



Staff Report

Strategic Priority:

- Communication and Transparency
- Finance and Service Improvement (Goal: H2)
- Data Supported Planning

To: Mayor and Members of Council
From: John F. Connolly, CAO/Deputy Clerk
Meeting Date: December 16, 2025
Subject: Environmental Registry Ontario – Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities

PURPOSE

To seek Council approval to provide the comments (attached) through the Environmental Registry of Ontario (ERO) as part of the Province’s consultation on the Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities (ERO Posting#25-1257).

RECOMMENDATION

THAT Council receive this “Environmental Registry Ontario – Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities” report, dated December 16, 2025;

AND FURTHER THAT Council direct staff to submit comments through the ERO on this matter.

BACKGROUND

At the October 11, 2025, the Province through the Ministry of Environment, Conservation and Parks (MOECP) outlined a series of proposals with respect to the operation and governance of Ontario’s 36 Conservation Authorities. For the Municipality of Marmora and Lake, these proposals, if adopted, represent some significant changes with respect to its working relationship with Crowe Valley Conservation Authority (CVCA) and Quinte Conservation.

On November 6, 2025, MOECP posted ERO#25-1257 on the Environmental Registry of Ontario (ERO). This proposal entitled “Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities” (Attachment A) with a comment period that is due to be closed December 22, 2025. However, Bill 68 (which included these measures impacting Conservation Authorities was introduced on November 6, 2025 has already been passed and received Royal Assent on November 27, 2025.

ANALYSIS

Both CVCA and Quinte Conservation have Marmora and Lake Councilors who sit on both their respective conservation authority Boards of Directors. The background information and supporting documentation provided as part of the media release and the ERO posting do not provide enough amount of detail relative to the pros, cons and implications of the proposals. As such, there are many considerations of how these changes may impact local circumstances as well as the operational and governance of conservation authorities under this new framework.

The attached comments (Attachment B) have been developed by Conservation Ontario along with the individual conservation authorities including Quinte Conservation. Many of these comments focus on: standards, service delivery; administrative duplication/overlap; and other considerations. Marmora and Lake's conservation authority representatives share these concerns and have indicated a desire to go on record (through the ERO) to share these concerns.

These comments largely apply to all conservation authorities as well as directly impacting local concerns for CVCA and Quinte Conservation. Council will take note that there are some detailed Quinte Conservation provided by that authority as part of its local context but most of these concerns are also consistent with concerns for the CVCA.

If Council supports the attached comments, staff will submit these through the ERO to make them part of the public record.

FINANCIAL IMPACT

Unknown at this time.

IMPACTING LEGISLATION

Conservation Authorities Act, RSO 1990 C.27

Respectfully submitted,

John F. Connolly, MCIP RPP
CAO/Deputy Clerk
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Attachments:

- Attachment A - ERO Posting #25-1257 – Supporting Documentation
- Attachment B - Comments to be submitted to ERO Posting – Marmora and Lake

Proposed boundaries for the regional consolidation of Ontario's conservation authorities – supplemental document

Posting closes December 22, 2025, at 11:59pm
Please submit comments via the ERO posting or by email to
ca.office@ontario.ca

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Summary of Proposal

This proposal seeks feedback on proposed boundaries and criteria for the regional consolidation of Ontario's 36 conservation authorities.

It is proposed that Ontario's 36 conservation authorities would be consolidated into the following 7 regional conservation authorities:

- Lake Erie Regional Conservation Authority – covers southwestern Ontario watersheds draining into Lake Erie, including the Thames, Grand, and Sydenham systems, supporting agriculture, industry, and shoreline communities. Primarily based on the Northern Lake Erie Secondary Watershed
- Huron-Superior Regional Conservation Authority – includes watersheds along Lake Huron's northern shore and the Lake Superior basin, supporting conservation and flood management across vast northern watersheds. Primarily based on the Eastern Lake Huron and southern portion of Eastern Georgian Bay Secondary Watershed and in the north the central portion of Northwestern Lake Superior Secondary Watershed.
- Western Lake Ontario Regional Conservation Authority – extends along the western Lake Ontario shoreline from Niagara through Halton and Peel, encompassing urban and rural watersheds that support the Greater Toronto–Hamilton corridor. Primarily based on the western portion of the Northern Lake Ontario and Niagara River Secondary Watershed.
- Central Lake Ontario Regional Conservation Authority – covers the watersheds from north of Toronto, including parts of York Region, west through Peel Region, east through Durham, and into parts of the Kawarthas, balancing urban growth and agricultural lands while protecting key tributaries to Lake Ontario. Primarily based on the central portion of the Northern Lake Ontario and Niagara River Secondary Watershed.
- Eastern Lake Ontario Regional Conservation Authority – Includes watersheds draining to eastern Lake Ontario and the Bay of Quinte, including the Trent and Cataraqui systems, supporting a mix of agricultural, urban, and coastal communities. Primarily based on the eastern portion of the Northern Lake Ontario and Niagara River Secondary Watershed.
- St. Lawrence Regional Conservation Authority – Encompasses watersheds flowing into the St. Lawrence River, including the Raisin and South Nation areas, coordinating flood and water management across eastern Ontario. Primarily based on the Upper St. Lawrence, Lower Ottawa River, and southern portion of the Central Ottawa River Second Watersheds.
- Northeastern Ontario Regional Conservation Authority – brings together the conservation authorities in the northeast, maintaining coordination across large

watershed areas and shared northern infrastructure and ecosystems. Its work focuses on maintaining healthy waterways, protecting natural habitats, and promoting sustainable land and water use across major watershed areas that span parts of Northern Lake Huron, the Abitibi, Missinaibi, Mattagami, Wanipitai, French, and Upper Ottawa River systems.

No changes are proposed to the overall extent of conservation authority jurisdiction within the province, and under consolidation the new regional conservation authorities would remain independent organizations operating with municipal governance and oversight, in accordance with requirements under the *Conservation Authorities Act*, as administered by the Ministry of the Environment, Conservation and Parks.

In addition, the important work that conservation authorities do to protect people and property from the risks of flooding and other natural hazards will not change. The regional conservation authorities would continue to fulfill provincially mandated programs such as drinking water source protection under the *Clean Water Act*, managing development and other activities in areas at risk of natural hazards like flooding and erosion (e.g., floodplains, shorelines, watercourse and wetlands), flood forecasting and warning, and managing their lands and recreational trails so that Ontarians have access to local natural areas and outdoor activities. Regional conservation authorities would continue to provide additional municipal and other watershed programs and services set out under the *Conservation Authorities Act*.

We welcome your feedback in response to the proposed boundaries and criteria applied to inform the proposed boundaries for the regional consolidation of Ontario's conservation authorities. Comments may be submitted through the Environmental Registry posting or by email to ca.office@ontario.ca.

