

December 19, 2025

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North Tower, 5th Floor
Peterborough, ON
K9J 3C7

Via Email: ca.office@ontario.ca

Re: ERO#025-1257 Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Kettle Creek Conservation Authority (KCCA) is one of Ontario's 36 conservation authorities and is governed by a Board of 10 municipally appointed members from 7 municipalities. The Board reviewed the "Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities" in concert with Schedule 3 of Bill 68 which outlines the creation of the new Ontario Provincial Conservation Agency (OPCA).

KCCA acknowledges the province's continued recognition of the vital role that conservation authorities play in delivering watershed management across Ontario and the province's commitment that Conservation Authorities (CAs) will continue to provide not only their important work in natural hazards, but the full range of programs and services such as tree planting, stewardship, environmental monitoring and outdoor recreation. Conservation Authorities are recognized worldwide for excellence in watershed management and public safety.

Overall, the proposal to consolidate 36 CAs into 7 regional CAs lacks sufficient detail or assurances on how local decision-making, knowledge, and community involvement will be preserved in a regional model. The proposed scale of consolidation introduces significant risk that the community-based framework upon which CAs were founded, rooted in responsiveness to the community, local municipal governance and watershed-scale decision making, could be fundamentally and permanently diminished.

Without a detailed cost-benefit analysis, meaningful consultation with municipalities and stakeholders, and a clear transition/implementation plan, the risks associated with consolidation at the proposed scale outweigh the potential benefits. Without this critical information, the proposal may unintentionally lead to higher short and long-term costs, reduced service efficiencies and slower approval for natural hazards plan input, review and permitting – areas where CAs, like KCCA, are currently meeting or exceeding provincial guidelines.

KCCA remains committed to modernization and continues to pursue efficiencies and economies of scale but never at the risk of local program delivery. We welcome provincial investment in the future of watershed management, including e-permitting, updated technical guides and sustainable funding for mapping and natural hazard infrastructure. However, it remains unclear why these improvements cannot be achieved within the existing CA framework.

KCCA's Board of Directors encourages the province to work collaboratively with municipalities, local conservation authorities and community partners to determine whether consolidation, at any scale, is the most strategic and effective approach to achieve both provincial and local objectives.

The *Conservation Authorities Act (1946)* envisioned agencies built on municipal-provincial partnership, watershed-based planning and strong local involvement. As Ontario considers the future state of CAs, it is essential that local governance, local representation, local staff and local programming be retained.

Please find attached Appendix 1: KCCA's Official Comments on ERO #025-1257. For further clarification or discussion, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Noble', with a stylized flourish at the end.

Todd Noble
Chair, KCCA Board of Directors

Encl. Appendix 1 – KCCA's Official Comments on ERO #025-1257

1. Key Factors for a Successful Transition and Outcome

Comment	Explanation
<p>Preserve Local Municipal Governance and Decision-Making</p>	<p>A foundational principle of the <i>Conservation Authorities Act</i> (1946) is that municipalities create and govern their own conservation authorities. KCCA was formed in 1965 and currently has 7 member municipalities represented by 10 municipally appointed Board members. The watershed boundary is 520 km² encompassing the City of London’s rural southern edge, the majority of the City of St. Thomas and the rural Municipalities of Thames Centre, Middlesex Centre, Central Elgin, and the Townships of Southwold and Malahide.</p> <p>Under the proposed Lake Erie Regional Conservation Authority, 8 CAs and 81 municipalities would be merged into a ~20,000 km² region. Kettle Creek would represent roughly 3% of the land base with its rural municipalities being overshadowed by larger urban centres. If Board representation remains population-based, municipalities in the Elgin–Middlesex region could see their guaranteed representation reduced to a single shared seat, undermining their current level of influence over local watershed priorities.</p> <p>Recent changes to the <i>Conservation Authorities Act (CA Act)</i> strengthened local accountability through municipal agreements. In the Kettle Creek watershed, all member municipalities agreed to financially support tree planting and environmental monitoring programs. Regionalization risks diluting this autonomy. As the largest outside contributor to CA budgets, municipalities must continue to have the same equitable representation and voice they are afforded today. Meaningful municipal representation must be protected at every level of decision-making in the future.</p>
<p>Regional Representation on OPCA</p>	<p>Bill 68 grants the Ontario Provincial Conservation Authority (OPCA) broad directive-making authority across governance, strategy, budget, and operations of regional conservation authorities. However, there is no indication that the OPCA Board will have municipal or regional representation that balances urban and rural communities. Consideration should be given to ensure appointments to the OPCA represent municipalities from across Ontario.</p>

