. Clear communication and advisory structures will be key to preserving local knowledge and community trust, which are essential for effective conservation work.

The current fee freeze continues to create challenges. The LSRCA operates on a cost recovery basis based on the approach that development should pay for development. The ongoing fee freeze is unsustainable for the aforementioned approach. The LSRCA encourages the Minister of Environment, Conservation and Parks to lift the fee freeze for 2026.

The proposed conservation authority consolidation also creates a unique opportunity to resolve a longstanding inconsistency between the jurisdictional boundary of the Lake Simcoe Region Conservation Authority and jurisdictional boundary of the *Lake Simcoe Protection Act* (LSPA and supporting Plan). The current inconsistency is that what is known as the Upper Talbot Arm and the watershed area of the City of Orillia are within the jurisdiction of the LSPA but are not currently within the LSRCA jurisdiction. This creates challenges for application of levies under the LSPA, inconsistency of permit requirements under S.28 of the *Conservation Authorities Act*, and other related challenges. Should the proposed consolidation of conservation authorities

proceed, the province is strongly encouraged, to bring alignment between the LSPP and proposed RCA boundaries.

One of the stated considerations for the RCA consolidation of conservation authorities is to reduce the amount of conservation authorities a municipality has within their jurisdiction. Considering appropriate boundary changes that would allow for municipalities to fall within only one conservation authority would be prudent. While this may detract from a watershed principle, it would reduce duplication while increasing efficiencies and consistency.

We encourage the province to consider alternative RCA alternatives that are more reflective of scale and regional circumstances. The LSRCA recommends that the province create an RCA comprised of the LSRCA, Nottawasaga Valley Conservation Authority, and the Grey Sauble Conservation Authority, which would encompass the watersheds of Georgian Bay. We also recommend the name of the proposed RCA being the Lake Simcoe – Georgian Bay Regional Conservation Authority.

The Lakehead Region Conservation Authority is a great northern Ontario conservation authority and truly linked to the conservation authorities in northern Ontario. We recommend the province remove Lakehead from the Huron-Superior RCA.

In Conclusion

We appreciate the Province of Ontario's leadership and the opportunity to provide input. If the proposed consolidation of existing conservation authorities into regional conservation proceeds, we are committed to working collaboratively to ensure successful transition.

We look forward to continuing this dialogue and contributing to solutions that protect Ontario's watersheds and communities for the next seven generations.

Yours truly,



Councillor Clare Riepma
Chair



Rob Baldwin
Chief Administrative Officer

Staff Report

To: Board of Directors

From: Rob Baldwin, Chief Administrative Officer

Date: December 19, 2025

Subject

Lake Simcoe Region Conservation Authority's submission regarding the Ministry of the Environment, Conservation and Parks Environmental Registry Notice No. 025-1257, Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Recommendation

Whereas the Provincial Government has amended the *Conservation Authorities Act* through Bill 68 "Plan to Protect Ontario (Budget Measures)" that allows for establishing the Ontario Provincial Conservation Agency to oversee the transition to Regional Conservation Authorities, and direct the strategic direction, finances, and operational activities of the new Regional 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 consolidate Ontario's 36 conservation authorities into 7 regional entities as part of a broader consolidation; and

Whereas under this proposal, the Lake Simcoe Region Conservation Authority would be consolidated into a new "Huron-Superior Regional Conservation Authority", together with the Nottawasaga Valley Conservation Authority, Grey Sauble Conservation Authority, Saugeen Valley Conservation Authority, Maitland Valley Conservation Authority, Ausable Bayfield Conservation Authority, and Lakehead Region Conservation Authority.

Therefore, be it Resolved That Staff Report No. 40-25-BOD regarding Lake Simcoe Region Conservation Authority's Environmental Registry of Ontario response to proposed consolidation of Conservation Authorities be received; and

Further that the Attachment A, the Lake Simcoe Region Conservation Authority's comments letter, be approved for submission by the December 22, 2025 deadline for submissions; and



Further That the Lake Simcoe Region Conservation Authority recognizes and supports the Province’s desired outcome of improved consistency and modernized digital permitting processes, aligned with its goals and objectives for cutting red tape and getting more homes built faster, and safely; and

Further That the Lake Simcoe Region Conservation Authority recommends that the Province engages in detailed consultation with all conservation authorities, municipalities, and watershed stakeholders in a meaningful manner and provide the detailed information required to implement such a significant undertaking; and

Further That should the proposed regional consolidation of conservation authorities be implemented, the current implementation of the *Lake Simcoe Protection Act* and Plan by the Lake Simcoe Region Conservation Authority be transferred to the proposed Huron-Superior Region Conservation Authority; and

Further That should the proposed consolidation proceed, the Lake Simcoe Region Conservation Authority requests the Province establish consistency between the *Lake Simcoe Protection Act* jurisdiction and the Lake Simcoe Region Conservation Authority jurisdiction through the inclusion of Upper Talbot River Arm and the portion of the City of Orillia that is within the Lake Simcoe watershed; and

Further That the Lake Simcoe Region Conservation Authority recommends the removal of the Lakehead Region Conservation Authority from the proposed Huron-Superior Regional Conservation Authority.

Purpose of this Staff Report

The purpose of this Staff Report No. 40-25-BOD is to provide input from the Lake Simcoe Region Conservation Authority regarding proposed consolidation of Ontario’s 36 Conservation Authorities into 7 regional agencies. This input will be formally provided as a submission in response to the Ministry of the Environment, Conservation and Parks Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities”).

Background

The Province has passed legislation to create the Ontario Provincial Conservation Agency, which is intended to oversee consolidation of Ontario’s current 36 Conservation Authorities into seven regional authorities, and over the long term, provide oversight of those regional conservation authorities. The stated objectives behind the proposed changes are to streamline and modernize planning approvals, improve consistency across the Province in agency capacity and service delivery, and reduce the number of agencies municipalities interact with.

The Environmental Registry of Ontario posting provides details of the seven regions and poses a series of questions around the proposed consolidation. The Lake Simcoe Region Conservation Authority's response to those questions is included in Attachment A.

As proposed, Lake Simcoe Region Conservation Authority would become part of the Huron Superior Regional Conservation Authority, which includes the Lake Simcoe, Nottawasaga Valley, Grey Sauble, Saugeen Valley, Maitland Valley, Ausable Bayfield, and Lakehead watersheds, and more than 70 municipalities.

Issues

The Lake Simcoe Region Conservation Authority supports the objectives of modernizing and improving service delivery and is committed to working collaboratively towards those ends with the Province, municipalities, and partner conservation authorities. At the same time, it is recognized that achieving these outcomes will require careful planning, clear direction, and significant coordination to address the many operational, financial, and governance considerations involved.

Board members have expressed concerns over maintaining strong local relationships in a regional agency context. Clear communication and advisory structures will be key to preserving local knowledge and community trust, which are essential for effective conservation work.

While the Lake Huron grouping of watersheds makes sense, inclusion of the Lakehead Region Conservation Authority is not an appropriate inclusion for a variety of reasons including its distant location, creating numerous logistical challenges. Instead, it has more strategic alignment and connections to the Northeastern Ontario Regional Conservation Authority.

Relevance to Conservation Authority Policy

The Province has indicated that the proposed consolidation and the Ontario Provincial Conservation Agency will not change the work that conservation authorities currently perform, nor will it eliminate any of the existing offices. The financial and human resources policies of each existing conservation authority, however, would presumably need to be amalgamated going forward.

Currently there is no direct relevance to Conservation Authority policy as the consolidation of conservation authorities is currently a proposal. If the proposal moves forward to implementation, detailed review of policies, bylaws, assets, and much more will be required to not only plan for transition but also to identify any challenges requiring Board direction during this time.

Impact on Conservation Authority Finances

There currently is no direct impact to Conservation Authority finances as consolidation is in a proposal stage. However, should the proposal proceed, detailed analysis and review of all assets and liabilities will be required, and review of conditions and/or restrictions of Conservation Authority reserves is a must. Currently there are limited details on future funding and finance models for the proposed Regional Conservation Authorities, and as these evolve if consolidation moves forward, staff will ensure to outline these aspects to the Board.

The Province has indicated it will be responsible for the costs of the Ontario Provincial Conservation Agency initially. Over time, operational costs will be apportioned to the seven Regional Conservation Authorities. Transition costs and the mechanisms to share those among partners within the Regional Conservation Authorities are still unclear. The Province has indicated support for the transition, but this is yet to be defined.

Summary and Recommendations

Whereas the Provincial Government has amended the *Conservation Authorities Act* through Bill 68 "Plan to Protect Ontario (Budget Measures)" that allows for establishing the Ontario Provincial Conservation Agency to oversee the transition to Regional Conservation Authorities, and direct the strategic direction, finances, and operational activities of the new Regional 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 consolidate Ontario's 36 conservation authorities into 7 regional entities as part of a broader consolidation; and

Whereas under this proposal, the Lake Simcoe Region Conservation Authority would be consolidated into a new "Huron-Superior Regional Conservation Authority", together with the Nottawasaga Valley Conservation Authority, Grey Sauble Conservation Authority, Saugeen Valley Conservation Authority, Maitland Valley Conservation Authority, Ausable Bayfield Conservation Authority, and Lakehead Region Conservation Authority, forming a single organization of Lake Huron watershed conservation authorities.

Therefore, be it Resolved That Staff Report No. 40-25-BOD regarding Lake Simcoe Region Conservation Authority's Environmental Registry of Ontario response to proposed consolidation of Conservation Authorities be received; and

Further that the Attachment A, the Lake Simcoe Region Conservation Authority's comments letter, be approved for submission by the December 22, 2025 deadline for submissions; and

Further That the Lake Simcoe Region Conservation Authority recognizes and supports the Province’s desired outcome of improved consistency and modernized digital permitting processes, aligned with its goals and objectives for cutting red tape and getting more homes built faster, and safely; and

Further That the Lake Simcoe Region Conservation Authority recommends that the Province engages in detailed consultation with all conservation authorities, municipalities, and watershed stakeholders in a meaningful manner and provide the detailed information required to implement such a significant undertaking; and

Further That should the proposed regional consolidation of conservation authorities be implemented, the current implementation of the *Lake Simcoe Protection Act* and Plan by the Lake Simcoe Region Conservation Authority be transferred to the proposed Huron-Superior Region Conservation Authority; and

Further That should the proposed consolidation proceed, the Lake Simcoe Region Conservation Authority requests the Province establish consistency between the *Lake Simcoe Protection Act* jurisdiction and the Lake Simcoe Region Conservation Authority jurisdiction through the inclusion of Upper Talbot River Arm and the portion of the City of Orillia that is within the Lake Simcoe watershed; and

Further That the Lake Simcoe Region Conservation Authority recommends the removal of the Lakehead Region Conservation Authority from the proposed Huron-Superior Regional Conservation Authority.

Signed by

Rob Baldwin
Chief Administrative Officer

Attachments:

1. ERO Comments Letter

LSRCA Board of Directors' Resolution No. BOD-117-25 – December 19, 2025

BOD-117-25 **Whereas** the Provincial Government has amended the *Conservation Authorities Act* through Bill 68 "Plan to Protect Ontario (Budget Measures)" that allows for establishing the Ontario Provincial Conservation Agency to oversee the transition to Regional Conservation Authorities, and direct the strategic direction, finances, and operational activities of the new Regional 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 consolidate Ontario's 36 conservation authorities into 7 regional entities as part of a broader consolidation; and

Whereas under this proposal, the Lake Simcoe Region Conservation Authority would be consolidated into a new "Huron-Superior Regional Conservation Authority", together with the Nottawasaga Valley Conservation Authority, Grey Sauble Conservation Authority, Saugeen Valley Conservation Authority, Maitland Valley Conservation Authority, Ausable Bayfield Conservation Authority, and Lakehead Region Conservation Authority, forming a single organization of Lake Huron watershed conservation authorities.

Therefore, be it Resolved That Staff Report No. 40-25-BOD regarding Lake Simcoe Region Conservation Authority's Environmental Registry of Ontario response to proposed consolidation of Conservation Authorities be received; and

Further that the Attachment A, the Lake Simcoe Region Conservation Authority's comments letter, be approved as amended for submission by the December 22, 2025 deadline for submissions; and

Further That the Lake Simcoe Region Conservation Authority recognizes and supports the Province's desired outcome of improved consistency and modernized digital permitting processes, aligned with its goals and objectives for cutting red tape and getting more homes built faster, and safely; and

Further That the Lake Simcoe Region Conservation Authority recommends that the Province engages in detailed consultation with all conservation authorities, municipalities, and watershed stakeholders in a meaningful manner and provide the detailed information required to implement such a significant undertaking; and

Further That should the proposed regional consolidation of conservation authorities be implemented, the current implementation of the *Lake Simcoe Protection Act* and Plan by the Lake Simcoe Region Conservation Authority be transferred to the proposed Huron-Superior Region Conservation Authority; and

Further That should the proposed consolidation proceed, the Lake Simcoe Region Conservation Authority requests the Province establish consistency between the *Lake Simcoe Protection Act*

jurisdiction and the Lake Simcoe Region Conservation Authority jurisdiction through the inclusion of Upper Talbot River Arm and the portion of the City of Orillia that is within the Lake Simcoe watershed; and

Further That in order to achieve the stated goals of consistency through consolidation and elimination of duplication of efforts, consideration be given to requests from municipalities regarding municipal boundaries when determining membership in individual conservation authorities; and

Further That should the proposed consolidation proceed, consideration be given to the consolidation of Lake Simcoe Region Conservation Authority, Nottawasaga Valley Conservation Authority, and Grey Sauble Conservation Authority to be called the Lake Simcoe Georgian Bay Regional Conservation Authority; and

Further That the Lake Simcoe Region Conservation Authority recommends the removal of the Lakehead Region Conservation Authority from the proposed Huron-Superior Regional Conservation Authority. **Carried**

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The Municipality of West Elgin

22413 Hoskins Line, Rodney, Ontario N0L 2C0
www.westelgin.net

af

December 22, 2025

Hon. Todd McCarthy
Ontario Minister of Environment, Conservation and Parks
5th Floor
777 Bay St.
Toronto, ON M7A 2J3

Via Email: todd.mccarthy@pc.ola.org

Re: Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

At its Regular Meeting on December 18, 2025, West Elgin Council adopted the following motion regarding proposed boundaries for the regional consolidation of Ontario's Conservation Authorities:

Resolution Number 2025-327

That West Elgin Council hereby receives the report Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities from Robin Greenall, CAO, And

That West Elgin Council resolves that the Municipal of West Elgin calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; AND

FURTHER THAT while the Municipality of West Elgin supports provincial goals for consistent permit approval processes, shared services, digital modernization, and imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; AND

FURTHER THAT the Municipality of West Elgin supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives, AND

FURTHER THAT a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of

Ontario, the Rural Ontario Municipal Association, and municipalities and Conservation Authorities in Ontario.

Carried.

Sincerely,



Terri Towstiuć
Manager of Community Services/Clerk

Cc: Andrew Lawton, MP, Elgin-St. Thomas-London South
Hon. Rob Flack, MPP, Elgin-Middlesex-London
Association of Municipalities of Ontario
Rural Ontario Municipal Association
All Municipalities of Ontario
All Conservation Authorities of Ontario

From: Lisa Burnside
Sent: December 22, 2025 11:09 AM
To: Sandra Winninger
Subject: Fwd: North Dundas Council Resolution: Conservation Authority

Lisa Burnside
 Chief Administrative Officer
 Hamilton Conservation Authority
 Phone: 905-525-2181 Ext. 126

Sent from my mobile device.

Begin forwarded message:

From: Lea Anne Munro <lamunro@northdundas.com>
Date: December 22, 2025 at 11:05:55 AM EST
To: dheinbuck@abca.ca, dellingwood@crca.ca,
generalmanager@catfishcreek.ca, cdarling@cloca.com, bvcsharma@hrca.on.ca,
Terri.LeRoux@cvc.ca, amanda.donald@crowevalley.com, tbyrne@erca.org,
llaliberte@grca.on.ca, slawson@grandriver.ca, t.lanthier@greysauble.on.ca, Lisa
 Burnside <lisa.burnside@conservationhamilton.ca>,
mmajchrowski@kawarthaconservation.com,
elizabeth@kettlecreekconservation.on.ca, r.baldwin@lsrca.on.ca,
tammy@lakeheadca.com, jmaxwell@lprca.on.ca, mark.peacock@ltvca.ca,
rhonda.bateman@ltc.on.ca, pbeard@mvca.on.ca, david.vallier@timmins.ca,
smcintyre@mvc.on.ca, Llee-yates@npca.ca,
Carl.Jorgensen@conservationsudbury.ca, Liza.Vandermeer@nbmca.ca,
jvincent@nvca.on.ca, jsmith@otonabeeconservation.com,
bmcnevin@quinteconservation.ca, Alison.McDonald@rrca.on.ca,
sommer.casgrain-robertson@rvca.ca, E.Downing@svca.on.ca,
cbarrett@ssmrca.ca, cbickerdike@nation.on.ca, kphillips@scrca.on.ca,
john.mackenzie@trca.ca, annett@thamesriver.ca,
acoleman@conservationontario.ca
Subject: North Dundas Council Resolution: Conservation Authority

Good Morning,
 Please be advised that the Council of the Township of North Dundas passed the following resolution on December 17, 2025 in support of the SDG County Council Resolution No. 2025-159 (attached):

Resolution No. 2025-248
Moved By: Deputy Mayor Bergeron
Seconded By: Councillor Uhrig

BE IT RESOLVED THAT THE Council of the Township of North Dundas supports Resolution No. 2025-159 from the United Counties of Stormont Dundas and Glengarry passed on November 17, 2025 calling on the Government of Ontario to maintain local, independent, municipally governed, watershed based conservation authorities;

**AND THAT a copy of this resolution be sent to the Ontario Minister of Environment Conservation and Parks, to the local MP and MPPS, the Association of Municipalities in Ontario, the Rural Ontario Municipal Association, and all municipalities and Conservation Authorities in Ontario.
Carried**

Kind Regards,

Lea Anne Munro
Deputy Clerk
Corporate Services
Township of North Dundas
636 St. Lawrence Street
PO Box 489
Winchester ON K0C 2K0
P: 613-774-2105 ext. 235
lamunro@northdundas.com
www.northdundas.com

PS: My working hours may be different than yours. Please do not feel obligated to reply outside of your normal work schedule.

This communication is intended only for the addressee indicated above. It may contain information that is privileged, confidential, or otherwise protected from disclosure under *The Municipal Freedom of Information and Protection of Privacy Act*. Any review, copying, dissemination, or use of its contents by persons other than the addressee is strictly prohibited. If you have received this in error, please notify us immediately.



United Counties of
Stormont, Dundas & Glengarry

7a)

RESOLUTION

MOVED BY Councillor Densham

RESOLUTION NO 2025- 159

SECONDED BY

DATE November 17, 2025

WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, 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 the municipalities within Stormont, Dundas and Glengarry (SDG) established South Nation Conservation (SNC) in 1947 and the Raisin Region Conservation Authority (RRCA) in 1963;

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

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of acres 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 Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Council of the United Counties of Stormont, Dundas and Glengarry calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local

representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND FURTHER THAT while the United Counties of SDG supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND FURTHER THAT the United Counties of SDG supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives.

AND FURTHER THAT a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of Ontario, the Rural Ontario Municipal Association, and all municipalities and Conservation Authorities in Ontario.

CARRIED

DEFEATED

DEFERRED



WARDEN

Recorded Vote:

Councillor Bergeron	_____
Councillor Broad	_____
Councillor Densham	_____
Councillor Fraser	_____
Councillor Guindon	_____
Councillor Landry	_____
Councillor MacDonald	_____
Councillor McDonald	_____
Councillor McGillis	_____
Councillor St. Pierre	_____
Councillor Williams	_____
Warden Lang	_____

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3889 Rideau Valley Drive
PO Box 599, Manotick ON K4M 1A5
T 613-692-3571 | 1-800-267-3504
F 613-692-0831 | www.rvca.ca

December 19, 2025

The Honourable Todd J. McCarthy
Minister of the Environment, Conservation and Parks
Ministry of Environment, Conservation and Parks
5th Floor, 777 Bay St.
Toronto, ON M7A 2J3

**Re: Comments Regarding Proposed Consolidation of Conservation Authorities and
Creation of Ontario Provincial Conservation Agency (ERO Posting 025-1257)**

Dear Minister McCarthy,

At their meeting on November 27, 2025, the Board of Directors of the Rideau Valley Conservation Authority reviewed and discussed the proposed consolidation of Ontario's conservation authorities and the creation of the Ontario Provincial Conservation Agency. Following their discussion, the Board unanimously passed a resolution endorsing RVCA Staff Report 01-251127 and directing the Chair to submit a letter to the province reflecting the comments, concerns and directions outlined in the report.

General Comments

The RVCA concurs that the challenges facing Ontario continue to increase in complexity from climate change, population growth and the pace of development, and we welcome changes that are intended to strengthen the capacity, influence and impact of CAs in providing vital watershed management, in safeguarding people and property from flooding, and in being transparent and accountable in the delivery of permitting, programs, and services to Ontario's communities. And while we also agree that with better tools and resources, and central enablement and support, CAs could operate with greater consistency and transparency, and deliver improved services to municipalities and permit applicants, we differ on the most effective way to achieve this outcome.

The RVCA recommends that the province achieve its desired outcomes without amalgamating CAs. Clear provincial directives, consolidation of administrative services and shared staffing can all achieve consistency, modernized systems, better performance and standardized customer service, without the cost, disruption and potential drawbacks of amalgamation. These arrangements can also continue to be refined to ensure constant improvement, whereas amalgamation cannot be undone if unintended consequences arise.

Below are two tables that summarize areas of concern and comment as well as recommended direction to the province on how to proceed regarding the creation of the Ontario Provincial Conservation Agency (Table 1) and the proposed consolidation of CAs (Table 2).

Table 1: Creation of Ontario Provincial Conservation Agency
<p>Funding of Agency</p> <ul style="list-style-type: none"> The creation of a new provincial agency would be an added financial cost for the province, and if the Agency recovers costs from CAs as proposed, it will put additional pressure on the municipal levy which local municipalities cannot afford.
<p>Role of Agency</p> <ul style="list-style-type: none"> While CA Boards of Directors will retain governance over CAs, the scope and meaningfulness of their role may be diminished by the role and authority of the Agency. CA Boards must retain full governance responsibilities over CAs, including program oversight, budgeting and staffing. The scope of the Agency should be limited to Category 1 programs which are those mandated by the province and include natural hazard and source protection programs. The Agency should not oversee Category 2 programs which are delivered on behalf of municipalities or Category 3 programs which are created by individual Boards to address local watershed issues and needs. The delivery of local programs and services should continue to be led by CAs.
<p>Need for Agency</p> <ul style="list-style-type: none"> The province can already direct any aspect of CA operations and programs through the MECP and MNRF using legislation, regulations, technical rules, guidance, policies and other tools. Between 2020 and 2023, the Minister of Environment, Conservation and Parks also convened a multi-stakeholder working group to work collaboratively with MECP and MNRF to develop regulatory amendments that addressed provincial priorities. The working group had representation from municipalities, CAs, Conservation Ontario, agriculture and developers.
<p>Recommended Direction</p> <ul style="list-style-type: none"> The province should continue to oversee CAs through the MECP with support from a multi-stakeholder working group to help implement provincial priorities If the province creates a new Agency to oversee conservation authorities <ul style="list-style-type: none"> It should be fully funded by the province with no cost recovery from CAs It should work collaboratively with municipalities, CAs and other key stakeholders to ensure changes are constructive, achieve desired outcomes and do not erode local municipal governance of CAs It should also ensure its Board of Directors includes municipal and CA/CO representation from urban and rural communities as well as from different geographical areas of the province

Table 2: Regional Consolidation of Conservation Authorities

Watershed Services

- CAs are organized along watershed boundaries and not municipal boundaries to enable them to address natural hazards and resource issues within the drainage basin that is being impacted or causing it. Each watershed is unique in its hydrology, geology, topography and land use, meaning the issues and challenges it faces are also unique. Managing five watersheds together as one region would therefore be complex because the watersheds are distinct in their characteristics and needs.
- Staff also develop specialized knowledge and understanding of their watershed which guides their work whether its flood forecasting and warning, hazard mapping, operating flood control infrastructure, monitoring watershed conditions, or designing restoration and stewardship projects. This critical local knowledge and understanding would need to be preserved if CAs are consolidated to ensure effective program delivery. The consolidation of CAs would also not result in the complete harmonization of programs and services within regions because needs and priorities will continue to vary from one watershed to the next.

