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Sent through ERO 025-1257 Posting Online

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RE: Essex Region Conservation Authority submission to ERO Posting 025-1257

The purpose of this submission is to provide the feedback of the Essex Region Conservation Authority (ERCA) Board of Directors to the ERO. This is in addition to the letter sent from the ERCA Board of Directors by email to Minister McCarthy, dated November 19, 2025.

Essex Region Conservation Authority was formed in 1973 and is one of 36 conservation authorities across the province of Ontario. For over 50 years, ERCA has been working with local municipalities, local watershed residents, First Nations, and local stakeholder groups (both environmental and development-focused) to ensure that the Essex region is protected from natural hazards, has systems in place to provide accurate and timely information and data in the event of emergencies (i.e. a flood), provide programs and services to enhance our shared goals for the watershed region and ensure responsible development to protect life and property.

Essex Region Conservation Authority's boundaries largely mirror the Source Protection Area. The area includes all watersheds out letting to Lake St. Clair, the Detroit River and Lake Erie bounded by the western watershed extent of the Lower Thame Region Conservation Authority (the western extent of the Thames River watershed). The topography of the Essex Region is unique in the province with flat, low-lying land, impermeable soils, rapid runoff response, aggressive shoreline erosion, and reaches of the watershed that have experienced significant flooding and damaging erosion. Managing these challenges requires technical expertise that exists within the current structure of our organization and staff who are fully experienced with the challenges of our landscapes. ERCA's position is that issues, that as yet are not fully articulated by the province, most likely stem from lack of stable provincial funding that was previously provided for historically.

There is no need for the province to undertake boundary amendments to achieve yet, unspecified provincial objectives. Current, agreed-to matrices determined in consultation with the province and Conservation Ontario are being met and or exceeded by the Essex Region Conservation Authority. We are currently operating a digital database that fully meets the provincially identified requirement for permitting that the province has identified as outstanding.

ERCA has strong relationships with our local Indigenous communities, none of which have been consulted as part of this proposed regional entity. Should regional conservation authority consolidation be considered, it must include meaningful and lawfully required consultation with Indigenous communities. To date, Caldwell First Nation and Walpole Island First Nation have not been consulted. Without this consultation, consideration for a potential consolidation is at risk as it overlooks important cultural, environmental, and legal considerations.

A provincial model of consolidating conservation authorities into significant regions, largely ignoring local watershed extents, risks undermining locally informed decision-making essential for effective watershed management.

ERCA is accountable to our local ratepayers through a governance model that represents both urban and rural municipalities through an engaged 19 member Board of Directors with representation from 9 member municipalities. The makeup of this Board provides for full, local transparency and accountability. Shifting from a local governance model to a proposal for regional appointments diminishes accountability. ERCA is a strong proponent of the "user-pay" principle and expecting that municipalities would pay for reduced input and access does not meet this standard. The voice of all member municipalities is an important consideration at the Board level as our members undertake their responsibilities as stewards of our watershed in unanimity.

Below are the requested responses to the questions posed in ERO#025-1257:

Q1. What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

- Consultation at the watershed level ahead of legislative action by parliament ensuring that a ground-up consensus determination of the future configuration of a specific watershed extent or district has been undertaken.
- Full and transparent cost-benefit analysis of the proposed amalgamation and the anticipated additional costs to municipalities and ratepayers for maintaining an overarching Agency, as well as amalgamation costs.
- Identification of an actual problem and concern that is attempted to be addressed by the significant modifications to conservation authority boundaries being put forward.
- Replacement of historic levels of provincial funding to support both mapping and technical work, and programs and services.
- The proposed timeline for implementation of a yet-to-be-determined regional entity of early 2027 is both unrealistic and unnecessarily hurried. A phased approach spanning a period of three-to-four years, coinciding with municipal election cycles allows for a phased

implementation period that would comprehensively address most of the issues (and potential issues) resulting from amalgamation/consolidation.