Boundary Criteria

Provided below are criteria applied for determining the proposed boundaries for regional conservation authorities:

- **Maintaining watershed-based jurisdictions** – Aligning with natural hydrological boundaries to support effective flood and water management, consistent with drinking water Source Protection Areas and Regions.
- **Relationships between conservation authorities and municipalities** – Reducing administrative duplication and overlap for municipalities and conservation authorities to simplify accountability and strengthen local partnerships.
- **Balancing expertise and capacity across conservation authorities** – Enhancing technical skills and resources across conservation authorities to improve service and program delivery.
- **Service Continuity** – Ensuring uninterrupted delivery of local conservation authority programs – including flood forecasting and warning, permitting, and source water protection – through and after consolidation.

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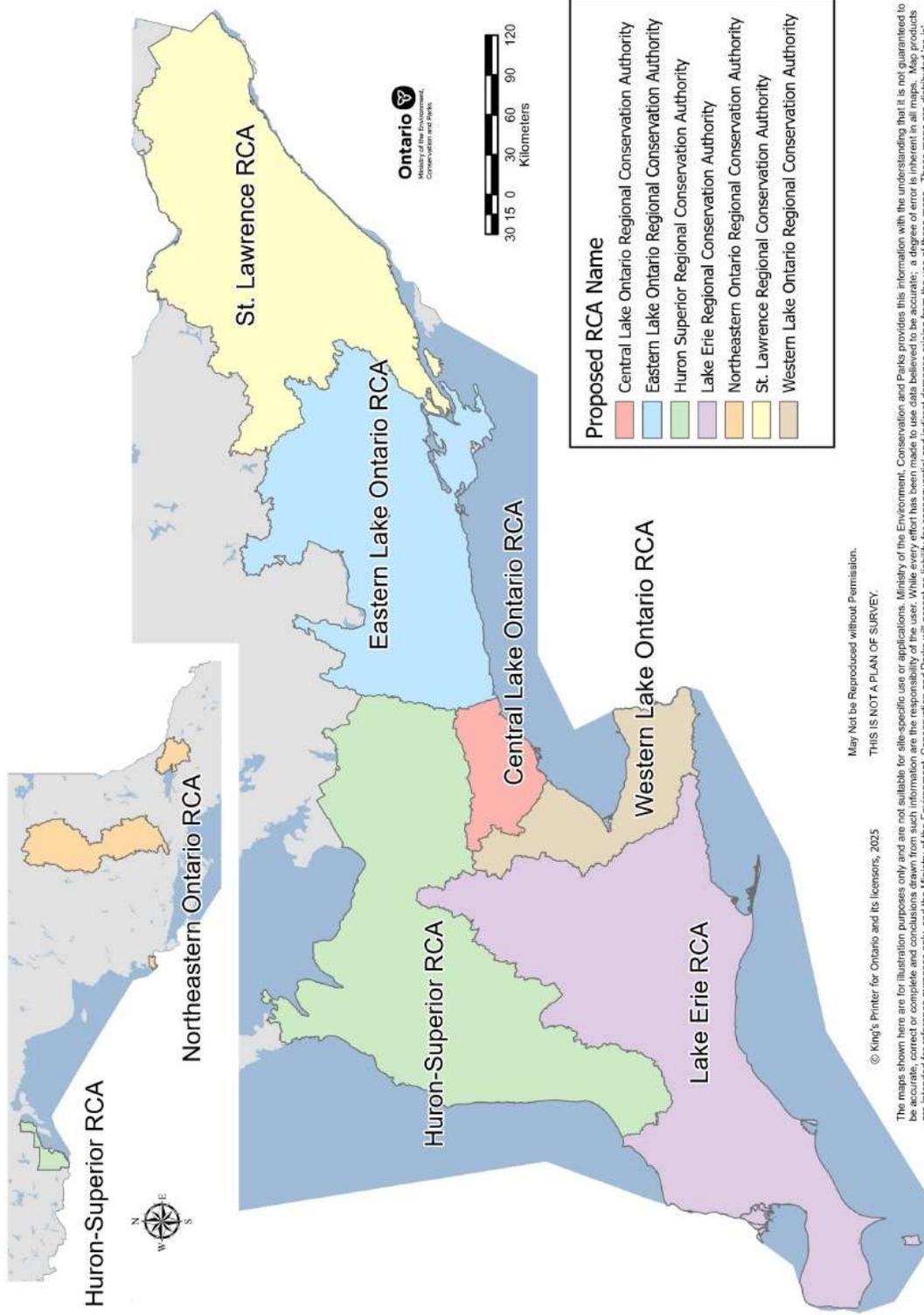
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Maps

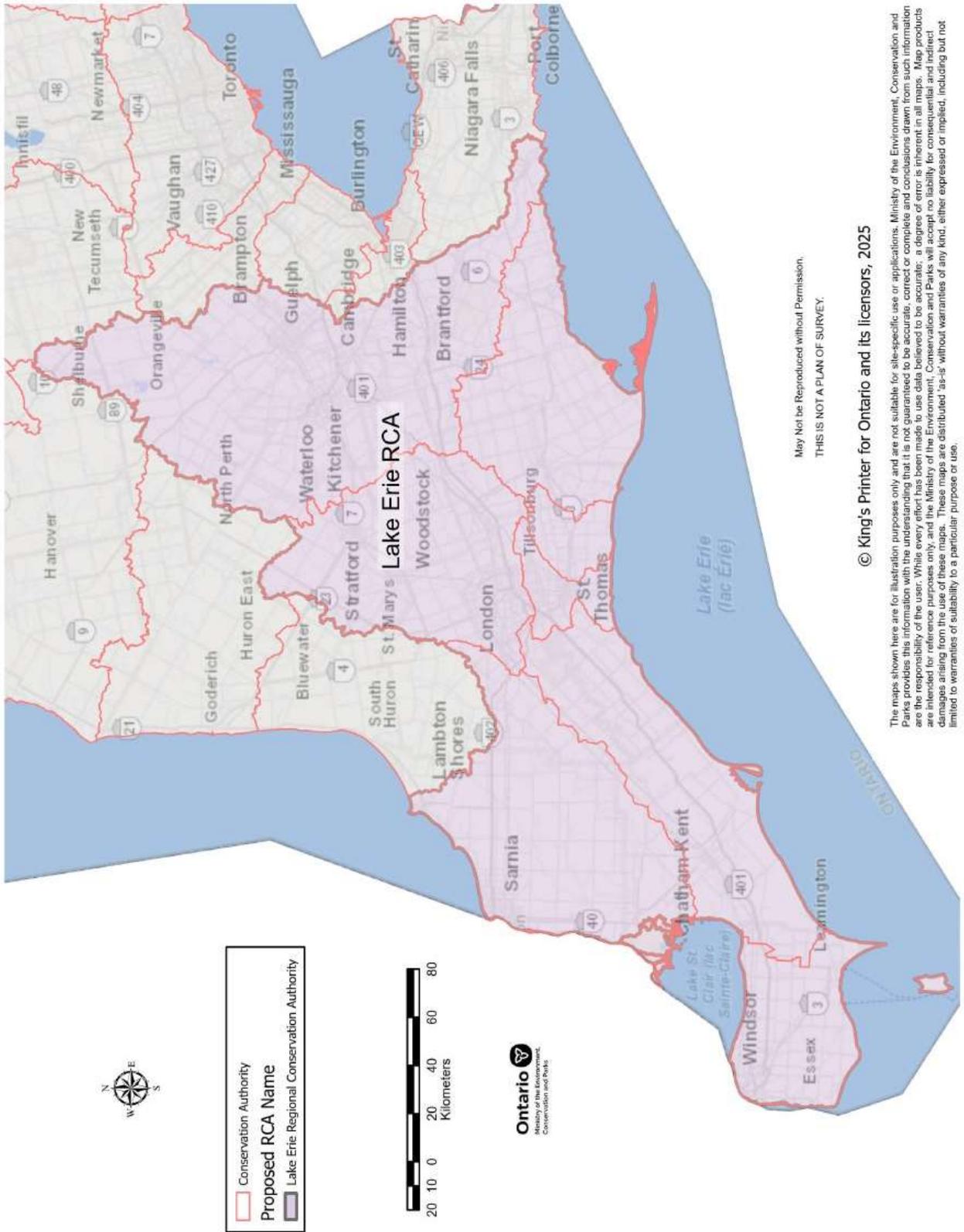
Map of Proposed Regional Conservation Authorities

