

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

December 19, 2025

Dear Premier and Ministers,

On behalf of the Council of the Municipality of North Perth, thank you for the opportunity to provide input on the proposed consolidation of Conservation Authorities in Ontario. We support practical reforms that improve outcomes for residents, landowners, and the environment. Our comments below are organized thematically and reflect the realities of delivering services in rural Ontario.

The proposed consolidation lacks a clear, evidence-based business case, and places undefined financial burdens on municipalities. Its development was without input from those most affected by the changes – Conservation Authorities and municipalities.

Municipalities provide financial contributions and make decisions through their appointed representatives to Conservation Authority (CA) Boards. Each Board identifies local resource management needs, endorses programs specifically designed to meet these needs, and through partnerships with all levels of government, delivers projects.

### **1. Governance and Representation**

A single board representing many municipalities diminishes a balance between rural and urban priorities. Larger organizations may eventually develop deeper functional expertise; however, that benefit will not be immediate and risks being offset by the dilution of local and rural voices. Representation and decision-making authority will need to be carefully structured to reflect municipal financial contributions. Rural communities and the agricultural sector will need to be adequately recognized and prioritized, particularly if the lead CA is expected to be an urban one in each region.

Given the distinct nature of each watershed, management decisions should be guided by scientific research, geographical factors, and local hydrological conditions, rather than generalized regional or administrative boundaries.

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

## **2. Cost Impacts and Funding Transparency**

While some harmonization is reasonable, sudden and drastic increases will shift costs to end users and municipalities. There is no indication of who will be responsible for the costs associated with the establishment and ongoing operation of amalgamation of CAs. This requires a detailed cost-benefit analysis, involving municipal consultation to ensure full transparency and fiscal accountability. This review should show the optimal size and boundaries of any new regional CAs to maximize cost savings and other potential benefits while minimizing impacts. A 5-10% efficiency target is cited, yet smaller CAs cannot achieve such reductions without compromising critical capacity. These savings are unlikely to materialize immediately after consolidation. Municipalities should not be responsible for the impact or costs of any provincial restructuring efforts.

## **3. Service Delivery, Timeliness, and Digital Enablement**

The proposed amalgamation is likely to disrupt service delivery. Local experience shows that routine permits can be issued quickly (e.g., average for Maitland Valley Conservation Authority (MVCA) is 5-7 days). Consolidation risks a longer queue for processing and reduced pre-consultation with applicants. Landowners have emphasized the importance of having skilled, local representatives who are familiar with the area's drains, soils, and flood history.

The Ontario Provincial Conservation Agency (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. It is recommended that enforceable permit service standards be established while maintaining local service hubs which would be supplemented by a digital portal.

## **4. Stewardship**

Current proposals and fee alignment materials appear to omit stewardship services. In our area, stewardship is a core prevention tool that contributes to soil health, erosion control, and wetland restoration. Tree planting noticeably reduces future flood and water-quality costs. MVCA municipalities have historically supported stewardship because it is a cost-effective solution to hazard reductions. Stewardship needs to be recognized as a core mandate, rather than reducing it to a minimum service.

## **5. Risk Management, Hazard Development, and Liability**

Municipalities and residents bear residual risks related to emergency response, infrastructure failure, flood mapping updates, and potential off-site impacts. The collaboration of CAs alongside municipal partners helps the Province prepare for and respond to the impacts of climate change. The proposed consolidation may jeopardize local capacities for managing natural hazards, maintaining locally stationed staff, and ensuring continuity of infrastructure operations. Can the new CA due to its size provide local municipalities the 24/7 flood warning systems when the size of the watershed is so massive and diverse? Continued and adequate investment in both current and future infrastructure is crucial for effective management of flooding and erosion resulting in the reduced risk of loss of life and community damage caused by flooding and erosion. Permits play a critical role in this work within regulated areas and are essential public-safety tools.

## **6. Human Resources and Knowledge Retention**

Any amalgamation of CAs must be grounded in hydrologic boundaries and service needs, rather than administrative convenience. Consolidation may result in a “one CEO” structure and the loss of senior staff, whose institutional knowledge is irreplaceable. Additionally, concerns include harmonizing salary grids, avoiding involuntary job loss, and sustaining field expertise during the transition.

## **7. Municipal Download and Capacity**

Municipalities are already fielding increased inquiries from landowners and lack the capacity to absorb additional technical or enforcement responsibilities. Responsibilities cannot be downloaded to municipalities without resources and authority. Source Water Protection programs will need to continue to be funded and staffed during consolidation, without any service gaps. 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 protections efforts and the governance model for source protection areas. Risk management officials and inspectors must remain resourced and independent.

We strongly urge the Government of Ontario to reconsider implementing the proposed changes to the structure of CAs. We ask that provincial decision-makers thoroughly evaluate the benefits and costs of this proposal with input from CAs, municipalities, and

other stakeholders. To achieve effective hazard management and conservation improvements, significant changes need the support of those responsible for the execution.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Kasenberg". The signature is fluid and cursive, with the first name "Todd" and last name "Kasenberg" clearly distinguishable.

Todd Kasenberg, Mayor  
Municipality of North Perth