Customer Service

- CAs are very responsive and accessible to partners, clients and the public providing a high level of personalized customer service. People can call, email or meet with staff and staff are highly visible in the watershed, meeting people onsite, attending events, presenting to groups and councils or interacting with visitors at our conservation areas. Since most staff deliver conservation programs and frontline service, they develop relationships with local partners and a deep understanding of local communities, groups and people. Partners and clients, including municipalities, developers, farmers and lake associations, are also used to having direct access to senior staff, including the General Manager.
- Concerns have been raised that if CAs are consolidated, this level of customer service, access to staff and relationship building would not be feasible or sustainable given the geographic size of the proposed region and the number of clients the regional CA would have to serve

Municipal Boards

- The RVCA has 18 member municipalities, all of whom have a seat on its Board of Directors (with Ottawa having 5 seats). The Board functions efficiently and effectively with just eight to nine meetings a year.
- The proposed St. Lawrence Regional Conservation Authority would have 46 municipalities, so not all municipalities would be represented on the new Board. Under the current model, seats are allocated based on population which would favour larger urban centres like Ottawa, Kingston and Cornwall while marginalizing the significant number of smaller rural municipalities in Eastern Ontario. However, despite size or how seats are allocated, each municipality's voice and influence would be diluted within a regional CA
- Regional Boards would also not be as attune and responsive to local watershed issues and community concerns.

Finances

- If consolidation proceeds, it would be important that regional CAs remain independent corporations to ensure that all CA assets remain under CA control and ownership including land holdings, buildings and financial reserves. It is important that the province has stipulated that no CA assets would be transferred to the Agency or province as part of the proposed changes.
- Questions have also been raised about how budgets would be developed within regional CAs as the levy capacity of municipalities varies from watershed to watershed and programs are different between CAs based on the needs and tax base of each local watershed. Larger municipalities may not support levy dollars being spent on programs or capital projects outside the watershed they benefit from or are impacted by. For example, Ottawa pays 91% of RVCA's municipal levy, but it benefits from all programs and services as it is the downstream receiver in the watershed.

Cost

- The province stated that one reason it is proposing consolidation of CAs is to reduce duplicative corporate functions and costs. Many CAs, especially in Eastern Ontario, have very lean corporate services, sometimes relying on the services of member municipalities or neighbouring CAs. This means consolidation may not result in duplication or savings, and a larger organization may even result in higher administrative needs. Most CAs are also very flat organizations with little middle management and working senior managers. This allows the maximum amount of resources to go to frontline service. In a larger organization with numerous office locations, there could be a need for more management or full-time managers who are not also delivering frontline service. Operating a larger regional CA could also result in additional costs as staff would be serving the needs of a larger area and the Board would likely require committees to serve the needs of five watersheds and 46 municipalities.
- CAs already save on procurement costs by acquiring insurance, benefits, GIS software and some training through Conservation Ontario which results in significant savings each year. Eastern CAs also partner on procurement when possible, to save money on data, training, equipment and other services. The RVCA also jointly delivers programs with, or on behalf of, neighbouring CAs to save on staffing resources, including tree planting, rural clean water grants, septic permitting and septic reinspection.

Permitting

- The province stated that another reason it is proposing to consolidate CAs is permitting, indicating that CAs have different policies, customer service standards, fees, processes and staffing and technical capacity leading to unpredictable and inconsistent turnaround times for approvals.
- In 2019, CAs voluntarily adopted permit timelines developed by CO and publicly report on their performance annually. In 2024, the province legislated a permit decision deadline of 90 days, but CAs retained their service standard of 30 days for minor works. Last year the RVCA approved 99% of complete applications and issued 97% of permits within service standard timelines.
- The RVCA, MVCA and SNC have also had a consistent fee schedule for planning and permitting for well over a decade to ensure equity across municipalities. However, consistent fees across the province would result in higher fees outside the GTA as their fees are higher than other regions.
- In 2024, RVCA also updated its development review policies to be more consistent with SNC and MVCA and we have longstanding reciprocal staff sharing arrangements with MVCA and SNC that are used as needed to ensure no interruption in service for development review files and no permit delays.

Recommended Direction

- The challenges the province is trying to address through the regional consolidation of CAs can be achieved with 36 CAs:
 - The province could implement a standardized policy, service standards and centralized system to ensure reliable and consistent permitting across all CAs.
 - The province could require staff sharing amongst CAs where it is needed to balance and enhance technical expertise and capacity, improving service and program delivery and ensuring service continuity.
 - The province could lead or support centralized procurement, training, digital strategies, shared services and strategic investments across CAs to reduce administrative duplication and discrepancies in tools, technology and data management.
- If there are still CAs who cannot achieve provincial standards and desired outcomes, then strategic and targeted consolidation of those CAs could be considered.
- If the province decides to proceed with the regional consolidation of all CAs:
 - A cost-benefit analysis should be completed to ensure it will result in sufficient cost savings and to determine the optimal size and boundaries of regional CAs to maximize benefits while minimizing impacts.
 - Transition funding would be required from the province to ensure the cost of consolidation is not born by member municipalities.
 - One region should be consolidated first where the need is greatest, to ensure the model is successful before it is rolled out province wide.

Thank you for the opportunity to comment and for your consideration of RVCA's remarks, concerns and recommended directions. We also appreciated the opportunity to participate in a Regional Engagement Session and thank you for hosting one in Ottawa. As conservation authorities only exist where local municipalities have chosen to form, govern and fund them, we also ask that any transformative changes to CAs, including consolidation, only be undertaken following extensive consultation with our member municipalities.

Should you require any further information please do not hesitate to contact me at gwaterfield@perth.ca or 613-485-9169.

Sincerely,



Gary Waterfield, Chair

cc:

- Members of Provincial Parliament in the Rideau Watershed
- Hassaan Basit, Chief Conservation Executive
- Association of Municipalities of Ontario (AMO)
- Rural Ontario Municipal Association (ROMA)
- Watershed Municipalities
- Neighbouring Conservation Authorities

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Upper Thames River Conservation Authority: ERO Questions and Responses

Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257).

This response is provided on behalf of the Board of Directors of the Upper Thames River Conservation Authority (UTRCA). Board members represent 17 member municipalities in the upper watershed of the Thames River. The UTRCA was formed in 1947. The watershed covers 3,430 square kilometres in southwestern Ontario and is home to approximately 593,700 people.

Effective watershed management relies on strong connections to local needs, priorities, and expertise. In the Province's proposal, the UTRCA watershed would be consolidated with seven other Conservation Authorities representing 81 member municipalities to form the Lake Erie Regional Conservation Authority, spreading over 23,000 square kilometers and representing a population of approximately 2.5 million people. The proposal risks undermining effective watershed management.

Historically, the Province funded up to 50% of Conservation Authority operations; today, provincial support has fallen to less than 2%, leaving municipalities to fund the majority of operations. UTRCA is concerned that the proposed restructuring would shift governance away from the municipalities who created and fund Conservation Authorities, resulting in a significant loss of local decision-making, community engagement, and rural representation.

The UTRCA:

- Supports the broad goals of the Province to modernize service delivery to achieve better outcomes, while strengthening hazard protection;
- Opposes the changes outlined in the ERO Proposal as a means of achieving those goals; and,
- Supports continued evolution of the system and prefers alternatives to the Proposal that would result in voluntary consolidation, supported by adequate business rationale and time for meaningful consultation, including with Indigenous rights holders.

ERO Proposal #025-1257 would result in a Regional Conservation Authority too large to deliver effective governance and accountability to municipal funders and their residents and taxpayers.

While the UTRCA supports the Province's generally stated objectives of modernization including the use of digital permitting systems, consistent policies and standards, and enhanced use of technology. The Province already holds the legislative authority needed to implement consistent policies and resources across the existing CA boundaries without consolidation through direction and tools, such as modernized technical guidelines. These objectives can be addressed without the disruption and destabilization inherent in large-scale structural consolidations, and counter to the Province's goals of advancing the housing priority, streamlining, and reducing red tape while ensuring safe development.

Substantial concerns and risks have been identified with the proposed consolidation, particularly with respect to the loss of local decision-making, reduced municipal representation,

uncertainty around transition funding, asset ownership considerations, potential service disruption, loss of local expertise, and impacts on the local delivery of programs and services. The scale of the proposed Lake Erie Regional CA raises additional challenges related to maintaining effective community relationships and ensuring services remain responsive to local watershed conditions. Considering the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the UTRCA does not support the proposed RCA framework.

Clarity is needed from the Province to understand the problem it is trying to solve. The importance of meaningful consultation and engagement with municipalities, conservation authorities, Indigenous communities and partners prior to any decision being finalized cannot be understated. Additional time for meaningful dialogue is required to discuss alternatives to ensure successful implementation.

A transparent, comprehensive cost-benefit analysis of alternative approaches should be undertaken to inform decision-making in any consolidation model. Where a consolidation is deemed beneficial, it should be supported by a clearly defined and phased transition plan. Full provincial financial support is critical for any transition period to ensure continuity of programs and services and to avoid disruption.

Accordingly, the Province needs to consider the benefits of a measured “pause” of the consolidation proposal to allow the Ontario Provincial Conservation Agency to complete its initial three-year term, undertake meaningful engagement with conservation authorities, municipalities, Indigenous communities and partners, to assess the necessity of consolidation of conservation authorities through an evidence-based approach. This would include clearly identifying issues, providing effective communication and feedback to conservation authorities to address any issues and if necessary, consider alternative models that would more effectively advance provincial priorities related to efficiency, red-tape reduction, and timely housing delivery.

For these reasons, the UTRCA Board passed a formal motion stating its opposition to the proposed Lake Erie Regional Conservation Authority. A copy of the motion has been attached to this response. Notwithstanding the opposition by the Board to the proposal, comments are provided on the five ERO questions in the table below.

ERO Questions	UTRCA Recommendations	UTRCA Comments
<p>1. Key Factors for a Successful Transition and Outcome: What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?</p>	<p>Recommendation 1: That the Province consider achieving modernization goals through the current 36 CA corporations using legislative and regulatory amendments, technological solutions, and compliance verification before considering consolidations.</p> <p>Recommendation 2: That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Conservation Ontario, CAs, Indigenous communities, municipalities, and other experts to consider options and evaluate proposed solutions within this proposal.</p>	<p>1a. Preserve Local Municipal Governance and Decision-Making The proposed Lake Erie Region Conservation Authority would consolidate 8 CAs, encompassing 81 local municipalities and 11 First Nation communities (there are none within the UTRCA watershed), and covered by more than 10 Treaties signed with multiple First Nations.</p> <p>Without a doubt, this scale risks diluting local municipal representation, particularly for smaller and rural communities. When the UTRCA’s Board size was reduced at the request of the province, in the mid-90s, it was important to maintain a balance of urban and rural representatives to reflect the diverse landscape of the watershed.</p> <p>As the largest contributor to CA budgets, municipalities must continue to have the same equitable representation and voice they are afforded today. Municipalities must maintain a meaningful voice at all levels of CA governance and decision-making to ensure local issues and concerns are not lost. Support from key partners, specifically municipalities, is key to the ongoing success of CAs in Ontario.</p> <p>To deliver on its mission, a new regional conservation authority model must be grounded in fundamentals of effective watershed management, including:</p> <ul style="list-style-type: none"> • Protecting life and reducing property damage from flooding and erosion, • Supporting municipal partners, Indigenous communities, the development community, and landowners with timely, reliable services, • Meeting the requirements under the <i>Clean Water Act</i> for source protection planning, • Enhancing the economic, environmental, and community health of the watershed through stewardship, education, and partnerships

ERO Questions	UTRCA Recommendations	UTRCA Comments
		<ul style="list-style-type: none"> • Providing meaningful opportunities for people to connect at the local level, and • Meeting the demands of a rapidly growing population at a time of climate pressure. <p>If regionalization stretches teams too broadly, we risk losing:</p> <ul style="list-style-type: none"> • The ability to design and deliver environmental programs and services tailored to the unique needs of each watershed and responsive to municipal and community priorities, • Local, on-the-ground expertise, • Critical knowledge of local environmental conditions and historical records (e.g., localized flooding impacts), • Strong relationships and funding support from municipalities, Indigenous communities, the agricultural community, donors, businesses, watershed residents, and other partners, • Real-time responsiveness during storms and emergencies and other urgent events, • Engagement and support from the scientific community, and • Effective oversight and buy-in from municipal funding partners. <p>To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, CAs must be appropriately accountable.</p> <ul style="list-style-type: none"> • The principle of “pay for say” should be reflected in the design of new CAs, as it is today. • The proposed catchment area of the proposed consolidated Lake Erie Regional CA would combine more than 80 municipalities, stretching oversight and “pay for say” beyond what is workable and undermining confidence in the governance of CAs. • Recognise the needs of rural communities and the agricultural sector.

ERO Questions	UTRCA Recommendations	UTRCA Comments
	<p>Recommendation 3: That a stable, clear, transition plan be prepared collaboratively with the implementation working group. To minimize potential disruptions, this plan should consider: service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures.</p> <p>The existing CA Boards should remain in place beyond 2026. The local CAs board could inform a comprehensive cost-benefit analysis on consolidation and help outline the most effective level of strategic consolidation to achieve both provincial and local objectives with municipal input. Local input and buy-in will be imperative to the success of any new framework.</p> <p>Recommendation 4: That the Province consider a longer implementation timeline to fully address: board governance and appointment frameworks; funding mechanisms, allocations, and reserve structures; and service continuity matters. Phasing standards,</p>	<p>The provincial goals for consistent permit approval processes, shared services, and digital modernization can be realized within the current Conservation Authority structure without imposing a new top-down agency structure that does not have strong local accountability but increases costs to taxpayers.</p> <p>1b. Avoid Delaying Performance Improvements Currently Underway The proposed changes risk undermining the implementation of provincial improvements that have already been introduced.</p> <p>In recent years, the Province has significantly changed the role of CAs in land use planning matters as part of its broader initiative to build more homes faster. Insufficient time has passed to fully implement recent amendments and evaluate their impact on development outcomes.</p> <p>Given the volume and speed of legislative changes, industry interest-holders are still processing the effect and significance of various legislative changes. All interest-holders, including the development industry, benefit from certainty. The proposed consolidation will introduce additional unknowns and new processes at an already uncertain time in the market.</p> <p>1c. Provide Dedicated Provincial Funding for the Transition A cost-benefit analysis of the proposed consolidation should be completed and properly evaluated by member municipalities. There would be substantial costs associated with merging eight CAs into one regional CA, including but not limited to:</p> <ul style="list-style-type: none"> • IT and data system integration, • HR and union harmonization (two CAs within the proposed Lake Erie Region are unionized, CUPE and OPSEU, while the other six are not),

ERO Questions	UTRCA Recommendations	UTRCA Comments
	<p>guidelines, and directives across all CAs before any consolidation (should consolidation be required at all) offers greater stability and predictability.</p> <p>This approach minimizes multiple significant changes occurring at the same time, reducing risks of disruption to program delivery, and creating conditions for better outcomes and buy-in.</p> <p>Recommendation 5: That transition costs for any consolidation be fully funded by the Province.</p>	<ul style="list-style-type: none"> • Potential HR costs and consolidation implications of merging multiple HR policies, • Fee and policy alignment, • Corporate service model consolidation, • Rebranding, signage, and legal transitions, and • Asset and liability assessment. <p>It is unacceptable to require member municipalities to fund these costs while diminishing their influence. They must not be burdened with the expense of mandated consolidations. Without a rigorous cost-benefit analysis proving that large-scale consolidations will reduce costs and enhance service, the risks clearly outweigh any potential benefits. Instead, collaboration between the Province, conservation authorities, municipalities, Indigenous communities and partners to determine whether consolidation, at any scale, is the most strategic and effective approach to achieve both provincial and local objectives.</p> <p>1d. Protect and Enhance Existing Service Levels The uncertainty around consolidation presents a significant risk to workforce stability, recruitment, and retention. Effective watershed management depends on local integrated expertise in hydrology/hydraulics, natural hazards, ecology, and familiarity with the unique conditions of each watershed.</p> <p>Local CA staff attend site visits and face-to-face meetings and knowledge of the local geography and political landscape. Despite increasing levels of development in the watershed, UTRCA continues to issue 99% of permits within the provincial guidelines and, on average, are issuing permits within 6-7 days of receiving complete applications.</p> <p>Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. Consolidating and</p>

ERO Questions	UTRCA Recommendations	UTRCA Comments
		<p>potentially centralizing offices could reduce responsiveness, delay decisions, and weaken local expertise and connection to the community.</p> <p>Centralization will not happen overnight, and effectiveness will likely decline before improvements occur. This could slow permitting in the near term.</p> <p>1e. Ensure Financial and Legal Due Diligence Each CA in the proposed region has vast landholdings, complex assets (e.g., water and erosion control infrastructure), financial assets and liabilities, foundations, legal proceedings, and unique local agreements. A thorough financial and legal due diligence analysis is necessary to assess restrictions and complexities on transferring these assets from local control to regional oversight.</p> <p>1f. Maintain Local CA Board beyond 2026 "Pausing" consolidation would permit the Province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion. Guidance may be taken from the Province's experience with municipal amalgamation in the 1990s and 2000s to ensure that any proposed consolidation of CAs is well-timed and efficiencies at the local level are evaluated prior to implementing structural changes.</p>
<p>2. Potential Opportunities or Benefits: What opportunities or benefits may come from a regional conservation authority framework?</p>	<p>Recommendation 6: That the Province demonstrates that the statutory objects of the CAs can be effectively delivered within the proposed new regional boundaries.</p> <p>Recommendation 7: That the Province update policies and</p>	<p>The provincial proposal for regional consolidation does not include enough information to effectively evaluate the benefits.</p> <p>2a. Ensure Consistent Standards Funding that would be directed into the consolidation costs mentioned above would be better spent on front-line resources that would improve consistency and modernize tools and resources equitably across all CAs. Provincial approvals of policies, guidance, and</p>

ERO Questions	UTRCA Recommendations	UTRCA Comments
	standards together with Conservation Ontario, CAs, AMO, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.	standards have not kept pace with modern needs. Provincial funds directed to improved mapping, technical guidance, policy development and e-permitting services would have immediate benefits across the province. Provincial efforts and funding should be directed to this goal within the existing CA framework.

ERO Questions	UTRCA Recommendations	UTRCA Comments
	<p>Recommendation 8: That the Province invest stable, adequate, multi-year funding into CA programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.</p> <p>Recommendation 9: That the Province recalibrate and increase the funding for the Water and Erosion Control Infrastructure funding program as part of the consolidation process, in time for the 2027 budget.</p>	<p>2b. Provide Additional Investment Municipal levies currently fund 34% of the <u>total costs</u> of UTRCA programs and services, with the Province contributing less than 2%. For <u>mandatory programs and services</u>, the municipal contribution in the UTRCA watershed is 67% while the provincial transfer payments cover less than 5% of operating expenses. The remaining costs are covered by leveraging the municipal investment with funds from user fees, grants, and contracts.</p> <p>Mandatory programs and services provided by the UTRCA include;</p> <ul style="list-style-type: none"> • flood forecasting and warning, • low water response, • operation and maintenance of water control and erosion control infrastructure, • provide input on land-use planning to ensure that decisions are consistent with the natural hazard policies of policy documents; • administering permits issued under section 28 of <i>Conservation Authorities Act</i> and associated enforcement activities, • the conservation and management of lands, • provincial surface quality and groundwater quantity monitoring, and • Source Protection authority under the Clean Water Act. <p>Additional Provincial investment is required to ensure mandatory programs and services of the UTRCA are supported without a reduced level of service delivery provided to the public.</p> <p>In addition, the UTRCA has aging major flood control structures requiring ongoing monitoring and maintenance. The current provincial Water and Erosion Control Infrastructure funding program cap of \$5 million for the entire province is completely inadequate.</p>

ERO Questions	UTRCA Recommendations	UTRCA Comments
	<p>Recommendation 10: That an integrated digital platform that connects the fundamental strengths of multiple CAs, across multiple offices and disciplines, be developed to deliver enhanced watershed programming in Ontario.</p>	<p>2c. Pooling of resources and collaboration between technical experts Effective watershed governance relies on strong connections to local needs, priorities, and knowledge, which then guide natural hazard management, shape infrastructure decisions, strengthen watershed health, stewardship programs, community education and partnerships and outdoor recreation.</p> <p>Specific knowledge of the local watershed and environment is integral to the ability of CAs to carry out their permitting function under the <i>Conservation Authorities Act</i>. Bringing experts from across CAs together may provide greater opportunities for collaboration, specialization, and information sharing as well as pooling resources. Consolidation of CAs is not required to achieve this outcome; however, a more centralized system and investment of baseline resources are required.</p>
<p>3. Governance Structure Considerations: 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?</p>	<p>Recommendation 11: That the Regional Conservation Authority Board should be:</p> <ul style="list-style-type: none"> • Maximum 30 members (ideally between 15-20 to be effective), • Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand, • Structured to preserve meaningful local influence, • Include Indigenous representation to strengthen partnerships and ensure 	<p>3a. Reduce the Geographical Area of the Proposed Consolidation In developing the proposed regional CAs the province-based decisions on watershed-based jurisdiction, administrative duplication and balancing expertise. This resulted in geographically vast regions that do not account for existing working relationships between CAs and municipalities.</p> <p>Other criteria should be weighted, including existing working relationships between CAs and municipalities, and urban versus rural balance. The success of the CA governance model has always been that local decisions are made by local representatives. The geographic scope of the region needs to be reduced to protect that principle.</p> <p>3b. Create a Governance Model that is Functional and Fair Applying current legislative population formulas would produce a Lake Erie Regional CA Board of 120 members, which is unmanageable and</p>

ERO Questions	UTRCA Recommendations	UTRCA Comments
	<p>programs reflect diverse perspectives.</p>	<p>ineffective. A Board of this size risks a loss of local perspectives and challenges in achieving timely, responsive decisions. There is a loss of local municipal representation in this framework.</p> <p>3c. Maintain Municipal Appointment Authority and Add Indigenous Appointments Appointments to the regional conservation authorities must remain municipal to ensure transparency, accountability, and local alignment. Appointments to the Ontario Provincial Conservation Agency should include municipal appointments from each of the RCA boards.</p> <p>A new structure provides an opportunity for appointments to include Indigenous representation on CA Boards as a vital step toward strengthening partnerships and ensuring programs reflect diverse perspectives. This representation of rightsholders would deepen cultural connections, enhance decision-making, and align with previous recommendations to create more inclusive and effective governance.</p>
<p>4. Maintaining a Transparent and Consultative Budgeting Process: Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?</p>	<p>Recommendation 12: That should any proposed consolidation proceed, existing watershed approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level.</p>	<p>4a. Engage Municipalities in Budget Development Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Issues of budgeting, reserve allocations, Category 3 program funding, and other financial matters require provincial consultation with current CAs and need to be in place prior to consolidation.</p> <p>Another key factor to consider is protecting watershed reserves, infrastructure, and land assets. Many watershed municipalities are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within the proposed consolidated structure.</p> <p>4b. Ensure Fair Apportionment</p>

ERO Questions	UTRCA Recommendations	UTRCA Comments
		Municipalities risk subsidizing areas with a smaller tax base. Local apportionment should be directed to local assets.
<p>5. Maintaining and Strengthening Local Relationships: How can regional conservation authorities maintain and strengthen relationships</p>	<p>Recommendation 13: That local offices be retained to deliver programs.</p>	<p>5a. Retain Local Presence Local offices and staff are essential for timely permitting, program delivery, flood forecasting and warning operations, environmental monitoring, community engagement, and effective stewardship. It is imperative that local knowledge be retained, and decisions reflect local conditions.</p> <p>5b. Protect Local Programs Locally delivered conservation authority programs such as the UTRCA’s Southern Ontario At Risk Reptiles (SOARR), Green Leaders, Tree Power / tree planting, stewardship services, environmental monitoring, education, community partnerships, and parks are rooted in community identity. They must be preserved.</p> <p>5c. Preserve Community Access to Greenspace Many municipalities rely on UTRCA lands for recreational opportunities because local land acquisition is cost prohibitive. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities.</p>

Additional Comments

In addition to the comments provided in response to the questions in the ERO posting, the UTRCA is concerned about the governance structure of the Ontario Provincial Conservation Authority.

