

December 22, 2025

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

To Whom It May Concern:

On behalf of Perth County Council, we write to express our concerns regarding the proposed regional consolidation of Ontario’s Conservation Authorities. The County has reviewed the information provided through ERO Posting 025-1257, and is offering the following feedback for the Province’s consideration. We acknowledge the importance of improving efficiency, reducing duplication, and support housing and economic growth and we share the goal of ensuring that planning and environmental review processes are effective, transparent, and responsive. At the same time, it is essential that any restructuring of the conservation authority system maintains the strengths of the existing watershed-based model and preserves the local knowledge, relationships, and technical expertise that are foundational to public safety and environmental protection.

Based on our review, Council has identified several areas of concern related to the proposed consolidation.

Reduced Transparency and Local Autonomy

Under the proposed model, the County and its local municipalities may have reduced representation on CA boards and diminished involvement in decision-making. If board composition is determined primarily by population, rural municipalities risk being under-represented despite stewarding large geographic areas and significant natural assets.

Perth County urges the Province to consider smaller, more focused regional models that improve efficiency while preserving meaningful local representation. Governance structures must balance rural and urban priorities to ensure watershed management remains community-driven. The needs of our agricultural sector and rural communities—central to Perth County’s identity and economy—must be adequately recognized and prioritized.

Reduced Certainty and Efficiency for Municipalities

Consolidation may result in municipalities working with CA staff who are more geographically distant, less familiar with local conditions, or less available to support municipal needs. Perth County’s

existing CA offices and staff are accessible, responsive, and deeply knowledgeable about local watershed characteristics.

We strongly recommend that the Province maintain local CA offices and retain staff with local expertise. This is essential to ensuring continuity in public safety, environmental protection, and effective service delivery.

Potential Delays in Permit Processing and Approvals

The four Conservation Authorities operating within Perth County consistently meet provincial timelines and provide timely, high-quality technical review. A regionalized model of the proposed scale may create a more distant bureaucracy, reducing responsiveness and increasing delays in permitting and approvals.

To avoid unintended consequences, the Province should ensure that service timelines are maintained or improved, and that municipalities and the public continue to have access to staff with local knowledge and technical expertise.

Oversight of Reserves, Investments, and Local Assets

Conservation Ontario notes that CAs collectively own and manage approximately 150,000 hectares of natural and built assets, including forests, wetlands, areas of natural and scientific interest, recreational lands, and flood/erosion control infrastructure. These assets are integral to local communities and require stewardship that reflects local priorities and watershed conditions.

Decisions regarding these assets should remain at the watershed level, guided by the communities that use, value, and care for them.

Reduced Local Influence Over Funding and Priorities

Municipalities will continue to fund all or part of the Ontario Provincial Conservation Agency (OPCA) through the existing levy/apportionment process. Under the proposed model, municipalities may contribute a significant share of the OPCA's budget without having a meaningful role in shaping its governance, priorities, or strategic direction.

The Province must ensure that the Regional Conservation Authority Board structure provides fair representation, local accountability, and transparent decision-making.

Importance of Local Context in Policy and Program Delivery

While Perth County's four existing Conservation Authorities have some differences in policies, standards, fees, and capacities, these differences reflect real variations in geography, watershed conditions, rural versus urban landscapes, growth pressures, and local priorities.

A consolidated model must be flexible enough to recognize and respond to these differences rather than impose uniform approaches that may not be appropriate across diverse regions.

Stewardship Services

Perth County also wishes to emphasize the critical importance of the stewardship-related services currently delivered by our local Conservation Authorities. Municipalities rely heavily on these programs—including landowner outreach, tree planting, habitat restoration, agricultural best-management practices, and community education—which are viewed as invaluable to both environmental health and long-term climate resilience. These services support our rural economy, protect natural assets, and strengthen relationships with landowners who are essential partners in watershed management. It is therefore imperative that the Ontario Provincial Conservation Agency (OPCA) maintain stewardship as a core mandate, with the resources and local capacity necessary to continue delivering these programs effectively across diverse watershed contexts.

Perth County supports the Province's efforts to improve efficiency and advance housing and economic development objectives. However, these goals must not come at the expense of sound planning principles, municipal decision-making, environmental protection, or public confidence.

We respectfully recommend that the Province:

- Maintain meaningful local representation within any new governance structure.
- Preserve local CA offices and staff to ensure continuity of service and local expertise.
- Protect timely permitting and technical review processes.
- Ensure decisions about natural and built assets remain grounded in watershed-level knowledge.
- Establish a funding and governance model that is transparent, accountable, and reflective of municipal contributions.
- Identify Stewardship Services provided by Conservation Authorities as a core mandate.

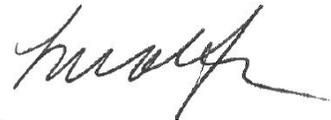
In pursuing provincial priorities, it is essential that new initiatives remain flexible, transparent, and responsive to local conditions to ensure effective implementation. We welcome further meaningful engagement as the Province considers its approach to CA consolidation.

Thank you for considering Perth County's comments.

Sincerely,



Dean Trentowsky, Warden



Lori Wolfe, CAO