PROPOSED 7 REGIONAL CONSERVATION AUTHORITIES (RCA)



Map of Proposed Lake Erie Regional Conservation Authority

LAKE ERIE REGIONAL CONSERVATION AUTHORITY



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Map of Proposed Huron-Superior Regional Conservation Authority

HURON-SUPERIOR REGIONAL CONSERVATION AUTHORITY

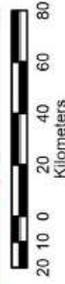


- Conservation Authority
- Proposed RCA Name
- Huron-Superior Regional Conservation Authority



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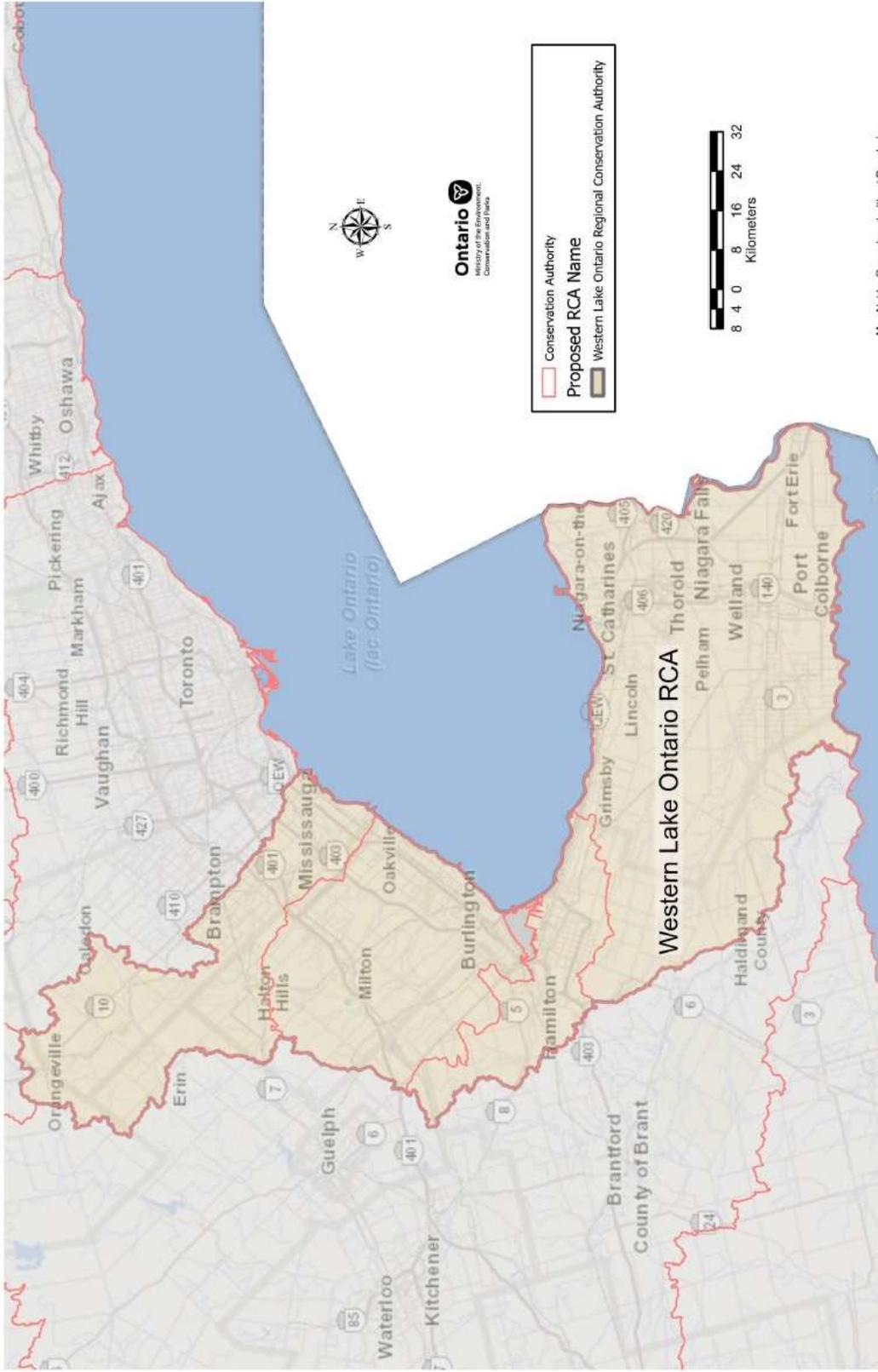


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Map of Proposed Western Lake Ontario Regional Conservation Authority

