



December 22, 2025

Via email to ca.office@ontario.ca

MECP Conservation and Source Protection Branch
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Peterborough, ON
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Dear Minister McCarthy and Chief Conservation Officer Basit:

Environmental Registry Ontario Posting No. 025-1257

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

Thank you for the opportunity to provide comments on ERO No. 025-1257 regarding the proposed boundaries for the regional consolidation of Ontario's conservation authorities.

The Lake Simcoe Region Conservation Authority (LSRCA) shares the Province of Ontario's vision for improving service delivery, increased efficiencies, improved governance while committing to working collaboratively to achieve mutually desired outcomes. At the same time, we recognize that achieving these outcomes will require careful planning, clear direction, and significant coordination to address the many operational, financial, and governance considerations involved.

The following feedback regarding the questions posed in ERO No. 025-1257 is the culmination of thorough consideration of the Province's proposal and meaningful consultation with senior staff and our Board of Directors. This collaborative approach reflects our commitment in ensuring that practical implementation challenges are addressed.

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

To identify key factors for a successful transition, we considered both the strategic and operational requirements necessary to achieve the proposed objectives. Our feedback reflects practical insights to ensure that these recommendations are grounded in experience and informed by governance best practices.

Provincial Direction and Leadership

- Early, consistent provincial guidance on mandate, expectations, governance structure, and transition objectives.

- Clear understanding of the operational role the Ontario Provincial Conservation Agency (OPCA) provides for existing conservation authorities and proposed Regional Conservation Authorities (RCA).

Governance Structure and Transition Planning

- Designated and/or established leadership teams are critical for success.
- Clearly defined roles and responsibilities for leadership teams with shared vision and defined decision-making authority.
- Province-wide transition plan with clear sequencing of milestones.
- Regional transition Board comprised of representatives from each of the existing conservation authorities within each respective RCA. This transition board may act as the bridge between the existing Boards, RCA leadership team, and the OPCA.
- Robust change management and communication strategies for staff, partners, municipalities, and the public.

Organizational Understanding and Integration

- Early assessment of organizational structures, staff complement, and technical capacities. Each conservation authority offers a range of skills and depth that needs to be fully evaluated and emboldened ensuring successful implementation.
- Harmonization of human resources policies, job descriptions, benefits, health and safety programs, and work arrangements.
- Salary grids, permitting and planning fee structures, and other related financial aspects need to be evaluated and measured within the local and regional cost of living and affordability considerations.
- Integration of information technology systems, financial platforms, and cybersecurity measures. Clear understanding of short- and long-term requirements and transition needs.

RCA and Source Protection

- Harmonization of RCA and Source Water Protection (SWP) boundaries and programs should be considered through the proposed consolidation process with clear understanding of challenges and opportunities.
- The South Georgina Bay – Lake Simcoe SWP region poses a unique challenge as a large portion of this region is not included in any conservation authority boundary.

Financial Strategy and Transparency

- Clear approach to transition financing, levy impacts, and reserve treatment, and assets.
- Funding for transition costs.
- Provincial co-funding to ensure equitable governance.

Understanding Local and Regional Priorities, Issues and Opportunities

- Developing a thorough understanding of local and watershed issues, priorities and opportunities is critical.
- Understanding the local issues, priorities and opportunities will allow for the development of a full understanding of what may be consolidated into, or is consistent with, a regional focus.
- Ignorance of local concerns, issues or voices can easily create distrust, lack of participation, conflict, and lack of stakeholder or municipal support.

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

In considering the opportunities and benefits of regional consolidation, we focused on how a unified framework could enhance governance, capacity, and service delivery. The following points highlight the potential for improved efficiency, stronger partnerships, and long-term strategic alignment.

Consistent and Transparent Governance

- A standardized upper-tier governance model will improve transparency, oversight, and strategic decision-making across watersheds. We encourage the province to consider amending the *Conservation Authorities Act* to designate the Counties as the member in the RCAs. For example, this proposed governance model would effectively change the proposed Huron-Superior RCA from approximately 80 municipalities to 15. This model proposes that counties, separated cities, and regional municipalities are the RCA members. This creates a stronger peer-to-peer relationship and greatly assists in efficient budget process for the RCA, while reducing the workload at the lower tier municipal level.
- Reduced complexity for municipal partners through fewer conservation authorities, less duplication, and more consistent policy direction.
- Opportunities may exist to expand RCA jurisdiction into areas not currently within the jurisdiction of an existing conservation authority or RCA.

