

# Board of Directors

Upper Thames River Conservation Authority



Live staking at Medway Creek

UPPER THAMES RIVER  
CONSERVATION AUTHORITY

# Upper Thames River Conservation Authority Board of Directors' Meeting Agenda – December 2025

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Date: December 16, 2025

Time: 9:30am

Place: Watershed Conservation Centre Board Room, Fanshawe Conservation Area –  
1424 Clarke Road, London, ON

## **1. Territorial Acknowledgement**

## **2. Modifications to the Agenda**

## **3. Declarations of Pecuniary Interest**

## **4. Presentations/Delegations**

- 4.1. Mark and Mary McNeil - Legal Ramifications to Home Owners  
Regarding Proposed Changes to the Mapping of the Regulated Area

## **5. Administrative Business**

- 5.1. Approval of Minutes of Previous Meeting: November 25, 2025
- 5.2. Business Arising from Minutes
- 5.3. Correspondence
  - 5.3.1. Letter from Warden Marcus Ryan
  - 5.3.2. Motions and Letters from Municipalities and Conservation Authorities  
Regarding Bill 68

## **6. Reports – For Consideration**

- 6.1. UTRCA Strategic Plan 2025-2030 – BoD-12-25-85
- 6.2. Draft Comments on Proposed Boundaries for  
the Regional Consolidation of Ontario's Conservation Authorities,  
ERO #025-1257 – BoD-12-25-86
- 6.3. 2026 Fees Policy and Fee Schedules – BoD-12-25-87

## **7. Reports – In Camera**

## **8. Reports – For Information**

- 8.1. Planning and Permitting Service Delivery Review – BoD-11-25-80 –  
Deferred from November 2025 Meeting
- 8.2. Tentative Implementation Plan for Service Delivery Review  
Recommendations – BoD-12-25-88
- 8.3. Preparation for January Elections – BoD-12-25-89
- 8.4. [Thames River Current December Edition](#)

## **9. Reports – Committee Updates**

- 9.1. Finance and Audit Committee
- 9.2. Hearing Committee

## **10. Notices of Motion**

- 10.1. Discussion on Formalizing the General Manager’s Performance  
Appraisal Process – BoD-12-25-90

## **11. Chair’s Comments**

## **12. Member’s Comments**

## **13. General Manager’s Comments**

## **14. Adjournment**

Tracy Annett, General Manager



**OFFICE OF THE WARDEN**  
21 Reeve Street, PO Box 1614  
Woodstock, ON N4S 7Y3  
519.539.9800 | 1.800.755.0394  
[oxfordcounty.ca](http://oxfordcounty.ca)

December 1, 2025

*Sent via email: [dtrentowsky@westperth.com](mailto:dtrentowsky@westperth.com)*

Chair Dean Trentowsky  
1424 Clarke Road  
London, ON N5V 5B9

Dear Chair and Board of the Upper Thames River Conservation Authority,

I continue to miss serving on the Board. I have often said that one of the few downsides of becoming Mayor was stepping away from the UTRCA Board. The UTRCA's commitment to its mission—and to evidence-based policy and decision-making—has long been commendable and of significant benefit to the residents of Oxford. Unfortunately, I am very concerned about the potential impact that recently introduced legislation may have on that.

With that in mind, I am writing to encourage staff (in preparing the draft budget) and the board (in approving a final budget) to consider the possible downstream implications of that legislation. Over the decades, obligated funding municipalities have contributed millions to existing assets and the financial plans (reserves) to fund those assets. That funding was provided within a certain governance model that gave obligated funding municipalities a transparent and predictable governance model to manage those assets and associated funding in the collective interests. The proposed legislation does not have sufficient details yet to make clear what the future governance and funding models will be, never mind service model or levels. Given that the existing obligated funding municipalities will have their governance diluted in a new model, I encourage the board to give direction to staff to consider the best uses of existing reserves in the 2026 budget, particularly considering the extreme number of unknowns in the current legislation, and yet to be published regulations, in preparing the draft budget.

In closing, I share these thoughts simply to support good decision-making during a time of uncertainty. The UTRCA has a strong track record of thoughtful leadership, and I'm confident the Board will navigate legislative changes carefully.

Sincerely,

A handwritten signature in black ink that reads "Marcus Ryan".