WESTERN LAKE ONTARIO REGIONAL CONSERVATION AUTHORITY



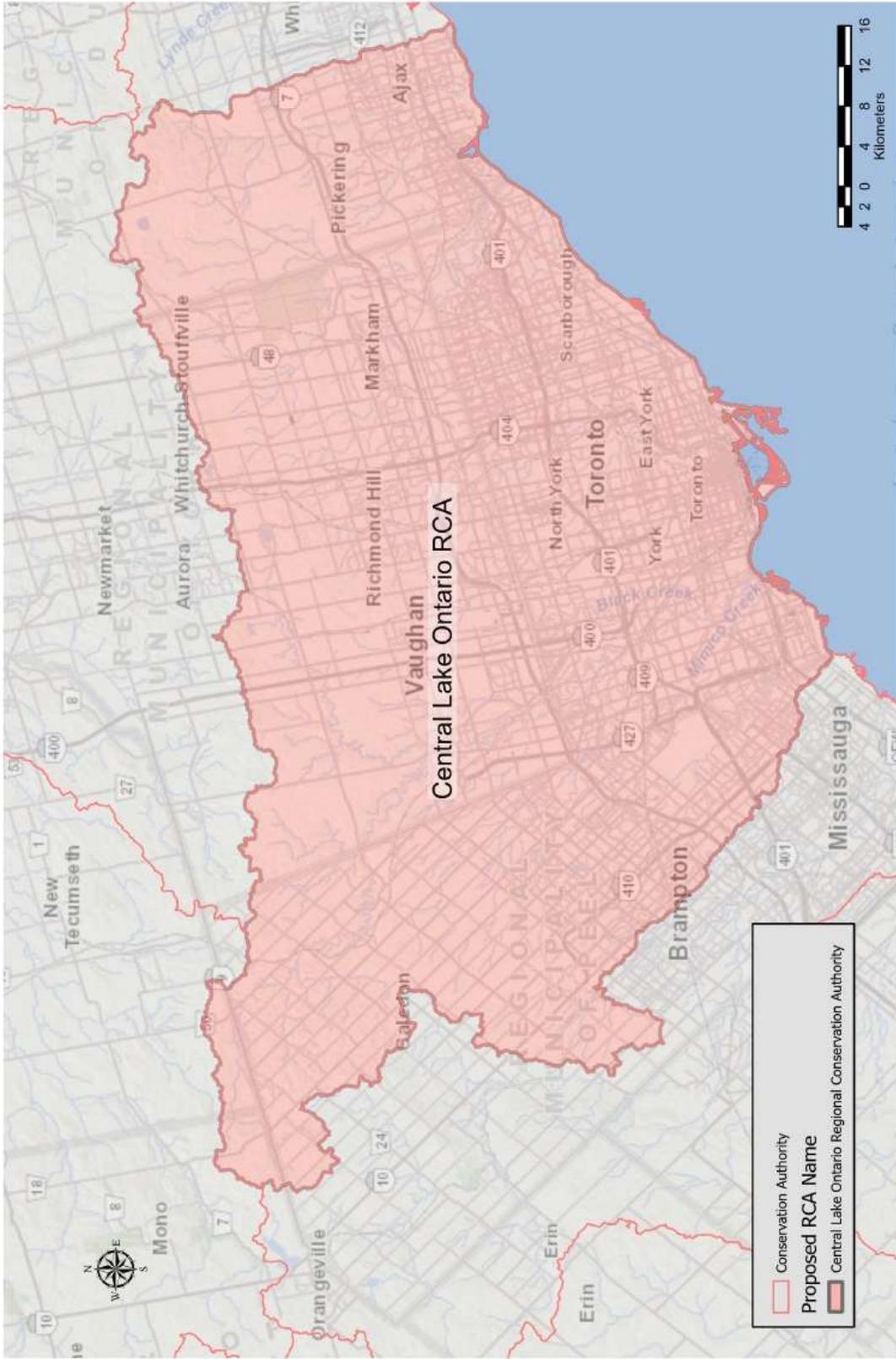
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Map of Proposed Central Lake Ontario Regional Conservation Authority

CENTRAL LAKE ONTARIO REGIONAL CONSERVATION AUTHORITY



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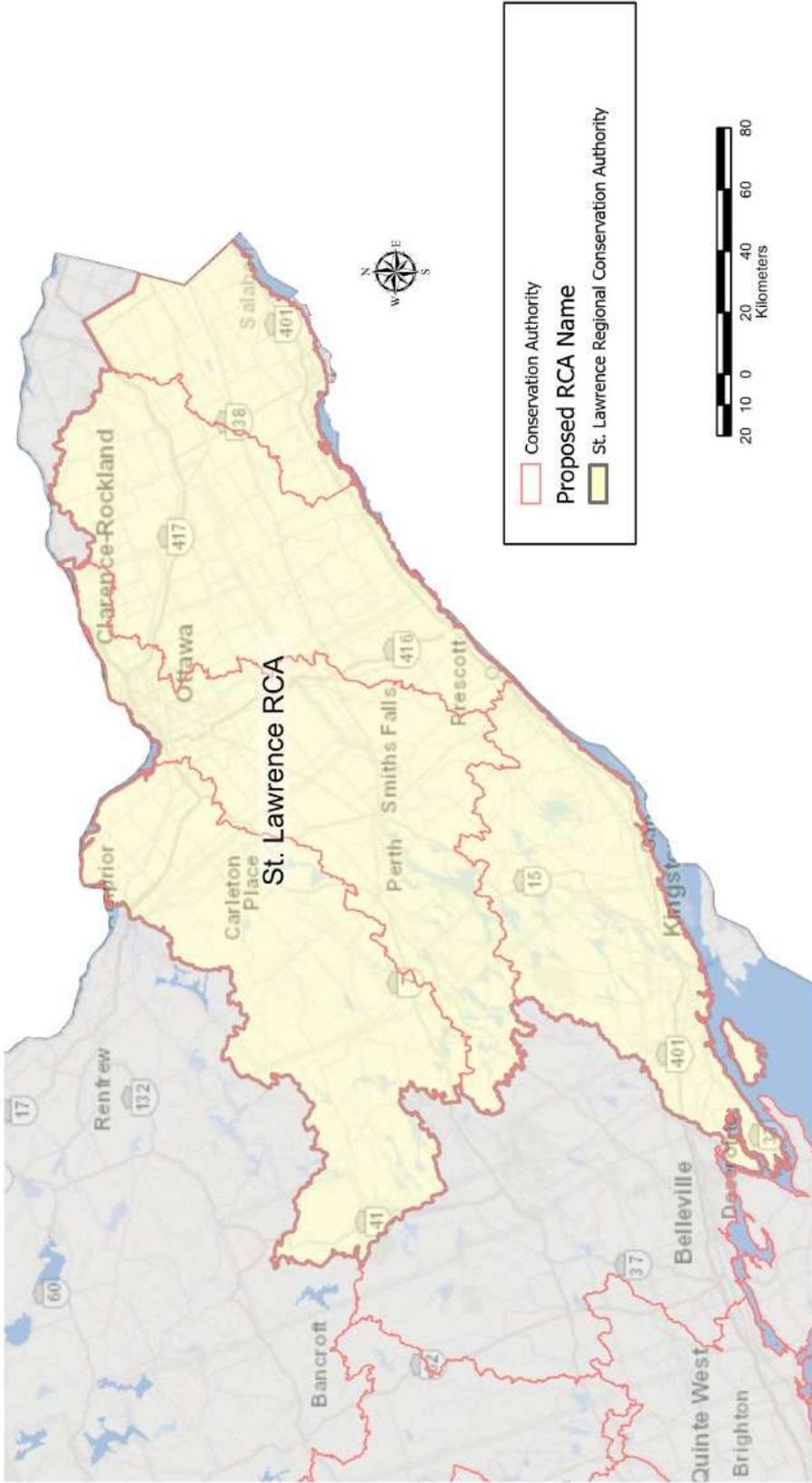


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Map of Proposed St. Lawrence Regional Conservation Authority