Enhanced Regional Capacity and Leadership

- Greater ability to attract, retain, and coordinate senior leadership and technical expertise.
- Strengthened relationships with provincial and federal partners through a unified structure.

Strategic and Long-Term Planning Benefits

- Region-wide alignment of priorities and watershed strategies and opportunities for merging of locally driven issues or priorities.

- Improved ability to measure and report outcomes consistently across larger geographies. In the context of the proposed Huron-Superior RCA, an example of this is broader linkage to the Lake Huron and the Great Lakes programs.
- Consistent service standards and delivery.

Economies of Scale and Innovation

- Shared investments in technology and modernization. Examples may include LIDAR, software licensing, records management, asset management, and flood warning.
- Capacity-building programs and knowledge transfer opportunities across the RCA.
- Stronger relationships with larger NGOs and stakeholder groups. As an example, a regional task force with the land development and housing industry could focus on best practices, solutions transfer across the RCA, develop consistent technical standards, and much more.
- Larger potential target audience for foundations and fundraising initiatives to raise funds for both locally focused and regional programs.

Expansion of Conservation Authority Jurisdiction

- The RCA framework may allow for future expansion of conservation authority jurisdiction within Ontario. An example would be expansion from Lake Simcoe through to Georgian Bay, allowing for recognized connection to Lake Huron.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level?

In developing recommendations for governance structure, we considered models that balance representation, transparency, and efficiency. Our prompts focus on ensuring fair municipal representation and strong decision-making capacity within a regional framework.

Board Composition

- Municipal composition and representation are an absolute must. We recommend a board composition of 12 - 20 members representing the member municipalities.
- Consideration of staggered terms for board members to ensure a level of consistency over time.
- One Board chair and two Vice-Chairs with specific term limits and recommend a requirement that each of those positions must come from different primary watersheds within the region (eg. Saugeen, Lake Simcoe, Maitland).

Fairness and Transparency

- Mechanisms to ensure balanced geographic representation and prevent voting blocs.
- Clear communication protocols between regional boards and participating municipalities.

Budget Equity Representation

- The proposed Huron-Superior RCA represents a large region with significant differences in size and economic stature of member municipalities. A clearly defined system for voting regarding budget that reflects the scale of the member municipalities must be implemented similar in construct to what is currently prescribed for conservation authorities.

Clarify OPCA's Governance and Oversight

- Detailed clarity is required to fully understand the relationship of the OPCA's oversight of the RCAs, as well as its role as the agent for the government.
- Representation from across the seven proposed RCAs is encouraged.
- Clarity of reporting structure for CAO/CEOs of the RCAs under the OPCA is required.

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

Our feedback emphasizes the importance of transparency and consistency to maintain trust among member municipalities and for local ratepayers. These recommendations aim to ensure clarity in levy amounts, equitable cost-sharing, and strong provincial support for transition funding.

OPCA / Provincial Expectations

- Consistent provincial co-funding to support equitable governance and reduce municipal concerns over subsidizing provincial responsibilities.
- Strong financial and technical support for financial transition is a must.
- The province is strongly encouraged to work with the RCAs to provide detailed clarity and timeframes for all finance and budgeting expectations.
- Timely information that supports RCA budgeting processes such as apportionment is a must. Clarity around apportionment is also a must as it evolves, as there is the potential for apportionment values to increase/decrease for municipalities based on RCA composition and other factors.

Unified Budget Framework

- A single, region-wide budgeting framework with standardized assumptions, timelines, and reporting expectations.
- Regional budget oversight led by a central finance team with significant input across all local operational areas and program areas.

Transparency Measures

- Regular financial reporting at the regional level to all participating municipalities. This may include, as example, a detailed budget companion document indicating revenue and expenditure across all program areas and be expanded to provide local focus.
- During the financial transition, also ensure detailed reporting and transparency to all municipalities within the RCA (participating or not).
- Clear communication on levy requirements and benefit apportionment for all Category 1 programs and services.
- Establish clear expectations and guidelines for developing budgets and agreements for Category 2 and 3 programs to assist in transparency, consistency, and accountability.

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

When considering how to maintain strong local relationships, we focused on preserving watershed identity and ensuring meaningful engagement within a regional model. Our recommendations reflect the need for clear communication, advisory structures, and processes that keep local priorities visible and respected.

