



Raisin Region Conservation Authority

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

Organization Name: Raisin Region Conservation Authority

Date: December 22, 2025

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*To guide our community in the protection, enhancement, and restoration
of our natural environment through programs that balance human,
environmental and economic needs for a sustainable future.*



We appreciate the opportunity to provide comments on ERO #025-1257 regarding the proposed boundaries for the regional consolidation of Ontario's conservation authorities. This feedback is the result of consultation with Raisin Region Conservation Authority (RRCA) staff, Board of Directors, municipalities, partners, and rightsholders.

While RRCA supports the province's objectives to modernize service delivery and strengthen hazard protection, we have significant concerns about the proposed consolidation model. Effective watershed management relies on strong connections to local needs, priorities, and expertise. The creation of a St. Lawrence Regional Conservation Authority spanning 46 municipalities and 18,500 km² risks undermining effective watershed management.

We are concerned that the proposed region will be too large to deliver effective governance, oversight, and accountability. We are worried about the loss of local decision-making authority, reduced municipal representation, service disruption, and impacts on local programs. We are also concerned this large Regional CA will not be able to maintain development review timelines and customer service standards.

RRCA recommends that the province:

1. **Reassess the consolidation model** to ensure geographic coherence, cost-effectiveness, and local accountability; consider source protection region alignments which reflect existing municipal partnerships and shared staffing.
2. **Consider alternative approaches** such as voluntary consolidation, smaller regional groupings, or shared corporate service agreements.
3. **Protect local municipalities and taxpayers** from any financial pressures related to the consolidation and the provincial agency.
4. **Ensure there is appropriate representation** of municipalities, including local governance bodies, to protect municipal representation, reserves, locally funded assets, and watershed priorities.
5. **Consider a longer implementation timeline** to address clear governance frameworks, timelines, and change management strategies to maintain service continuity and staff retention.

RRCA is committed to collaboration and encourages the province to take the necessary time to engage with Conservation Authorities and our partners in evaluating alternatives. These could include voluntary consolidation, smaller regional groupings, or shared corporate service agreements at a regional level.

If the province chooses to move forward with the current proposal, we respectfully request the opportunity for continued engagement to help achieving outcomes that serve both the province and local communities effectively.

ERO #025-1257 Questions:**1. What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?**

If consolidation fails, the following could be lost:

- On-the-ground expertise,
- Understanding of local environmental conditions and records (e.g., localized infrastructure flooding),
- Strong relationships and funding support from: municipalities, Indigenous communities, donors, businesses, the agricultural community, watershed residents, and other partners,
- The ability to provide real-time response during storms and emergencies,
- High standards of customer service in development review,
- Support from the scientific community, and
- Effective oversight and buy-in from municipal funding partners.

The province should consider if the proposal is the best possible way to achieve the stated goals and objectives; many CA's have noted that modernization goals could be achieved through the current 36 CA corporations using legislative and regulatory amendments, technological solutions, and performance metrics/indicators. If the proposal moves forward, we suggest the following for consideration.

I. *Municipal and Partner Support*

The RRCA currently enjoys several partnerships, funding relationships, municipal agreements and a variety of self-generated revenue streams. These relationships are already being impacted by the proposed consolidation model. One of our long-term partners indicated they will not renew a significant agreement due to the change from 'local' to 'regional'. This has a large financial impact on our organization.

Should the province move forward with the proposal, the principle of "pay for say" must be maintained to retain the trust of municipal decision makers, funders, and taxpayers. The proposed St. Lawrence Regional Conservation Authority will change from five municipalities to 46, stretching oversight and "pay for say" to the point it may undermine confidence in CA governance. Municipal priorities must be maintained by defining local governance structures that include all participating municipalities. Each existing CA should maintain a distinct watershed-based operating division so that local knowledge, municipal relationships, and watershed-specific conditions remain central to decision-making.

Our local conservation areas form part of a limited public land portfolio in Eastern Ontario. To maintain municipal and partner support, long-standing conservation and land management priorities, along with the community benefits provided by these local areas, must remain stable. Additionally, strong guarantees are needed to ensure that reserves (built over decades through local municipal and partner investment) are not diverted to support unrelated regional priorities.

II. *Working Group and Communications/Transition Plan*

The province should collaborate with a working group (Conservation Ontario, CAs, municipalities, and other experts) to evaluate proposed solutions including forms of local governance (watershed committees, local councils, etc.).

The working group should help prepare a clear transition plan including:

- Designation of established leadership teams,
- Transition plans with clear milestones,
- Transition boards with representation from each existing CA, and
- Well thought out change management strategies for staff, partners, municipalities, and the public.