ST. LAWRENCE REGIONAL CONSERVATION AUTHORITY



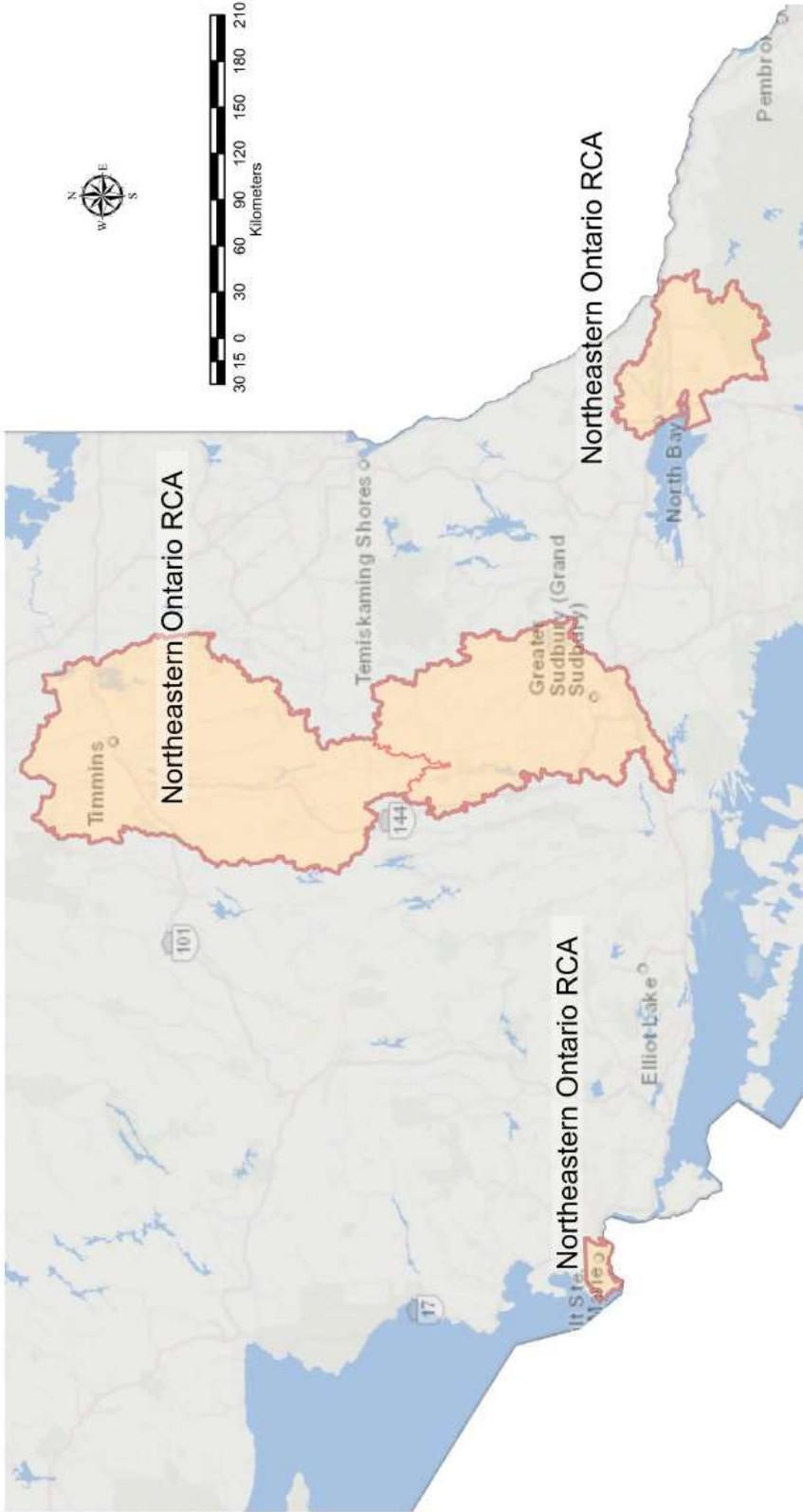
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Map of Proposed Northeastern Ontario Regional Conservation Authority

NORTHEASTERN ONTARIO REGIONAL CONSERVATION AUTHORITY



	Conservation Authority
	Proposed RCA Name
	Northeastern Ontario Regional Conservation Authority



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Listing of Municipalities and Conservation Authorities

Below are listings of the current conservation authorities that are proposed to be included with each regional conservation authority, and of the municipalities that would fall within each proposed regional conservation authority.

Lake Erie Regional Conservation Authority

Current conservation authorities that would make up the proposed Lake Erie Regional Conservation Authority include:

- Essex Region CA
- Lower Thames Valley CA
- St. Clair Region CA
- Upper Thames River CA
- Kettle Creek CA
- Catfish Creek CA
- Long Point Region CA
- Grand River CA

Municipalities that would fall within the proposed Lake Erie Regional Conservation Authority include:

- | | | |
|------------------------------------|---------------------------------------|----------------------------------|
| • City of Brantford | • Municipality of Dutton/Dunwich | • Town of Ingersoll |
| • City of Cambridge | • Municipality of Huron East | • Town of Kingsville |
| • City of Guelph | • Municipality of Lambton Shores | • Town of Lakeshore |
| • City of Hamilton | • Municipality of Leamington | • Town of Lasalle |
| • City of Kitchener | • Municipality of Middlesex Centre | • Town of Milton |
| • City of London | • Municipality of North Perth | • Town of Minto |
| • City of Sarnia | • Municipality of South Huron | • Town of Mono |
| • City of St. Thomas | • Municipality of Southwest Middlesex | • Town of Petrolia |
| • City of Stratford | • Municipality of Thames Centre | • Town of Plympton-Wyoming |
| • City of Waterloo | • Municipality of West Elgin | • Town of St. Marys |
| • City of Windsor | • Municipality of West Perth | • Town of Tecumseh |
| • City of Woodstock | • Norfolk County | • Town of Tillsonburg |
| • County of Brant | • Town of Amherstburg | • Township of Adelaide-Metcalf |
| • Haldimand County | • Town of Aylmer | • Township of Amaranth |
| • Municipality of Bayham | • Town of Erin | • Township of Blandford-Blenheim |
| • Municipality of Brooke-Alvinston | • Town of Essex | • Township of Centre Wellington |
| • Municipality of Central Elgin | • Town of Grand Valley | • Township of Dawn-Euphemia |
| • Municipality of Chatham-Kent | • Town of Halton Hills | • Township of East Garafraxa |

- Township of East Zorra-Tavistock
- Township of Enniskillen
- Township of Guelph/Eramosa
- Township of Lucan Biddulph
- Township of Malahide
- Township of Mapleton
- Township of Melancthon
- Township of North Dumfries
- Township of Norwich
- Township of Pelee
- Township of Perth East
- Township of Perth South
- Township of Puslinch
- Township of Southgate
- Township of South-West Oxford
- Township of Southwold
- Township of St. Clair
- Township of Strathroy-Caradoc
- Township of Warwick
- Township of Wellesley
- Township of Wellington North
- Township of Wilmot
- Township of Woolwich
- Township of Zorra
- Village of Newbury
- Village of Oil Springs
- Village of Point Edward

