



The Corporation of the Township of Huron-Kinloss

21 Queen Street
P.O. Box 130
Ripley, Ontario
N0G 2R0

519-395-3735
Toll Free: 844-395-3735
Fax: 519-395-4107
info@huronkinloss.com
www.huronkinloss.com

December 17, 2025

Ministry of Environment, Conservation and Parks
Environmental Registry of Ontario
(ERO) Posting #025-1257

Subject: Submission Regarding Proposed Conservation Authority Amalgamations

To the Honorable Todd J. McCarthy, Minister of the Environment, Conservation and Parks;

The Township of Huron-Kinloss appreciates the opportunity to provide comments on the proposed amalgamation of Conservation Authorities (CAs). We recognize the Province's intent to improve consistency, efficiency, and accountability in watershed management. Given the significant role CAs play in environmental protection, hazard management, rural recreation, and local permitting, the Township offers the following comments to support well-informed decision-making and ensure that any restructuring maintains strong, locally responsive service delivery, and protects the interests of rural Ontario.

Consultation and Need for a Clear Rationale

The Township is concerned that the proposal was introduced without sufficient consultation with municipalities or the Conservation Authorities themselves. Both groups possess extensive operational knowledge and direct experience in watershed-based management. In addition, a detailed business case outlining anticipated cost savings, administrative efficiencies, and service impacts has not been made available. The Township respectfully requests that such a business case be published prior to final decisions being made.

The Township understands that amendments to the Conservation Authorities Act, to create a new Conservation Authority Agency, as a provincial board-governed agency,

has already received Royal Assent, and as such it would be an unnecessary exercise to comment overly much on this aspect of the proposal, except to include a request that the ministry ensure that the representation of predominantly rural CA's and thereby their respective municipalities are given sufficient weight within the new board structure.

The Township understands that the new Agency's operational costs are intended to be the equivalent of 1% of the CA's operating budget, however the Township seeks assurance that the finalized structure of the new agency does not create an unnecessary level of bureaucracy or grow to an unwieldy size which would increase funding requirements by the municipalities.

Maintaining Watershed-Specific Decision-Making

Conservation Authorities were established along watershed boundaries to ensure that decisions are informed by local environmental conditions. Many of the authorities proposed for amalgamation vary significantly in ecological features, population density, community priorities, and operational capacity. Consolidating these diverse areas may reduce the ability to provide programs tailored to local needs and could weaken long-standing working relationships between CA staff and municipal staff. The Township encourages the Province to ensure that local expertise, field presence, and watershed-specific knowledge are preserved in any new structure.

Permitting Processes and Accessibility

The Township is concerned about the potential impacts of a larger, regional permitting model. Broader service areas may result in longer processing times and reduced responsiveness. The proposed emphasis on a fully digital permitting system raises accessibility considerations for rural residents and small-scale applicants, particularly where broadband access is limited. This is of particular interest to the Township of Huron-Kinloss, where a great number of our residents live within non-powered communities.

The Township supports modernization but believes that permitting systems must remain accessible through multiple formats, with clear service-level expectations and clarity regarding any costs that could be incurred by municipalities or applicants.

Additionally, consideration must be given to ensuring those exercising their right to appeal permit denials do not have to travel significant distances and/or make their case to a Regional Board who are detached and unfamiliar with the local circumstances, or who have not done on-site investigations relating to the appeal.

Service Levels, Funding Pressures, and Municipal Impact

While the goal of amalgamation is increased efficiency, the Township is concerned that costs may rise rather than decrease. Harmonizing staffing levels, travel across larger geographic areas, and the establishment of regional offices could all increase expenditures. At the same time, service levels could decline if staff are responsible for broader territories, and local municipal relationships are reduced. It is essential that municipalities do not face increased costs or decreased service quality due to changes.

Boundary Structure and Representation

The Township is concerned that the proposed boundaries may not reflect communities of interest or shared watershed priorities. Rural communities are expected to lose representation and influence within a larger governance structure, diminishing focus on issues such as farmland erosion, agricultural impacts, and rural infrastructure. With a large Mennonite community within the Township, it is particularly important that the unique needs of and relationships built within these communities, not be lost within the proposed new region.

A boundary approach that considers sub-regional governance or clusters areas with shared watershed characteristics may better preserve local relevance while achieving provincial objectives.

In particular, the inclusion of the Lakehead Region CA creates significant constraints due to the significant distance from each of the other CA's proposed for the Huron-Superior Regional CA. Additionally, the addition of the significantly more urbanized CAs of Lake Simcoe Region and Nottawasaga Valley, is anticipated to impair the rural focus and interests of the remaining CA's proposed for that Huron-Superior Region.

The Township would encourage the Province to reconsider reducing the number of authorities to only 7 regions, and instead consider boundaries of watersheds with similar watersheds, similar interests and within a smaller geographic area.

The Township would propose that a Lake Huron Regional Watershed Area including the Saugeen Valley Conservation Authority, the Maitland Valley Conservation Authority, and the Ausable Bayfield Conservation Authority, (with rural areas within the Grey Sauble Conservation Authority, and St. Clair Region Conservation Authority potentially included) would more accurately reflect communities of interest, and natural geographic features and an appropriately sized authority.

Preserving the Rural Role of Conservation Authorities

Rural CAs contribute significantly to tourism, recreation, education, stewardship, and community identity through conservation lands, trails, campgrounds, and outdoor programs. These services are vital to rural quality of life and support economic sectors such as agriculture and outdoor tourism. The Township stresses that these programs should remain protected and appropriately resourced in any new structure.

Conservation Authorities own and maintain local assets, reserves and infrastructure including real estate which has often been donated to the Authority with the intention that it be preserved for local stewardship purposes.

The structure of Regional CA's should be such that existing CA assets such as infrastructure, real estate and reserves are preserved under local control, having been built through local tax-payer investment.

Consistency and Opportunities for Collaboration

The Township supports efforts to improve consistency in permitting practices, hazard guidance, and technical standards across the province. Many challenges could be addressed through provincial standards or shared services without full structural mergers. Standardized guidance for lakeshore, escarpment, and inland watershed areas could reduce fragmentation. The Township is supportive of collaboration and shared services where this does not compromise service quality and supports efficiency.

Conclusion

The Township values the important role Conservation Authorities play in rural communities and is committed to working collaboratively with the Province to enhance consistency, efficiency, and transparency. At the same time, we emphasize the importance of preserving local expertise, watershed-specific decision-making, and strong rural representation. We respectfully request that the concerns outlined in this submission be fully considered prior to final decisions on amalgamation and welcome continued dialogue and consultation as the process advances.

Sincerely,



Don Murray, Mayor
Township of Huron-Kinloss
519-395-3735