As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, CAs and, therefore, municipalities, will be required to fund all or a portion of the agency’s operations through existing levy/apportionment processes. This means that municipalities may ultimately contribute all or a significant share of the OPCA’s budget without having any meaningful role in shaping its governance, priorities, or strategic direction.

For municipalities that rely heavily on CA guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence.

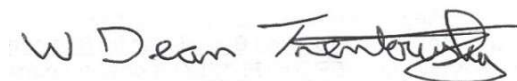
Not only would this be a precedent-setting method for funding a provincial agency, it establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

Summary Statement

UTRCA urges the Province to prioritize modernization through shared standards, tools, and funding rather than large-scale structural consolidations. We remain committed to working collaboratively to achieve efficiency and consistency while preserving the watershed-based governance model that has served Ontario effectively for decades. The Province needs to consider the benefits of a measured “pause” of the consolidation proposal to allow the Ontario Provincial Conservation Agency to complete its initial three year term, undertake meaningful engagement with conservation authorities, municipalities, Indigenous communities and partners, to assess the necessity of consolidation of conservation authorities through an evidence-based approach. This would include clearly identifying issues, providing effective communication and feedback to conservation authorities to address any issues and if necessary, consider alternative models that would more effectively advance provincial priorities related to efficiency, red-tape reduction, and timely housing delivery.

Thank you for the opportunity to review and provide comments on the proposed boundaries for the regional consolidation of Ontario’s conservation authorities.

Submitted by:
Upper Thames River Conservation Authority



W. Dean Trentowsky
Chair



Tracy Annett
General Manager

Attachment: Board of Directors Motion, November 25, 2025

Mover: Skylar Franke

Seconder: George Way

Board of Directors Motion, November 25, 2025

At the November 25, 2025, meeting, the Upper Thames River Conservation Authority (UTRCA) Board of Directors adopted the following motion. They further directed staff to circulate a letter to all member municipalities of the Upper Thames watershed and First Nation communities affected by the proposed change in geographic boundaries, with a focus on the economic and legal ramifications and other relevant ramifications of the proposed legislative changes by the province.

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Conservation Authorities”), proposing to reduce Ontario’s 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the Conservation Authorities Act;

AND WHEREAS under this proposal, the Upper Thames River Conservation Authority (UTRCA) would be merged into a new “Lake Erie Regional Conservation Authority” together with the: Essex Region CA, Lower Thames Valley CA, St. Clair Region CA, Kettle Creek CA, Catfish Creek CA, Long Point Region CA, and Grand River CA, forming a single organization stretching from Windsor, through London, Brantford, and north of Waterloo region;

AND WHEREAS the Board acknowledges and supports the Province’s goals of improved efficiency, consistency, and fiscal responsibility in conservation delivery, but find that the proposed “Lake Erie Region” configuration would create a geographically vast and administratively complex entity; dilute local accountability and municipal partnership; generate substantial transition costs, including human resources integration, governance restructuring, IT migration, and policy harmonization that would divert resources from the front-line service delivery making it hard for applicants to obtain timely local advice, resolve issues, or expedite housing and infrastructure approvals that support the Province’s goals;

AND WHEREAS UTRCA has always worked with its member municipalities, the province, and partners to be fiscally responsible while ensuring the conservation, restoration, development, and management of natural resources within the upper Thames River watershed including modernizing its programs and services and aligning them with provincial guidance and neighbouring CAs and will continue to do so;

THEREFORE BE IT RESOLVED THAT UTRCA Board of Directors does not support the proposed “Lake Erie Regional Conservation Authority” boundary configuration outlined in the Environment Registry Notice 02-1257; and the Board instead requests that the Ministry engage directly with affected municipalities and conservation authorities to evaluate a reduced geographic scope for consolidation that better reflects established relationships and enhances cost-efficient delivery of integrated watershed management, grassroots connections, and local understanding;

AND FINALLY THAT this resolution be forwarded to the Minister of Environment, Conservation and Parks, local members of Provincial Parliament, Association of Municipalities of Ontario, Rural Ontario Municipalities Association, all municipalities and CAs within the proposed Lake Erie Regional Conservation Authority, and Conservation Ontario.

A recorded vote was requested.

Jean Coles - For

Jim Craigmile - For

Peter Cuddy - Against

Skylar Franke - For

Tom Heeman - For

Anna Hopkins - For

Sandy Levin - For

Hugh McDermid - For

Paul Mitchell - For

Harj Nijjar - For

Brian Petrie - For

Mark Schadenberg - For

George Way - For

Scotty Zehr - For

Dean Trentowsky - For

The motion was carried with fourteen members in favour and one against.

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

Submission: Written Submission

Organization Name: Long Point Region Conservation Authority

Date: Thursday, December 18, 2025

Address: 4 Elm Street, Tillsonburg, ON N4G 0C4

Email Address: jmaxwell@lprca.on.ca

Phone Number: 519-842-4242

ERO Submission: LPRCA Response to ERO Posting #025-1257

Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Long Point Region Conservation Authority (LPRCA) appreciates the opportunity to comment on Ontario's proposal to consolidate 36 Conservation Authorities (CAs) into seven Regional Conservation Authorities (RCAs). This submission provides feedback intended to encourage sound policy development, protect public interest, and ensure effective watershed management.

The Long Point Region Conservation Authority Board of Directors does not support the Regional Conservation Authority consolidation proposal outlined in the Environmental Registry of Ontario notice. LPRCA maintains that the proposed RCA boundaries are far too large to sustain the effective, locally responsive services and programs that conservation authorities currently deliver. The scale of the proposed RCAs would reduce local autonomy, dilute, or eliminate the voices of rural municipalities, and increase financial pressures. To date, insufficient evidence has been provided to demonstrate that the proposed consolidations would result in more effective or cost-efficient program delivery. In the absence of a comprehensive cost-benefit analysis and meaningful consultation with municipalities and CAs, the proposed approach risks slowing approval processes and undermining informed, locally driven decision-making.

Before proceeding with consolidation, the Province is encouraged to fully evaluate whether modernization goals could be achieved through the new Ontario Provincial Conservation Agency (OPCA), without restructuring the existing CA framework.

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

LPRCA notes that any successful transition to a regional conservation authority model must have the support of those who established and fund CAs (member municipalities), provincial government, those responsible for CA governance (Boards of Directors), and the staff who deliver programs locally. Such support is most effectively cultivated through locally driven consultation rather than through top-down directives.

LPRCA recommends that the Province pursue its modernization objectives within the existing CA framework by leveraging legislative and regulatory amendments, technological improvements, and enhanced compliance verification.

2. What opportunities or benefits may come from a regional CA framework?

In analyzing the potential opportunities or benefits that may come from a regional CA framework, it is also important to note the potential disadvantages that may come from a regional CA framework. Listed below are the pros (advantages) and cons (disadvantages):

Pros:

- A single digital permitting system, province-wide permit performance standards, and updated floodplain maps
- Standardized permitting policies, permitting fees, and levels of staffing
- Standardized HR and administrative policies and procedures
- Potential overhead/administration efficiencies in a centralized support environment
- Modernization of software such as electronic digital retention management systems for CAs that don't have the capacity

Cons:

- No evidence has been provided that the benefits of the RCA will outweigh the costs for member municipalities
- Standardized permitting policies minimizes the local challenges of each individual watershed as many CAs face similar issues; however, there is also unique geographic/landscape issues related to permitting and floods & natural hazards within each CA
- Standardized permitting fees could substantially increase fees for permit applicants
- Local knowledge/staffing will be lost through streamlining and centralization
- Increased upfront levies to member municipalities to implement the regional consolidation and if efficiencies are not realized and in addition of the OPCA levying CAs (indirect tax) could potentially lead to long-term increased municipal levies for member municipalities
- Standardizing RCA logo's, signage, vehicle fleets will be costly to implement
- CAs in a healthy financial position with low dependence on municipal levies will be penalized upon consolidation to subsidize CAs with a higher dependence on municipal levies
- Reorganizational structure costs are inevitable, and the financial impact should not be transferred to the member municipalities as this consolidation is driven by the Province

The proposal for a regional conservation authority framework has prompted discussion around the existing deficiencies within the current CA system. However, these challenges can be effectively addressed through targeted provincial investment to enhance and standardize tools such as flood hazard mapping, technical guides, and regulation mapping. Additionally, the Province could continue to update policies and standards to better align with its objectives.

LPRCA does not believe that the proposed regional CA framework would provide any opportunities or benefits that cannot already be achieved within the existing CA structure.

3. Do you have suggestions for how governance could be structured at the regional CA level, including suggestions around board size, make-up and the municipal representative appointment process?

There is no governance model or structure within the proposed regional conservation authority framework that would ensure adequate municipal representation for all member municipalities that would be funding the RCA. The proposed structure would also disproportionately affect rural municipalities by diluting or eliminating their representation and voices in favour of larger urban centres. Given the extensive geographic scale of the proposed RCA, competing priorities among watersheds are inevitable. Without direct municipal representation from smaller watershed communities, the programs and services in those areas would be placed at significant risk.

The Ontario Provincial Conservation Agency authority, scope and limits need to be clarified, and the governance model must define the decisions reserved for the RCA board.

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

The current budgeting process under O. Reg 402/22: Budget and Apportionment is transparent and consultative under the current 36 local CA model. Under the proposed RCA consolidation model, the local input, transparency, consultation and representation will be lost due to the sheer size of the proposed RCA.

A system that would support the proposed RCA could be created, but at what price?

There is no sufficient system that would allow transparency and genuine consultation with municipal funders under the proposed RCA with 81 municipalities given the geographic scale.

5. How can regional CAs maintain and strengthen relationships with local communities and stakeholders?

To maintain and strengthen relationships with local communities and stakeholders, an organization must maintain a local presence through local offices and staff to provide timely permitting, program delivery, operations, community engagement and effective stewardship. Flood forecasting and warning systems are critical public safety functions that must not be disrupted and needs to include local knowledge of the land. LPRCA provides recreational opportunities for the public. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities. LPRCA has a community committee that was established as a condition of a land donation that provides valuable local input into the management of the land. These unique types of relationships need to be considered in any new governance model.

The Province should engage in constructive and transparent consultation with CAs and municipalities who established, fund and govern their local CAs before proposing changes that will continue to levy for the proposed RCA and the OPCA all while reducing local municipal input/representation, governance and control.

Many local residents have left significant financial and property assets to LPRCA with the intention of preserving and continuing works at the local level. Many of these have been left in legacy through property names, signage, galleries, and park additions. How will these property and legacy assets be protected through the RCA process? This transition will erode public trust if not properly managed. Continuation of these types of donations is put at risk due to local connection being lost.

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Submission to the Environmental Registry of Ontario

ERO Posting: Proposed Regional Consolidation of Conservation Authorities

Submitted by: South Nation Conservation (SNC)

December 22, 2025

1. Introduction and Overall Position

South Nation Conservation (SNC) appreciates the opportunity to provide comments on the Province's proposal to restructure Ontario's Conservation Authority system through large-scale regional consolidation overseen by a new provincial agency.

This proposal represents the most significant change to Ontario's environmental management framework in over 80 years. While SNC supports efforts to modernize services, improve efficiency, and strengthen coordination, we are deeply concerned that the current proposal lacks transparency, evidence, and sufficient consideration of local governance, rural representation, watershed science, and municipal accountability.

Consolidation at this scale and speed creates a high risk to service continuity. Organizational capacity would be diverted to managing the consolidation process, rather than supporting provincial priorities, legislated responsibilities, and local programs. The compressed timelines increase the risk of staff attrition in critical public-safety roles and will impose significant financial costs on local ratepayers.

Conservation Authorities were created as locally governed, watershed-based institutions, established by municipalities, funded primarily by municipalities, and accountable to municipalities. Any reform must preserve this foundational model. Structural consolidation that removes local decision-making authority—without a return to meaningful provincial funding—would fundamentally undermine the effectiveness, accountability, and public trust that Conservation Authorities have built over generations.

2. Lack of Transparency and Evidence Undermines the Proposal

SNC has serious concerns regarding the limited transparency accompanying the proposed restructuring.

Municipalities and Indigenous communities received minimal advance notice, and the ERO posting does not clearly reference the legislative amendments contained in Bill 68 (Schedule 3) that would enable consolidation. This limits the ability of municipalities, stakeholders, donors, and the public to fully understand or assess the implications of the proposal.

No cost-benefit analysis, transition plan, or evidence-based justification has been provided. Notably, the Province's Housing Affordability Task Force Report does not identify Conservation Authorities as a barrier to housing or economic development.

SNC consistently delivers strong performance outcomes:

- 98% of regulatory permits are issued within provincial timelines
- 100% of planning reviews are completed within municipal timelines

- 100% of sewage system permits under Part 8 of the Ontario Building Code are issued on time, with an average review period of 9 days

These results demonstrate that Conservation Authorities already support timely, sustainable development and do not support the premise that structural consolidation is required to improve outcomes.

Past provincial changes—such as removing Conservation Authorities’ ability to provide natural heritage and hydrogeological services—have already demonstrated unintended consequences for rural municipalities who needed to hire their own consultants, forcing higher costs, longer timelines, and reduced local knowledge. These outcomes underscore the need for careful, evidence-based reform.

3. Watershed-Based Management, Local Expertise, and Effective Permitting

Watershed-based management depends on strong local expertise. Natural hazards, erosion processes, drainage systems, groundwater conditions, and land-use pressures vary significantly across Ontario and require place-based knowledge to manage safely and effectively.

The Ontario Superior Court has affirmed, in the context of municipal permitting under the *Building Code Act*, that decision-makers must understand the character of their community and local conditions. This principle applies equally to Conservation Authority permitting, where decisions directly affect public safety, property protection, and environmental risk.

Eastern Ontario includes highly sensitive conditions such as:

- Leda clay plains and retrogressive landslide zones
- High phosphorous loads and an established Phosphorous Credit Trading Program
- Flood-prone river systems and flat landscapes
- Highly variable groundwater conditions

These realities cannot be effectively managed through distant, centralized decision-making.

SNC is one of the oldest and geographically largest Conservation Authorities in Ontario and has undergone multiple jurisdictional expansions over the past decade—at the request of municipalities—including extensions to the St. Lawrence River and Ottawa River systems. These expansions reflect municipal confidence in the Conservation Authority model and a desire for shared, locally delivered services.

SNC also demonstrates effective shared-service delivery through programs such as the Ontario Building Code Part 8 Sewage System Program, delivered on behalf of 16 municipalities with specialized staff, high-quality service, and no direct cost to municipalities. This model illustrates how shared expertise can improve efficiency without removing local governance.

4. Provincial Funding Concerns

When Conservation Authorities were created, the Province and municipalities were equal partners, each contributing approximately 50% of operating funding. Provincial support has since declined to approximately 3% of current operations.

Municipalities have continued to invest because the work protects people, property, drinking water, and local economies. South Nation Conservation is a partner of choice for its member municipalities.

The Province now proposes to:

- Eliminate Conservation Authorities without municipal consent
- Redirect municipal funding to provincially controlled agencies
- Centralize environmental decision-making without restoring funding

This represents provincial control without provincial investment. Unlike health or education restructurings—where services are provincially funded—environmental management has been consistently downloaded to municipalities. Municipal funding must not be redirected to support new bureaucracies and municipalities should be able to decide the future of their Conservation Authority and jurisdictional boundaries.

Future funding of the new Ontario Provincial Conservation Agency should be clarified to ensure that the Province fully funds this new agency without contributions from local rate payers.

5. Local Governance, Municipal Oversight, and Rural Representation

The proposed consolidation risks marginalizing rural communities within extremely large regions—comparable in size to small European countries.

Representation under regional models would be driven by municipal levy contributions, meaning urban centres could dominate decision-making despite the fact that:

- The majority of the land base is rural.
- Rural municipalities rely most heavily on Conservation Authority services and staff expertise.
- Conservation Authorities function as the primary environmental staff extension for small municipalities.

Current governance models demonstrate a strong balance between urban and rural funding and decision-making, where a single urban centre (Ottawa) already contributes most of the local funding while achieving consensus with rural municipalities. Large regional boards with multiple urban centres and over 40 rural municipalities would make it extremely difficult to maintain equitable rural representation and local accountability.

While consolidation may offer future benefits in service coordination, the proposed size of the regions would be incredibly difficult to manage operationally. It already takes several hours to drive through these areas and consolidation of that size would risk marginalizing rural communities.

Amalgamations or regional consolidations should only occur where supported by member municipalities to ensure continued local decision-making and financial accountability.

6. Protecting Category 3 Services Supported by Municipalities: Place-Based Stewardship

Many essential Conservation Authority services are municipally supported Category 3 programs, including:

- Agricultural stewardship and drainage support
- Tree planting, forest, and woodlot management
- Cost-share water quality improvement projects on private land
- Environmental education and outreach

These services reflect local priorities and deliver measurable environmental and economic benefits. Structural consolidation risks weakening or eliminating these locally supported programs as they are not uniformly offered in other jurisdictions. Opportunities to protect and strengthen these programs should be considered.

Agricultural stewardship programs depend on trust, local relationships, and deep understanding of soils, drainage systems, and farm operations. Conservation Authorities work closely with drainage superintendents, farmers, and municipalities to deliver coordinated solutions. Agricultural organizations also have close working relationships with SNC where programs are jointly developed, and landowner stewardship projects are implemented through peer-to-peer farm networks.

Replacing these community-based partnerships with centralized administration risks undermining farm viability, environmental protection, and rural resilience.

7. Bilingual Services and Cultural Identity

SNC is the only bilingual Conservation Authority in Southern Ontario, serving municipalities designated under the *French Language Services Act*. Respecting French-language rights is both a legal obligation and a core cultural value.

Any restructuring must guarantee full bilingual capacity without downloading additional costs or administrative burdens onto municipalities. Larger regional structures risk weakening service quality, responsiveness, and cultural representation.

8. Donor Lands and Community Stewardship Must Be Respected

SNC manages over 13,000 acres of conservation land, much of it donated by residents and farm families with the expectation of permanent local stewardship.

These lands are subject to:

- Donor intent and charitable trust obligations
- Conservation easements and municipal agreements
- Legal and tax requirements

Transferring these lands to a new agency could undermine donor trust, violate legal obligations, and damage long-standing community partnerships. Conservation lands were built by communities and must remain locally stewarded.

9. Modernization Can Proceed Without Structural Amalgamation

SNC already demonstrates that consistency, efficiency, and coordinated service delivery can be achieved without dissolving local Conservation Authorities.

Across Eastern Ontario, SNC participates in strong regional partnerships that align policies, share expertise, and deliver services seamlessly across municipal boundaries. The Ottawa Conservation Authority Partners (SNC, RVCA, and MVCA) coordinate land use planning reviews, watershed monitoring, and the joint delivery of stewardship programs such as tree planting and water quality improvement projects. SNC administers City of Ottawa programs on behalf of the conservation partners and coordinates regional initiatives such as the Eastern Ontario Farm Stewardship Collaborative. SNC also maintains shared service delivery models with neighbouring authorities, including with the Raisin Region Conservation Authority for drinking water source protection and community programs.

These collaborations extend to natural hazard management. Along the Lower Ottawa River, the Ottawa CA partners work closely with the Ottawa River Secretariat and affected municipalities to monitor river conditions, share data, and deliver coordinated flood forecasting and communications. This model demonstrates that effective, science-based watershed management already occurs across jurisdictions, without the disruption, cost, and risk associated with structural amalgamation.

SNC supports modernization initiatives that strengthen the system while preserving local governance, including:

- A provincial online permitting portal to improve transparency and customer service
- Updated and evidence-based natural hazard policies
- Shared-service models for technology, information management, and corporate services
- The use of service corporations or regional shared-service hubs to support back-end efficiencies

Shared services or service corporations can deliver many of the outcomes the Province seeks through consolidation, while avoiding its risks. These models:

- Reduce administrative duplication while protecting frontline capacity
- Build technical and corporate capacity for smaller Conservation Authorities
- Are scalable, reversible, and easier to refine over time
- Provide greater organizational stability and reduce the risk of staff attrition
- Preserve the local knowledge, responsiveness, and accountability of existing field staff

In contrast, full amalgamation is irreversible and carries significant transition risk. Once local governance structures, staffing models, and community relationships are dismantled, they cannot easily be rebuilt if unintended consequences arise.

Modernization can — and should — proceed within Ontario’s existing watershed-based framework. Structural amalgamation is not required to achieve consistency or improved service delivery and would weaken the municipal relationships and local expertise that underpin effective environmental management.

10. Conclusion and Recommendations

SNC urges the Province to pause the proposed consolidation and engage in meaningful, evidence-based consultation with municipalities, Conservation Authorities, Indigenous communities, agricultural partners, and other stakeholders.

The challenges facing Ontario — climate change, population growth, development pressure, and increasingly complex natural hazards — require stronger Conservation Authorities, not the dismantling of institutions that communities have relied on for nearly eight decades.

With the passage of Bill 68 and the creation of the Ontario Provincial Conservation Agency (OPCA), it is essential that the Province clearly define the role, scope, governance, and funding of this new body. Any new provincial agency must be:

- Fully funded by the Province, with no cost recovery from municipal levies.
- Designed to support, not override, municipal governance of Conservation Authorities.
- Governed with balanced representation from urban and rural municipalities, agriculture, and Conservation Authorities, with geographic diversity across Ontario.
- Work collaboratively with partners and stakeholders to ensure changes are constructive and achieve desired outcomes.

