

Upper Thames River Conservation Authority: ERO Questions and Responses

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

This response is provided on behalf of the Board of Directors of the Upper Thames River Conservation Authority (UTRCA). Board members represent 17 member municipalities in the upper watershed of the Thames River. The UTRCA was formed in 1947. The watershed covers 3,430 square kilometres in southwestern Ontario and is home to approximately 593,700 people.

Effective watershed management relies on strong connections to local needs, priorities, and expertise. In the Province's proposal, the UTRCA watershed would be consolidated with seven other Conservation Authorities representing 81 member municipalities to form the Lake Erie Regional Conservation Authority, spreading over 23,000 square kilometers and representing a population of approximately 2.5 million people. The proposal risks undermining effective watershed management.

Historically, the Province funded up to 50% of Conservation Authority operations; today, provincial support has fallen to less than 2%, leaving municipalities to fund the majority of operations. UTRCA is concerned that the proposed restructuring would shift governance away from the municipalities who created and fund Conservation Authorities, resulting in a significant loss of local decision-making, community engagement, and rural representation.

The UTRCA:

- Supports the broad goals of the Province to modernize service delivery to achieve better outcomes, while strengthening hazard protection;
- Opposes the changes outlined in the ERO Proposal as a means of achieving those goals; and,
- Supports continued evolution of the system and prefers alternatives to the Proposal that would result in voluntary consolidation, supported by adequate business rationale and time for meaningful consultation, including with Indigenous rights holders.

ERO Proposal #025-1257 would result in a Regional Conservation Authority too large to deliver effective governance and accountability to municipal funders and their residents and taxpayers.

While the UTRCA supports the Province's generally stated objectives of modernization including the use of digital permitting systems, consistent policies and standards, and enhanced use of technology. The Province already holds the legislative authority needed to implement consistent policies and resources across the existing CA boundaries without consolidation through direction and tools, such as modernized technical guidelines. These objectives can be addressed without the disruption and destabilization inherent in large-scale structural consolidations, and counter to the Province's goals of advancing the housing priority, streamlining, and reducing red tape while ensuring safe development.

Substantial concerns and risks have been identified with the proposed consolidation, particularly with respect to the loss of local decision-making, reduced municipal representation,

uncertainty around transition funding, asset ownership considerations, potential service disruption, loss of local expertise, and impacts on the local delivery of programs and services. The scale of the proposed Lake Erie Regional CA raises additional challenges related to maintaining effective community relationships and ensuring services remain responsive to local watershed conditions. Considering the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the UTRCA does not support the proposed RCA framework.

Clarity is needed from the Province to understand the problem it is trying to solve. The importance of meaningful consultation and engagement with municipalities, conservation authorities, Indigenous communities and partners prior to any decision being finalized cannot be understated. Additional time for meaningful dialogue is required to discuss alternatives to ensure successful implementation.

A transparent, comprehensive cost-benefit analysis of alternative approaches should be undertaken to inform decision-making in any consolidation model. Where a consolidation is deemed beneficial, it should be supported by a clearly defined and phased transition plan. Full provincial financial support is critical for any transition period to ensure continuity of programs and services and to avoid disruption.

Accordingly, the Province needs to consider the benefits of a measured “pause” of the consolidation proposal to allow the Ontario Provincial Conservation Agency to complete its initial three-year term, undertake meaningful engagement with conservation authorities, municipalities, Indigenous communities and partners, to assess the necessity of consolidation of conservation authorities through an evidence-based approach. This would include clearly identifying issues, providing effective communication and feedback to conservation authorities to address any issues and if necessary, consider alternative models that would more effectively advance provincial priorities related to efficiency, red-tape reduction, and timely housing delivery.

For these reasons, the UTRCA Board passed a formal motion stating its opposition to the proposed Lake Erie Regional Conservation Authority. A copy of the motion has been attached to this response. Notwithstanding the opposition by the Board to the proposal, comments are provided on the five ERO questions in the table below.