A clear and well-coordinated communication strategy will also be essential to support the transition. The province must ensure early and consistent provincial guidance on mandate, expectations, governance structure, and transition objectives. Where transitional staffing is established, regional leadership should be available to attend local offices to address issues as often as possible.

Personalized engagement, including council presentations, small-group stakeholder meetings, and one-on-one conversations with municipal representatives would provide opportunities for input on region-specific questions.

III. *Protecting Local Service Delivery and Staff Retention*

Staff retention strategies should be prepared and communicated to manage the proposed consolidation. Engaging existing leadership should be a key priority.

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.

RRCA's timely and personalized customer service is key to our strong relationships with residents and municipal partners. We are concerned that consolidation will cause service delays as new teams, processes, and expectations are established. RRCA currently delivers among

the fastest permit timelines in Ontario with routine permits often issued within 24 hours. Staff are directly integrated with partner municipal offices and regularly attend meetings with developers to expedite projects. Our staff are highly accessible through walk-ins, meetings, events, and site visits.

CAs also depend on well established partnerships with stewardship organizations, private landowners, farmers, Drainage Superintendents, and the development industry to deliver programs and services effectively. These partnerships are crucial for navigating complex regulatory frameworks, accessing funding programs, and advancing projects on the ground.

All stakeholders, including the development industry, benefit from certainty. The proposed consolidation will introduce unknowns and new processes at an already uncertain time in the market. Consolidation would require merging multiple IT systems, protocols, databases, HR and payroll systems, GIS platforms, and finance software. The potential for permit timeline delays is very high. The geographic size of the proposed region also creates uncertainty around the availability of in-person access and timeliness of field inspections.

Staff retention ensures continuity, preserves local watershed knowledge, protects decades of cultivated relationships, and maintains both service quality and community confidence. Ignorance of local concerns or issues will create distrust, lack of participation, conflict, and lack of partner or municipal support. The consolidation proposal has already introduced uncertainty and concern in staff. Clarity, consistency, and on-going support is essential throughout the proposed transition.

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

Most of the stated provincial objectives (shared digital tools, modernized systems, stronger technical capacity, and more consistent standards) can be achieved through existing provincial authority, recent legislative amendments, and the influence of the OPCA without the need for consolidation. If consolidation proceeds, RRCA recommends leveraging the following as opportunities.

1. Consistency

Right-sized consolidation could result in consistent permitting practices, technical standards, service levels, and fees which, in the long-term, contributes to a predictable development review environment. However, the RRCA already maintains low fees, quick turnaround times, and highly personalized service. Our municipalities do not want to go backwards with more complicated policies or increased fees. Harmonizing policies and fee structures must be done collaboratively to ensure they respect local delivery standards and do not drastically increase review fees.

Provincial approvals of policies, guidance, and standards have not kept pace with modern needs, and our core mandate has suffered from inadequate funding support. The creation of the OPCA should improve collaboration between CAs and the province resulting in alignment with provincial expectations including consistent permitting systems, GIS platforms, and public portals.

This alignment should result in additional funding and technical support to continue to modernize service delivery, improve technical capacity, and improve data access. Provincial guidance should be updated and stable, and multi-year funding should be directed to programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

II. Shared Staffing, Resources, and Partnerships

The regional model will provide for shared corporate services and staffing that may have been limited by availability, local budgets, or strategic priorities. A regional CA may also have greater ability to attract, retain, and coordinate senior leadership and technical expertise.

RRCA has investigated opportunities for shared corporate services; we would benefit from access to high-level finance, human resources, GIS, IT, legal as well as shared investments in technology and modernization (LIDAR, software licensing, records management, asset management, and flood warning). Consolidating shared services at the regional level would improve efficiency and consistency. Local offices could continue to focus on operations and local service delivery.

A regional CA may be better positioned to secure funding for broad, high-impact projects and support and enhance relationships with interest holders through regional groups for specific program areas (i.e., development approval best practices and consistent technical standards). Conversely, the region may lose connections with smaller, local funders and donors and may lose the trust of local interest holders.

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 governance structures must maintain strong connections to local priorities, local expertise, and municipal perspectives. Achieving the right balance between strategic and effective centralized oversight and fair and transparent local involvement is essential for successful, ongoing, watershed management.

The proposed consolidation requires careful consideration of governance and funding principles; specifically, ensuring large urban municipalities do not disproportionately control

regional priorities. Small, rural municipalities must be heard, supported, prioritized, and represented.

To mitigate this, a two-tier (or sub-regional or federated) governance model should be considered. By maintaining a local governance body with clear roles, the region can ensure decision-making is collaborative, transparent, and respectful of municipal autonomy. It will be important to ensure this does not create duplication while providing appropriate, delegated decision-making for local programs and services.

