

December 18, 2025

The Honourable Todd J. McCarthy  
Minister of Environment, Conservation and Parks  
Essex Region Conservation Authority  
777 Bay Street, 5<sup>th</sup> Floor  
Toronto, ON M7A 2J3

## **RE: Opposition to the Proposed Consolidation of Ontario's Conservation Authorities**

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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.

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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

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