Huron-Superior Regional Conservation Authority

Current conservation authorities that would make up the proposed Lake Huron Regional Conservation Authority include:

- Ausable Bayfield CA
- Maitland Valley CA
- Saugeen Valley CA
- Grey Sauble CA
- Nottawasaga Valley CA
- Lake Simcoe Region CA
- Lakehead Region CA

Municipalities that would fall within the proposed Huron-Superior Regional Conservation Authority include:

- City of Barrie
- City of Kawartha Lakes
- City of Orillia
- City of Owen Sound
- City of Thunder Bay
- Municipality of Arran-Elderslie
- Municipality of Bluewater
- Municipality of Brockton
- Municipality of Central Huron
- Municipality of Grey Highlands
- Municipality of Huron East
- Municipality of Kincardine
- Municipality of Lambton Shores
- Municipality of Meaford
- Municipality of Middlesex Centre
- Municipality of Morris-Turnberry
- Municipality of Neebing
- Municipality of North Middlesex
- Municipality of North Perth
- Municipality of Oliver Paipoonge
- Municipality of Shuniah
- Municipality of South Bruce
- Municipality of South Huron
- Municipality of West Grey
- Municipality of West Perth
- Town of Aurora
- Town of Bradford West Gwillimbury
- Town of Caledon
- Town of Collingwood
- Town of East Gwillimbury
- Town of Georgina
- Town of Goderich
- Town of Hanover
- Town of Innisfil
- Town of Minto
- Town of Mono
- Town of New Tecumseth
- Town of Newmarket

- Town of Richmond Hill
- Town of Saugeen Shores
- Town of Shelburne
- Town of South Bruce Peninsula
- Town of The Blue Mountains
- Town of Wasaga Beach
- Town of Whitchurch-Stouffville
- Township of Adelaide Metcalfe
- Township of Adjala-Tosorontio
- Township of Amaranth
- Township of Ashfield-Colborne-Wawanosh
- Township of Brock
- Township of Chatsworth
- Township of Clearview
- Township of Conmee
- Township of Dorion
- Township of Essa
- Township of Georgian Bluffs
- Township of Gillies
- Township of Howick
- Township of Huron-Kinloss
- Township of King
- Township of Lucan Biddulph
- Township of Mapleton
- Township of Melancthon
- Township of Mulmur
- Township of North Huron
- Township of O'Connor
- Township of Oro-Medonte
- Township of Perth East
- Township of Perth South
- Township of Ramara
- Township of Scugog
- Township of Southgate
- Township of Springwater
- Township of Uxbridge
- Township of Warwick
- Township of Wellington North

Western Lake Ontario Regional Conservation Authority

Current conservation authorities that would make up the proposed Western Lake Ontario Regional Conservation Authority include:

- Niagara Peninsula CA
- Halton Region CA
- Hamilton Region CA
- Credit Valley CA

Municipalities that would fall within up the proposed Western Lake Ontario Regional Conservation Authority include:

- City of Brampton
- City of Burlington
- City of Hamilton
- City of Mississauga
- City of Niagara Falls
- City of Port Colborne
- City of St. Catharines
- City of Thorold
- City of Toronto
- City of Welland
- Haldimand County
- Town of Caledon
- Town of Erin
- Town of Fort Erie
- Town of Grimsby
- Town of Halton Hills
- Town of Lincoln
- Town of Milton
- Town of Mono
- Town of Niagara-on-the-Lake
- Town of Oakville
- Town of Orangeville
- Town of Pelham
- Township of Amaranth

- Township of East Garafraxa
- Township of Puslinch
- Township of Wainfleet
- Township of West Lincoln

Central Lake Ontario Regional Conservation Authority

Current conservation authorities that would make up the proposed Central Lake Ontario Regional Conservation Authority include:

- Toronto and Region CA

Municipalities that would fall within the proposed Central Lake Ontario Regional Conservation Authority include:

- City of Brampton
- City of Markham
- City of Mississauga
- City of Pickering
- City of Toronto
- City of Vaughan
- Town of Ajax
- Town of Aurora
- Town of Caledon
- Town of Mono
- Town of New Tecumseth
- Town of Richmond Hill
- Town of Whitchurch-Stouffville
- Township of Adjala-Tosorontio
- Township of King
- Township of Scugog
- Township of Uxbridge

Eastern Lake Ontario Regional Conservation Authority

Current conservation authorities that would make up the proposed Eastern Lake Ontario Regional Conservation Authority include:

- Central Lake Ontario CA
- Kawartha Region CA
- Otonabee Region CA
- Ganaraska Region CA
- Lower Trent Region CA
- Crowe Valley CA
- Quinte Region CA

Municipalities that would fall within the proposed Eastern Lake Ontario Regional Conservation Authority include:

- City of Belleville
- City of Kawartha Lakes
- City of Oshawa
- City of Peterborough
- City of Pickering
- City of Quinte West
- County of Prince Edward County
- Municipality of Brighton
- Municipality of Centre Hastings
- Municipality of Clarington
- Municipality of Hastings Highlands
- Municipality of Highlands East
- Municipality of Marmora and Lake
- Municipality of Port Hope
- Municipality of Trent Hills

- Municipality of Trent Lakes
- Municipality of Tweed
- Town of Ajax
- Town of Cobourg
- Town of Deseronto
- Town of Greater Napanee
- Town of Whitby
- Township of Addington Highlands
- Township of Alnwick/Haldimand
- Township of Asphodel-Norwood
- Township of Brock
- Township of Cavan Monaghan
- Township of Central Frontenac
- Township of Cramahe
- Township of Douro-Dummer
- Township of Faraday
- Township of Hamilton
- Township of Havelock-Belmont-Methuen
- Township of Limerick
- Township of Loyalist
- Township of Madoc
- Township of North Frontenac
- Township of North Kawartha
- Township of Otonabee-South Monaghan
- Township of Scugog
- Township of Selwyn
- Township of South Frontenac
- Township of Stirling-Rawdon
- Township of Stone Mills
- Township of Tudor and Cashel
- Township of Tyendinaga
- Township of Uxbridge
- Township of Wollaston

St. Lawrence Regional Conservation Authority

Current conservation authorities that would make up the proposed St. Lawrence Regional Conservation Authority include:

- Catarqui Region CA
- Rideau Valley CA
- Mississippi Valley CA
- South Nation River CA
- Raisin Region CA

Municipalities that would fall within the proposed St. Lawrence Regional Conservation Authority include:

- City of Brockville
- City of Clarence-Rockland
- City of Cornwall
- City of Kingston
- City of Ottawa
- Municipality of Mississippi Mills
- Municipality of North Grenville
- Municipality of South Dundas
- Municipality of The Nation
- Town of Carleton Place
- Town of Gananoque
- Town of Greater Napanee
- Town of Perth
- Town of Smiths Falls
- Township of Addington Highlands
- Township of Alfred and Plantagenet
- Township of Athens
- Township of Augusta
- Township of Beckwith
- Township of Central Frontenac
- Township of Champlain
- Township of Drummond/North Elmsley
- Township of Edwardsburgh/Cardinal
- Township of Elizabethtown-Kitley
- Township of Front of Yonge
- Township of Greater Madawaska
- Township of Lanark Highlands
- Township of Leeds and the Thousand Islands
- Township of Loyalist
- Township of Montague
- Township of North Dundas
- Township of North Frontenac
- Township of North Glengarry