SNC recommends that the Province:

- Restore meaningful and sustained provincial funding aligned with provincial priorities
- Advance modernization through shared services, service corporations, and centralized tools rather than amalgamation
- Respect municipal authority to establish, modify, or dissolve Conservation Authority boundaries
- Protect adequate rural and agricultural representation in all governance models
- Maintain the principles of Integrated Watershed Management
- Protect bilingual services, donor lands, and Category 3 municipal programs
- Ensure reforms are transparent, evidence-based, and collaborative
- Provide sufficient transition timelines and provincial funding to protect existing service delivery
- Consider a focused role for the OPCA in permit appeals and hearings, rather than operational control
- If consolidation is deemed necessary, pursue targeted, voluntary, and incentivized approaches, supported by provincial funding

Environmental management works best when decisions are made close to the land, the people, and the communities they serve. Conservation Authorities exist because municipalities chose to create, govern, and fund them — and that foundational principle must continue to guide reform.

With the right commitment, collaboration, and provincial investment, this moment can strengthen Ontario's conservation system rather than destabilize it — building on what already works, respecting local governance, and ensuring communities remain protected in the face of growing environmental risk.

Resolution
Special Council Meeting



Agenda Number: 7.1.1.
Resolution Number: 2025-215
Title: Response to Bill 68 – Conservation Authority Changes
Date: Wednesday, December 10, 2025

Moved by Mike Tarnowski
Seconded by Genevieve Lajoie

Whereas the *Conservation Authorities Act* (R.S.O. 1990, c. C.27) enables municipalities to establish conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of Board Members and the provision of annual municipal levies to support mandatory and non-mandatory programs and services;

And whereas the municipalities within Eastern Ontario, including the United Counties of Prescott and Russell (the “UCPR”), are founding municipal partners of the South Nation Conservation Authority (1947) and the Raisin Region Conservation Authority (1963);

And whereas municipal governments currently provide between 25% and 50% of total conservation authority funding, while the Province of Ontario provides approximately 3%;

And whereas municipalities have, for decades, governed their respective conservation authorities to ensure that programs, services, fee structures, permitting processes, and public service delivery remain aligned with local watershed needs and accountable to ratepayers;

And whereas conservation authorities collectively own and manage significant public lands across Ontario, including lands donated by local residents with the expectation that they would be protected, stewarded, and governed locally for the long-term public good;

And whereas Bill 68 proposes the creation of a new Ontario Provincial Conservation Agency—a Crown corporation that would assume governance responsibilities and consolidate Ontario’s 36 conservation authorities into seven regional authorities, with municipal cost apportionment and governance structures yet to be defined;

And whereas the Province already holds the authority to set provincial standards, regulations, and expectations for conservation authority operations under the *Conservation Authorities Act* and through the Ministry of the Environment, Conservation and Parks;

Be it resolved that the Council of the UCPR call on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities, ensuring strong municipal representation in decisions related to levies, service delivery, land management, and community-focused program outcomes.

Be it further resolved that while the UCPR support provincial objectives related to consistent permitting standards, shared services, and digital modernization, the imposition of a top-down centralized agency risks increasing cost, red tape, and administrative complexity while reducing accountability and responsiveness to local watershed needs.

Be it further resolved that the UCPR support balanced approaches to improving capacity, efficiency, and technical expertise across conservation authorities and request that the Province work collaboratively with municipalities and existing conservation authorities to evaluate where strategic consolidation—if any—is appropriate, effective, and financially sustainable.

Be it further resolved that a copy of this resolution be sent to the Ontario Minister of the Environment, Conservation and Parks; the local Member of Parliament and Member of Provincial Parliament; the Association of Municipalities of Ontario; the Rural Ontario Municipal Association; and all municipalities and conservation authorities in Ontario.

Carried

Mélissa Cadieux, Clerk

Sent by email to: minister.mecp@ontario.ca

December 24, 2025

The Honourable Todd McCarthy
Minister of Environment, Conservation and Parks
5th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

Subject: Recommendations for Successful Conservation Authority Transformation

Dear Minister McCarthy,

The Association of Municipalities of Ontario and Conservation Ontario are writing to provide joint feedback on ERO 025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities (CAs) complementing our respective and separate ERO submissions.

We support the goals of this proposal. Accelerating local approvals helps protect Ontario's economy amid global uncertainty. Faster, more predictable approvals, that maintain environmental protections and prioritize frontline conservation can unlock the new infrastructure and development required for a growing, competitive province.

Municipal and local partnership is key to CA success. The success of the CA model is local: expertise, governance, community trust, and partnerships. If regionalization results in structures that cover too large a geographic area, we risk losing what makes CAs effective:

- **Loss of local expertise:** Watershed-based CAs have extensive on-the-ground expertise and understanding of unique environmental conditions, enabling timely and effective decision-making on local development, and real-time responsiveness during storms and emergencies.
- **Loss of effective municipal oversight:** Municipal accountability and oversight help CAs effectively balance watershed management and community growth.
- **Loss of strong local relationships:** Key stakeholders (such as municipalities, Indigenous communities, businesses, the agricultural community, watershed residents, and other partners) provide funding, donations, and build public trust.

Over 100 municipalities have passed or are considering resolutions urging the Province to move forward by working together with municipalities and CAs to achieve provincial objectives while preserving local governance, accountability, and expertise.

AMO and CO propose a right-sized, simplified regional model that:

- is grounded in science-based watershed boundaries
- maintains strong municipal involvement and oversight
- preserves local relationships and community trust
- balances the need to stay connected at the community level with the needs of certainty, predictability, and consistency of service delivery standards for permitting and approvals
- avoids unnecessary complexity by allowing lands, major agreements (including employment), reserve funds etc. to remain within existing corporations

To achieve this, AMO and CO recommend that the Province:

1. Work together with an implementation working group (including AMO, Conservation Ontario and select CAs, municipal, developers, and Indigenous representatives) to jointly develop practical solutions, including:
 - service standards, permitting faster and standardized approvals
 - governance and boundary design
 - funding models, allocations, and reserve structures
 - shared “back office” efficiencies and,
 - clear transition planning including: service continuity; points of contact; permitting continuity measures; board and staff communications; and staff retention measures.
2. Commit to a clear implementation timeline and transition plan supported by the implementation working group to position transformation for success. This will ensure continuity of service certainty for all stakeholders.
3. Share comprehensive financial, operational, and governance impact analysis to support evidence-based decision-making.
4. Restore a 50-50 municipal-provincial funding partnership for CAs, reflecting expanded Provincial role in CA operations while ensuring affordability and long-term stability.

All stakeholders, including the development industry, benefit from certainty. This approach minimizes the risk of multiple significant changes occurring at the same time, limits disruption to program delivery, and creates conditions for better outcomes and buy-in.

Ministry McCarthy, we thank you for the opportunity to provide feedback and look forward to discussing these concerns with you. Please contact Karen Nesbitt, Director of Policy and Government Relations at AMO (knesbitt@amo.on.ca), to arrange a meeting at your earliest convenience.

Sincerely,



Robin Jones
AMO President
Mayor of the Village of Westport



Dave Barton
Chair, Conservation Ontario
Vice-Chair, Toronto and Region Conservation Authority
Mayor, Township of Uxbridge

cc: The Honourable Rob Flack, Minister of Municipal Affairs and Housing
Sarah Harrison, Deputy Minister, Ministry of Environment, Conservation and Parks
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing

Report to: Conservation Advisory Board

Approved for Circulation By: Lisa Burnside, CAO

Reviewed By: T. Scott Peck, MCIP, RPP, Deputy CAO/Director, watershed Management Services

Prepared By: Mike Stone, MCIP, RPP, Manager, Watershed Planning, Stewardship & Ecological Services
Lesley McDonell, Supervisor Stewardship and Ecological Services
Colin Oaks, Aquatic Ecologist
Stacey Van Opstal, Monitoring Technologist
Allison Morgan, Climate Change Coordinator
Kasia Zgurzynski, Natural Areas Inventory Coordinator

Meeting Date: December 11, 2025

Subject: Ecological and Water Resources Monitoring Comprehensive Plan

Recommendation:

THAT the Conservation Advisory Board recommend to the Board of Directors,

THAT the document titled “Hamilton Conservation Authority’s Ecological and Water Resource Monitoring Programs – A Comprehensive Plan for Program Development, Integration and Implementation November 2025”, be approved.

Executive Summary:

This report highlights a HCA Strategic Plan First Year Priority to develop a comprehensive approach for the integration of the aquatic, terrestrial, and water quality monitoring programs. The Comprehensive Plan will also link these programs to the HCA Climate Change Strategy, in order to help gauge the impact of climate change on watershed health and formulate adaption and mitigation approaches.

Over the past 10 years, HCA has developed and refined its watershed

monitoring programs in water quality, aquatic and terrestrial systems. Prior to the development of the Comprehensive Plan, these programs had not been reviewed related to how they could be integrated with each other or how their results of one program could influence another. HCA staff detailed the existing programs, mapped existing monitoring stations throughout the watershed separately and combined to review how the monitoring programs could be used to gauge the impact of climate change. With this, gaps in the monitoring programs were identified to strengthen the monitoring programs and to gauge the impact of climate change. Short term and long term enhancements have been identified and will be implemented year over year and budget permitting to bring watershed science to a new level at HCA.

Staff Comment / Discussion:

The Comprehensive Plan for the Ecological and Water Monitoring Programs has been developed to identify a comprehensive approach for the integration of the aquatic, terrestrial, and water quality monitoring programs. The Plan will also link these programs to the HCA Climate Change Strategy, in order to help gauge the impact of climate change on watershed health and formulate adaption and mitigation approaches. These monitoring programs have been functioning in parallel for more than 10 years, this report brings the watershed science together. Each monitoring program is documented with details as to how it is executed and data stored and analyzed. The Comprehensive Plan is needed for the following reasons.

- To identify gaps within and between programs to ensure monitoring is comprehensive.
- To integrate HCA's monitoring programs so that data can be related between monitoring programs and any watershed threats identified and mitigated, such as climate change.
- To provide guidance on time frames and costs to integrate programs and address data gaps.

Goals for the programs over the short (5 years) and long (10 years) term have been created based on identified program gaps (See Pages 38, 39 and 40 of Monitoring Comprehensive Plan). There are three short term goals for the Terrestrial Resource Monitoring Program (TRMP) and the Water Quality Monitoring Program, two short term goals for the Aquatic Resource Monitoring Program (ARMP) and five short term goals for the combined programs. Examples of combined goals include:

- creation of an ecology database to house the TRMP and ARMP
- developing communications strategies to explain watershed science.

There are also several long-term goals identified, including four for the TRMP, two each for the ARMP and water quality monitoring program and two goals shared by all the programs. Common long terms goals centre around communication and creation of a monitoring program web page. Including these additional parameters will help HCA integrate the programs as well as provide information as to the impact of climate change on the watershed.

Strategic Plan Linkage:

The initiative refers directly to the HCA Strategic Plan 2025 – 2029:

- **Strategic Priority Area – Natural Heritage Conservation**
 - Improve our understanding of watershed ecosystems and address emerging issues by broadening the scope of HCA monitoring activities.

- **Strategic Priority Area – Water Resources Management**
 - Monitor the impacts of climate change through existing and enhanced monitoring programs and networks to inform adaptation and mitigation strategies.

Agency Comments:

N/A

Legal / Financial Implications:

The comprehensive plan includes a detailed section of short- and long-term goals with proposed budgets. Within the 2026 priorities, costs have been incorporated into the 2026 Budget for a statistical review (power analysis), spring ephemeral tracking dissolved organic carbon analysis and working group with an estimated costs of \$30,000. Migratory bird surveys are also proposed for 2026 and have been included in a recent funding application.

Related Reports and Appendices:

Hamilton Conservation Authority’s Ecological and Water Resource Monitoring Programs – A Comprehensive Plan for Program Development, Integration and Implementation November 2025

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A Healthy Watershed for Everyone

Hamilton Conservation Authority’s Ecological and Water Resource Monitoring Programs – A Comprehensive Plan for Program Development, Integration and Implementation

November 2025

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1.0 Executive Summary

The Comprehensive Plan for the Ecological and Water Monitoring Programs has been developed to identify a comprehensive approach for the integration of the aquatic, terrestrial, and water quality monitoring programs. The Plan will also link these programs to the HCA Climate Change Strategy, in order to help gauge the impact of climate change on watershed health and formulate adaption and mitigation approaches. Each monitoring program is documented with details as to how it is executed and data stored and analyzed. The Comprehensive Plan is needed for the following reasons.

- To identify gaps within and between programs to ensure monitoring is comprehensive.
- To integrate HCA's monitoring programs so that data can be related between monitoring programs and any watershed threats identified and mitigated, such as climate change.
- To provide guidance on time frames and costs to integrate programs and address data gaps.

Goals for the programs over the short (5 years) and long (10 years) term have (been created based on identified program gaps. There are three short term goals for the Terrestrial Resource Monitoring Program (TRMP) and the Water Quality Monitoring Program, two short term goals for the Aquatic Resource Monitoring Program (ARMP) and five short term goals for the combined programs. Examples of combined goals include:

- Creation of an ecology database to house the TRMP and ARMP
- Developing communications strategies to explain watershed science.

There are also several long-term goals identified, including four for the TRMP, two each for the ARMP and water quality monitoring program and two goals shared by all the

programs. Common long terms goals centre around communication and creation of a monitoring program web page. These long- and short-term goals have a budgetary value between 0\$ and \$150,000. Including these additional parameters will help HCA integrate the programs as well as provide information as to the impact of climate change on the watershed.

2.0 Purpose and Goals

The Hamilton Conservation Authority (HCA) Board of Directors approved several priority initiatives in 2025 to support the implementation of the HCA Strategic Plan (2025-2029). One of the initiatives was to “develop a comprehensive plan for the aquatic, terrestrial, and water quality monitoring programs to gauge the impact of climate change and link this to the HCA Climate Change Strategy to formulate adaption and mitigation approaches.” This plan and the subsequent analysis will be used to gauge the impact of threats to the watershed that include a variety of factors including climate change, urbanization, pollution, recreation, and encroachment. Adaptation and mitigation approaches will address high level restoration opportunities as they become clear through monitoring program integration and analysis.

Over the past 20 years, HCA has developed an extensive monitoring program for aquatic, terrestrial, and water resources. These programs have been developed at different times, and generally independently of each other where integration via station selection and data analysis has not occurred. The purpose of this comprehensive plan is to review integration of these monitoring programs and how it could be achieved. This will include the identification of gaps within the current monitoring programs, both between programs and gaps in what is currently monitored within each program. The overall goal for all the monitoring programs and their integration is to:

1. Continue to build and improve on HCA’s knowledge of the health of fish populations, aquatic habitat, forests and wetlands within the watershed, and to integrate this ecological monitoring with water quality monitoring so that data can be compared and analysed.

2. To be able to report on trends and changes over time for all the monitoring programs and their specific metrics across the watershed.
3. To help focus restoration efforts where monitoring is showing degradation.
4. To monitor and report on the impacts of climate change across the watershed and identifying mitigation and adaptation approaches to address these impacts.

This plan should serve as a living document as more data is collected and monitored overtime, and recommendations are evaluated. It is anticipated that the comprehensive monitoring plan will be reviewed and updated every 5 years.

2.1 Monitoring Program Integration

This comprehensive plan will be the first step to integrate HCA's ecological and water resources monitoring programs, and will consider a variety of issues including

- Identification of gaps in the program,
- Identification of overlap in station location,
- Identification of data that can be shared that would affect the variables collected in the other programs.

A map that overlays all the monitoring across the watershed is included in Appendix A. This helps identify data gaps in each individual monitoring program, as well as gaps to be addressed in considering the integration of the programs. Further work will be needed reviewing all the programs together to see how each might influence a decision on monitoring program metrics. It will be important to develop metrics to evaluate status and trends of ecological integrity and ecosystem health across the watershed. The status and trend of different variables can be decided through the development of various metrics, such as Index of Biological Integrity (IBI). IBI is a scientific tool used to assess ecological health by comparing specific biological indicators to the ideal conditions for the stream type such as the presence of sensitive species. Status and trends for the three programs and the metrics within them can be reviewed at multiple spatial and temporal scales. Integrating these programs to monitor varied ecosystems components may aid in finding emerging threats and as an early warning sign of declines in ecosystem health and impacts of climate change.

3.0 Summary of Current Programs and Program Gaps

3.1 Aquatic Resource Monitoring Program

3.1.1 Background

The HCA's aquatic biological monitoring program began in the 1990's with individual projects generally restricted to a specific area or sub-watershed. The Aquatic Resource Monitoring Program (ARMP) was developed in 2004 to establish a long-term consistent approach to monitoring aquatic systems throughout HCA's jurisdiction. The program, which was approved by the HCA Board of Directors on April 7, 2005, integrates chemical (water chemistry via benthic macroinvertebrate community composition), biological (fish populations and communities) and physical (fish habitat, channel morphology) assessments within all of the HCA's major watersheds to provide an overall assessment of watershed health. The ARMP has evolved over time but maintains a focus on monitoring parameters that are indicators of ecological health. These parameters are analysed using an IBI.

3.1.2 Station Selection

To meet program objectives for stream sampling, a minimum of 26 stations has been designated to be surveyed every year for fish and benthic macroinvertebrates. This number is based on the size of each watershed as well as the resources and staffing capabilities. As a result, there are 36 designated monitoring stations in Spencer Creek, 10 in Red Hill Creek, 7 in Stoney Creek and 1 for Lake Ontario per year. Although similar in size to the Red Hill Creek watershed, a substantial proportion of the Stoney Creek watershed contains intermittent streams that dry through the summer months. Based on HCA resources, 13 stations were selected as annual monitoring stations and will be monitored yearly. The remaining stations are monitored over a split rotating 3-year cycle. 5 of the designated stations correspond with HCA's surface water quality and stream flow monitoring programs as annual monitoring stations. Through annual monitoring, chemical and discharge-related parameters influencing aquatic species and habitat at each of these stations can be analyzed and compared with the physical

analyses of fish, habitat, and benthic macroinvertebrate composition. See Appendix B for a complete listing of station codes and Figure 1 below for station locations.

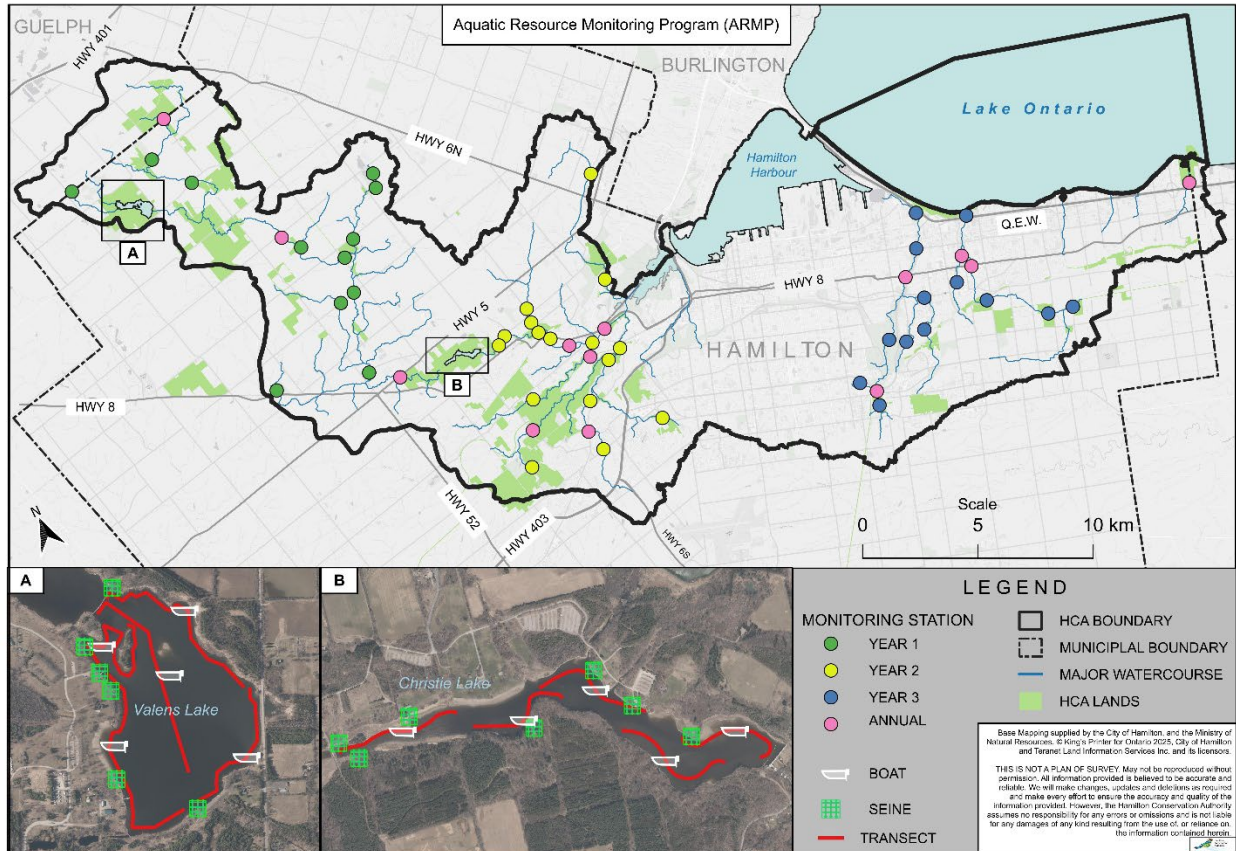


Figure 1: Map of Aquatic Resource Monitoring Program Stations, Seine Net and Boat Electrofishing Transects

Only fish sampling is conducted at the Valens Lake and Christie Lake reservoirs. 5 systematically placed boat electrofishing transects were identified in each reservoir within the navigable portion. Additionally, 6 and 7 seine sites were identified along each reservoir shoreline respectively (Figure 1).

3.1.3 Sampling Program and Methodology Overview

13 annual sites and up to 13 rotating sites are sampled twice during the months of May – August as part of the ARMP for benthic macroinvertebrates and fish.

Benthic macro invertebrate sampling follows the Ontario Benthos Biomonitoring Network (OBBN) protocol (Jones et. al, 2005). The central purpose of this protocol is to assess the water quality and habitat conditions of aquatic ecosystems using benthic macroinvertebrates as indicators. These larger macroinvertebrates live within or on the bottom substrates of watercourses for at least a portion of their life cycle. Stream measurements are taken for habitat details and then the collected macroinvertebrates are returned to the HCA lab. At the lab the macroinvertebrates are identified to the family level for analysis.

For stream fish, ARMP uses sampling methodology developed by HCA that is very similar to the Ontario Streams Assessment Protocol (OSAP) (Stanfield L., 2010) single pass electrofishing method. A Halltech Model# HT- 2000B electrofishing unit is used for single pass presence/absence surveys. Fish community and habitat data is collected each year at these stations by an electrofishing crew using a backpack unit. This is completed in July and August. Station length, wetted width and hydraulic head are also recorded. IBI is calculated for each site. This rates sites based on the fish community present from Poor to Very Good. Fish community and habitat data is also collected via separate established protocols for seine nets and boat electrofishing in the Valens Lake and Christie Lake Reservoir.