Comment	Explanation
<p>Provide for Greater Transparency and Consultation</p>	<p>The CA Act already outlines a clear process for amalgamation that includes public notice, municipal involvement and a two-thirds majority vote. The current proposal bypasses these safeguards.</p> <p>Launching the new governance model with a 2027 implementation date gives insufficient time for municipal councils, CAs or residents and stakeholders to evaluate impacts, assess risk or propose alternatives.</p> <p>If the goal of consolidation is to improve consistency, free up resources for front-line conservation and provide faster service, these objectives can be met within the existing CA framework through shared services, technological advancements (i.e. e-permitting) and policy alignment.</p> <p>KCCA supports modernization efforts for the natural hazards program areas and is ready to collaborate.</p> <p>If strategic amalgamation of CAs is required to further modernize CAs it should be done using the consultative process outlined in the Act – mainly at the bequest of the involved municipalities and with ample opportunity for the public and other stakeholders to contemplate the desired and undesired outcomes and have meaningful input into the proposed boundaries.</p>
<p>Provide Dedicated Provincial Funding for the Transition and OPCA</p>	<p>There would be substantial costs associated with merging 8 CAs into the Lake Erie Regional CA including but not limited to:</p> <ul style="list-style-type: none"> • IT and data system integration • HR and union harmonization (2 CAs within the proposed Lake Erie Region are unionized while the other 6 are not) • Fee and policy alignment • Corporate service restructuring • Rebranding, signage • Legal transitions • Asset and liability assessment <p>Municipalities should not be expected to absorb these expenses while simultaneously losing influence over governance.</p>

Comment	Explanation
	<p>Further, as outlined in Bill 68, the OPCA has the ability to apportion costs to regional CAs and charge fees. Municipalities through the RCAs should not be expected to fund the OPCA, a provincially mandated agency. The OPCA and its services should be fully funded by the Province in the short and long-term.</p>
<p>Protect and Enhance Existing Service Levels</p>	<p>Local CA staff are able to attend site visits, hold face-to-face meetings and know the local geography, stakeholders and political landscape. Despite increasing levels of development in the area, KCCA issues 100% of permits within the provincial guidelines and on average is issuing permits within 7-10 days of receiving a complete application. The local municipalities also rely on having a dedicated KCCA staff contact.</p> <p>Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. A larger bureaucratic structure will often increase delays, reduce responsiveness, weaken local expertise and reduce “boots on the ground” capacity.</p> <p>CAs are more than just regulatory agencies, they are part of the community. Working with the watershed community, KCCA plants 50,000 trees, creates wetlands, establishes tallgrass prairies, manages invasive species and engages over 2,000 students through outdoor education events every year. The delivery of this local programming is based on community relationships built over time and associated with a network of local assets. For instance, local tree planting programs will be more difficult to operate if local infrastructure such as coolers are not maintained and local staff are not retained to provide one-on-one support to landowners.</p>
<p>Financial and Legal Due Diligence</p>	<p>Each CA in the proposed region has vast landholdings, complex capital assets (i.e. water control infrastructure), financial assets and liabilities, conservation foundations, ongoing 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.</p> <p>Each CA also has reserves that have been carefully curated to account for local programs and services including asset management. There should be assurance that these reserves will be protected in any consolidation and only be assigned to their original intended local use. Local reserves should remain</p>

Comment	Explanation
	<p>within the original watershed and serve the local need for which it was intended.</p> <p>Local buying power cannot be lost in the regional model. In a regional model, local accounting firms, banks, IT companies, engineering firms, and countless local service providers may lose business if the OPCA or RCA is directing large-scale regional procurement policies and centralized purchasing.</p>
<p>Maintain Local CA Board Beyond 2026</p>	<p>Local input and buy-in will be imperative to the success of any new framework. Therefore, the existing CA Boards should remain in place beyond 2026 and the pace of any proposed consolidation should be staged.</p> <p>The local CA Boards, with municipal input, could help outline the most effective level of strategic consolidation to achieve both provincial and local objectives. Local CA boards would be able to provide guidance and ensure that local assets are protected and accounted for through the transition to any new regional model.</p> <p>Moreover, with guidance and resources from the OPCA, the existing CA Boards could work toward achieving short term goals of consistent policies and improved mapping while simultaneously planning for the more complex transition to a regional framework. This would allow for incremental changes and provide time for staff and stakeholders to acclimatize to the culture change gradually rather than changing long-standing relationships and working arrangements overnight.</p> <p>Keeping current CA Boards and staging consolidation in well-defined phases with transparent consultation will help to retain experienced staff.</p>