ERO Questions	UTRCA Recommendations	UTRCA Comments
1. Key Factors for a Successful Transition and Outcome: What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?	Recommendation 1: That the Province consider achieving modernization goals through the current 36 CA corporations using legislative and regulatory amendments, technological solutions, and compliance verification before considering consolidations. Recommendation 2: That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Conservation Ontario, CAs, Indigenous communities, municipalities, and other experts to consider options and evaluate proposed solutions within this proposal.	1a. Preserve Local Municipal Governance and Decision-Making The proposed Lake Erie Region Conservation Authority would consolidate 8 CAs, encompassing 81 local municipalities and 11 First Nation communities (there are none within the UTRCA watershed), and covered by more than 10 Treaties signed with multiple First Nations. Without a doubt, this scale risks diluting local municipal representation, particularly for smaller and rural communities. When the UTRCA's Board size was reduced at the request of the province, in the mid-90s, it was important to maintain a balance of urban and rural representatives to reflect the diverse landscape of the watershed. As the largest contributor to CA budgets, municipalities must continue to have the same equitable representation and voice they are afforded today. Municipalities must maintain a meaningful voice at all levels of CA governance and decision-making to ensure local issues and concerns are not lost. Support from key partners, specifically municipalities, is key to the ongoing success of CAs in Ontario. To deliver on its mission, a new regional conservation authority model must be grounded in fundamentals of effective watershed management, including: • Protecting life and reducing property damage from flooding and erosion, • Supporting municipal partners, Indigenous communities, the development community, and landowners with timely, reliable services, • Meeting the requirements under the <i>Clean Water Act</i> for source protection planning, • Enhancing the economic, environmental, and community health of the watershed through stewardship, education, and partnerships

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		• Providing meaningful opportunities for people to connect at the local level, and • Meeting the demands of a rapidly growing population at a time of climate pressure. If regionalization stretches teams too broadly, we risk losing: • The ability to design and deliver environmental programs and services tailored to the unique needs of each watershed and responsive to municipal and community priorities, • Local, on-the-ground expertise, • Critical knowledge of local environmental conditions and historical records (e.g., localized flooding impacts), • Strong relationships and funding support from municipalities, Indigenous communities, the agricultural community, donors, businesses, watershed residents, and other partners, • Real-time responsiveness during storms and emergencies and other urgent events, • Engagement and support from the scientific community, and • Effective oversight and buy-in from municipal funding partners. To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, CAs must be appropriately accountable. • The principle of “pay for say” should be reflected in the design of new CAs, as it is today. • The proposed catchment area of the proposed consolidated Lake Erie Regional CA would combine more than 80 municipalities, stretching oversight and “pay for say” beyond what is workable and undermining confidence in the governance of CAs. • Recognise the needs of rural communities and the agricultural sector.

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	Recommendation 3: That a stable, clear, transition plan be prepared collaboratively with the implementation working group. To minimize potential disruptions, this plan should consider: service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures. The existing CA Boards should remain in place beyond 2026. The local CAs board could inform a comprehensive cost-benefit analysis on consolidation and help outline the most effective level of strategic consolidation to achieve both provincial and local objectives with municipal input. Local input and buy-in will be imperative to the success of any new framework. Recommendation 4: That the Province consider a longer implementation timeline to fully address: board governance and appointment frameworks; funding mechanisms, allocations, and reserve structures; and service continuity matters. Phasing standards,	The provincial goals for consistent permit approval processes, shared services, and digital modernization can be realized within the current Conservation Authority structure without imposing a new top-down agency structure that does not have strong local accountability but increases costs to taxpayers. 1b. Avoid Delaying Performance Improvements Currently Underway The proposed changes risk undermining the implementation of provincial improvements that have already been introduced. In recent years, the Province has significantly changed the role of CAs in land use planning matters as part of its broader initiative to build more homes faster. Insufficient time has passed to fully implement recent amendments and evaluate their impact on development outcomes. Given the volume and speed of legislative changes, industry interest-holders are still processing the effect and significance of various legislative changes. All interest-holders, including the development industry, benefit from certainty. The proposed consolidation will introduce additional unknowns and new processes at an already uncertain time in the market. 1c. Provide Dedicated Provincial Funding for the Transition A cost-benefit analysis of the proposed consolidation should be completed and properly evaluated by member municipalities. There would be substantial costs associated with merging eight CAs into one regional CA, including but not limited to: • IT and data system integration, • HR and union harmonization (two CAs within the proposed Lake Erie Region are unionized, CUPE and OPSEU, while the other six are not),