I. Regional Governance

Regional governance must balance representation, transparency, logistics, and efficiency. The regional board should include delegates from each CA (sub-regional/local office) to direct funding/budgets, policy, strategic priorities, and shared programs/services (GIS, IT, data management, legal, human resources, training, reporting). Upper and single tier appointments may be the simplest approach.

The size of the regional board must be reasonable for efficient decision making; however, municipal representation must be fair and provide meaningful engagement. For example, the Chair and Vice-Chair should be held by different local watersheds to ensure equal opportunities for these positions. Also, term lengths should similarly be limited.

The relationship between the regional CA Board and the OPCA should be clarified to ensure the regional boards can be independent and that board members understand the scope of meaningful decision-making and local accountability. The OPCA board should consider including members from each regional board to ensure direct connection back to each watershed.

II. Local Governance

Local councils (or watershed committees, advisory committees, etc.) would support pay-for-say representation and local decision making. The regional CA could appoint representatives from member municipalities to the local council. This ensures that municipalities who do not have an appointee on the regional CA have a clear ability to communicate with the region.

Local councils can provide advice and local context on program policy, advise on watershed-level programs and services, update watershed plans, prioritize category 2 and 3 services, and offer input on budget priorities. The regional CA could delegate additional responsibilities and functions to the local committee, as needed.

Additional regional, or watershed scale committees can be established based on local needs (agricultural advisory groups, St. Lawrence River Area of Concern, home-builder liaison committees). The Eastern Ontario First Nations Working Group (hosted by South Nation Conservation) should be supported to ensure that Indigenous perspectives are incorporated respectfully and consistently into decision-making.

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

Local watershed input in budget processes is essential if the province moves forward with the proposed consolidation. Our municipalities currently fund 24% of the RRCA's operating budget due to substantial external investments and user fees. We have also carefully tailored our programs and services to meet the needs of local taxpayers while keeping costs low. We are concerned that our municipal apportionment will increase in the large regional budget model. Locally funded reserves, land assets, and long-term capital programs must also be preserved for their local and intended use.

Local councils could follow a similar budgeting process as they do today. The proposed local budgets and apportionments could then be proposed to the regional CA for final approval. Alternatively, a Budget Advisory Committee could be established with membership from the local watershed council. There must be clear communication, expectations, and guidelines for developing budgets and agreements for Category 2 and 3 programs to assist in transparency, consistency, and accountability.

Budget documents should be publicly available, written in clear language, and shared early enough to align with municipal budget cycles. The regional board should consider a multi-year budget framework to improve predictability for municipal budgets.

RRCA regularly meets with municipal CAOs and senior staff to review workplans and presents the budget to municipal councils; these types of engagement opportunities should be preserved and prioritized. Regular regional financial reporting must be provided to municipalities including budget documents with local watershed focus.

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

We have serious concerns that the proposed St. Lawrence Region is too large to function effectively and risks undermining the principles of watershed-based management. Municipalities are concerned they will be under-represented, and that our local watershed needs (agricultural issues, drinking water management, localized flooding, conservation

lands) will be diluted. Source Protection Regions should be considered as a consolidation model, recognizing that these communities and staff are already working together.

Our local municipalities depend on our office for responsive access to staff and clear pathways for conflict resolution. Maintaining local offices, programming, municipal service agreements, local knowledge, on the ground presence, consistent access to staff, and brand identity is essential. Permitting decisions should also continue to be made at the local level.

A clear, well-coordinated communication strategy 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. Regional CAs will depend on local watershed councils to ensure local concerns are addressed. An early announcement of these local councils would help maintain stability and function during the transition.

Proactive outreach to municipalities, Indigenous communities, landowners, agricultural groups, developers, and other key interest holders will set expectations and reduce uncertainty. It will be critical for regional leaders to build trust and respect. Regional staff should be available to attend local offices to address issues as often as possible. Personalized engagement, including council presentations, small-group meetings, and one-on-one conversations with municipal representatives, provide opportunities to address region-specific questions and reinforce local connections.

Additional Comments:

Ontario Provincial Conservation Authority

CAs 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. CAs, and therefore municipalities, will be required to fund a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities may contribute a significant share of the OPCA's budget without having any meaningful role in shaping its governance, its priorities, or its strategic direction.

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. This raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

The OPCA should be fully funded by the province with no cost recovery from CAs and 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.

If municipalities will fund the new regional authorities and OPCA, municipalities expect a meaningful governance model to ensure strong municipal input on watershed-specific issues. The OPCA should ensure its Board of Directors includes municipal, CA, and Conservation Ontario representation from urban and rural communities as well as from different geographical areas of the province.

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)*. If you have any questions about these comments, please feel free to contact the undersigned.



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Submitted on behalf of the Raisin Region Board of Directors