

By electronic submission only

December 19, 2025

Ministry of Environment, Conservation and Parks
Conservation and Source Protection Branch
5th Floor, 300 Water Street North Tower
Peterborough, ON K9J 3C7
ca.office@ontario.ca

Re: Comments from the City of Kawartha Lakes in Response to ERO No. **025-1257**

Dear Minister McCarthy:

Thank you for the opportunity to provide comments on the consultation on proposed boundaries for the regional consolidation of Ontario's conservation authorities.

The City of Kawartha Lakes (the City) understands and supports the Province's goals of improving the efficiency of watershed management, increasing accountability, reducing delays in service delivery, and increasing consistency in the enforcement and implementation of both the Conservation Authorities Act, regulations and policies, and the services provided by local Conservation Authorities (CAs) in a manner which is consistent across the entire province, despite having minimum advanced notice about the proposed regional consolidation, nor any clear explanation about its necessity. The City also supports the intent to standardize fees, permit process, report templates, administrative software, and levels of service delivery in addition to the sharing of resources and methodologies for programs such as flood plain mapping. All of these initiatives should result in additional transparency between the CAs and the Province, and lead to a more client-focused delivery of services. The City endorses the creation of the Ontario Provincial Conservation Agency (OPCA) as an oversight body and a direct conduit facilitating the flow of information between the Province and the local CAs.

Despite the City's support for the Province's objectives of consistency, transparency, accountability, efficiency, and speed of service, we feel strongly that the regional consolidation is premature at this time. Our four (4) local CAs would benefit from a gradual transition to new Provincial standards through the OPCA's creation of Standard Operating Procedures, policies, service delivery standards, clear progress metrics or

reporting requirements, and increased Provincial oversight through the OPCA. These initiatives can be completed over the next three (3) years, at which time the first functional review of the OPCA will occur. If at this time it is determined that the additional oversight and guidance from OPCA has not resulted in the desired outcomes, amalgamation could be considered. The City believes that at this time, the desired outcomes can be implemented through the existing CA framework while potential regional consolidation strategies are discussed over future years and undergo a robust and meaningful consultation period which lasts longer than the minimum 45-day legislated period.

Under the current framework, the City falls within the jurisdiction of four (4) CAs: Kawartha Region Conservation Authority, Otonabee Region Conservation Authority, Lake Simcoe Region Conservation Authority, and Ganaraska Region Conservation Authority. Despite the Province's best efforts to streamline and eliminate duplication of efforts, the City will be within the jurisdiction of two (2) Regional Conservation Authorities (RCAs), being the Eastern Lake Ontario Regional Conservation Authority (ELORCA) and the Huron-Superior Regional Conservation Authority (HSRCA), should the amalgamation proceed as proposed. A vast portion of the City's jurisdiction is currently not regulated by any CA, and this unregulated portion will remain outside of Provincial protections of the RCA under the proposed consolidation.

The City's responses to the questions posed in the ERO are as follows:

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

To ensure a successful transition to the operation of the consolidated regional conservation authorities, should the Province proceed with the consolidation as proposed, a very clear and Provincially supported transition plan is required. This includes guidelines and procedures including but not limited to:

- the role the OPCA will play in the transition
- how the OPCA will support local CAs through amalgamating into Regional CAs
- timelines and financial support for rebranding
- succession and knowledge transfer strategies

- guarantees of the maintenance of local expertise and knowledge (e.g., education and outreach materials should be area specific rather than provincially or even regionally generic)
- clarification for municipalities on the circulation process of permit and development applications
- assurance on the continuation of local environmental programs
- information on the location and operation of local CA offices
- clarification on the standards to be followed (e.g., will the RCA follow the standards of the most technically advanced CA within the RCA, or will Provincial standards and methodologies be used across the entire province based on the most advanced CA in the province)

Having undergone a Provincially mandated amalgamation in 2001, the City knows firsthand how challenging this restructuring can be, not only from an operational standpoint, but from a customer service and community standpoint as well. In our experience, amalgamations have resulted in an erosion of trust in the larger organization, confusion and frustration in the updating of formerly established processes, financial burdens, and lengthy re-establishment of processes or procedures such as retraining staff, all of which put additional stress on the front line and regional staff when fulfilling their customer service duties. The City is urging the Province to ensure that an extremely clear and thorough transition strategy, which has been created through extensive consultation with municipalities and existing CAs, be finalized prior to any potential amalgamations proceeding.

From the outset, it is imperative that all CAs undergo the transition at the same time as opposed to taking a phased approach. Many property owners and applicants file applications with multiple CAs and a phased-in approach to modernization will confuse and frustrate clients. The OPCA shall dictate one singular set of processes to be followed for everything from permit submission requirements to filing and naming structure. The OPCA must also make clear how policies and regulations are to be interpreted and implemented in a manner which is consistent yet accurate across the province. This includes guidance on processes for initiatives such as flood plain mapping and GIS modelling.