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	guidelines, and directives across all CAs before any consolidation (should consolidation be required at all) offers greater stability and predictability. This approach minimizes multiple significant changes occurring at the same time, reducing risks of disruption to program delivery, and creating conditions for better outcomes and buy-in. Recommendation 5: That transition costs for any consolidation be fully funded by the Province.	• Potential HR costs and consolidation implications of merging multiple HR policies, • Fee and policy alignment, • Corporate service model consolidation, • Rebranding, signage, and legal transitions, and • Asset and liability assessment. It is unacceptable to require member municipalities to fund these costs while diminishing their influence. They must not be burdened with the expense of mandated consolidations. Without a rigorous cost-benefit analysis proving that large-scale consolidations will reduce costs and enhance service, the risks clearly outweigh any potential benefits. Instead, collaboration between the Province, conservation authorities, municipalities, Indigenous communities and partners to determine whether consolidation, at any scale, is the most strategic and effective approach to achieve both provincial and local objectives. 1d. Protect and Enhance Existing Service Levels The uncertainty around consolidation presents a significant risk to workforce stability, recruitment, and retention. Effective watershed management depends on local integrated expertise in hydrology/hydraulics, natural hazards, ecology, and familiarity with the unique conditions of each watershed. Local CA staff attend site visits and face-to-face meetings and knowledge of the local geography and political landscape. Despite increasing levels of development in the watershed, UTRCA continues to issue 99% of permits within the provincial guidelines and, on average, are issuing permits within 6-7 days of receiving complete applications. Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. Consolidating and

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		potentially centralizing offices could reduce responsiveness, delay decisions, and weaken local expertise and connection to the community. Centralization will not happen overnight, and effectiveness will likely decline before improvements occur. This could slow permitting in the near term. 1e. Ensure Financial and Legal Due Diligence Each CA in the proposed region has vast landholdings, complex assets (e.g., water and erosion control infrastructure), financial assets and liabilities, foundations, legal proceedings, and unique local agreements. A thorough financial and legal due diligence analysis is necessary to assess restrictions and complexities on transferring these assets from local control to regional oversight. 1f. Maintain Local CA Board beyond 2026 "Pausing" consolidation would permit the Province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion. Guidance may be taken from the Province's experience with municipal amalgamation in the 1990s and 2000s to ensure that any proposed consolidation of CAs is well-timed and efficiencies at the local level are evaluated prior to implementing structural changes.
2. Potential Opportunities or Benefits: What opportunities or benefits may come from a regional conservation authority framework?	Recommendation 6: That the Province demonstrates that the statutory objects of the CAs can be effectively delivered within the proposed new regional boundaries. Recommendation 7: That the Province update policies and	The provincial proposal for regional consolidation does not include enough information to effectively evaluate the benefits. 2a. Ensure Consistent Standards Funding that would be directed into the consolidation costs mentioned above would be better spent on front-line resources that would improve consistency and modernize tools and resources equitably across all CAs. Provincial approvals of policies, guidance, and

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	standards together with Conservation Ontario, CAs, AMO, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.	standards have not kept pace with modern needs. Provincial funds directed to improved mapping, technical guidance, policy development and e-permitting services would have immediate benefits across the province. Provincial efforts and funding should be directed to this goal within the existing CA framework.

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	Recommendation 8: That the Province invest stable, adequate, multi-year funding into CA programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure. Recommendation 9: That the Province recalibrate and increase the funding for the Water and Erosion Control Infrastructure funding program as part of the consolidation process, in time for the 2027 budget.	2b. Provide Additional Investment Municipal levies currently fund 34% of the <u>total costs</u> of UTRCA programs and services, with the Province contributing less than 2%. For <u>mandatory programs and services</u>, the municipal contribution in the UTRCA watershed is 67% while the provincial transfer payments cover less than 5% of operating expenses. The remaining costs are covered by leveraging the municipal investment with funds from user fees, grants, and contracts. Mandatory programs and services provided by the UTRCA include; • flood forecasting and warning, • low water response, • operation and maintenance of water control and erosion control infrastructure, • provide input on land-use planning to ensure that decisions are consistent with the natural hazard policies of policy documents; • administering permits issued under section 28 of <i>Conservation Authorities Act</i> and associated enforcement activities, • the conservation and management of lands, • provincial surface quality and groundwater quantity monitoring, and • Source Protection authority under the Clean Water Act. Additional Provincial investment is required to ensure mandatory programs and services of the UTRCA are supported without a reduced level of service delivery provided to the public. In addition, the UTRCA has aging major flood control structures requiring ongoing monitoring and maintenance. The current provincial Water and Erosion Control Infrastructure funding program cap of \$5 million for the entire province is completely inadequate.

