

Member Municipalities

Township of
Adelaide-Metcalf

Municipality of
Brooke-Alvinston

Municipality of
Chatham-Kent

Township of
Dawn-Euphemia

Township of
Enniskillen

Municipality of
Lambton Shores

Municipality of
Middlesex Centre

Village of
Newbury

Village of
Oil Springs

Town of
Petrolia

Town of
Plympton-Wyoming

Village of
Point Edward

City of
Sarnia

Municipality of
Southwest Middlesex

Township of
St. Clair

Municipality of
Strathroy-Caradoc

Township of
Warwick

St. Clair Region Conservation Authority: Environmental Registry of Ontario (ERO) Responses

Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities (ERO #025-1257)

This response is provided on behalf of the St. Clair Region Conservation Authority (SCRCA). The SCRCA represents 17 member municipalities and 148,000 residents in its approximately 4,100 square kilometer watershed in southwestern Ontario. The SCRCA watershed is proposed to be consolidated with 7 other Conservation Authorities representing 81 member municipalities to form the Lake Erie Region Conservation Authority.

ERO Proposal #025-1257 would result in a Regional Conservation Authority (RCA), void of meaningful local representation to deliver effective governance and accountability to municipal funders and their ratepayers. The SCRCA:

- Supports the desired goal of achieving better service outcomes;
- Opposes the changes outlined in the ERO Proposal as a means of achieving those goals;
- Supports continued modernization of existing practices and policies but prefers alternatives to the Proposal that would consider voluntary consolidation that is supported by adequate business rationale, sound and third-party peer reviewed financial analysis and meaningful, open consultation rather than proscribed controlled input to the Ministry.

While the SCRCA supports the proposed provincial investments in technology, standardization and modernization, the proposed RCA framework would create complexities and risk local municipal representation and decision-making, local expertise, and delivery of programs and services. Considering the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the SCRCA does not support the proposed RCA framework. If the government decides to proceed with the ERO Proposal, it is imperative that there are measures in place to mitigate risks that are inherent in consolidations of this size.

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?

Preserve Local Municipal Governance and Decision-Making

With 81 local municipalities, the proposed Lake Erie Region Conservation Authority would make it incredibly challenging to have meaningful local municipal representation, particularly for smaller and rural communities. The SCRCA's board maintains a respectful balance between urban and rural representatives that reflect the diverse nature of the watershed.

As the largest contributor to Conservation Authority 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 Conservation Authority 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 Conservation Authorities 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, the development community, and landowners with timely, reliable services;
- Enhancing the economic, environmental, and community health of the watershed;
- Providing meaningful opportunities for people to connect at the local level;
- Meet the demands of a rapidly growing population at a time of climate pressure.
- If regionalization stretches teams too broadly, there is a risk of 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, donors, businesses, the agricultural community, watershed residents, and other partners;
- Real-time responsiveness during storms and emergencies and other urgent events;
- Engagement and support from the scientific community;
- Effective oversight and buy-in from municipal funding partners;
- To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, Conservation Authorities must be appropriately accountable;
- The principle of “pay for say” should be reflected in the design of new Conservation Authorities, as it is today. The proposed catchment area of the proposed consolidated Lake Erie Regional Conservation Authority would combine more than 80 municipalities, stretching oversight and “pay for say” beyond what is workable and undermining confidence in the governance of Conservation Authorities.

Recommendation 1:

That the Province consider achieving modernization goals through the current 36 Conservation Authority corporations using legislative and regulatory amendments, technological solutions and compliance verification.

Recommendation 2:

That the Province demonstrate the statutory objects of the Conservation Authorities can be effectively delivered within the proposed new regional boundaries.

Recommendation 3:

- a) That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.
- b) 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 Conservation Authorities 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 stakeholders are still processing the effect and significance of various legislative changes. All stakeholders, 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.

c) 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 Conservation Authorities into one Regional Conservation Authority, including but not limited to:

- Information technology and data system integration,
- Human resources and union harmonization (two Conservation Authorities within the proposed Lake Erie Region are unionized with different unions while the other six are not),
- Fee and policy alignment,
- Corporate service model consolidation,
- Potential need for 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.

d) Protect and Enhance Existing Service Levels

Local Conservation Authority staff attend site visits and face-to-face meetings and know the local geography and political landscape. Despite increasing levels of development in the watershed, SCRCA continues to issue permits within the provincial guidelines. Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. Consolidating and potentially centralizing offices could reduce responsiveness, delay decisions, and weaken local expertise and connection to the community.

e) Ensure Financial and Legal Due Diligence

Each Conservation Authority in the proposed region has vast landholdings, complex assets (e.g., water 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 and/or ownership.

f) Maintain Local Conservation Authority Board beyond 2026

Slowing the pace of 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 Conservation Authorities is well-timed and efficiencies at the local level are evaluated prior to implementing structural changes.

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.
- Implementing consistent standards, guidelines, and directives across all Conservation Authorities in a phased manner, prior to any consolidation (if required) would improve stability and predictability.
- This approach reduces the risk of program delivery disruptions by avoiding multiple significant changes at the same time, thereby supporting improved outcomes and greater buy-in.