Lastly, the OPCA must create clear and specific guidance on how programs and legislation, such as the *Clean Water Act, 2006*, which make reference to or are directly

tied to the existing *Conservation Authorities Act, 1990*, or regulations, will be impacted as a result of these changes. It is also worth noting that this restructuring is premature if the intent is solely to streamline the implementation of the *Conservation Authorities Act, 1990*. Since coming into effect on April 1, 2024, existing Conservation Authorities have been working to update their policies and procedures to remain in line with O.Reg. 41/24 – Prohibited Activities, Exemptions and Permits under the *Conservation Authorities Act, 1990*. Practically speaking, eighteen (18) months is not nearly long enough to determine if this streamlined structure is functioning as intended, or if additional changes need to be made. The objectives of transparency, consistency, and replicability can be met by the Province, through the OPCA, by creating one set of plan review and regulation policies under O.Reg. 41/24 to which all existing CAs are bound by. These regulations shall cover everything from application and permit templates, file nomenclature, timelines, fees, and strict and transparent reporting requirements. If after 3 years of implementation under these new regulation policies the objectives are not being met, amalgamation into RCAs should be considered.

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

There could be many benefits from the consistent coordination and oversight of CAs by the OPCA. These benefits include, but are not limited to:

- Sharing of staff with specific expertise
- Shared service agreements for staff during periods of peak demand
- Efficiencies through the shared use of resources (IT, software licencing, data acquisition, fleet vehicles and machinery, insurance, finance and purchasing services, HR, etc.)
- Enhanced regional-scale data collection and analysis
- Larger scale projects (geographic, financial, and resource scale)
- Regionally consistent development application review and comments
- Streamlined permit review and issuance processes
- Less competition for resources (e.g., grants, funding, etc.)

It should be noted that many of these opportunities occur under the existing framework, however, with the lack of formal tracking and reporting, the Province may be unaware of them. It should also be noted that these benefits can be strengthened or enhanced outside of the creation of the RCA model.

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?

It has been stated repeatedly that the existing CA boundaries would not be changed or altered in any way, however, this proposed regional consolidation may provide a unique opportunity address gaps which currently exist within the CA coverage over the City of Kawartha Lakes. Both the Gull River and Burnt River suffer severe flooding events which have become more common in recent years. Both the Gull River and Burnt River watersheds would greatly benefit from regulation by a CA, and the regional consolidation is an opportune time to consider incorporating them into the ELORCA. Their incorporation would provide a greater level of protection for people and property from natural hazards, and will have positive impacts on residents downstream of these rivers, which are currently within the jurisdiction of Kawartha Region Conservation Authority.

During the consultation meetings the Province held with municipalities and CAs, it was suggested that the current Source Water Protection framework may be used as a potential guide for administrative structure and regional oversight. Under this guidance, we suggest that rather than creating seven (7) extremely large RCAs, the Province instead follow the nineteen (19) existing Source Protection Region boundaries. This compromise would contribute to the streamlining of services and oversight without losing local knowledge and expertise by oversimplifying the province into vast RCAs. This could also lead to the potential removal of duplicated administrative efforts between Source Protection Committees and RCA boards by having one regional board which addresses both CA and Source Water Protection matters. This framework would assist in the elimination of relic mapping errors which exist in the current CA boundary mapping, such as the gap southeast of Havelock, ON (pictured below). This gap was eliminated through its incorporation into the Lower Trent Source Protection Area during the creation of the Source Water Protection program within the Trent Source Protection Region, and as such it should be eliminated through the creation of the ELORCA (see Appendix 1).

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

The City supports continuation of the current approach to the municipal levy apportionment practice. Protection of existing, and creation and maintenance of new watershed reserves should also be supported.

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

Municipalities and local stakeholders also have long-established relationships with the existing CAs and staff which need to be maintained. Municipalities require clear guidance on potential changes to circulation and consultation requirements or methods. Existing CAs or RCAs can strengthen or maintain relationships with local municipalities through timely review and approval of planning and permitting applications, and clear communication when timelines, should they be established by the OPCA, cannot be met. The City believes that standardized approval/comment or permit templates will assist in the speeding up of this review and approval. Ideally, the City would like to continue working with local CA staff on applications which fall within the local CA jurisdiction. For example, we do not want to send a development application for a property located in Lindsay to a planner located in Belleville at the former Quinte Conservation office for review. Applications should continue to be circulated to the staff at the local CA to utilize existing relationships and trust.

Local CAs have a well-established level of trust and support within their communities which has taken decades to develop. These relationships could be severely damaged under the RCA model if CAs are not permitted to retain their ability to conduct local level research and implement local programming and services. Local offices must remain open and fully staffed to ensure the continued delivery of high-quality customer services the local communities have come to rely on from their CAs. One universal file management structure should be used across the RCA which will ensure consistency and replicability in service delivery, creating opportunities for community members to obtain information on permit, development application, or project progress from any of the CA offices in the RCA, regardless of the location of the application.