3.1.4 Data Analysis

3.1.4.1 Watershed Report Card / Macroinvertebrate Assessment

The macroinvertebrate community (benthics) structure indicates the ecological health of an aquatic system. Benthic populations and species presence/absence can be useful in identifying environmental quality. Macroinvertebrates are directly linked to fish through the food chain; therefore, a change in their community can act as an indicator for possible change in a fish community. Benthic macroinvertebrate communities are recognized as less able to readily move about the stream as compared to fish species. As such, it is assumed that they are better representative of all physical, chemical, and biological changes at the site level than fish communities. Data analysis regarding macroinvertebrates follows the Watershed Report Card process which uses the Hilsenhoff 1988 Family Biotic Index as modified by New York State (Smith et al., 2009).

This involves calculating the average benthic value for the samples taken over the five-year period between watershed report cards for each sub watershed. The New York State Family Biotic Index Tolerance Values are used to determine the final point score and grade for each sampling site. The scores for each station across a subwatershed are then combined for the final score. Each site is rated from Very poor to Excellent for water quality based on the points scores which can then be rolled up to a subwatershed rating.

This benthic information is then combined with the surface water chemistry data from the Provincial Water Quality Monitoring Network (PWQMN) sampling to produce the surface water quality score for the Conservation Authority Watershed Report Card which is produced every 5 years.

3.1.4.2 Fish Community Assessment

Fish communities can be used as indicators of water and habitat quality. They are more mobile than benthic macroinvertebrates so as an indicator they are not as reliable. However, fish are generally the target organisms important to people for recreation and consumption and these results are most relatable to the public. Different species of fish have differing tolerances for water quality and pollution. Some are more tolerant while others like Brook Trout are very sensitive and can only live in the best conditions. One tool HCA uses to analyse fish catches and stream health is a IBI. T A modified version of the IBI has been created by Credit Valley Conservation (CVC) staff, tailoring the IBI to the Credit River watershed, and in general, to urbanized southern Ontario watersheds (Morris, Undated). This modified version of the IBI uses similar metrics and provides an IBI score for each species sampled. This methodology from CVC was adapted and adopted by HCA (Dunn et al, 2005 and Faulkenham et al, 2007). Each site is rated from Very poor to Excellent for water quality based on the points scored under the metrics. These combined metrics speak to the ecological integrity (EI) of the stream system and fish community.

3.1.4.3 Thermal Assessment

In 2019, HCA initiated a thermal stream assessment program and installed nine temperature loggers in the Spencer Creek system. The loggers are set to record the stream temperature every 30 minutes from installation (spring) to removal (fall). The loggers are left in place until late fall, usually early December. The temperature sites generally align with the ARMP sites in Spencer Creek. Additionally, 1 air logger is installed in the watershed to provide a local comparison to the standardised Environment Canada weather station sites (Hamilton Airport).

3.2 Aquatic Resource Monitoring Program Gaps

3.2.1 Statistical Analysis and Reporting

Formal reporting for the ARMP is generally not undertaken. Significant data is collected and stored in a database; however, minimal analysis is completed. Summary reports for the data should be produced after each full 3-year monitoring cycle. Additional metrics indexes and analysis of the catches and habitat should be included in the analysis beyond IBIs for fish and benthics. Each assessment type has limitations and using multiple variables provides a better understanding of the conditions present. At least 10 additional analysis variables/metrics have been identified for inclusion (Appendix C).

3.2.2 Additional Fish and Benthic Surveys

The fish monitoring site locations surveyed each year generally date back to the origins of the ARMP. However, since then, HCA has restored sections of the watershed, with wetlands created at three conservation areas, placement of recycled Christmas trees in stream corridors. With these restoration areas and the original survey locations, more capacity maybe needed in the fish monitoring program for summer staff or a longer season. With the naturalization of the pond at Fifty Point Conservation Area including a wetland and a natural fishery, stations should be added. Additionally, consideration should be given to adding monitoring stations to the shoreline of Lake Ontario. The number of stations will be determined. Finally, there are several subwatersheds that have insufficient data for the Watershed Report Card. While some of these subwatersheds have no stream systems, like urban Hamilton others could be surveyed

during springs of abundant rain as they are normally dry by survey season. A review should be completed to determine if it is possible to add benthic monitoring stations or rework the program to gain more watershed coverage in these areas. These additional benthic monitoring stations would be in addition to the standard ARMP sites unless the sites would also support fish monitoring.

3.2.3 Stream Temperature Logger Distribution

Stream temperature is monitored as part of the thermal assessment program. The existing program is restricted to the Spencer Creek system and represents less than one third of the total ARMP program area. It would be beneficial to expand this program to the Redhill, Sulphur, Logies, Ancaster, Tiffany, all of Spring, Borers, and Stoney/Battlefield creeks. This would provide greater coverage of the watershed and allow HCA to monitor changes in stream temperature related to the changing climate and other factors such as urbanization or storm water management inputs. Stream temperature is crucial in maintaining the ecological integrity of aquatic ecosystems and limits the distribution and abundance of aquatic species (Jones, N.E. and L. Allin. 2010.). Fish are broken down into thermal guilds and as the climate warms, this will impact surface water temperature which could lead to changes in the fishery distribution. Identifying where changes in the temperature are occurring could provide opportunities to identify restoration projects either on HCA land or potentially for stewardship to work with landowners. Mitigation or adaptive management techniques in these locations could be implemented via active restoration. The number of stations and distribution will be determined in conjunction with the water quality monitoring team. It will also be influenced by the results of the power analysis, as discussed in Section 7. A power analysis is a statistical method that assesses the probability of correctly rejecting a null hypothesis when it is false (Steidl, R.J. and L. Thomas. 2001). In the context of monitoring, it is used to determine the minimum sample size needed in studies to detect significant changes in variables (like species population trends) with an acceptable confidence level (Steidl, R.J. and L. Thomas. 2001). This program is recommended for expansion above as it is ideal for tracking the effects of climate change on our aquatic stream environments (McBean, et al, 2022) and (Marcinkowski, P., 2024).

3.2.4 Important Fish and Benthic Habitat Area Maps

Fish species such as Brook Trout have specific habitat requirements for spawning. These habitats can be very limited on the landscape. Knowledge of the locations of these spawning habitats is poorly known in the watershed and therefore long-term protection is difficult. Surveys should be added to the monitoring program to map and protect these habitats.

3.2.5 Summary of Program Gaps

The table below provide a summary of the gaps monitoring gaps identified in the aquatic resources monitoring program. See section 6.1 for proposed costs and timing.

Table 1. Aquatic program gaps, and goal type

Gap	Goal Type
Statistical analysis and reporting.	Short term
Additional fish and benthic surveys	Short term
Stream temperature logger distribution	Short term
Important fish and benthic habitat area maps	Long term

3.3 Terrestrial Resource Monitoring Program (TRMP)

3.3.1 Background

HCA created a terrestrial monitoring program in 2012 which was then implemented in the spring of 2013. This program focuses on monitoring hardwood forests to determine if the Ecological Integrity (EI) of the watershed's hardwood forests differ between the urban (lower watershed - Hamilton and Stoney Creek area) and rural portions (upper watershed - Flamborough and Dundas areas). This type of forest was chosen because it is a large landscape component that occurs in all areas of the watershed, and there are a variety of indicators that can be used to gauge EI in this ecosystem type.

3.3.2 Station Selection

As hardwood forests are the focus for the beginning of the monitoring program, HCA reviewed the Ecological Land Classification as it relates to HCA property ownership and

distribution. Plots were selected based on their distribution in the watershed and occurrence of hardwood forests, regardless of condition. The plot set up resulted in 40 plots being set up over the last 13 years (2013-2025). There are 6 plots in Valens, Iroquois Heights and Felker's Falls Conservation Areas while the Dundas Valley Conservation Area has 8 plots. The remaining 14 are scattered throughout the watershed (Figure 2).

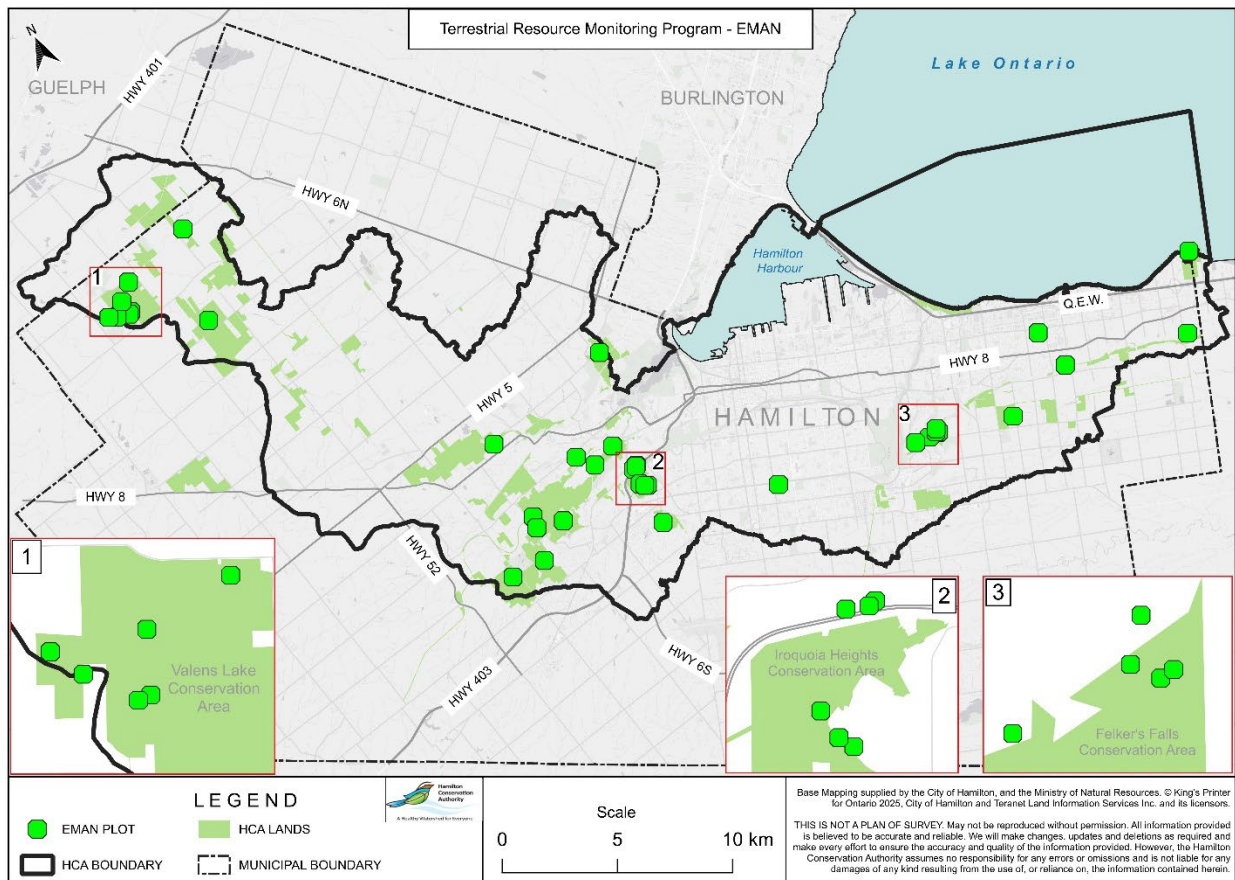


Figure 2: Ecological Monitoring Assessment Network Plots

3.3.3 Sampling Program and Methodology Overview

Forest plots have been set up according to standards developed by Environment Canada's Ecological Monitoring and Assessment Network (EMAN 2004a, EMAN 2004b, Roberts Pichette and Gillespie 1999), with slight modifications. This protocol is almost identical to that used by the Credit Valley Conservation, Conservation Halton, and

Toronto and Region Conservation Authority for forest monitoring (CVC 2010 and TRCA 2012).

Each forest vegetation plot consists of a 20 x 20m square plot (400 m²) for monitoring tree health. Multiple variables are recorded in each plot, examples include tree status and condition (alive or dead, standing, leaning or broken), diversity of ground vegetation including invasive species while tree regeneration is done by stem counts in 2x2 m sub plots.

3.3.4 Data Analysis

HCA analyzes the data from this monitoring program using a spotlight system, of good, fair, and poor categories based on conditions. Metrics were developed based on forest structure, composition, and function. Forest structure monitoring is based on identifying the structures and processes that define the natural functions in the forests of the watershed (Aubin 2007). Forest structure is important to biodiversity because it provides a variety of habitats for differing species in multiple taxa. The loss of a single species may not necessarily signal a decrease in the overall integrity of the ecosystem, if the function of the ecosystem remains the same (King 1993). Species composition within forest types is unique, and this composition is constantly changing in relation to stress, succession and human impacts. The long-term monitoring of trees in permanent plots provides important information on the structure and function of forest systems (Roberts-Pichette and Gillespie 1999). These metrics help to build an index of biological integrity, like the aquatic program. This allows HCA to assess the ecological integrity of the watershed forests. In addition, the TRMP likely has enough stations to study trends over time of EI in both the rural and urban portions of the watershed.

3.3.5 Constructed Wetlands and Restoration

HCA is currently monitoring two constructed wetland projects at Saltfleet and 50-point conservation areas. Monitoring of a newly constructed wetland at Eramosa Karst Conservation Area will begin in 2026. This work includes frog call surveys, photo monitoring, and migratory bird monitoring. This type of monitoring tends to have a short

duration between 1-5 years as the site stabilizes. Methods used for this monitoring program could be translated to an overall wetland monitoring program.

3.3.6 Terrestrial Resource Monitoring Program Gaps

There are multiple gaps within the terrestrial monitoring program. The following is a list of monitoring gaps currently identified in the program. These include physical program gaps and analysis gaps.

3.3.6.1 Watershed Wide Wetland Monitoring

This would fill a large gap in our knowledge of the watershed's health and overall ecological integrity, while connecting the aquatic and water quality monitoring programs to the terrestrial program.

3.3.6.2 Forest Bird Monitoring

While it was proposed when the original TRMP program was developed, it was never implemented. It is valuable to monitor variables that include flora and fauna when looking at the ecological integrity of the watershed. The current program focuses on flora only. Aspects of forest bird monitoring can also be used to track the impacts of climate change, by studying bird species that are vulnerable to climate change.

3.3.6.3 Statistical Analysis and Reporting

Formal reporting for the TRMP is generally not undertaken. Significant data is collected and stored in a database; however, minimal analysis has been completed. Summary reports for the data should be produced after each full 4-year monitoring cycle.

3.3.6.4 Spring Ephemerals Monitoring

These plants are perennials that bloom early in the spring before retreating underground for the rest of the year. They thrive in deciduous woodlands, taking advantage of the sunlight available before the tree canopies fill out. The phenology of these spring ephemerals can be impacted by climate change (Petrauski, L. et al, 2019). Plant phenology refers to the study of the timing of biological events such as leafing,

flowering and how these are influenced by changes to climate (Petrauski, L. et al, 2019). While catching first flower may be too time consuming, HCA can designate the same week of EMAN surveys in late May or early June for the urban and rural plots. By going on the same week each year flowering and leafing out of certain species can be determined and tracked in an anecdotal way. HCA will need to analyze the 40 monitoring plots and find common spring ephemerals across monitoring plots to add to the specific study.

3.3.6.5 Vernal Pool Water Levels

There is a significant population of Jefferson Salamanders (JESA) in the HCA watershed. Although recently studied by the University of Guelph, the impact of changing rainfall patterns on the water levels in the vernal pools of the Dundas Valley is unknown. There is a concern that these pools will dry up mid-summer while the JESA have not fully metamorphized (S.G. Van Drunen et al, 2023). T-bars should be placed into the middle of known JESA breeding pools with rulers attached to monitor water levels. These pools should be visited yearly in early spring (April) and later summer (mid to late August) to assess water levels and therefore potential survival of JESA. Tracking this information year over year along with precipitation and soil moisture should allow HCA to track the impact of climate change on these vernal pools.

3.3.6.6 Watershed-wide Frog Call Surveys

Amphibians are sensitive to changes in their environment from urbanization to pollution to climate change. A watershed wide monitoring program for amphibians following the marsh monitoring program could be implemented to track changes in populations across the watershed. This would require a large-scale volunteer effort or the installation of acoustic monitors to record amphibian calls. A focused effort could also be implemented for western chorus frogs, a species determined to be moderately vulnerable to climate change via the Climate Change Vulnerability Assessment of Species in The Great Lakes Basin (Brinker, S., 2018). This is a species that occurs in the eastern portion of the HCA watershed, particularly at Saltfleet Conservation Area and roadside ditches between 1st and 8th roads, saltfleet. HCA could create a monitoring

program specifically for tracking the first calls of this species and population dynamics through the Marsh Monitoring Program or automated acoustic monitors for both chorus frogs and a watershed wide program. The number of stations needed would be determined through a power analysis as previously described. This monitoring program could be developed alongside a wetland monitoring program.

3.3.6.7 Abundance and Distribution of Insects and Pathogen Outbreaks

The current monitoring program tracks the following diseases and pathogens.

- Beech leaf disease
- Beech Bark disease
- Emerald Ash Borer
- LDD moth
- oak wilt
- Hemlock Wooley Adelgid
- Spotted Lantern Fly.

It is anticipated with climate change that tree disease and pathogens may more easily survive Canadian winters and therefore persist more within forests than in the past. Natural Resources Canada (2025), within their report tracking climate change effects in Canada's forest sector (2014) considers tracking the changes in distribution, frequency and severity of major forest insect pests (i.e. forest tent caterpillar) to be highly indicative of climate change. Insects are sensitive to climate change and can impact large areas of forest. Monitoring for these pests will be added to the field sheets of the TRMP. This will formalize the monitoring to specific station HCA will need to determine which forest pest/pathogens will be tracked and how increases or decreases will be linked to climate change.

3.3.7 Summary of Gaps

The table below provides a summary of the monitoring gaps identified in the TRMP. See section 6.1 for proposed costs and timing for filling these gaps.

Table 2. Terrestrial program gaps, and goal type

Gap	Goal type
Forest bird monitoring	Short term
Spring ephemerals monitoring	Short term
Vernal pool water levels	Short term
Statistical analysis and reporting	Short term
Watershed wide wetland monitoring	Long term
Frog call surveys, watershed wide	Long term
Abundance and distribution of insects and pathogen outbreaks	Long term

3.4 Hamilton Natural Areas Inventory

3.4.1 Background

The Hamilton Natural Areas Inventory (NAI) is a partner-led project, through the collaborative efforts of lead partners including City of Hamilton, Hamilton Naturalists' Club, and Hamilton Conservation Authority. Supporting partners include Niagara Peninsula Conservation Authority, Grand River Conservation Authority, Conservation Halton, Royal Botanical Gardens, and McMaster University. An NAI has been completed in Hamilton approximately every ten years since 1993, with the current NAI scheduled to be completed in 2027. This project has traditionally surveyed large natural areas (Environmentally Significant Areas) for plant and bird communities across the City of Hamilton. Not all areas were surveyed in each NAI cycle, but different areas were surveyed in each project.

3.4.2 Station Selection

In 2003, Ecological Land Classification (ELC) started being incorporated into survey efforts. This includes documenting species and habitat types based on the vegetation community. Previously, work was done mainly with biologists in the field documenting species. There is the opportunity, as some sample locations have been visited repeatedly, to look for changes over time and possibly the impact of climate change on these vegetation communities. Trends over time are being considered by returning to

areas with consistent data over the years; to analyze how specific biodiversity metrics have changed in these areas.

The current NAI (2024-2027) has a focus on identifying data gaps. Aquatic systems were identified as a data gap as they were not surveyed throughout previous NAIs. A data gap analysis has also uncovered terrestrial natural areas that are undocumented or data-deficient, which the project aims to survey or record for future survey potential. This will allow the survey of these areas in the future with the lens of climate change and changes over time.

3.4.3 Sampling Program and Methodology Overview

For the current NAI, 5 locations were identified with 37 overlapping polygons that have been surveyed for plants and ELC multiple times over the course of the NAIs since the early 1990s. This area will be surveyed in these locations with trends analyzed over time. Factors that may be impacted by climate change will be analyzed, such as changes in the distribution of sensitive species. These sites will likely continue to be surveyed during future iterations of the NAI, giving us long-term data to analyze habitat changes.

The sampling methodology for the NAI is like the TRMP and ARMP programs, aside from a few key differences. While aquatic sampling followed Ontario Benthic Biomonitoring Network (OBBN) guidelines, a fourth vial was collected for samples. This vial contained species that were not present in the other vials, to illustrate a more complete representation of the biodiversity at each site. Since the benthic and fish surveys are new to the NAI as of 2025, they will be used as a baseline for future NAI surveys, providing data over time that may also illustrate trends.

3.4.4 Data Analysis

Several metrics have been identified as useful to the analysis of data collected by the NAI. The mean Coefficient of Conservatism (CC) refers to the sensitivity of plants within an area, based on how specific their habitat requirements are. Each plant species is

assigned to a CC, and a higher CC indicates that the species has more specific habitat requirements. A mean CC can then be calculated for an area; that describes how particular the species are to the habitat present there. Floristic Quality Index (FQI) uses the mean CC, in addition to richness values, to describe the overall conservation value of an area, based on how many sensitive species rely on that specific ecosystem. The FQI can be a useful measure to describe the quality and rarity of an ecosystem and can be included in justification to protect unique and valuable habitats. The NAI is completing repeat measures in biodiversity and the metrics noted above in 37 polygons. This data analysis will allow for comparison in a broad sense if the change that has occurred over time to the woodlots that have been repeatedly surveyed. NatureServe (2021) has developed a Climate Change Vulnerability Index that can be used to assess the vulnerability of species found during NAI and potentially illustrate areas that may be more vulnerable to climate change than others, based on their distribution of species. There is potential to illustrate this through reports that include mapping sensitive areas, to identify where adaptive measures may be necessary.

Other biodiversity indices that can be used include Pielou's evenness index, which describes how evenly distributed species are throughout a given area. Shannon Diversity Index can then be calculated, which describes the biodiversity using both the evenness and the richness of the area. A higher Shannon Diversity index indicates a greater diversity that is more evenly distributed throughout the ecosystem, which implies greater resilience in the face of threats (Gastauer et al. 2021). These metrics may be used for quantitative abundance data, such as those derived from benthic or fish surveys through the NAI. Again, these metrics can be used to compare biodiversity between sites over various survey years.

3.4.5 NAI Data Gaps

3.4.5.1 iNaturalist Data Analysis

Similar to spring ephemeral monitoring in the terrestrial monitoring data gaps section, iNaturalist a public participation database, could be used to track changes in plant phenology watershed wide. These changes have not been tracked in the past. The data analysis for this gap can note the species that were previously considered more

southern as they arrive in our jurisdiction. There is also potential for the loss of certain climate vulnerable species and habitat types to shift and decrease abundance in Hamilton over the course of the NAIs. This can also be compared to changes noted in this metric in the terrestrial monitoring program.

3.4.5.2 Migratory Birds

This NAI is also aiming to document migratory bird species moving through Hamilton, as this is a data gap, with most bird data being from breeding bird surveys. Working with this data may be too complicated to use for monitoring, but this will be investigated.

3.5 Water Resource Monitoring Program

The water quality (chemistry) monitoring programs undertaken by the HCA provides essential information regarding the current state of water quality in key streams and groundwater areas within the watershed. Maintaining these programs over extended periods of time allows HCA to assess important trends in water quality, including the overall improvements to water quality due to water quality enhancement measures or changes in water quality due to changes to land use and infrastructure operations.

In addition, the data and assessments provide valuable information to assist HCA and partners / others (City of Hamilton, Ministry of Environment, Conservation & Parks, academia, development consultants) with their activities and decision making.

There are three main Water Quality (Chemistry) Monitoring Programs.

