



300 Dufferin Avenue  
P.O. Box 5035  
London, ON  
N6A 4L9

**London**  
CANADA

December 22, 2025

**Subject: City of London Staff Comments on ERO No. 025-1257 – Proposed Consolidation of Conservation Authorities**

To Whom It May Concern,

Thank you for the opportunity to comment on the Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities, which was posted to the Environmental Registry of Ontario (ERO) by the Ministry of the Environment, Conservation and Parks (MECP) under ERO No. 025-1257.

After reviewing the proposal, the following are key recommendations identified by staff from the City of London:

- That the proposed Ontario Provincial Conservation Agency be fully funded by the Province to prevent additional financial contributions from municipalities, which would otherwise place further strain on the municipal tax base.
- That the Province explores ways to ensure localized, watershed-aligned expertise is retained in the new model in order to respond to environmental conditions, infrastructure realities, and community needs while maintaining targeted conservation, permitting, and hazard-management services.
- That clear provincial direction be provided through the Regional Conservation Authority (RCA) model, especially through meaningful updates to certain sections under the Conservation Authorities (CA) Act, which could achieve greater consistency in permitting across Ontario in order to achieve the stated goals in the Proposal.

The following is a summary of the suggestions raised by staff from the City of London.

**Discussion Questions Posed Under ERO No. 025-1257**

The Province, through this ERO posting, has posed five key questions to guide feedback on the proposed consolidation of conservation authorities:

- What are the key factors to support a successful transition and outcome of regional conservation authority consolidation?
- What opportunities or benefits may arise from a regional conservation authority framework?

- How could governance be structured at the regional conservation authority level, including board size, composition, and municipal representative appointment processes?
- How can a transparent and consultative budgeting process be maintained across member municipalities?
- How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

This response is structured to address each of these key questions, providing staff from the City of London's perspective on transition planning, opportunities, governance, budgeting, and stakeholder engagement within the proposed regional framework

### **Key Factors for a Successful Transition**

A successful transition requires:

- Clear provincial direction to ensure consistent policies and regulatory approaches.
- Recognition that the size of the proposed Regional Conservation Authority (RCA) will influence the complexity of the transition. For example, UTRCA currently serves 17 municipalities, whereas the proposed Lake Erie RCA would encompass 81 municipalities, substantially increasing coordination requirements and transition uncertainties.
- Mechanisms to address potential inequities between larger and smaller municipalities, including the management of varying application volumes, review timelines, and the fair and transparent application of priority review frameworks (e.g., housing or economic development–driven applications).
- Comprehensive transition planning, including defined timelines, watershed service areas, and uninterrupted delivery of permitting, flood forecasting, environmental monitoring, and enforcement functions.
- Preservation of local watershed expertise, particularly for the Thames River and associated tributaries within the City's boundaries, to maintain informed and local data driven decision-making.
- Clarity on municipal funding contributions and assurance of service continuity.
- Ongoing municipal involvement to ensure governance, budgeting, and service delivery remain aligned with local priorities.

In addition, City staff have indicated that a successful transition would also include ensuring that the RCA, through the UTRCA, continue to deliver core local programs from which the City of London currently benefits, preserving continuity in areas such as flood management and environmental monitoring and management.

### **Opportunities from a Regional Conservation Authority Framework**

Certain opportunities may exist from the regional consolidation proposed, including improved efficiency, standardization, and continuity across municipalities, as well as

data and technology sharing across larger administrative boundaries. For example, the City of London maintains substantial in-house technical expertise, including stormwater engineering, hydrology, hydrogeology, ecology, and natural heritage review, which overlaps with Conservation Authority review functions. This overlap can result in duplicated technical reviews. Clear delineation of responsibilities could reduce redundancy and streamline timelines, while allowing Conservation Authorities to reallocate technical resources to smaller municipalities lacking similar internal capacity and technical expertise.

However, while these efficiencies improve clarity, consistency, and reduce technical overlap, it is unclear if the consolidation of the current Ontario CA structure will ultimately lead to the desired outcomes stated in the proposal, such as leading to a direct increase in the number of homes built, as development outcomes are influenced by multiple factors beyond conservation authority review.

In addition to consolidating Ontario's existing Conservation Authorities, the Province could consider providing clearer direction through substantive amendments to the Conservation Authorities Act. Modernizing the Act to remove subjective or ambiguous language, particularly with respect to Section 28 permitting, would support greater consistency and predictability in permit decision-making across the province, especially as the current Conservation Authority framework transitions to an RCA model.

### **Governance Structure for Proposed Regional Conservation Authorities**

Providing effective representation from the 81 municipalities within the proposed Lake Erie RCA will require careful planning. The Province could consider a two-tier governance model that uses the existing local Conservation Authorities as local experts, with the Chair (or designated representative) of each local Conservation Authority board serving on an upper-tier regional board, thereby preserving local input while facilitating regional coordination. A board of municipal representatives, appointed through clear processes and providing proportional representation based on population and watershed characteristics, while ensuring representation for smaller municipalities, would support effective oversight and maintain local interests and priorities.

### **Budgeting Within a Regional Conservation Authority**

Given the magnitude of the proposed changes, City staff recommend that the proposed creation of the Ontario Provincial Conservation Agency be fully provincially funded to avoid additional municipal contributions, which would put further pressure on the Municipal tax base.

Further, as noted by City of London staff, transparent and consultative budgeting is essential. Member municipalities should receive clear documentation of the current and proposed funding frameworks, with opportunities to review and provide input through a public facing posting. Watershed-specific reporting, consistent timelines, and

standardized formats will enhance accountability and ensure local priorities and initiatives are met.

### **RCA Relationships with Local Communities and Stakeholders**

RCAs can maintain strong community relationships by preserving local service hubs and staff, supporting watershed-specific outreach, and coordinating closely with local municipal departments. Continued engagement with Indigenous communities and other interested parties in planning and stewardship initiatives will foster meaningful collaboration.

### **Concluding Remarks**

Staff from the City of London support the goal of improving efficiency and coordination in watershed management. Care is recommended in ensuring the new RCAs retain local expertise, accountability, and effective watershed-based governance, conservation outcomes and municipal representation. Retaining a more localized, watershed-aligned substructure could support effective response to environmental conditions, infrastructure realities, and community needs, while maintaining targeted conservation, permitting, and hazard-management services.

Staff would also value clear and consistent provincial direction be provided through the RCA model, especially through meaningful updates to specific sections under the CA Act, which could achieve greater consistency in permitting across Ontario and ultimately provide a mechanism for achieving the stated goals in the Proposal. As suggested in this response, a two-tier governance model that retains existing local Conservation Authorities with representation at the RCA-level could serve to preserve local input while facilitating regional coordination.

The City appreciates the opportunity to provide comments on ERO No. 025-1257 and encourages the Province to thoughtfully consider whether the proposed consolidation will meet its intended objectives while maintaining strong local service quality and effectiveness

Sincerely,



Heather McNeely  
Director, Planning & Development  
Housing and Community Growth  
City of London



Ashley M. Rammeloo, MMSc., P.Eng.  
Director, Water, Wastewater, and Stormwater  
Environment and Infrastructure  
City of London