In summary, having attended one of the information sessions hosted by the Province, City staff feel more assured about the rollout of these changes, however, we feel that the announcement and consultation process would have benefitted from additional transparency and information from the outset. It also remains unclear who this regional



consolidation benefits, what the trigger was for this major restructuring, and why the sweeping changes must occur so quickly. It would behoove the Province to have a more thorough and detailed strategy for the roll out of massive legislative overhauls such as this prior to initiating stakeholder and public consultation to ensure a transparent and thoughtful exchange of ideas and informed suggestions prior to announcing such monumental changes.

Thank you for the opportunity to provide comments. We welcome further discussion and an opportunity to address any questions that arise from our comments.

Regards,

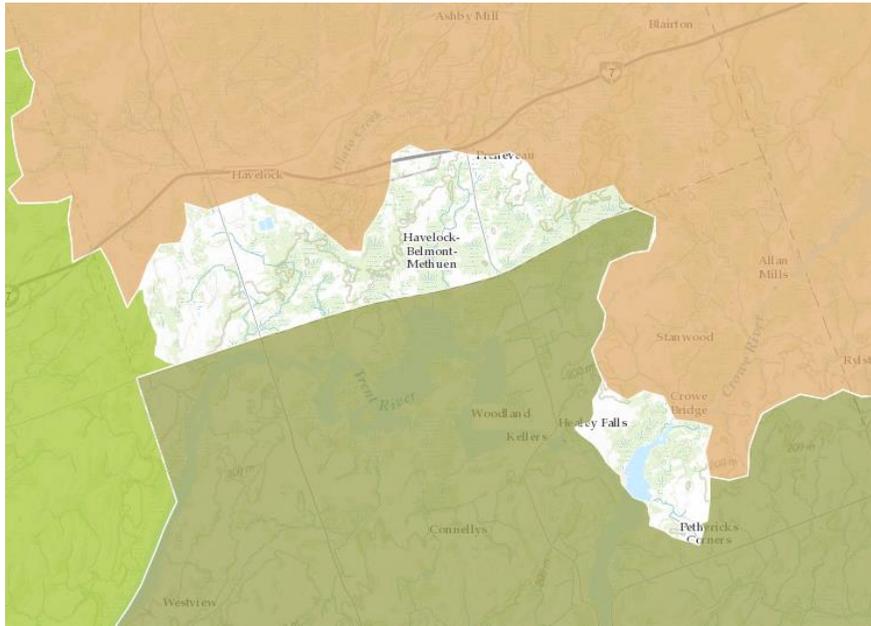
A handwritten signature in blue ink, appearing to read "Jenna Stephens" with a stylized flourish at the end.

Jenna Stephens

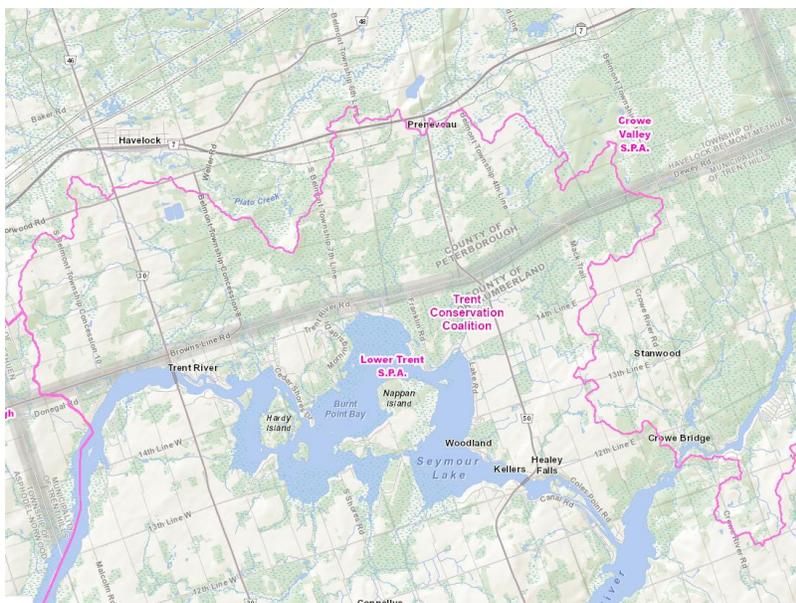
Planning Officer, Environmental Policy
City of Kawartha Lakes

Cc Leah Barrie, Director, Development Services

Appendix 1



Current CA Boundary Issue (<https://conservationontario.ca/conservation-authorities/find-a-conservation-authority>)





Current Source Protection Area boundaries

(<https://www.lioapplications.lrc.gov.on.ca/SourceWaterProtection/index.html?viewer=SourceWaterProtection.SWPViewer&locale=en-CA>)