3.5.1 Hamilton Harbour Remedial Action Plan (HHRAP) Water Quality Monitoring of Main Tributaries to Cootes Paradise Marsh

3.5.1.1 Background

This program supports the HHRAP objective of establishing non-point sources of water quality inputs to the marsh, which is an important step in reaching the delisting objectives for the Hamilton Harbour Area of Concern. HCA's program focuses on collecting surface water quality samples and identifying water quality contributions to Cootes Paradise from key watercourses.

HCA has been involved with this water quality monitoring program in partnership with the HHRAP, Ministry of Environment Conservation and Parks (MECP), and the City of Hamilton since the spring of 2014. HCA's involvement in this water quality sampling program has steadily grown, in response to initial findings and HHRAP suggestions.

3.5.1.2 Station Selection

The current 11 sampling sites include 5 in Chedoke Creek, 4 in Ancaster Creek, 1 in Spencer Creek, and 1 in Borers Creek (Figure 3). Station locations have been selected collaboratively by HCA, HHRAP and MECP. Stations located near where the main watercourses enter Cootes Paradise were initially chosen to allow for the separate determination of water quality inputs from each of these watercourses. Additional upstream stations were also added in some watercourses, to assist in identifying potential sources of water quality within a particular watershed.

3.5.1.3 Sampling Program and Methodology Overview

Year-round bi-weekly grab samples and the addition of 5 new grab sampling sites have brought the total number of analyzed samples from 77 (7 sampling sites x 11 grab samples per monitoring year) in 2014 to 286 (11 sampling sites x 26 grab samples per monitoring year) in 2023.

Water quality samples collected and reviewed by HCA staff identify potential key sources of watercourse-delivered nutrient, sediment and *E. coli*, determines annual averages and long-term trends in watercourse concentrations, and monitors the effects of implemented remedial actions. Parameters collected for this program are:

- Ammonia + Ammonium as N,
- Escherichia coli,
- Nitrate, Nitrite,
- o-Phosphate,
- Total Phosphorus,
- Total Suspended Solids

- Volatile Suspended Solids.

In field parameters are water temperature, dissolved oxygen, conductivity, pH, and turbidity.

This water quality data is shared with the City of Hamilton and is also conveyed annually to our partners through the Hamilton Harbour Remedial Action Plan. This information is additionally used by City of Hamilton for its own water quality review. This information is also provided to academia and the consulting community for water quality modeling studies, integrated watershed studies and other water resource engineering studies.

3.5.1.4 Data Analysis

In April each year, HCA staff undertake a fulsome assessment of the years sampling data, ultimately providing analysis and presentations to HHRAP and its partners. These assessments include identifying samples that exceed target concentrations, that are expected to support delisting of Cootes Paradise and Hamilton Harbour. The assessments also include identifying differences in average annual and seasonal concentrations across the 11 sampling sites, between baseflow and storm event average concentrations, as well as seasonal trends. Long-term trend analysis is completed using available historical data from Royal Botanical Gardens (who undertook this sampling program prior to 2014).

The HCA sampling program is not intended as real time monitoring of water quality nor as real time spill monitoring.

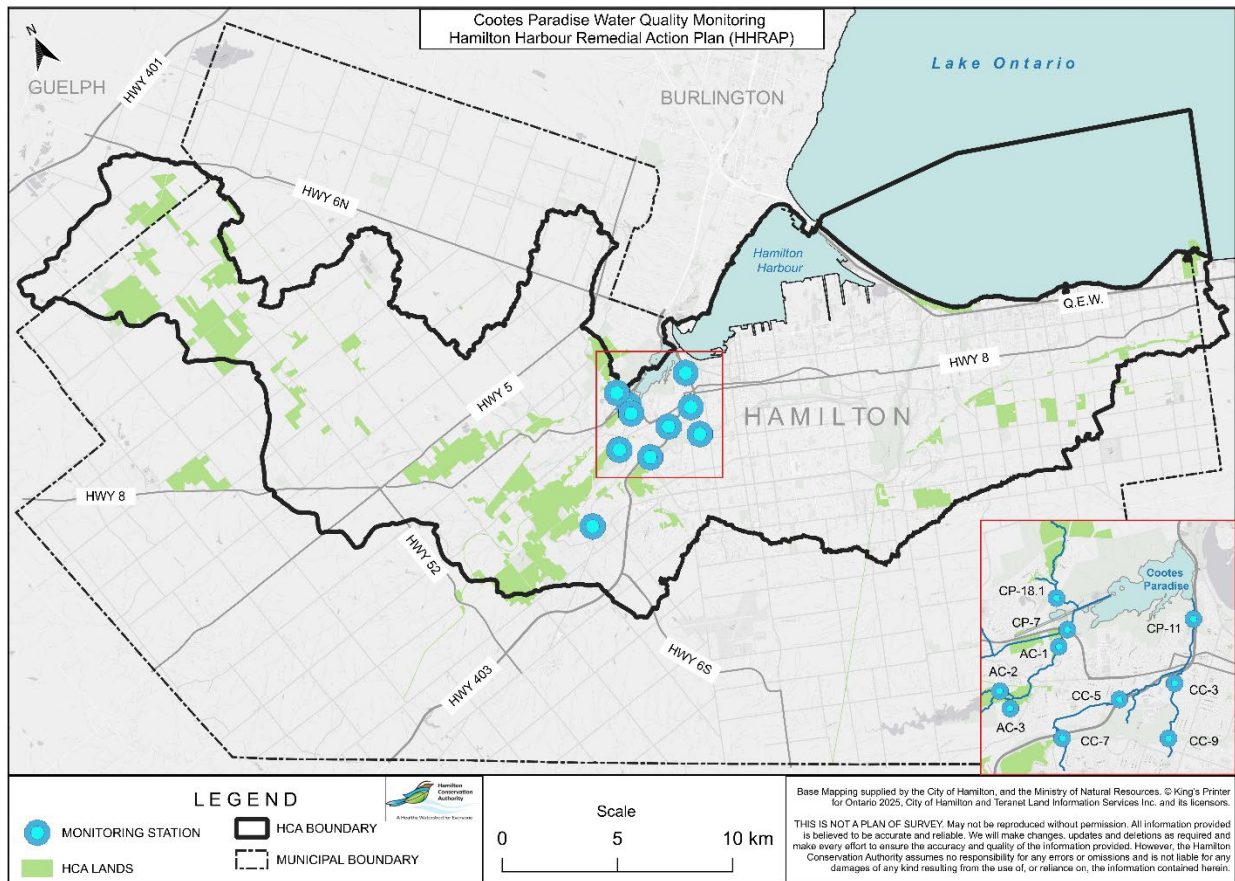


Figure 3: HHRAP Water Quality Monitoring Stations

3.5.2 Provincial Water Quality Monitoring Network (PWQMN) Sampling

3.5.2.1 Background and Station Selection

The Provincial Water Quality Monitoring Network (PWQMN) is a long-term partnership program between HCA and MECP, which started in 2002. HCA staff collect surface water quality samples, and MECP staff are responsible for the assessment of the sampling data. The surface water quality data provides long-term information about water quality conditions and trends. Six station locations across the HCA watershed were selected by MECP (Figure 5).

3.5.2.2 Sampling Program, Methodology Overview and Data Analysis

HCA collects surface water quality samples at the 6 stations once per month from April to November. In field parameters are also collected: water temperature, dissolved

oxygen, conductivity, pH, and turbidity. Samples are shipped to MECP for water quality analysis, and in field data is provided to MECP.

A copy of water quality analysis results is provided to HCA by MECP, who also provides access to the data through an open data catalogue. Parameters include nutrients and metals.

Sampling results provided by MECP are used by HCA as a key component to evaluate surface water quality as part of the HCA Watershed Report Cards which are developed every 5 years. The key data parameter used for the Watershed Report Cards is total phosphorus. Results are also used by HCA within integrated Sub-Watershed Studies.

3.5.3 Provincial Groundwater Monitoring Network (PGMN) Sampling

3.5.3.1 Background and Station Selection

The Provincial Groundwater Monitoring Network (PGMN) is another long-term partnership program between HCA and MECP, which also started in 2002. HCA staff collect groundwater quality samples, and MECP staff are responsible for the assessment of the sampling data. The ground water quality data provides long-term information about water quality conditions and trends. The wells are also used to continuously monitor ground water levels and temperature. Seven station locations including 9 wells across the HCA watershed were selected by MECP (Figure 4).

3.5.3.2 Sampling Program, Methodology Overview, and Data Analysis

HCA collects ground water quality samples at the 9 wells once per year in the autumn. Samples are shipped to MECP for water quality analysis. Also, ground water levels and temperature data are downloaded from each well periodically and provided to MECP.

A copy of sample results is provided to HCA staff by MECP, who also provides access to the data through an open data catalogue.

Sampling results provided by MECP are used by HCA staff as a key component to evaluate groundwater quality as part of the HCA Watershed Report Cards. The key

ground water quality parameters used for the Watershed Report Cards are Nitrite, Nitrate and Chloride. Results are also used by HCA within integrated Sub-Watershed Studies.

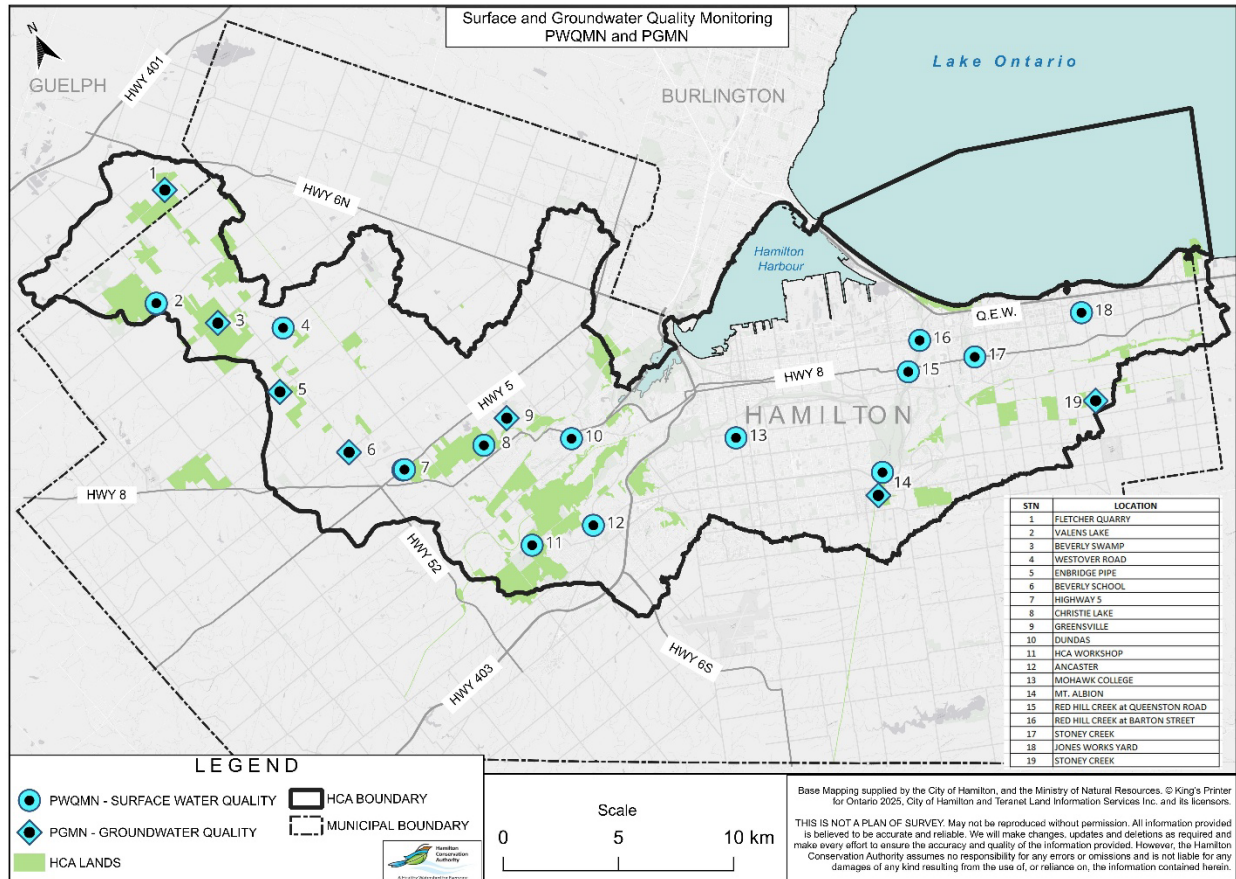


Figure 4: PWQMN and PGMN Sampling Locations

3.5.4 HCA Hydrometric Network

The HCA hydrological monitoring network consists of 6 streamflow, 10 precipitation gages, and 2 reservoirs water levels. Real time data is collected every 5 to 15 minutes for water levels and precipitation. Flows are calculated through rating curves created by the Water Survey of Canada (WSC). Data from the HCA hydrological monitoring network is used for our Flood Forecasting and Warning Program and our Low Water Response monitoring program. The Low Water Monitoring Response Program tracks 7-, 30- and 90-day moving averages for flow. Figure 5 depicts these station locations.

3.5.5 Snow Surveys

This is a long-term partnership program with Ministry of Natural Resources (MNR). Snow surveys at designated stations are made at regular intervals during the winter months to determine the depth of the snowpack and its water equivalent. The data obtained are of value in estimating the spring run-off potential, agricultural productivity, and fertilizer requirements, waterfowl populations, etc. Furthermore, they have application concerning livestock and wildlife survival, and in such problems as snow on roofs, etc.

The HCA has 4 snow courses within the watershed (Valens, Christie, Dundas Valley & Mt. Albion) that are monitored every 2 weeks during the winter. The MNRF will send the survey schedule prior to the season beginning (Figure 5).

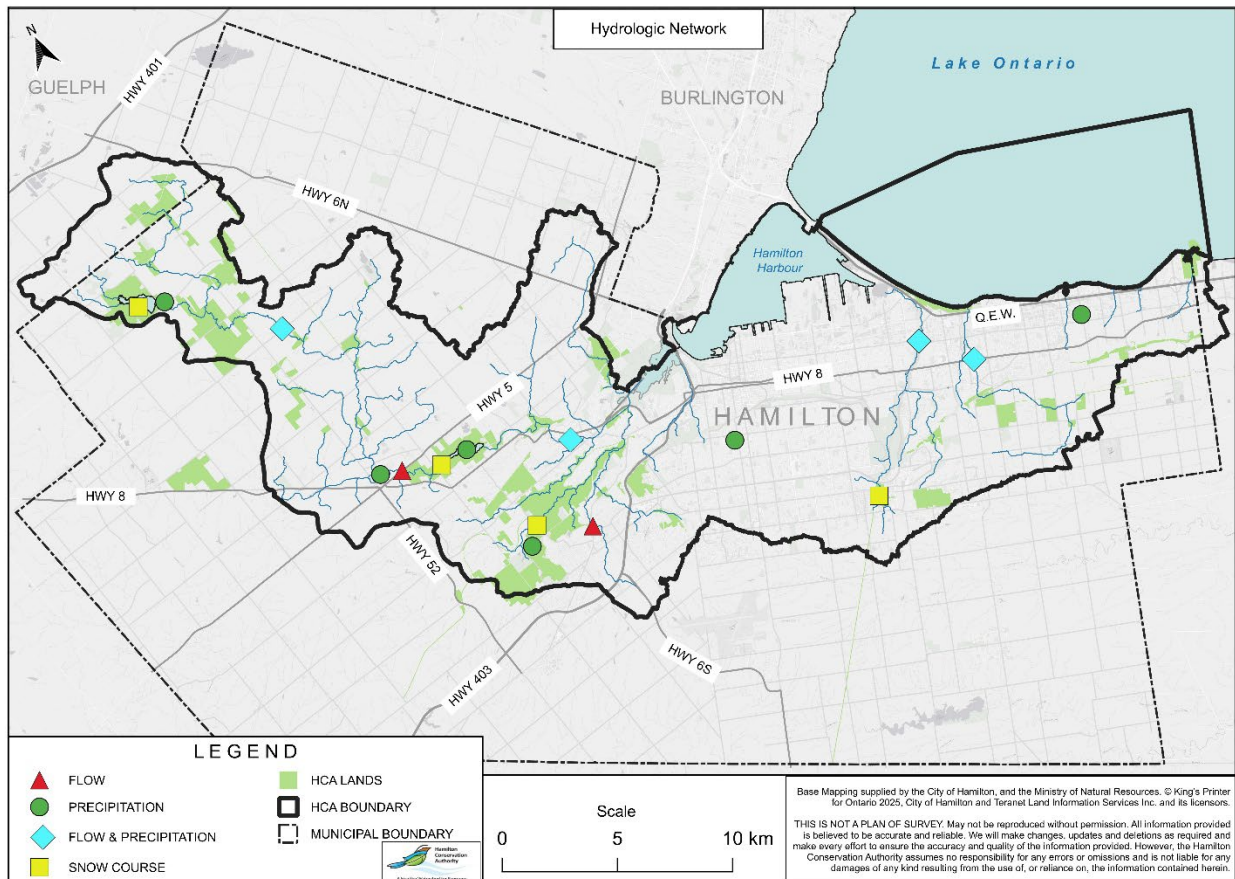


Figure 5: Hydrologic Network Stations and Snow Survey Stations

3.5.6 Water Resource Monitoring Gaps

There are several within program gaps for the water resources monitoring program.

3.5.6.1 Stream Flow

HCA monitoring program annual stream flows are captured at 3 locations on Spencer Creek, 1 location on Ancaster Creek, 1 location on Stoney Creek and 1 location on Redhill Creek are calculated. The calculation of the average of the highest three consecutive days of streamflow can be used to identify when the largest flow events happen and how the size and frequency of large flood events have changed over time, including the influence of climate change. The timing of the spring freshet annual high flow is also an indicator that can be used with HCA streamflow data. This indicator is important because streamflow can be strongly influenced by snowmelt and can directly

relate to climate conditions and climate change. The baseflow index is a measure of the ratio of baseflow volume to total streamflow volume. Baseflow typically represents the slow continuous contribution of groundwater to river flow, but in some settings is also the result of natural processes such as delayed flow through wetlands or anthropogenic processes such as flow regulation and wastewater discharge (Credit Valley Conservation, 2022a) Baseflow is also an indicator of drought stress. Metrics will be developed for these three measures of stream flow.

The following subwatersheds have been identified as areas where the installation of new flow gauge(s) is expected to be viable and would be beneficial to HCA's Flood Forecast and Warning (FFW) and Low Water Response (LWR) programs.

- Fletchers Creek
- Borers Creek
- Sydenham Creek
- Spring Creek
- Lower Ancaster Creek
- Lower Spencer Creek
- Battlefield Creek
- Chedoke Creek
- Stoney Creek – 2 existing gauges at Saltfleet (Green Mountain Rd.) and Saltfleet (3rd Line)

The potential locations are currently ungauged and thus require site observations to confirm watercourse and flooding conditions. These enhancements will increase the number of locations within the HCA watershed where local real-time flow data are available, which will enhance HCA's ability to forecast potential floods and monitor ongoing storm events.

In addition, these enhancements will be used to better connect water quality and aquatics monitoring. The addition of these sites will also add to the monitoring of local climate changes.

3.5.6.2 Precipitation

HCA has 10 precipitation gauges throughout the watershed that collect rainfall data at a 15-minute interval. This precipitation data is used to calculate daily, monthly and yearly totals and can be used to analyse changes in precipitation patterns year over year. Additionally, HCA uses data from three Environment Canada weather stations tracking air temperature and precipitation. HCA can use this data to determine the type of precipitation that has fallen. The percentage of precipitation that fell as rain can be used as an indicator of warming winters. The amount of snowfall or frozen precipitation over a timeframe can also be used to track warming winters. The sum of all precipitation for a given timeframe (month, season, year) can be used as indicators for more intense storms, drier summers, etc., and is a standard indicator for climate change. Specific metrics will be developed for these measures of climate change impacts on precipitation.

The following subwatersheds have been identified as areas where the installation of new precipitation gauge(s) is expected to be viable and would be beneficial to HCA's FFW and LWR programs.

- Fletchers Creek
- Middle Spencer Creek – HCA Millgrove Workshop
- Borers Creek
- Hannon Creek - Redhill Mount Albion
- Upper Davis Creek - Eramosa Karst Conservation Area
- Upper Battlefield Creek - Saltfleet Conservation Area
- Stoney Creek Numbered Watercourses - Fifty Point Conservation Area

These enhancements will increase the number of locations within the HCA watershed where local real-time precipitation data are available, which will enhance HCA's ability to forecast potential floods and monitor ongoing storm events, with a particular benefit for thunderstorm monitoring.

In addition, these enhancements will be used to better connect water quality and aquatics monitoring. The addition of these sites will also add to the monitoring of local climate changes.

3.5.6.3 Ground Water Elevation and Temperature Analysis with a Climate Lens

As part of the PGMN network ground water elevations and temperatures are obtained from 9 wells throughout the watershed. The timing of seasonal highs and lows can be used as a climate change indicator. Timing may shift due to a change in precipitation type. Late freezing and early thawing of the ground surface may result in more infiltration in the early winter and spring. Increases in groundwater levels may occur earlier in the spring if the snowpack and ground thaws earlier. This indicator is a measure of intra-annual fluctuations in mean monthly groundwater levels. Mean monthly groundwater levels is also an indicator that HCA can determine with its current monitoring program. Lower groundwater levels could be observed in summer months while higher levels could occur in spring and fall months. Increases in mean summer atmospheric temperature and corresponding increases in evapotranspiration rates may shift the fraction of precipitation that runs off as surface water or infiltrates to the subsurface as recharge. A reduction in recharge can correlate to lower groundwater levels (Credit Valley Conservation 2022a). Specific metrics will be developed for these measures of climate change impacts on groundwater.

3.5.6.4 Water Quality

The quality of water within a stream is linked to surrounding land uses, temperature, and precipitation. Water quality has a strong influence on the ability of some species to survive within a stream; those sensitive to pollution can survive only in streams with good water quality, while tolerant species can survive a wide range of pollutants. Surrounding land uses determine the chemical and nutrient inputs to a stream from both

point and non-point sources. Streams within forested areas are influenced by surrounding vegetation, with trees providing shade as well as nutrient inputs through leaf litter and woody debris. The vegetation helps to stabilize banks, and pervious surfaces help to filter out pollutants and protect against flooding and erosion (Conservation Halton, 2023). Both chlorides and total phosphorous can be used to monitor the changing climates impacts on water quality.

3.5.6.5 Chloride

HCA monitors Chloride concentrations of surface water through the PWQMN and ground water through the PGMN. HCA proposes adding chloride as a parameter to HHRAP sample locations to increase the number of watercourses throughout the watershed that measure chloride. The majority of HHRAP sampling locations are in denser populated areas that could see more road salt being used during winters. In the short term the number of freeze-thaw cycles are expected to increase, and the severity of winter weather will remain unpredictable. More road salt is used during severe winters, however, the impact of freeze-thaw cycles on salt use is unknown. Mean chloride concentrations could decrease if winters produce more rain events than snow, and as a result less winter de-icing material is applied to impervious surfaces. Additionally, greater infiltration could further dilute background chloride concentrations in groundwater. However, higher percolation rates due to the ground being unfrozen can result in more chloride contaminated water recharging aquifers. The number of stations and distribution will be determined in conjunction with the aquatic monitoring team as well as consider a power analysis for number of stations. Metrics for this will be determined as the program expands.