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	Recommendation 10: That an integrated digital platform that connects the fundamental strengths of multiple CAs, across multiple offices and disciplines, be developed to deliver enhanced watershed programming in Ontario.	2c. Pooling of resources and collaboration between technical experts Effective watershed governance relies on strong connections to local needs, priorities, and knowledge, which then guide natural hazard management, shape infrastructure decisions, strengthen watershed health, stewardship programs, community education and partnerships and outdoor recreation. Specific knowledge of the local watershed and environment is integral to the ability of CAs to carry out their permitting function under the <i>Conservation Authorities Act</i>. Bringing experts from across CAs together may provide greater opportunities for collaboration, specialization, and information sharing as well as pooling resources. Consolidation of CAs is not required to achieve this outcome; however, a more centralized system and investment of baseline resources are required.
3. Governance Structure Considerations: 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?	Recommendation 11: That the Regional Conservation Authority Board should be: • Maximum 30 members (ideally between 15-20 to be effective), • Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand, • Structured to preserve meaningful local influence, • Include Indigenous representation to strengthen partnerships and ensure	3a. Reduce the Geographical Area of the Proposed Consolidation In developing the proposed regional CAs the province-based decisions on watershed-based jurisdiction, administrative duplication and balancing expertise. This resulted in geographically vast regions that do not account for existing working relationships between CAs and municipalities. Other criteria should be weighted, including existing working relationships between CAs and municipalities, and urban versus rural balance. The success of the CA governance model has always been that local decisions are made by local representatives. The geographic scope of the region needs to be reduced to protect that principle. 3b. Create a Governance Model that is Functional and Fair Applying current legislative population formulas would produce a Lake Erie Regional CA Board of 120 members, which is unmanageable and

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	programs reflect diverse perspectives.	ineffective. A Board of this size risks a loss of local perspectives and challenges in achieving timely, responsive decisions. There is a loss of local municipal representation in this framework. 3c. Maintain Municipal Appointment Authority and Add Indigenous Appointments Appointments to the regional conservation authorities must remain municipal to ensure transparency, accountability, and local alignment. Appointments to the Ontario Provincial Conservation Agency should include municipal appointments from each of the RCA boards. A new structure provides an opportunity for appointments to include Indigenous representation on CA Boards as a vital step toward strengthening partnerships and ensuring programs reflect diverse perspectives. This representation of rightsholders would deepen cultural connections, enhance decision-making, and align with previous recommendations to create more inclusive and effective governance.
4. Maintaining a Transparent and Consultative Budgeting Process: Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?	Recommendation 12: That should any proposed consolidation proceed, existing watershed approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level.	4a. Engage Municipalities in Budget Development Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Issues of budgeting, reserve allocations, Category 3 program funding, and other financial matters require provincial consultation with current CAs and need to be in place prior to consolidation. Another key factor to consider is protecting watershed reserves, infrastructure, and land assets. Many watershed municipalities are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within the proposed consolidated structure. 4b. Ensure Fair Apportionment

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		Municipalities risk subsidizing areas with a smaller tax base. Local apportionment should be directed to local assets.
5. Maintaining and Strengthening Local Relationships: How can regional conservation authorities maintain and strengthen relationships	Recommendation 13: That local offices be retained to deliver programs.	5a. Retain Local Presence Local offices and staff are essential for timely permitting, program delivery, flood forecasting and warning operations, environmental monitoring, community engagement, and effective stewardship. It is imperative that local knowledge be retained, and decisions reflect local conditions. 5b. Protect Local Programs Locally delivered conservation authority programs such as the UTRCA's Southern Ontario At Risk Reptiles (SOARR), Green Leaders, Tree Power / tree planting, stewardship services, environmental monitoring, education, community partnerships, and parks are rooted in community identity. They must be preserved. 5c. Preserve Community Access to Greenspace Many municipalities rely on UTRCA lands for recreational opportunities because local land acquisition is cost prohibitive. 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.

Additional Comments

In addition to the comments provided in response to the questions in the ERO posting, the UTRCA is concerned about the governance structure of the Ontario Provincial Conservation Authority.

As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, CAs and, therefore, municipalities, will be required to fund all or a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities may ultimately contribute all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, priorities, or strategic direction.

