

**Proposed boundaries for the regional consolidation of Ontario's conservation
authorities (ERO#025-1257)**

Submission: Written Submission

Organization Name: Long Point Region Conservation Authority

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Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Long Point Region Conservation Authority (LPRCA) appreciates the opportunity to comment on Ontario's proposal to consolidate 36 Conservation Authorities (CAs) into seven Regional Conservation Authorities (RCAs). This submission provides feedback intended to encourage sound policy development, protect public interest, and ensure effective watershed management.

The Long Point Region Conservation Authority Board of Directors does not support the Regional Conservation Authority consolidation proposal outlined in the Environmental Registry of Ontario notice. LPRCA maintains that the proposed RCA boundaries are far too large to sustain the effective, locally responsive services and programs that conservation authorities currently deliver. The scale of the proposed RCAs would reduce local autonomy, dilute, or eliminate the voices of rural municipalities, and increase financial pressures. To date, insufficient evidence has been provided to demonstrate that the proposed consolidations would result in more effective or cost-efficient program delivery. In the absence of a comprehensive cost-benefit analysis and meaningful consultation with municipalities and CAs, the proposed approach risks slowing approval processes and undermining informed, locally driven decision-making.

Before proceeding with consolidation, the Province is encouraged to fully evaluate whether modernization goals could be achieved through the new Ontario Provincial Conservation Agency (OPCA), without restructuring the existing CA framework.

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

LPRCA notes that any successful transition to a regional conservation authority model must have the support of those who established and fund CAs (member municipalities), provincial government, those responsible for CA governance (Boards of Directors), and the staff who deliver programs locally. Such support is most effectively cultivated through locally driven consultation rather than through top-down directives.

LPRCA recommends that the Province pursue its modernization objectives within the existing CA framework by leveraging legislative and regulatory amendments, technological improvements, and enhanced compliance verification.

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

In analyzing the potential opportunities or benefits that may come from a regional CA framework, it is also important to note the potential disadvantages that may come from a regional CA framework. Listed below are the pros (advantages) and cons (disadvantages):

Pros:

- A single digital permitting system, province-wide permit performance standards, and updated floodplain maps
- Standardized permitting policies, permitting fees, and levels of staffing
- Standardized HR and administrative policies and procedures
- Potential overhead/administration efficiencies in a centralized support environment
- Modernization of software such as electronic digital retention management systems for CAs that don't have the capacity

Cons:

- No evidence has been provided that the benefits of the RCA will outweigh the costs for member municipalities
- Standardized permitting policies minimizes the local challenges of each individual watershed as many CAs face similar issues; however, there is also unique geographic/landscape issues related to permitting and floods & natural hazards within each CA
- Standardized permitting fees could substantially increase fees for permit applicants
- Local knowledge/staffing will be lost through streamlining and centralization
- Increased upfront levies to member municipalities to implement the regional consolidation and if efficiencies are not realized and in addition of the OPCA levying CAs (indirect tax) could potentially lead to long-term increased municipal levies for member municipalities
- Standardizing RCA logo's, signage, vehicle fleets will be costly to implement
- CAs in a healthy financial position with low dependence on municipal levies will be penalized upon consolidation to subsidize CAs with a higher dependence on municipal levies
- Reorganizational structure costs are inevitable, and the financial impact should not be transferred to the member municipalities as this consolidation is driven by the Province

The proposal for a regional conservation authority framework has prompted discussion around the existing deficiencies within the current CA system. However, these challenges can be effectively addressed through targeted provincial investment to enhance and standardize tools such as flood hazard mapping, technical guides, and regulation mapping. Additionally, the Province could continue to update policies and standards to better align with its objectives.

LPRCA does not believe that the proposed regional CA framework would provide any opportunities or benefits that cannot already be achieved within the existing CA structure.

3. Do you have suggestions for how governance could be structured at the regional CA level, including suggestions around board size, make-up and the municipal representative appointment process?

There is no governance model or structure within the proposed regional conservation authority framework that would ensure adequate municipal representation for all member municipalities that would be funding the RCA. The proposed structure would also disproportionately affect rural municipalities by diluting or eliminating their representation and voices in favour of larger urban centres. Given the extensive geographic scale of the proposed RCA, competing priorities among watersheds are inevitable. Without direct municipal representation from smaller watershed communities, the programs and services in those areas would be placed at significant risk.

The Ontario Provincial Conservation Agency authority, scope and limits need to be clarified, and the governance model must define the decisions reserved for the RCA board.

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

The current budgeting process under O. Reg 402/22: Budget and Apportionment is transparent and consultative under the current 36 local CA model. Under the proposed RCA consolidation model, the local input, transparency, consultation and representation will be lost due to the sheer size of the proposed RCA.

A system that would support the proposed RCA could be created, but at what price?

There is no sufficient system that would allow transparency and genuine consultation with municipal funders under the proposed RCA with 81 municipalities given the geographic scale.

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

To maintain and strengthen relationships with local communities and stakeholders, an organization must maintain a local presence through local offices and staff to provide timely permitting, program delivery, operations, community engagement and effective stewardship. Flood forecasting and warning systems are critical public safety functions that must not be disrupted and needs to include local knowledge of the land. LPRCA provides recreational opportunities for the public. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities. LPRCA has a community committee that was established as a condition of a land donation that provides valuable local input into the management of the land. These unique types of relationships need to be considered in any new governance model.

The Province should engage in constructive and transparent consultation with CAs and municipalities who established, fund and govern their local CAs before proposing changes that will continue to levy for the proposed RCA and the OPCA all while reducing local municipal input/representation, governance and control.

Many local residents have left significant financial and property assets to LPRCA with the intention of preserving and continuing works at the local level. Many of these have been left in legacy through property names, signage, galleries, and park additions. How will these property and legacy assets be protected through the RCA process? This transition will erode public trust if not properly managed. Continuation of these types of donations is put at risk due to local connection being lost.