Accessibility

- The proposed RCAs generally are large geographic regions with local conservation authority offices within their respective watersheds. It is critical for the RCA leadership team to be accessible across the RCA. Establishing trust and respect is critical for the RCA to succeed and thrive. Accessibility means being available and being in the local office or the local municipality to address issues or specific topics as often as possible. Solely governing or leading from a “regional office” will not be acceptable and therefore requires support from the OPCA to ensure accessibility is a clear expectation.

Clear, Early Communication

- Regular updates to municipalities, stakeholders, and the public on governance changes and regional decision-making structures.

Preserving Local Identity

- Maintain all local current conservation authority offices as principal locations for access and information for watershed residents and other stakeholders.
- Consider the concept of a local advisory body to advance local watershed priorities and issues.
- Transparent processes for municipal input and engagement.

Decision Making

- Decision making is a critical element for success. Where possible, local decision making should be maintained and supported. Whether a permit approval, purchase order, or land management decision, a clearly defined decision-making process is required. Challenging decisions can utilize the full breadth of the RCA staff capacity when required.

Other Considerations

While regional consolidation offers clear opportunities, the success of this initiative depends on more than structural changes. It requires significant investment in planning, resources, and coordination. Without early and consistent provincial leadership, clear governance frameworks, and robust financial strategies, there is a risk that efficiencies and improved service delivery may not materialize as intended.

Harmonizing organizational systems, policies, and cultures across multiple authorities will be a complex process. Areas such as integrating information technology platforms, aligning human resources practices, managing transition costs, and ensuring consistent, holistic communications with staff and the public will require careful planning and support.

Conservation authorities have advanced numerous initiatives to modernize planning and permit review processes. The recent LEAN review, along with similar reviews undertaken by other conservation authorities, should be considered and utilized to provide additional insights that inform strategic decisions related to organizational streamlining and consolidation. Rebranding efforts will also need to be coordinated thoughtfully to maintain clarity and confidence throughout the transition, helping to avoid delays and sustain staff engagement.

Maintaining strong local relationships and ensuring watershed-specific priorities remain visible within a regional model will require intentional planning and engagement. Clear communication and advisory structures will be key to preserving local knowledge and community trust, which are essential for effective conservation work.

The current fee freeze continues to create challenges. The LSRCA operates on a cost recovery basis based on the approach that development should pay for development. The ongoing fee freeze is unsustainable for the aforementioned approach. The LSRCA encourages the Minister of Environment, Conservation and Parks to lift the fee freeze for 2026.

The proposed conservation authority consolidation also creates a unique opportunity to resolve a longstanding inconsistency between the jurisdictional boundary of the Lake Simcoe Region Conservation Authority and jurisdictional boundary of the *Lake Simcoe Protection Act* (LSPA and supporting Plan). The current inconsistency is that what is known as the Upper Talbot Arm and the watershed area of the City of Orillia are within the jurisdiction of the LSPA but are not currently within the LSRCA jurisdiction. This creates challenges for application of levies under the LSPA, inconsistency of permit requirements under S.28 of the *Conservation Authorities Act*, and other related challenges. Should the proposed consolidation of conservation authorities

proceed, the province is strongly encouraged, to bring alignment between the LSPP and proposed RCA boundaries.

One of the stated considerations for the RCA consolidation of conservation authorities is to reduce the amount of conservation authorities a municipality has within their jurisdiction. Considering appropriate boundary changes that would allow for municipalities to fall within only one conservation authority would be prudent. While this may detract from a watershed principle, it would reduce duplication while increasing efficiencies and consistency.

We encourage the province to consider alternative RCA alternatives that are more reflective of scale and regional circumstances. The LSRCA recommends that the province create an RCA comprised of the LSRCA, Nottawasaga Valley Conservation Authority, and the Grey Sauble Conservation Authority, which would encompass the watersheds of Georgian Bay. We also recommend the name of the proposed RCA being the Lake Simcoe – Georgian Bay Regional Conservation Authority.

The Lakehead Region Conservation Authority is a great northern Ontario conservation authority and truly linked to the conservation authorities in northern Ontario. We recommend the province remove Lakehead from the Huron-Superior RCA.

In Conclusion

We appreciate the Province of Ontario's leadership and the opportunity to provide input. If the proposed consolidation of existing conservation authorities into regional conservation proceeds, we are committed to working collaboratively to ensure successful transition.

We look forward to continuing this dialogue and contributing to solutions that protect Ontario's watersheds and communities for the next seven generations.

Yours truly,



Councillor Clare Riepma
Chair



Rob Baldwin
Chief Administrative Officer