For municipalities that rely heavily on CA guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence.

Not only would this be a precedent-setting method for funding a provincial agency, it establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

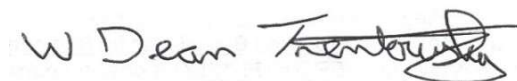
Summary Statement

UTRCA urges the Province to prioritize modernization through shared standards, tools, and funding rather than large-scale structural consolidations. We remain committed to working collaboratively to achieve efficiency and consistency while preserving the watershed-based governance model that has served Ontario effectively for decades. The Province needs to consider the benefits of a measured "pause" of the consolidation proposal to allow the Ontario Provincial Conservation Agency to complete its initial three year term, undertake meaningful engagement with conservation authorities, municipalities, Indigenous communities and partners, to assess the necessity of consolidation of conservation authorities through an evidence-based approach. This would include clearly identifying issues, providing effective communication and feedback to conservation authorities to address any issues and if necessary, consider alternative models that would more effectively advance provincial priorities related to efficiency, red-tape reduction, and timely housing delivery.

Thank you for the opportunity to review and provide comments on the proposed boundaries for the regional consolidation of Ontario's conservation authorities.

Submitted by:

Upper Thames River Conservation Authority



W. Dean Trentowsky
Chair



Tracy Annett
General Manager

Attachment: Board of Directors Motion, November 25, 2025

Mover: Skylar Franke

Seconded: George Way

Board of Directors Motion, November 25, 2025

At the November 25, 2025, meeting, the Upper Thames River Conservation Authority (UTRCA) Board of Directors adopted the following motion. They further directed staff to circulate a letter to all member municipalities of the Upper Thames watershed and First Nation communities affected by the proposed change in geographic boundaries, with a focus on the economic and legal ramifications and other relevant ramifications of the proposed legislative changes by the province.

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the Conservation Authorities Act;

AND WHEREAS under this proposal, the Upper Thames River Conservation Authority (UTRCA) would be merged into a new "Lake Erie Regional Conservation Authority" together with the: Essex Region CA, Lower Thames Valley CA, St. Clair Region CA, Kettle Creek CA, Catfish Creek CA, Long Point Region CA, and Grand River CA, forming a single organization stretching from Windsor, through London, Brantford, and north of Waterloo region;

AND WHEREAS the Board acknowledges and supports the Province's goals of improved efficiency, consistency, and fiscal responsibility in conservation delivery, but find that the proposed "Lake Erie Region" configuration would create a geographically vast and administratively complex entity; dilute local accountability and municipal partnership; generate substantial transition costs, including human resources integration, governance restructuring, IT migration, and policy harmonization that would divert resources from the front-line service delivery making it hard for applicants to obtain timely local advice, resolve issues, or expedite housing and infrastructure approvals that support the Province's goals;

AND WHEREAS UTRCA has always worked with its member municipalities, the province, and partners to be fiscally responsible while ensuring the conservation, restoration, development, and management of natural resources within the upper Thames River watershed including modernizing its programs and services and aligning them with provincial guidance and neighbouring CAs and will continue to do so;

THEREFORE BE IT RESOLVED THAT UTRCA Board of Directors does not support the proposed "Lake Erie Regional Conservation Authority" boundary configuration outlined in the Environment Registry Notice 02-1257; and the Board instead requests that the Ministry engage directly with affected municipalities and conservation authorities to evaluate a reduced geographic scope for consolidation that better reflects established relationships and enhances cost-efficient delivery of integrated watershed management, grassroots connections, and local understanding;

AND FINALLY THAT this resolution be forwarded to the Minister of Environment, Conservation and Parks, local members of Provincial Parliament, Association of Municipalities of Ontario, Rural Ontario Municipalities Association, all municipalities and CAs within the proposed Lake Erie Regional Conservation Authority, and Conservation Ontario.

A recorded vote was requested.

Jean Coles - For

Jim Craigmile - For

Peter Cuddy - Against

Skylar Franke - For

Tom Heeman - For

Anna Hopkins - For

Sandy Levin - For

Hugh McDermid - For

Paul Mitchell - For

Harj Nijjar - For

Brian Petrie - For

Mark Schadenberg - For

George Way - For

Scotty Zehr - For

Dean Trentowsky - For

The motion was carried with fourteen members in favour and one against.