- Township of North Stormont
- Township of Rideau Lakes
- Township of Russell
- Township of South Frontenac
- Township of South Glengarry
- Township of South Stormont
- Township of Stone Mills
- Township of Tay Valley
- Village of Casselman
- Village of Merrickville-Wolford
- Village of Westport

Northeastern Ontario Regional Conservation Authority

Current conservation authorities that would make up the proposed Northeastern Ontario Regional Conservation Authority include:

- Nickel District CA
- Sault Ste. Marie Region CA
- Mattagami Region CA
- North Bay-Mattawa CA

Municipalities that would fall within the proposed Northeastern Regional Conservation Authority include:

- City of Greater Sudbury
- City of North Bay
- City of Sault Ste. Marie
- City of Timmins
- Municipality of Callander
- Municipality of Powassan
- Municipality of East Ferris
- Town of Iroquois Falls
- Town of Mattawa
- Township of Black River-Matheson
- Township of Bonfield
- Township of Calvin
- Township of Chisholm
- Township of Matachewan
- Township of Mattawan
- Township of Nairn and Hyman
- Township of Nipissing
- Township of Papineau-Cameron
- Township of Prince

Attachment B – Comments to be Submitted to ERO – Marmora and Lake

The formation of regional CAs may have significant impacts for a broad number of local stakeholders in all consolidated regions. No specific evidence-based analysis has been provided to justify a larger, regional CA or the need for a new and separate provincial agency to provide oversight, that already exists within a specific provincial Ministry who provides direction through regulatory legislation. In a recent information session held by MECP on November 18th, the following rationale was provided as to “Why changes are being made to Ontario’s Conservation Authority System?”

- Patchwork of standards, service delivery
- Outdated and fragmented systems
- Administrative duplication
- Need for more accountability and transparency

1. Patchwork of Standards and Service Delivery

- Quinte Conservation and CVCA follow Conservation Ontario’s Client Service Standards for permit reviews and planning applications. All CA’s use the same regulation which includes pre-submission pre-consultation requirements, application requirements and requirements for CA Policy and Procedures which includes timing. Further, O. Reg. 686/21 requires every conservation authority to submit a permitting annual report which includes timelines.
- Quinte Conservation has a proven track record of processing permits and planning application within provincial guidelines. Over the past 3 years (2022-2024) we issued 1109 permits with an average of 14 days to issue the permit (Current guidelines are 30 days for routine permits and 90 days for major permits). Often, the overall delays are not the fault of the individual CAs. CAs are just a convenient scapegoat. In many cases, delays come from other parties (landowners, developers, consultants, other review agencies) who tend to blame the CA in efforts to deflect from the real situation. This statement from the province also ignores the fact that the province is large, not uniform, and rural areas have different concerns to that of the highly urbanized GTA.
- Quinte Conservation has a Client Service Charter outlining standards to ensure inquiries are acknowledged. The charter is available on our website and includes timelines to ensure permits are reviewed within provincial guidelines.
- All conservation authorities have a suite of tools that are used to prevent delays, such as online booking for pre-consultations, digital permit application portals, online regulated area maps, technical checklists, fee schedules, policies with all information available to the public for complete transparency.
- CA’s have Pre-consultation meetings and site visits to reduce uncertainty and delays and are essential for landowners, so they get accurate and on the ground information.
- Ontario Land Tribunal demonstrates consistency and fairness if matters cannot be supported by conservation authority staff and/or board members. Quinte Conservation uses a board approved, provincially developed Hearing Guideline to hear all regulatory matters that do not meet policy.
- All CA’s generally follow the Conservation Ontario Policies and Procedures Document for Plan Review and Permitting.
- Quinte Conservation and neighboring conservation authorities routinely compare fees. However, although Quinte Conservation strives to be cost recovery, fees are

geared to the local economy and of course are reviewed and approved by our local municipalities. It is likely that QC's fees are lower than the fees in the GTA. GTA fees may be prohibitively expensive for this rural watershed.

- A standardized, one-size-fits-all provincial model risks undermining place-based decision making essential for effective watershed management. Quinte Conservation has significant ecological differences, watershed-specific risks, and locally tailored science that is unique to our region. The geology in the Quinte watershed is significantly different from the CAs to the west, as a result there are different studies required to maintain the protection of life and property from natural hazards.
- Quinte Conservation participates in provincial working groups, has shared service agreements, and coordinates many initiatives to align turnaround times and streamline processes. Issues stem largely from provincial underfunding rather than structural flaws.
- Quinte Conservation staff are participant and in many instances leaders on groups such as the Water and Erosion Control Infrastructure (WECI) committee, leaders in the Provincial Flood Forecasting and Warning Committee, represent Canada on the Great Lakes Fisheries Commission, Insurance committee, all these initiatives serve to provide a standard level of service and delivery.
- Quinte Conservation provides engineering support to neighboring conservation authorities as a shared service initiative.
- Quinte Conservation administers the WISKI Hub for 11 conservation authorities to ensure accurate and real-time data for flood forecasting and warning.
- Quinte Conservation works directly with builders and landowners that benefit most from locally informed reviews ensuring that impacts such as flooding, erosion, and infrastructure damage are avoided.
- Standards at Quinte Conservation meet the development needs and demands. In some instances, Quinte Conservation may require less detailed studies than those required in the GTA (ex. Coastal engineering studies for shoreline protection works, or water balances for developments in some urban areas).
- Quinte Conservation has the necessary staffing expertise in order to effectively review development applications.
- Our regulations department is well organized. Regulations staff discuss files within their team. Regulations staff engage technical/engineering review staff early and with clear deadlines and expectations for review.

2. Outdated and Fragmented Systems

- Quinte Conservation has the appropriate technological resources for data management and flood risk management through our WISKI database, our watershed understanding, and floodplain mapping. Our WISKI database is shared among 10 other CAs (mostly located in eastern Ontario), it is the most common data management system used amongst conservation authorities, and it is also used by the Ministry of Natural Resources and Ministry of Environment, Conservation and Parks. Quinte Conservation is a leader in rural Ontario in flood forecasting and warning. We are also fortunate that our major flood damage centres are at the downstream end of our watersheds, allowing lead time for forecasting and warning. One area of potential improvement would be to install flow gauges on the urban

creeks for flood forecasting and warning purposes. This has been planned as a future project through our capital asset management funding.