3.5.6.6 Total Phosphorus

HCA monitors total phosphorus in surface water as part of our HHRAP and PWQMN programs. Phosphorus typically comes from eroded soils entering streams. Milder winters may mean soils remain unfrozen for longer leaving them vulnerable to erosion during storm events. Erosion from high intensity summer storms can also potentially increase. These eroded soils, particularly in agricultural areas, will transport phosphorus to receiving watercourses. Tracking total phosphorus over time can be an indicator or

climate change and potential erosion occurring. Specific metrics to track this over time will be developed.

3.5.6.7 Dissolved Organic Carbon (DOC)

Organic carbon is stored in soils and a portion of it is exported to surface water as DOC. Warmer weather and increased precipitation may impact the production and mobilization of DOC from soils to surface water. HCA proposes adding DOC as a parameter to its HHRAP program to increase the number of watercourses monitored for this indicator of climate change.

3.5.7 Summary of in Program Gaps

The table below provide a summary of the gaps monitoring gaps identified in the water resources monitoring program. See section 6.1 for proposed costs and timing for filling these gaps.

Table 3. water resources program gaps, and goal type

Gap	Goal type
Sample more areas for chloride	Short term
Sample more areas for dissolved organic carbon	Short term
Install new stream flow gauges in nine subwatersheds	Long term
Install new precipitation gauges in seven subwatersheds	Long term
Water quality analysis with a climate lens	Long Term
Sample more areas for total phosphorus	Long Term

4.0 Between Program and Overall Gaps

Within each monitoring program described above data gaps were identified that are program specific or would assist HCA in quantifying the impacts of various threats like climate change or urbanization. This section relates specifically to gaps between programs or that are needed for all the programs. These include a power analysis for all program areas and creating overlap between the aquatic and water quality monitoring programs. Appendix A includes a map of all the monitoring programs overlain across

the watershed. The relevance of this map is discussed below. Details on these gaps is provided below and summarized in the table.

4.1 Power Analysis

One of the largest data gaps for the monitoring programs at HCA is the completion of a power analysis. Power analysis is a critical tool in monitoring, helping researchers design studies capable of detecting meaningful changes with sufficient statistical power. Power analysis is required for HCA's monitoring programs to ensure there are enough stations within each program to make statistically significant assessment of the information being produced.

Generally, a power analysis helps ensure that monitoring programs are efficient and effective, maximizing the use of limited resources. Power analysis allows for the optimization of study designs by estimating necessary sample sizes and identifying the most effective strategies to detect trends. This step is vital during the planning phase, especially when assessing impact or change due to management actions or environmental changes. It can also be applied retrospectively to assess the reliability and effectiveness of monitoring data already collected, helping researchers understand whether observed trends are statistically significant or likely due to random variation (Steidl, R.J. and L. Thomas. 2001).

In sum, power analysis is essential for monitoring as it guides the design and implementation of studies that aim to identify changes in ecological patterns and processes reliably. By effectively utilizing power analysis, researchers can improve accuracy, resource allocation, and the overall impact of their monitoring efforts. A power analysis should be completed on the existing monitoring program data to assess its ability to assess the impacts of watershed wide threats like climate change and urbanization. It should also be completed on any new variable to be monitored to ensure there are enough stations to view any trends in the data. The power analysis will also be used within the programs to examine the ecological integrity of the watershed in the TRMP, ARMP and water quality monitoring programs.

4.2 Enhanced Program Integration

In reviewing the map in Appendix A, it is noticeable that there is a lack of overlap in the monitoring programs in Middle Spencer Creek where there are currently only aquatic resource monitoring stations. If possible, adding both terrestrial and water quality stations in this area would give a more fulsome picture of the watershed, especially in this location. Looking at the information in an integrated manner is an existing gap. All the programs currently sample independently of one and other. Review and analysis of data across all monitoring programs should be completed to see if there are any trends that are evident across programs.

4.3 Water Chemistry and Aquatic Ecology

When the ARMP was first developed, 5 sites were overlapped with 5 of the PWQMN sites. The intention of this overlap was the opportunity to compare results between what the aquatic ecology and water chemistry regarding water quality. Data has been now collected for 20 years however; interpretation of data has been limited. Additionally, given the duration of the sampling program, this combined analysis could provide valuable insights and directions on whether there is a need to expand the sites where overlap occurs or where restoration is needed. As this sampling is restricted to specific watersheds, there may be a need to expand this to other subwatersheds for a fuller picture of any issues. Possible areas to extend this work to might include Spring, Sulphur, Fletcher, and Borer's creeks depending on the results of the analysis. This would have financial implications as the current lab testing for the PWQMN sampling is covered by the province and any additional sites would have to be covered by HCA.

There are also subwatersheds which has insufficient data to provide results in the watershed report card between the aquatic and water quality monitoring programs. The Urban Hamilton Core (buried creeks) and Greenhill are either buried in pipes or lack enough flow to sample which is like Ottawa Creek and Sydenham creek. Upper Davis creek and the numbered watercourse in Stoney creek could be sampled in wet years as they are otherwise intermittent and difficult to sample. Additions of sampling sites could be considered so the health of these subwatersheds could be reported and tracked.

4.4 Erosion Monitoring (Dundas Valley)

Adding erosion monitoring to the overall monitoring program, would assist the terrestrial, aquatic and water quality programs to assess the health of valleys with active erosion. Examples include Ancaster, Spring and Sulphur creeks, where unimpeded storm water adds significant fluctuations to the water levels during storm events. This leads to erosion in these creek corridors. Erosion increases the amount of phosphorus the water as the soil is suspended and the phosphorus released. Monitoring erosion hotspots for changes would help inform areas where restoration is required or stormwater retrofits would be applicable to slow the amount and intensity of water moving through the system.

4.5 Climate Change

Tracking the health of the watershed in relation to the impacts of climate change is a difficult task as this is an emerging science. There are generally five criteria for indicators of impacts that can be used to select among a host of candidate indicators (Gauthier, S. et al 2025). These include:

1. Sensitivity to climate,
2. Measurability,
3. Feasibility,
4. Spatial temporal scope, and
5. Relevance.

Indicators selected by CVC for their watershed will be reviewed along with other literature to begin the selection of climate change indicators for the HCA watersheds. Many of the metrics collected already in each monitoring program could be used to analyze the impact of climate change in the watershed. A variety of metrics have been recommended under specific monitoring programs.

4.6 Soil Moisture

Soil temperature and dryness is an additional gap. Climate change can make droughts larger as they both shift rainfall patterns and because of increases in temperature

(Canadian Climate Institute ,2024). This leaves ecosystems increasingly vulnerable to dry conditions. These dry conditions lead to higher tree mortality, higher fire risk and larger, more frequent insect outbreaks (McCauley et al 2022). It also has impacts on the regeneration of forests as climatic changes can impact forest regeneration at different stages from flower development, pollination, seed development, and ultimately seedling establishment. Impacts to just one stage in seedling development due to climate change can have detrimental impacts to forest regeneration (Williams, N. 2021). Incorporating soil moisture monitoring into the TRMP will require the purchase of equipment to test or monitor soil moisture at existing monitoring plots. Specific metrics for tracking this will be developed.

As part of HCA's Flood Forecasting and Warning (FFW) program, Environment Canada satellite data is used to estimate soil moisture at the surface and in the root zone. In-situ soil moisture probes are available on the market that can be added to the Monitoring Network, to provide enhanced local real-time soil moisture measurements. Soil moisture is a key parameter for estimating the potential watershed response to rain or snowmelt runoff for FFW assessments. Real-time measurements of the liquid or frozen state of soil moisture would also be highly beneficial, as it allows for enhanced estimations of the potential watershed response to rain or snowmelt runoff.

The preferred locations for such soil moisture sensors are still to be evaluated. Preference is being given to locations with existing or planned precipitation or flow gauges.

5.0 Link to HCA's Climate Change Strategy

HCA's mandate includes addressing the impacts of flooding and erosion and managing natural resources on a watershed basis in partnership with member municipalities. This work also includes considering and addressing the effects of climate change at the watershed level. The HCA has a role to play in understanding climate change impacts

within our watershed and the adaption and mitigation efforts required to help reduce them.

The HCA’s Climate Change Strategy (2023) provides broad and comprehensive suggestions for mitigating and adapting to climate change in all aspects of the HCA’s operations and lands. In the document, solutions for carbon storage, energy usage, water management, wetland management, as well as invasive species, natural heritage and wildlife protection were explored. The Strategy discusses the importance of a climate change monitoring network and up-to-date forecasting tools to understand the changes occurring in our watershed. Proactive monitoring programs are advantageous over reactive measures which often become costly and disruptive.

The recommended approaches for monitoring provided in this document highlights how HCA can monitor the impacts of climate change in our watershed.

6.0 Summary of Recommendations

6.1 In Program and Between Program Gap Summaries

6.2 Short-term Goals

There are portions of the proposed additions to each monitoring program that could be added within the next 5 years depending on budget and staff resources. Certain additions/tasks are essential for the stability of monitoring programs and analysis moving forward. This is the power analysis on each program. This process will ensure that there are enough stations collecting data within each program to allow for trends to be analyzed over time and between locations.

Table 4: Short term goals to implement years 1-5

Program	Task	Cost	Timing
Terrestrial	Spring ephemeral tracking	\$0	2026
NAI	Migratory Bird Surveys (funding pending)	\$25,500	2026
Water quality	Add dissolved organic carbon to HHRAP	TBD	2026

All	Power analysis across all programs (summer student)	\$25,000	2026
All	Working group creation with all monitoring program staff. Cost is staff time	~\$500-800/year	2026
Terrestrial	Breeding bird surveys (staff time)	\$5000	2027
Terrestrial	Vernal pool monitoring (staff time)	\$2000	2027
Aquatic	Upgrade ARMP database. Cost is staff time or a consultant	~\$4,000-\$10,000	2027
Water quality	Install additional water level and flow gauges	TBD	2027
Aquatic and water quality	Analyze data where ARMP and water quality stations overlap. Cost is staff time	~\$4,000-\$6,000	2027
Terrestrial and aquatic	Create an ecology database. Cost is staff time or consultant	~\$4,000-\$10,000	2027
Aquatic	Temperature data analysis (spencer creek). Cost is staff time.	~\$6000	2026-2027
Water quality	Chloride sampling	TBD	2026-2027
All	Summarize results of all programs and publish them on website. Staff time.	\$5,000	2030

6.3 Long-term Goals

These are goals that may require additional staff resources or significant amounts of time to plan changes to the monitoring programs. Longer terms goals include:

Table 5: Long term goals (5-10 years)

Program	Task	Cost	Timing
Terrestrial	Add Tree disease and pathogen monitoring (staff time)	\$2,000	2030
NAI	Start a new NAI project	Split between partner organizations	2034

All	Summary results of all programs on website. Cost is staff time.	\$50,000 - \$60,000	2030
Terrestrial	Create a wetland monitoring program (new staff and equipment)	\$150,000	2030-2035
Terrestrial	Frog call monitoring program (automated)	\$10,000	2030-2035
Terrestrial	Soil moisture monitoring	\$10,000	2030-2035
Aquatic	Expand stream temperature monitoring, watershed wide. Potentially looking at upwards of 40 additional stations depending on scope and budget. Up front Costs are mostly related to purchase of equipment. Annual operating budget covers some staff costs and ongoing equipment costs.	Up front costs \$15 000 to \$20 000 Annual operating budget \$2000 to \$5000	2027-2030, ongoing
Aquatic	Map important fish and benthic habitats. Cost is staff time.	\$9000/year	2027-2033
All	Erosion monitoring program (Dundas Valley)	\$40,000	2027-2030
Water quality	In-situ soil moisture sensor instillation	TBD	2027-2030
Water quality	Replace precipitation tipping buckets	TBD	2027, ongoing

7.0 Recommended Mitigation and Adaptation Approaches

The results of the monitoring programs will be used to help reduce the threats to the watershed, mitigate impacts and adapt to changing conditions. These mitigation measures can come in many forms within and between the monitoring programs. For example, increases in tree diseases and pathogens and monitoring results showing drier soil conditions could result in recommendations for tree plantings that are focused on more adaptable species and increasing diversity to mitigate the impact of species-specific tree diseases. HCA could review the option to add more southern tree species

to our forests to increase resilience to drought, invasive pests and temperature increases. This would include investigating what ecologists call assisted migration. Plant species can take years to migrate across the landscape temperatures shift and favourable growing conditions move. Assisted migration is moving plant species north to live in the predicted hotter drier climates in the climate change scenarios. This would include HCA investigating which tree species, like American Yellow wood, it might want to introduce to our forests to make them more resilient. Restoration and stabilization of HCA's forests will help make them more resilient to threats from climate change, urbanization, invasive species, among a host of other threats.

Expansion of the stream temperature monitoring program will give HCA an idea of locations for instream restoration to cool streams with tree plantings or narrow them with instream structures. This will assist with the stabilization of stream temperatures and fish habitat. It could also inform where Redside Dace which are identified as extremely vulnerable to climate change (Brinker et al, 2018) could be re-introduced. This species has likely been extirpated from our watershed already.

Working together in analysing the data over the aquatics, water quality and terrestrial monitoring programs will provide greater clarity on potential gaps within and between programs will give HCA a better idea of where restoration should occur. Results of erosion monitoring in the Dundas valley could result in the creation of storm water management (SWM) solutions where none exist to help slow and infiltrate water to reduce surface runoff volumes and increase recharge via groundwater. Holding back water can reduce erosion and cool the water before it is released back into receiving streams.

8.0 Next Steps

Next steps are to create an internal working group to move integration of the monitoring programs forward. Meeting regularly to discuss the monitoring programs will enhance integration and data analysis. Short term goals included in this comprehensive plan will

be reviewed for inclusion in future budgets. Station data for all programs will be reviewed for inclusion in a power analysis.

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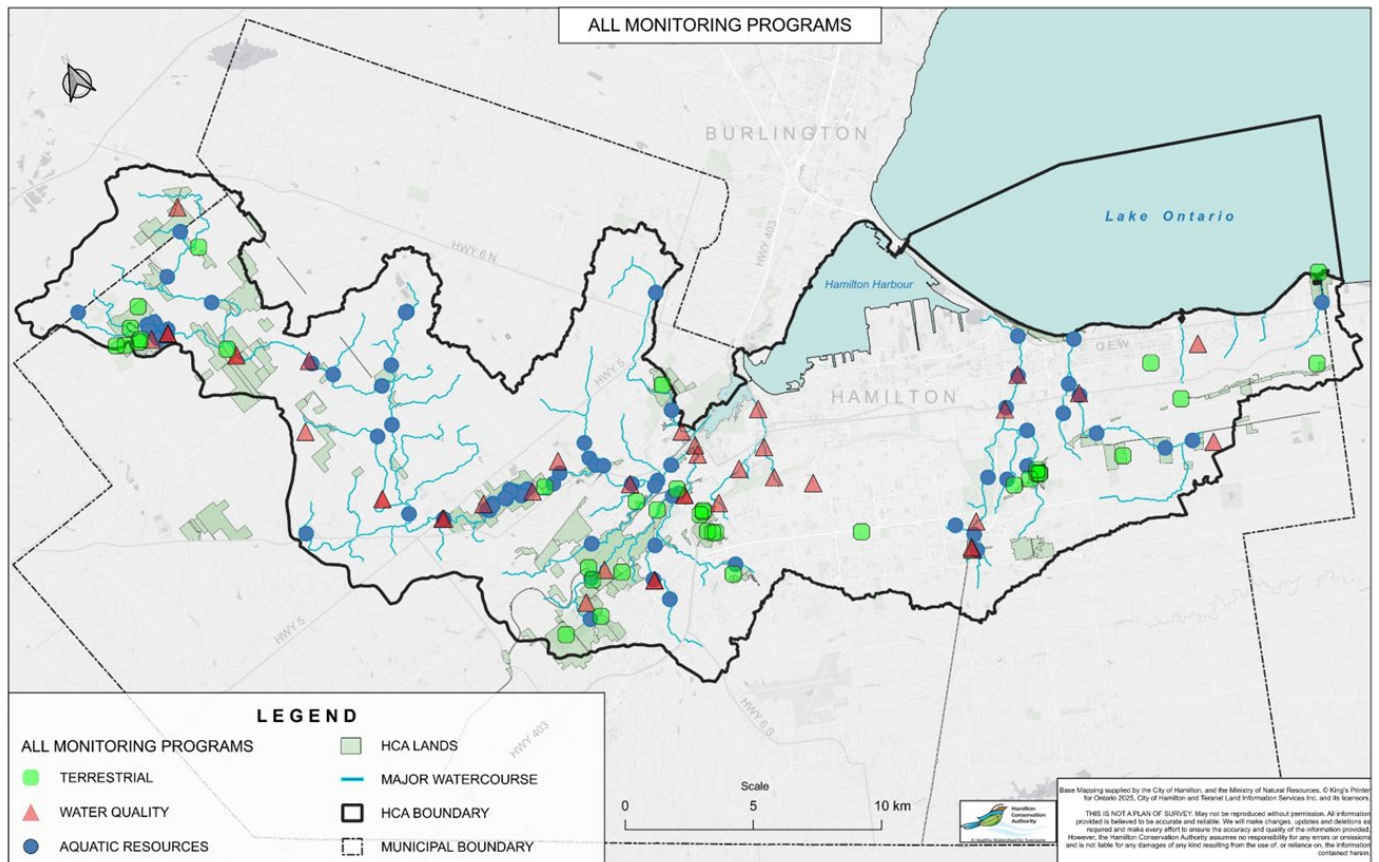
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10.0 Appendices

Appendix A

Watershed wide monitoring station map, all programs



Appendix B – Aquatic Monitoring Stations and Locations

ID_NUM	WATERSHED	SUBWATERSHED
Year 1 sites		
MSP319-A1	Spencer Creek	Mid Spencer Creek
MSP323-A1	Spencer Creek	Mid Spencer Creek
USP301-H1	Spencer Creek	Upper Spencer Creek
USP315-A1	Spencer Creek	Upper Spencer Creek
USP315-A1a	Spencer Creek	Upper Spencer Creek
USP315-D2	Spencer Creek	Upper Spencer Creek
WES321-A3	Spencer Creek	Westover Creek
WSP324-A3	Spencer Creek	West Spencer Creek
FLE308-C1	Spencer Creek	Fletcher Creek
FLE312-B2	Spencer Creek	Fletcher Creek
FLM316-A1	Spencer Creek	Flamborough Creek
FLM317-A1b	Spencer Creek	Flamborough Creek
Year 2 sites		
ANC367-A2	Spencer Creek	Ancaster Creek
ANC369-A1	Spencer Creek	Ancaster Creek
ANC375-A1	Spencer Creek	Ancaster Creek
BOR351-A1	Spencer Creek	Borers Creek
BOR354-A2	Spencer Creek	Borers Creek
LOG326-A2	Spencer Creek	Logie's Creek
LOG338-B2	Spencer Creek	Logie's Creek
LSP378-A4	Spencer Creek	Lower Spencer Creek
MSP332-A1	Spencer Creek	Mid Spencer Creek
MSP332-A4	Spencer Creek	Mid Spencer Creek
MSP338-A1	Spencer Creek	Mid Spencer Creek
MSP338-A1f	Spencer Creek	Mid Spencer Creek
SPR343-A1	Spencer Creek	Spring Creek
SUL356-K1	Spencer Creek	Sulphur Creek

SUL361-A1	Spencer Creek	Sulphur Creek
TIF382-F1	Spencer Creek	Tiffany Creek

Year 3 sites

BATB6-A4	Stoney Creek	Battlefield Creek
LDA2201-A1	Red Hill Creek	Lower Davis Creek
LDA2201-A3	Red Hill Creek	Lower Davis Creek
MON2101-A3	Red Hill Creek	Montgomery Creek
OTT1017-A7	Red Hill Creek	Upper Ottawa Creek
RED1001-A1	Red Hill Creek	Red Hill Creek
RED1005-A1	Red Hill Creek	Red Hill Creek
RED1015-A3	Red Hill Creek	Red Hill Creek
STOS2-A1	Stoney Creek	Stoney Creek
STOS3-A2	Stoney Creek	Stoney Creek
STOS9-A3	Stoney Creek	Stoney Creek
UHA3002-A1	Red Hill Creek	Upper Hannon Creek
STOS3-A5	Stoney Creek	Stoney Creek

Annual Sites

ANC368-A1	Spencer Creek	Ancaster Creek
BATB6-A2	Stoney Creek	Battlefield Creek
FIF126-A1f	Stoney Creek	Watercourse 12 (Fifty Creek)
FLE307-A2	Spencer Creek	Fletcher Creek
LSP378-A1	Spencer Creek	Lower Spencer Creek
MSP330-A1	Spencer Creek	Mid Spencer Creek
MSP339-A1	Spencer Creek	Mid Spencer Creek
RED1009-A1	Red Hill Creek	Red Hill Creek
SPR346-A2	Spencer Creek	Spring Creek
STOS6-A3	Stoney Creek	Stoney Creek
SUL350-A1	Spencer Creek	Sulphur Creek
UHA3001-A1	Red Hill Creek	Upper Hannon Creek

USP315-C3

Spencer Creek

Upper Spencer Creek

Appendix C

Aquatic ARMP Analysis to add to program (Armanini, et. al 2010)

- GHFI – New Index created by several Neighbouring Conservation Authorities to improve on the limitations of Steedman (1988) for our area. Looks at abundance, whether species present are Stenotherms or not, the sensitivity of the species and their trophic status (Moore, D. 2025)
- Shannon Wiener Diversity - measures the species diversity and evenness and we can infer site integrity from this as sites with higher diversity scores are generally healthier sites
- Abundance analysis – simple measure of the numbers of each species present at a site
- Non-native Abundance Analysis simple comparison of the numbers of non-native species present
- Biomass for our fish catches – measure of the weight of the fish caught as a measure of the productivity of the site. Healthier sites should produce higher productivities
- Biomass of target species eg Brook Trout – for sites with Brook Trout present measures the weight of the Brook Trout caught as a measure of the site’s productivity. Changes in the biomass of Brook Trout could indicate changes at the site. Brook Trout are coldwater species and valued game fish native to our watershed. This could also be applied to other valued species in reaches with out Brook Trout (Credit Valley Conservation, 2022c).
- Modified EPT (mEPT) (per cent) - Proportion (percentage) of the sample made up of Ephemeroptera (mayflies), Plecoptera (stoneflies) and Trichoptera (caddisflies) (i.e. EPT which are generally sensitive organisms), sites with higher percentages of these families are generally healthier (Credit Valley Conservation, 2022b).
- ICHAEO (per cent) (Isopoda, Chironomidae, Hydropsychidae, Amphipoda, Elmidae, Baetidae and Oligochaeta) – Similar to EPT but is the opposite measure as these species are less sensitive and higher numbers of them can be indicators of poorer quality habitats (Credit Valley Conservation, 2022b).