2. Potential Opportunities or Benefits

Comment	Explanation
<p>Provincial Investment</p>	<p>KCCA has long supported shared services where economies of scale can be achieved. This commitment is demonstrated through the <i>Long Point Region Conservation Authority and Kettle Creek Conservation Authority Co-Operative Efficiency Study</i> completed in 2010. The study led to several successful shared service initiatives, including shared GIS services, joint studies, collaborative funding applications, and stewardship projects. Another example is the Elgin Clean Water Program, a collaborative initiative between CAs within Elgin County. Administrated by KCCA, and delivered locally in each watershed by KCCA, LPRCA, CCCA and LTVCA, the Elgin Clean Water Program has provided ~\$1,000,000 to over 350 projects since 2012 - proving that collaboration can occur without consolidation.</p> <p>Centralized policy development and training related to the natural hazards program was also identified as an achievable shared service in the KCCA LPRCA Efficiency Study that could improve consistency with provincial guidelines and enhance customer service. However, provincial technical guides that would inform consistent policy development were under review and unavailable – and remain unavailable today.</p> <p>Improvements to the delivery of hazard planning, plan input and permitting could be realized without consolidation if the province or OPCA provided the following:</p> <ul style="list-style-type: none"> • Updated Provincial Technical Guides • Consistent flood standards for all CAs • Adequate funding to regularly update flood and regulation mapping <p>If the province’s overall goal is to improve approval timelines and create greater consistency, investments would have greater impact by strengthening front-line resources within the existing framework. Directing provincial funds toward updated mapping, technical guidance, coordinated policy development and modernized e-permitting tools would generate immediate and province-wide benefits.</p>

3. Governance Structures Considerations

Comment	Explanation
<p>Reduce the Geographical Area of the Proposed Consolidation</p>	<p>When developing the proposed regional CAs, the province based decisions on watershed-based jurisdictions, administrative duplication and balancing expertise. This approach has created regions that are geographically too vast and do not account for existing working relationships between CAs and municipalities. Additional criteria should have been considered including established working relationships between CAs and municipalities, and the differing needs of rural and urban communities.</p> <p>A core strength of the existing CA governance model is that local decisions are made by municipal representatives who understand their community’s unique issues and have a vested interest in the CA budget. To protect service levels and meaningful decision making, the geographic scope of the Lake Erie Regional CA needs to be significantly reduced.</p> <p>A more scoped consolidation of CAs in the Lake Erie Region would have a better economy of scales and preserve local decision-making without increasing bureaucracy.</p>
<p>Create a Governance Model That Is Functional and Fair</p>	<p>Applying current legislative population formulas would produce a Lake Erie Regional CA Board of approximately 120 members, which is unmanageable and 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 the proposed consolidation.</p> <p>A workable Board should be:</p> <ul style="list-style-type: none"> • Large enough to represent watershed municipalities, yet small enough to operate efficiently; • Balanced in terms of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demands • Structured to preserve meaningful local influence and maintain strong communication with local watershed communities. <p>Based on the current proposed regional boundaries, creating a functional Board with under 30 members would be unachievable. A reduced geographical consolidation would be required for a functional Board.</p> <p>KCCA advocates that the existing CA boards should remain in place to guide modernization efforts, including shared services and ultimately through any transition period of required consolidations. In the</p>

	<p>short-term, existing CA boards can work with the OPCA to inform modernization of services such as e-permitting while simultaneously evaluating the most appropriate consolidation of CAs that maintain the same level of municipal representation and local service delivery and reduce administrative duplication.</p>
<p>Hybrid Regional Governance Model</p>	<p>A governance model similar to the Lake Erie Source Protection Region allows for shared services and expertise between CAs while simultaneously protecting local autonomous decision making and governance. The Lead Source Protection Authority already informs the Source Water Protection program in concert with local autonomous source protection authorities (SPA). This model could be extended to other provincially mandated programs and services. With proper provincial funding, and oversight from the OPCA, the Lead SPA can provide technical expertise, resources and policies to the SPAs on mandated programs and services for delivery at the local level. However, the SPAs would remain autonomous and control budget and policies for non-mandated programs and services protecting local service delivery.</p> <p>In a hybrid regional model, CAs would continue to be governed by local Boards made up of representatives from member municipalities. The CAs would name representatives (Chair and Vice Chair) to a Regional Board that would govern the delivery of the mandated programs and services and act as the Region’s Hearing Board under the guidance and expert staff of the Lead CA.</p> <p>A hybrid regional model where a lead CA and regional board oversee certain mandatory program areas while autonomous local CA boards oversee non-mandatory local service delivery provides the consistency the province is advocating for and the protection of local decision making and programming that must be retained.</p>
<p>Maintain Municipal Appointment Authority</p>	<p>Based on the funding municipalities provide to CAs, in any size of consolidation, municipalities must retain full authority to appoint representatives to regional conservation authorities to ensure accountability, transparency, and strong alignment with local priorities. Section 8 of the <i>Conservation Authorities Act</i> (“Grouping of municipalities”) should remain intact, allowing smaller municipalities to jointly appoint a representative when needed.</p> <p>Appointments to the Ontario Provincial Conservation Agency should include municipal appointments from each of the RCA boards to ensure local perspectives remain connected to provincial decision-making.</p>