- Quinte Conservation and CVCA with assistance from our municipal partners have invested in advanced GIS and Open Data Hubs that provide public access to geospatial datasets, including LiDAR and aerial imagery.
- Quinte Conservation in partnership with our local municipalities have invested in local floodplain mapping projects (e.g., Potter Creek, Upper Salmon River, Macaulay Creek, Consecon Lake, Marsh Creek, Bell Creek, Deer Creek, Selby Creek, Lane Creek, Napanee River Upper Lakes, Bay of Quinte and Lake Ontario Shoreline Management Plan) that use advanced hydrologic and hydraulic modeling.
- Quinte Conservation leads the WISKI hub that provides advanced real-time data to allow for responsive decision-making when dealing with flood forecasting and warning.
- The biggest barrier to consistent technological capacity across conservation authorities is chronic provincial underinvestment. Standardization can be achieved through provincial funding for shared platforms and does not require restructuring.
- Quinte Conservation along with our partnering conservation authorities already operate sophisticated modeling tools (e.g., LiDAR, flood forecasting systems, hydrologic models), often exceeding provincial capabilities.
- Quinte Conservation and our partnering municipalities rely on local technical expertise. Centralizing decisions will increase risks, weaken data quality, slow down review times, and significantly reduce response to flood management, particularly during extreme weather events.
- Quinte Conservation permitting process (Section 28 of the Conservation Authorities Act) is automated and streamlined through our website. All permits are emailed to the applicant; respective municipality is copied all to ensure expedited service.
- Local conservation authority staff are experts in our field and regularly share knowledge and expertise.
- Quinte Conservation routinely shares expertise and knowledge at the Section 28 Committee, Regulations Compliance Committee, Coastal Engineering Committee and other working groups.
- In smaller CAs the complexity of risk management is less, with staff corporate memory (experience) is very high, making the reliance on “Technical tools” overrated. Ultimately, a person must make an assessment and a decision, regardless of the “technical tools” available. The position of the province on this matter also ignores the fact CAs support each with technological implementation (i.e. the WISKI hub, flood forecasting working groups, Eastern flood forecasting group etc.)

3. Administrative Duplication

- Quinte Conservation has already gone through the amalgamation process in the mid 90's with three original CA's forming Quinte Conservation.
- Quinte Conservation provides integrated services for 18 municipalities, including flood forecasting, flood control operations, planning and regulations, stewardship, education, and source water protection.

- Quinte Conservation provides risk management services to partner Municipalities to ensure municipal drinking water is protected, avoiding duplication and ensuring compliance.
- Centralized platforms like OnBase, GIS, WISKI, all assist with streamlining workflows and reducing redundant tasks.
- Quinte Conservation annually prepares detailed budgets and capital asset management plans that are discussed with municipal partners to ensure transparency, accountability and demonstrate efficient allocation of funds prior to board approval. Our municipal partners review and approve our budget and can therefore direct more of the budget to frontline staff if warranted having important local impact.
- Quinte Conservation uses shared services whenever possible. We provide engineering support to neighboring conservation authorities when needed, share in licensing on several software packages, bulk purchase on items such as benefits and insurance.
- Eliminating local administrative functions does not guarantee savings and may increase municipal costs if municipalities must assume these roles or procure more expensive services from the province.
- Local governance ensures that municipal priorities are represented, which prevents misalignment with local risks and interests of the watershed residents that are taxpayers.
- Any duplication of services could be addressed through targeted provincial investment in shared back-office tools, instead of by restructuring or disempowering CAs.
- The Quinte Conservation jurisdiction is straightforward, where no urban areas are within the jurisdiction of both Quinte Conservation and another conservation authority. As a result, all large planning files in the urban development areas in Quinte Conservation's jurisdiction follow the same standards and have the same staff working on the files. As a conservation authority that was formed as the amalgamation of 3 CAs in the 1990s, Quinte Conservation provides efficient administration for a large geographic region.
- Centralizing administration will create an inefficient centralized (more highly paid) bureaucracy which will actually raise operating costs and not reduce them. This assertion ignores the way conservation authorities operate. Quinte Conservation and many other conservation authorities operate on shoestring budget with local administration, which is scaled to the resources (budget) and size of the operation. This highly scaled operating model in reality is extremely efficient. Conservation authorities that represent larger urban centers have significantly larger administration while smaller conservation authorities have practically no administration and in many smaller CAs administration is simpler and individuals often occupy many roles within the organization.

4. Need for More Accountability and Transparency

- Annual reports, strategic plans, financial statements, audits, asset management plans, etc. are all publicly available

- Open Data Hub offers public access to watershed data, floodplain maps, water levels on many lakes and rivers and source protection information.
- Client feedback and annual performance reviews are part of Client Service commitments and are regularly reviewed to ensure compliance.
- Public engagement through open houses for floodplain mapping, source protection planning, etc., occur regularly.
- Conservation Authorities are required to prepare and submit an annual report that outlines statistics on permits. This information is presented to the board of directors, provided to all our municipal partners and submitted to Conservation Ontario.
- All conservation authorities operate under accountability mechanisms, including:
 - audited financial statements,
 - multi-year capital asset management plans approved by municipal partners,
 - board meetings open to the public,
 - mandatory reporting under the CA Act,
 - provincially mandated transition plans.
- The Province has the ability under the newly formed Ontario Provincial Conservation Agency to provide **performance metrics, timely regulations**, policies, technological advancement, etc. without having changes to conservation authority boundaries that will negatively impact our local municipal partners and watershed residents.
- All conservation authorities have a local board of directors comprised of municipal councilors that represent their local municipal residents and taxpayers that provide **strong democratic oversight**; removing or reducing local governance would **decrease**, not increase accountability to residents and municipalities and ultimately cost local taxpayers more money.
- Quinte Conservation provides transparent service standards, online permit dashboards, and performance reporting—often exceeding provincial expectations and similar circumstances can be seen across the province within the other conservation authorities.
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If the province is intending to proceed in a open and transparent manner, then CA boards and agencies, along with Municipal representation, who are currently engaged in integrated watershed management. The proposed restructuring leads to a number of concerns and many questions that have yet to be addressed, including:

- The new governance model and how local representation will occur on a regional board of directors, potentially leading to inadequate local/municipal representation.
- The implication of the dissolution of each existing CA and the impact under the Income Tax Act for authorities who are registered charities.
- The impact to related charitable foundations, specifically those with narrow objectives supporting their geographically-limited CA and maintaining segregated funds.
- The impact on staff and how “redeployment” will practically and logically work.
- The merging of watershed-specific and therefore, disparate policies and processes, into a “one size fits all” framework that potentially would negate site-specific management approaches in favour of diluted, overarching policies.

- The centralization of programs and services that have been customized and responsive to watershed conditions, municipal and CA priorities and funding opportunities.
- The ultimate transfer of assets and infrastructure (eg dams, dykes, power generation, etc), some of which resulted from donations and estate bequests, currently owned by each CA.
- And finally, the Funding model for the new provincial oversight agency and the expect financial impact to the taxpayers in each municipality.

Under the proposed Eastern Lake Ontario RCA, 54 municipalities could not reasonably hope to have a voice (or vote) the ERO describes – “...under consolidation the new regional conservation authorities would remain independent organizations operating with municipal governance and oversight, in accordance with the requirements under the Conservation Authorities Act.”