- Scrapers: Shredders+Collectors - Ratio of organisms whose are consumers of autotrophs (algae/ microscopic organism -eating/) vs. heterotrophic (leaf/detritus-eating). Sites with high integrity generally have lower ratio of Scrapers: Shredders+Collectors (Credit Valley Conservation, 2022b).
- Burrowers: Clingers+Sprawlers - compares organism habitat preferences, i.e. Burrowers live in the hyporheic (sub-surface) zone vs. Sprawlers/Clingers who reside on substrate surfaces. Sites with lower velocities and finer particles tend to support higher ratios of Burrowers:Clingers+Sprawlers (Credit Valley Conservation, 2022b).
- Canadian Ecological Flow Index (CEFI) - Indicator for the effects of watercourse flow alteration, index can indicate a change in community composition as a result of streamflow alteration (Armanini, et al, 2010).
- Hilsenhoff Family Biotic Index (HBI) This is part of the Watershed report card and could be formally reported as well. This is the result we have been including in the BoD report for the last 2 years

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Report to: Board of Directors

Approved for Circulation By: Lisa Burnside, CAO

Reviewed By: Gord Costie, Director, Conservation Area Services

Prepared By: Liam Fletcher, Eastern Senior Manager Conservation Area Services

Meeting Date: February 5, 2026

Subject: Hamilton Conservation Authority – Appointment of Officers under the *Conservation Authorities Act*

Recommendation:

THAT the HCA Board of Directors appoint the staff identified in Attachment A as Officers under Section 30.1 of the *Conservation Authorities Act*, for the purposes of enforcing the *Conservation Authorities Act* and related regulations, as well as the *Trespass to Property Act*, as more specifically identified in Attachment A.

Executive Summary:

HCA staff in the Conservation Area Services Division have responsibilities related to the administration and enforcement of the *Conservation Authorities Act* and its regulations. In this regard, Conservation Area Managers, Superintendents, and Assistant Superintendents within Conservation Areas Services Division have responsibilities related to the administration and enforcement of Section 29 of the *Conservation Authorities Act* and *O. Reg. 688/21: Rules of Conduct in Conservation Areas*.

Under Section 30.1 of the *Conservation Authorities Act* an Authority may appoint Officers for the purposes of ensuring compliance with the Act and the regulations. The appointment of Officers under Section 30.1 of the *Conservation Authorities Act* is necessary in order to fulfill class designation requirements for HCA Officers to be designated as Provincial Offences Officers. On March 20, 2024, the Minister of Natural Resources and Forestry issued a class designation under the authority of subsection 1(3) of the *Provincial Offences Act* to designate Officers appointed under Section 30.1

of the *Conservation Authorities Act* as Provincial Offences Officers for the purpose of enforcing the *Conservation Authorities Act* and its regulations, as well as the *Trespass to Property Act*, within the jurisdiction of their Conservation Authority.

The purpose of this report is to seek the appointment of the HCA staff identified in Attachment A, as Officers of the HCA and Provincial Offences Officers.

Staff Comment / Discussion:

HCA staff in Conservation Area Services Divisions have responsibilities related to the administration and enforcement of the *Conservation Authorities Act* and its regulations. This includes enforcing rules of conduct in Conservation Areas and supporting court proceedings and prosecutions when necessary. Appointment of HCA staff in Conservation Area Services Division as Officers under Section 30.1 of the *Conservation Authorities Act* provides staff with the necessary authorities to carry out their job duties.

The staff identified in Attachment A have satisfied the criteria for appointment as Officers under Section 30.1 of the *Conservation Authorities Act* as outlined in the *Protocol for Conservation Authority Designation of a Provincial Offences Officer* developed by Conservation Ontario, which requires:

1. The officer shall provide proof of a clean criminal record check
2. The officer shall be adequately trained in the legislation they are to enforce (i.e. the *Conservation Authorities Act*, *Provincial Offences Act*, and the *Trespass to Property Act*).

Strategic Plan Linkage:

The initiative refers directly to the HCA Strategic Plan 2025 – 2029:

- **Strategic Priority Area – Organizational Excellence**
 - Promote employee training, engagement, well-being, diversity, and inclusivity to strengthen our organizational resilience and ensure employees are equipped with the necessary skills to address emerging needs.

Agency Comments:

Not applicable

Legal / Financial Implications:

Not applicable

Related Reports and Appendices:

- Attachment A, Staff Appointments

ATTACHEMENT A

HCA staff appointments for the purposes of enforcing Section 29 of the *Conservation Authorities Act* and related regulations, as well as the *Trespass to Property Act*

Jack Elderman, Park Superintendent, Confederation Beach Park

Nick Burgess, Assistant Superintendent, Hamilton Mountain Conservation Area

2026 Board of Directors Meeting Schedule

Hamilton Conservation Authority

838 Mineral Springs Road, Ancaster

1st Thursday of each month at 6:00 p.m., excluding January and August

February 5, 2026 – AGM

March 5, 2026

April 2, 2026

May 7, 2026

June 4, 2026

July 2, 2026

September 3, 2026

October 1, 2026

November 5, 2026

December 3, 2026

Section 28 Hearing Dates

2nd Thursday of every other month at 6:00 p.m., alternating with regularly scheduled Conservation Advisory Board meetings.

March 12, 2026

May 14 2026

July 9, 2026

September 10, 2026

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Report to: Board of Directors

Prepared & Reviewed By: Lisa Burnside, CAO

Meeting Date: February 5, 2026

Subject: 2026 Voting members for Conservation Ontario

Recommendation:

THAT the following members be appointed to Conservation Ontario for 2026:

Designate: Chair

Alternate: Vice Chair

Second Alternate: Chief Administrative Officer, and further

THAT Conservation Ontario be advised of these appointments.

Executive Summary:

The purpose of this report is to establish the voting representatives to Conservation Ontario as per Annual General Meeting (AGM) requirements, internal business planning purposes and awareness for Conservation Ontario.

As noted in the HCA Administrative By-Law in Section 5B, Meeting Procedures, the Authority at the Annual General Meeting shall include in its course of business the appointment of the voting delegates to Conservation Ontario.

Conservation Ontario is a non-profit association that represents Ontario's 36 Conservation Authorities. Conservation Ontario is directed by a Council comprised of appointed and elected municipal/citizen officials from the 36 Conservation Authorities Boards of Directors. All Conservation Authorities designate voting delegates to Conservation Ontario. It is recommended that HCA continue with its designation of the Chair with noted alternates.

Staff Comment / Discussion:

The HCA has traditionally designated the Chair as the voting representative to Conservation Ontario with alternates. Conservation Ontario holds quarterly meetings in the Toronto area, at a central location for the 36 conservation authorities. Meetings are held both in-person and virtually. The meeting dates for 2026 have been set for:

- Monday, April 13, AGM (in-person)
- Monday, June 22 (virtual)
- Monday, September 21 (in-person)
- Monday, December 7 (virtual)

Strategic Plan Linkage:

The initiative refers directly to the HCA Strategic Plan 2025 – 2029:

- **Strategic Priority Area – Organizational Excellence**

Agency Comments:

N/A

Legal / Financial Implications:

There are no new or additional financial implications posed by adoption of the Board of Directors' appointment of voting representatives as presented

Related Reports and Appendices:

N/A

Report to: Board of Directors

Approved for Circulation By: Lisa Burnside, CAO

Prepared & Reviewed By: Scott Fleming, Director of Finance and Central Support Services

Meeting Date: February 5, 2026

Subject: Appointment of Auditors for 2026 Fiscal Year

Recommendation:

STAFF RECOMMENDATION

THAT the Hamilton Conservation Authority appoints KPMG LLP as its auditors for the 2026 fiscal year.

Executive Summary:

The purpose of this report is to appoint the auditors for the HCA for the 2026 fiscal year as per Annual General Meeting (AGM) requirements and for internal business planning.

As noted in the HCA Administrative By-Law in Section B, Governance, (7), Appointment of Auditor, the Board of Directors at the Annual General Meeting shall include in its course of business the appointment of the auditor for the upcoming year.

Staff Comment / Discussion:

KPMG LLP was awarded a five-year contract for audit services in 2025 following an RFP process. In addition to the HCA, they will also carry out the audit of the Hamilton Conservation Foundation and review the statements of Confederation Beach Park prepared as required by the Management Agreement between the HCA and the City of Hamilton. Additionally, advisory and/or other services may be requested by KPMG LLP on an as needed basis.

As part of their service, a senior representative of the firm will attend the Budget & Administration Committee and/or Board of Directors meeting when the Audited Financial Statement is presented.

STRATEGIC PLAN LINKAGE

The initiative refers directly to the HCA Strategic Plan 2025 - 2029:

- **Strategic Priority Area – Organizational Excellence**

AGENCY COMMENTS

Not applicable

LEGAL/FINANCIAL IMPLICATIONS

Sufficient funding has been allocated within the HCA's annual operating budget to support external audit.

Related Reports and Appendices:

Not applicable

Memorandum to: Board of Directors

Approved for Circulation By: Lisa Burnside, CAO

Reviewed By: T. Scott Peck, MCIP, RPP, Deputy CAO/Director, Watershed Management Services

Prepared By: Mike Stone, MCIP, RPP, Senior Manager, Watershed Planning, Stewardship & Ecological Services

Meeting Date: February 5, 2026

Subject: Annual Reporting on HCA Permit Review Timelines – January 1, 2025 to December 31, 2025

Executive Summary:

The *Conservation Authorities Act* (CA Act) sets out specific timelines related to the review of permit applications and issuance of permit decisions. Under the CA Act, conservation authorities (CA) are required to prepare an annual report on their permit review timelines and compliance with legislative requirements. HCA issued ninety-two (92) permits in 2025 and achieved a high level of compliance with the review timelines established under the CA Act, as well as the permit review guidelines provided by Conservation Ontario (CO).

Staff Comment / Discussion:

Background

HCA is committed to providing excellent client service under its planning and regulations programs. In support of this, HCA tracks and reports on permit review timelines annually.

Legislative and regulatory changes to the CA Act that came into effect April 1, 2024 established new legislative requirements related to permitting. The CA Act and *Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits* (O. Reg. 41/24) outline two distinct timelines associated with the review of permit applications:

1. Upon receipt of an application and the applicable fee, a CA has 21 days to notify the applicant in writing whether or not the application is deemed a complete application.
2. Once an application is deemed complete, a CA is to complete their review and make a decision on the application within 90 days. If a CA has not made a decision within 90 days the applicant may appeal the application directly to the Ontario Land Tribunal (OLT) on the basis of a non-decision.

It should be noted the 21 day and 90 day timeframes now established under the CA Act and O. Reg. 41/24 represent calendar days. In tracking permit review timelines, CAs have traditionally made a distinction between calendar days and actual review days, where the later excludes days where an applicant is working to address CA comments and prepare resubmission materials (i.e. 'stopping the review clock').

To support CAs in implementing the new legislative requirements for permitting, Conservation Ontario released new guidelines in September 2024 – *Annual Reporting Guidance and Template: Permit Timelines and Regulatory Compliance – For review of permits pursuant to Section 28.1 of the Conservation Authorities Act*. The 2024 guidelines update and replace earlier 2019 CO guidelines and 2010 Ministry of Natural Resources (MNR) guidelines regarding permitting review timelines.

Under the 2024 guidelines, once a CA deems a permit application complete, it will have 90 days to make a decision regarding a major permit and 30 days for a minor permit. The guidelines note that where a CA has requested clarification or further details regarding the application, a CA may “stop the review clock” on their decision-making timeline when awaiting clarification or additional details. Despite the recommended 90 day (major permit) and 30 day (minor permit) review timelines, the ability to appeal a non-decision to the OLT remains 90 calendar days following the confirmation of a complete application, regardless of a permit’s classification as major or minor.

HCA Permit Review Timelines 2025

HCA issued ninety-two (92) permits between January 1 and December 31, 2025. Table 1 below provides a summary of HCA’s permitting review timelines and statistics for 2025 in relation to legislative requirements and Conservation Ontario guidelines. Results from 2024 are also included to allow for comparison year over year.

Table 1

	2025	2024
No. permits issued (major + minor)	92 (25+67)	72 (17 + 55)
No. complete application reviews within 21 calendar days*	88 (96%)	67 (93%)
No. permits issued within 90 calendar days*	85 (92%)	54 (75%)
No. major permits issued within 90 review days +	22 (88%)	16 (94%)
No. minor permits issued within 30 review days +	67 (100%)	42 (76%)

* Timeline established in legislation under CA Act or O. Reg. 41/24

+ Timeline established in 2024 CO guidelines

Table 1 illustrates that HCA achieved a high level of compliance with the permit review timeline requirements and guidelines that came into effect in 2024, generally meeting or exceeding these over 90% of the time. Permit review timelines in 2025 were generally consistent with or improved compared to 2024 results. In particular, a greater percentage (92%) of permits were issued within the legislated 90 calendar day decision timeline compared to 2024. Eighty-eight percent (88%) of major permits and 100% of minor permits were issued within the 90 and 30 review day guidelines recommended by CO. HCA's permit review timelines and statistics are reported annually to CO.

Strategic Plan Linkage:

The initiative refers directly to the HCA Strategic Plan 2025 - 2029:

- **Strategic Priority Area – Organizational Excellence**
 - Initiative - Enhance communications efforts to promote our accomplishments, programs, and services, including results of our monitoring and restoration programs, to strengthen awareness and engagement with the watershed community.

Agency Comments:

N/A

Legal / Financial Implications:

Ontario Regulation 686/21 (Mandatory Programs and Services) made under the *Conservation Authorities Act* requires conservation authorities to prepare an annual report outlining statistics on permits, including the level of compliance with the requirements of *Ontario Regulation 41/24 (Prohibited Activities,*

Exemptions and Permits) respecting the application for and issuance of permits, including any associated timelines.

The *Conservation Authorities Act* also provides permit applicants the ability to appeal an application directly to the OLT if a conservation authority fails to give the applicant notice of a decision with respect to the application within 90 days of the application being deemed complete.

Related Reports and Appendices:

N/A

Memorandum to: Board of Directors

Approved for Circulation By: Lisa Burnside, CAO

Reviewed By: T. Scott Peck, MCIP, RPP, Deputy Chief Administrative Officer / Director, Watershed Management Services

Prepared By: Jonathan Bastien, P. Eng., Manager, Water Resources Engineering

Meeting Date: January 23rd, 2026

Subject: Watershed Conditions Memorandum

Executive Summary:

During the period of November 24th, 2025, to January 23rd, 2026, there were no significant watercourse flooding events, and no Lake Ontario shoreline flooding events. However, three rain and snowmelt events warranted issuing messages and additional monitoring of watercourse conditions. For the early January 2026 event, although no reports were received, it is expected that localized watercourse flooding of low-lying areas that typically flood during higher water levels and significant water safety concerns occurred in Lower Spencer Creek.

In December, January and currently, ice conditions artificially affected readings at the streamflow gauges, thus flow measurements are not considered accurate.

There are no observations, reports, or expectations that significant watercourse flooding, localized watercourse flooding of low-lying areas that typically flood during higher water levels, or significant water safety concerns are occurring at this time. Current flows are estimated to be near baseflow conditions to elevated but below thresholds for significant water safety concerns.

The average monthly flows for December and January so far are not considered accurate, due to ice conditions that have artificially affected readings at the streamflow gauges. November average recorded flows ranged between significantly below long-term averages to near long-term averages.

There are no observations, reports, or expectations that significant Lake Ontario shoreline flooding is occurring at this time. The Lake Ontario mean daily water level averaged across the entire lake is 3 cm below average for this time of year, as of yesterday.

Christie Lake and Valens Lake water levels are currently within the preferred winter operating levels.

The most recent drought assessment indicated that normal conditions are an appropriate overall characterization of the watershed at this time.

There are currently no significant rainfall or snowmelt events, nor significant Lake Ontario shoreline flooding, forecasted for the watershed over the next 2 weeks.

HCA staff will continue to undertake monthly drought assessments, and coordinate with the Hamilton Low Water Response Team if drought conditions warrant actions.

Staff Comment / Discussion:

CURRENT WATERSHED CONDITIONS – January 23rd, 2026

Current Flows in Major Area Watercourses

In December, January and currently, ice conditions artificially affected readings at the streamflow gauges, thus flow measurements are not considered accurate.

There are no observations, reports, or expectations that significant watercourse flooding, localized watercourse flooding of low-lying areas that typically flood during higher water levels, or significant water safety concerns are occurring at this time.

Current flows are estimated to be near baseflow conditions to elevated but below thresholds for significant water safety concerns. The five available streamflow gauges are Upper Spencer Creek at Safari Road, Middle Spencer Creek at Highway 5, Lower Spencer Creek at Market Street, Ancaster Creek at Wilson Street and Red Hill Creek at Barton Street.

The average monthly flows for December and January so far are not considered accurate, due to ice conditions that have artificially affected readings at the streamflow gauges.

November average recorded flows ranged between significantly below long-term averages to near long-term averages. Monthly flow in Upper Spencer Creek at Safari Road was considered near average. However, Upper Spencer Creek at Safari Road gauge may have been experiencing debris related issues that artificially elevating recorded flows. Monthly flow in Middle Spencer Creek at Highway 5 was considered significantly below average. Monthly flow in Lower Spencer Creek at Market Street was considered significantly below average. Monthly flow in Ancaster Creek at Wilson Street was considered below average. Monthly flow in Red Hill Creek at Barton Street was considered well below average. It is noted that streamflows in Spencer Creek were increased during November as a result of the winter drawdowns of the Valens Lake reservoir (October 20 to November 6) and the Christie Lake reservoir (October 24 to December 3).

Current Lake Ontario Water Levels

There are no observations, reports, or expectations that significant Lake Ontario shoreline flooding is occurring at this time. The Lake Ontario mean daily water level in the Hamilton area was 74.55 to 74.56 m IGLD85 as of yesterday. The Lake Ontario mean daily water level averaged across the entire lake (74.57 m IGLD85 as of yesterday) is 3 cm below average for this time of year.

Current Storages in HCA Reservoirs

Christie Lake levels (765.50 ft) are currently within preferred winter operating levels (765.30 to 765.80 ft).

Valens Lake levels (274.23 m) are currently within the preferred winter operating levels (274.15 to 274.40 m).

Current Soil Conditions

Surface and root-zone soils are considered wet to saturated, and fully frozen, across the watershed.

RECENT STORM EVENTS

During the period of November 24th, 2025, to January 23rd, 2026, there were no significant watercourse flooding events, and no Lake Ontario shoreline flooding events.

However, three rain and snowmelt events warranted issuing messages and additional monitoring of watercourse conditions.

Potential for Watercourse Flooding During Rain and Snowmelt Event

December 17th to 23rd, 2025

Prior to this event, up to 16 mm of snowmelt was forecasted for the Hamilton area with an additional up to 15 mm of rain, combined over December 17 and 18th. There was considerable uncertainty as to the amount of runoff that would occur. HCA staff continued to monitor watercourse and weather conditions closely and reassessed the potential for flooding.

There were no received observations, reports, or expectations of significant watercourse flooding, localized watercourse flooding of low-lying areas that typically flood during higher water levels, or significant water safety concerns.

HCA engineering staff issued the following messages related to this event, to communicate the potential watercourse flooding and water safety concerns to the community:

- December 16th: Flood Watch – Inland Lake and River Flooding
- December 23rd: Cancellation - Flood Watch – Inland Lake and River Flooding

Potential for Watercourse Flooding During Rain and Snowmelt Event

December 28th to 30th, 2025

Prior to this event, 25 to 50 mm of rain including thunderstorm activity was forecasted for the Hamilton area for December 28th. There was considerable uncertainty as to the amount of runoff that would occur. HCA staff continued to monitor watercourse and weather conditions closely and reassessed the potential for flooding.

There were no received observations, reports, or expectations of significant watercourse flooding, localized watercourse flooding of low-lying areas that typically flood during higher water levels, or significant water safety concerns.

HCA engineering staff issued the following messages related to this event, to communicate the potential watercourse flooding and water safety concerns to the community:

- December 27th: Flood Watch – Inland Lake and River Flooding
- December 30th: Cancellation - Flood Watch – Inland Lake and River Flooding

Potential for Watercourse Flooding During Rain and Snowmelt Event

January 6th to 12th, 2026

Prior to this event, up to 33 mm of snowmelt was forecasted for the Hamilton area with an additional up to 43 mm of rain, combined over January 6 to 10th. There was considerable uncertainty as to the amount of runoff that would occur. HCA staff continued to monitor watercourse and weather conditions closely and reassessed the potential for flooding.

There were no received observations, reports, or expectations of significant watercourse flooding. However, although no reports were received, it is expected that localized watercourse flooding of low-lying areas that typically flood during higher water levels and significant water safety concerns occurred in Lower Spencer Creek.

HCA engineering staff issued the following messages related to this event, to communicate the potential watercourse flooding and water safety concerns to the community:

- January 5th: Flood Watch – Inland Lake and River Flooding
- January 12th: Cancellation - Flood Watch – Inland Lake and River Flooding

RECENT WATERSHED LOW WATER CONDITIONS

The most recent drought assessment (including data up to December 31) indicated that normal conditions are an appropriate overall characterization of the watershed at this time.

FORECASTED WATERSHED CONDITIONS

Watercourse Flooding

There are currently no significant rainfall or snowmelt events (+20 mm in a day) forecasted for the watershed over the next 2 weeks. HCA staff continue to monitor conditions and forecasts routinely. Resultant water levels and flows from currently anticipated rain or snowmelt are not expected to result in significant watercourse flooding.

Lake Ontario Shoreline Flooding

In the next 2 weeks, no significant Lake Ontario shoreline flooding is currently expected.

Watershed Low Water Conditions

HCA staff will continue to undertake monthly drought assessments, and coordinate with the Hamilton Low Water Response Team if drought conditions warrant actions.

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Memorandum to: Board of Directors

Approved for Circulation By: Lisa Burnside, CAO

Reviewed By: Gord Costie, Director, Conservation Area Services

Prepared By: Liam Fletcher, Senior Manager, Conservation Area Services

Meeting Date: Thursday February 5, 2026

Subject: Conservation Area Services Update

Executive Summary:

Enjoy Family Day with winter activities across Hamilton Conservation areas. Valens Lake Conservation Area is now open for on-ice activities, welcoming anglers of all ages to fish or skate. On Monday, February 16 from 10 AM to 4 PM, Westfield Heritage Village hosts Hike for Hot Chocolate, featuring scenic hikes, free hot chocolate, wagon rides, campfires, scavenger hunts, and family-friendly learning experiences. Throughout the Family Day long weekend, all major conservation areas will be open for hiking, snowshoeing, fishing, and enjoying winter scenery. Visitors are encouraged to check the HCA website for alerts before heading out.

Staff Comment / Discussion:

- **Valens Lake Conservation Area – On Ice Activities**
As of Monday January 19, the Valens lake reservoir is now open for on ice activities. Anglers of all ages are welcome to try their luck for a variety of pan fish species on the hard water of the Valens lake reservoir. As a reminder, the HCA has a voluntary catch and release program that helps support a sustainable fishery for future generations to enjoy sport fishing. Good luck to all the anglers who try to land the big one.
- **Westfield Heritage Village – Hike for Hot Chocolate**
Step outside this Family Day at Westfield Heritage Village. Take a hike around the historic village and trails as you warm up with a complimentary hot chocolate. Enjoy a day of outdoor winter activities with your family, including tractor pulled wagon rides around the village, outdoor campfires, a scavenger hunt, and learn

about native birds found at Westfield. Visitors can also learn about the history of chocolate in early times. This event will be held on Monday, February 16 from 10 AM to 4 PM.

- **Family Day Weekend**

All of our major conservation areas will be open and staffed for the Family day long weekend. Get out into nature and shake the winter blues by hiking, snowshoeing, fishing or taking in the beauty of our many waterfalls. Visitors are encouraged to wear appropriate footwear as trail conditions can vary this time of year. Don't forget to check the HCA website for up to date alerts for all areas or trail closures before heading out.