Recommendation 5:

That a stable, clear, transition plan be prepared collaboratively with the implementation of a 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 Conservation Authority Boards should remain in place beyond 2026. The local Conservation Authority 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.

2. Potential Opportunities or Benefits

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

The provincial proposal for regional consolidation does not include enough information to effectively evaluate the benefits.

- a) **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 Conservation Authorities. 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 these goals within the existing Conservation Authority framework.
- b) **Provide Additional Investment**
Additional investment is required to ensure mandatory programs and services are supported. The projected cost of the new Ontario Provincial Conservation Agency is significantly higher than the current transfer payments provided by the Province to the 36 Conservation Authorities.

Recommendation 6:

That the Province update Provincial policies and standards together with the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

Recommendation 7:

That the Province invests stable, adequate, multi-year funding into Conservation Authority programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

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?

- a) **Reduce the Geographical Area of the Proposed Consolidation.**
In developing the proposed Regional Conservation Authorities, the Province made its decision to form watershed-based jurisdictions, avoiding what it viewed as administrative duplication and balancing expertise. However, this resulted in geographically vast regions that do not account for existing working relationships between Conservation Authorities and municipalities. Other criteria should be weighted, including existing working relationships between Conservation Authorities and municipalities, and the urban versus rural balance. The success of the Conservation Authority governance model has always been that local representatives make local decisions. The geographic size of the region needs to be reduced to protect that principle.
- b) **Create a Governance Model that is Functional and Fair**
Applying current legislative population formulas would produce a Lake Erie Regional Conservation Authority Board of 120 members, which is unrealistic. A Board of this size risks a loss of local perspectives and challenges in achieving timely, responsive decisions. However, a board that is too small would have the same impact. A reasonable balance needs to be achieved. There will be a loss of local municipal representation in this framework.

- c) **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 Regional Conservation Authority boards. A new structure provides an opportunity for appointments to include Indigenous representation on Conservation Authority Boards as a vital step towards strengthening partnerships and ensuring programs reflect diverse perspectives. This representation would deepen cultural connections, enhance decision-making, and align with previous recommendations to create more inclusive and effective governance.

Recommendation 8: That the Conservation Authority Board should be:

- Maximum 25 members;
- Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand;
- Structured to preserve meaningful local influence including Indigenous representation to strengthen partnerships and ensure programs reflect diverse perspectives.

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?

- a) **Engage Municipalities in Budget Development**
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. Another key factor to consider is protecting watershed reserves, infrastructure, and land assets. Watershed municipalities are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within the proposed consolidated structure.
- b) **Ensure Fair Apportionment**
Municipalities risk subsidizing areas with a smaller tax base. Local apportionment should be able to be directed to local assets.
- c) **Fully Fund the Transition Provincially**
Costs for integration, including but not limited to information technology, human resources, capital, data, governance and potential rebranding are extensive and must not fall to municipalities.

Recommendation 9:

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 and the transition costs be funded provincially.

5. Maintaining and Strengthening Local Relationships

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

- a) **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.

b) Protect Local Programs

Locally delivered conservation authority programs such as tree planting, stewardship services, environmental monitoring, education, community partnerships, and parks are rooted in community identity. They must be preserved.

c) Preserve Community Access to Greenspace

Municipalities rely on SCRCA lands for recreational opportunities. 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.

Recommendation 10:

That assurances are made to confirm the retention of local offices in order to continue delivering current programs locally.

Additional Comments

In addition to the comments provided in response to the questions in the ERO posting, the SCRCA is concerned about the governance structure of the Ontario Provincial Conservation Agency (OPCA). As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, Conservation Authorities 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 will 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 Conservation Authority 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 of St. Clair Region Conservation Authority Recommendations

Recommendation 1:

That the Province consider achieving modernization goals through the current 36 Conservation Authority corporations using legislative and regulatory amendments, technological solutions and compliance verification.

Recommendation 2: That the Province demonstrate the statutory objectives of the Conservation Authorities can be effectively delivered within the proposed new regional boundaries.

Recommendation 3:

That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.

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, guidelines, and directives across all Conservation Authorities before any consolidation (should consolidation be required at all) offers greater stability and predictability.

Recommendation 5:

That a stable, clear, transition plan be prepared collaboratively with the implementation of a 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 Conservation Authority Boards should remain in place beyond 2026.

Recommendation 6:

- That the Province update Provincial policies and standards together with Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

Recommendation 7:

- That the Province invests stable, adequate, multi-year funding into Conservation Authority programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

Recommendation 8: That the Conservation Authority Board should be:

- Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand;
- Structured to preserve meaningful local influence including Indigenous representation to strengthen partnerships and ensure programs reflect diverse perspectives.

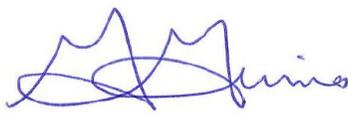
Recommendation 9:

- 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 and the transition costs be funded provincially.

Recommendation 10:

- That the Province upholds the commitment to retain local Conservation Authority offices to deliver programs currently offered to the communities they currently serve.

Respectfully submitted,



Greg Grimes, Chair



Kristen Rodrigues, Vice Chair