4. Maintaining a Transparent and Consultative Budgeting Process

Comment	Explanation
Fully Fund the Transition Provincially	<p>Integration costs associated with consolidation, including IT, HR, capital, data, governance, and branding, will be extensive and must not fall to municipalities. Municipalities already fund approximately 30% of CA total budgets and in the case of KCCA over 70% of the natural hazards program areas. KCCA has self-funded flood mapping updates and regulatory map updates with reserves and funding proposals to keep the municipal apportionment within target. Adding costs of integration and OPCA operational costs on the municipal apportionment will tax already burdened municipalities. Integration costs could be minimized if the province chose first to concentrate on building consistency within the natural hazards program under the existing framework and provided the necessary resources to achieve this in an accelerated timeline. The province should fully fund the OPCA and all consolidation costs.</p> <p>Smaller CAs such as KCCA have unique funding models that are not seen elsewhere in the province. For instance, KCCA does not currently charge planning fees; planning costs are partially recouped through a Special Levy to member municipalities to ensure stable program funding. Any consolidation process must account for these unique models. Should planning fees be introduced to align with other CAs, the shift would require clear and early communication with the public.</p>
Ensure Fair Apportionment and Local Accountability	<p>There is a risk that larger municipalities could end up subsidizing areas with a smaller tax base. Any apportionment model must allow municipalities to see their contributions directed to the assets and services within their local area. This is more achievable with a smaller, more strategic consolidation.</p> <p>Each subwatershed (e.g., Grand, Kettle, Catfish, Upper Thames etc.) should remain responsible for an annual budget reported independently within the regional framework. This maintains fiscal transparency for municipalities and stakeholders and ensures that local communities can clearly see the value of their investments.</p>
Engage Municipalities in Budget Development	<p>Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Variations in land type, fee structures, property assessment, and asset conditions must all be accounted for.</p>

	<p>Within KCCA’s current watershed jurisdiction, municipal budgeting processes vary greatly, with some but not all using a four-year budget cycle. The complexity of streamlining CA budgets into the municipal budget process with the same level of input and consultation as is currently used would be difficult to navigate. Smaller regional consolidation would allow for municipalities and CAs to continue to work together on building right-sized budgets for local program delivery.</p> <p>To ensure communities can clearly see their contributions and benefits, each current watershed should maintain its own operating budget and produce watershed-level reporting. This transparency reinforces municipal trust and demonstrates continued value at the local level.</p>
Maintain Local Procurement and Accountability for Purchasing	<p>CAs were built on and thrive on the local community connections including the procurement of local services. Even under a regional model, local staff/field offices should maintain control over their own annual operational budgets and have the ability to source local goods and services. Each subwatershed in the proposed Lake Erie region (Grand, Kettle, Catfish, Upper Thames etc.) should be accountable for an annual budget within the regional framework and be reported separately on the Financial Statements and annual reports to ensure that municipalities and stakeholders can see value for their money and local communities.</p>

5. Maintaining and Strengthening Local Relationships

Comment	Explanation
<p>Retain a Strong Local Presence</p>	<p>Local offices and staff are fundamental to timely permitting, effective operations, meaningful community engagement, and on-the-ground stewardship. Maintaining local expertise ensures that decisions reflect the unique environmental conditions of each watershed, municipal priorities and community expectations. Under a regional model, local field offices must continue to manage their own programs and services, with locally raised funds, such as campground revenues, staying within the local watershed. Local hiring practices should also remain in place to preserve community knowledge and relationships.</p>
<p>Protect Local Programs</p>	<p>Locally delivered conservation authority programs such as tree planting, environmental education, outdoor recreation and stewardship are rooted in community identity. They must be preserved.</p> <p>Member municipalities within the KCCA watershed reviewed the categorization of KCCA’s programs and services and supported the current level of programming including agreements approving municipal funding for Category 2 and 3 programs such as tree planting and environment monitoring. Local municipalities should retain their ability to direct funds to local CA programming.</p> <p>Long-standing partnerships with schools, stewardship groups, service clubs, trail associations, and local contractors are also foundational to conservation work.</p>
<p>Preserve Community Access to Greenspace</p>	<p>Many municipalities depend on CA lands for public recreation because acquiring new green space is cost prohibitive. Centralizing decision-making or altering asset ownership could jeopardize access. Decisions related to land management, recreation, and asset disposition must continue to be driven by local needs, not regional or provincial priorities that may be disconnected from community realities.</p>