- A user-interface to a robust and shared permitting system, that is intuitive and facilitates natural hazard assessments, for authority staff and for the commercial/residential development sector, to file applications for clearances and approvals.
- Cost savings for taxpayers should be part of the value proposition, as a trade-off for potentially reduced or altered levels of service, due to lack of accessible staff at the local level.
- The province has not provided a rationalization (cost-benefit or otherwise) for the significant reduction in the current conservation authority compliment. Undertaking a measured, science-based, transparent evaluation of proposed boundaries over a acceptable time frame could address many of the current pain-points which have been identified.
- Additionally, no prudent person will accept 'redeployment' of senior administrative staff to front-line service, as being viable, warranted or appropriate. Transparency will be demanded by the stakeholders and the Province should be transparent and honest regarding job losses rather than spin a 'redeployment' narrative that is absurd at best.
- Establishment of smaller sub-region hubs, with a small management team complement to oversee program staff, develop budgets, manage procurement for the sub-region and to secure and manage physical assets.
- A fair and equitable path forward for members of the various bargaining units within the affected conservation authorities, vis a vis the dovetailing of seniority and consistency of wages and benefits (i.e. ERCA CUPE Local 3784). Consider application of the PSLRTA to ensure fairness for all represented members.
- Little to no consideration has been given to the status of potential regional conservation authorities as it relates to current conservation authorities with Foundations actively supporting and fundraising for objects of the original conservation authority (i.e. impacts of restricted donations, donations of land, potential issues with Canada Revenue Agency, etc.).

Q2. What opportunities or benefits may come from a regional conservation authority framework?

- Standardized natural hazard mapping products and digital resources to better support local development and flood monitoring.
- Shared operational technology, resources, best practices, standard operating procedures, policies and protocols.
- Elimination of duplicative and costly administrative and governance expenses.
- Potential for temporary redeployment of technical expertise, as required.
- The above largely exists within the existing framework as conservation authority staff currently sit on various working groups, share information within their respective portfolios, and seek opportunities for projects/funding benefiting regional projects and can be formalized with joint operational agreements established between groups of existing conservation authorities.

Q3. 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?

- The existing Conservation Authority model to determine representation based on population extents is understood by municipal membership and accepted by rate-payers. It defines representation and this model should be the consideration for future representation.
- A significantly enlarged geographical reach does not provide for a manageable number of board members, satisfying accepted appropriate representation.
- Municipalities would be unwilling to contribute funding significantly distant of their geographical location. This destroys the concept of a local watershed principle. The phrase “no taxation without representation” although an American axiom is appropriate in consideration.
- A Hybrid Model could be considered for the potential for an amalgamated Conservation Authority. This model ensures geographic coverage through sub-regions or county representation while guaranteeing seats for major urban centers. Budget decisions could continue to incorporate CVA-weighted voting to maintain fiscal equity.

Key Features:

- Sub-regional/county seats for broad watershed coverage
- Urban seats for large municipalities/cities such as Windsor, London, Guelph, Brantford, based on population
- Actual stakeholder seats for Indigenous and agricultural sector representation (numbers to be determined)
- Weighted voting for budgets based on CVA

Q4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

- Significantly increasing the geographical reach, far beyond a single watershed, could be interpreted as an additional provincial-level tax.
- Modifications to the watershed principle may need to be considered, accounting for a population base that would generate the necessary capacity to support local programming, administrative responsibility and a sustainable organizational structure.
- Create 3-4 sub-regions of the regional authority, to facilitate accountability, transparency and consultative budgeting. The sub-regions, through the sub-regional Finance & Advisory Boards would be responsible for generating their sub-regional budgets and consulting with their respective municipalities. While ERPs (Enterprise Resource Planning), financial statements/report, and audit function can be centralized, there are certain aspects of financial planning and management that should remain decentralized and assigned to the sub-regions, such as budgeting for local capital project undertakings, as local staff have superior knowledge of the needs of the sub-region, as opposed to staff at a head office.

Q5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

- Relationships can only be maintained with physical presence. As has been observed during Covid-19, digital platforms allow for typical transactional functions, however, the ability to connect with technical staff in-person and particularly during storm/flood events, is especially impactful for both residents and municipal partners. Maintaining a local presence with local expertise providing local service is the single most effective way to ensure that relationships with community and stakeholders are maintained.

- Utilize the sub-regions with regional managers and technical experts who can liaise with and support the needs of the local communities and stakeholders directly.
- Significant funds are raised locally for various projects through the efforts of our charitable Foundation. Assurances that these funds will be utilized for their intended purposes and meet donor expectations is especially key given the current funding model.