Marcus Ryan  
Warden, Oxford County

Cc: Oxford County Council



OFFICE OF THE  
CITY CLERK

COUNCIL SERVICES DEPARTMENT

IN REPLY, PLEASE REFER  
TO OUR FILE NO. \_\_\_\_\_

November 28, 2025

Honourable Doug Ford  
Premier of Ontario  
Premier's Office  
Room 281, Legislative Building, Queen's Park  
Toronto, ON M7A 1A1

Dear Premier Ford,

Windsor City Council, at its meeting held November 24, 2025, adopted the following resolution:

Decision Number: CR481/2025

**WHEREAS** Ontario's Conservation Authorities play a critical role in watershed management, environmental protection, flood mitigation, and public safety across the province; and,

**WHEREAS** the Province of Ontario has introduced Bill 68, which contains significant and far-reaching amendments to the *Conservation Authorities Act* that would alter governance structures, decision-making authorities, and municipal participation in conservation authority oversight; and,

**WHEREAS** the proposed changes were introduced within an omnibus bill without the benefit of a standalone legislative process that would allow for comprehensive public input, stakeholder consultation, or sufficient scrutiny regarding their long-term environmental, financial, and public safety implications; and,

**WHEREAS** municipalities are key partners in watershed management and must retain a strong, meaningful voice in any new governance model to ensure that local knowledge, local priorities, and local risks are fully considered in provincial decision-making; and,

**WHEREAS** the potential impacts of the proposed amendments may increase risks to the public related to flooding, erosion, natural heritage loss, and environmental degradation if not properly analyzed and addressed through an open and transparent legislative process; and,

**THEREFORE BE IT RESOLVED THAT** the Council of the City of Windsor strongly urge the Provincial Government of Ontario to withdraw all sections of Bill 68 related to amendments to the *Conservation Authorities Act*; and,

**BE IT FURTHER RESOLVED THAT** the Province be requested to re-introduce any proposed changes as a standalone bill, to proceed through the full and regular legislative process—including First and Second Readings, Committee review, stakeholder submissions, and public consultation—to ensure that the impacts on watershed management, environmental protection, and public safety are fully and transparently considered; and,

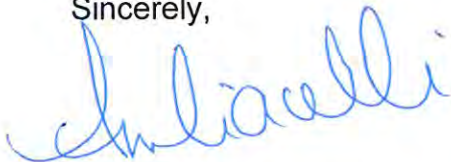
**BE IT FURTHER RESOLVED THAT** the Province ensure that any future governance framework for Ontario's Conservation Authorities includes robust and clearly defined municipal representation, recognizing municipalities as essential partners in protecting watersheds and mitigating environmental risks; and,

**BE IT FINALLY RESOLVED THAT** a copy of this motion be forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, local Members of Provincial Parliament, the Association of Municipalities of Ontario (AMO), the Essex Region Conservation Authority (ERCA), and all Ontario municipalities and Conservation Authorities for their information and support.

Carried.

Your consideration to Windsor City Council's resolution would be most appreciated.

Sincerely,



Anna Ciacelli  
Deputy City Clerk and Supervisor of Council Services  
AC/lh

cc: Mr. Todd McCarthy, the Minister of the Environment, Conservation and Parks  
Mr. Harb Gill, Member of Parliament, Windsor West  
Ms. Kathy Borrelli, Member of Parliament, Windsor-Tecumseh-Lakeshore  
Mr. Andrew Dowie, Member of Provincial Parliament, Windsor-Tecumseh  
Ms. Lisa Gretzky, Member of Provincial Parliament, Windsor West  
Association of Municipalities of Ontario (AMO)

Tim Byrne, Chief Administrative Officer & Secretary Treasurer, Board of  
Directors, Essex Region Conservation Authority (ERCA)  
Nicole Kupnicki, Manager, Human Resources & Council Services of the  
Essex Region Conservation Authority  
All Ontario municipalities and Conservation Authorities



## South Stormont Resolution - Support for SDG Counties in Maintaining Local Conservation Authorities

**From** Ashley Sloan <ashley@southstormont.ca>

**Date** Thu 12/4/2025 4:20 PM

**To** minister.mecp@ontario.ca <minister.mecp@ontario.ca>; resolutions@amo.on.ca <resolutions@amo.on.ca>; roma@roma.on.ca <roma@roma.on.ca>; Quinn, Nolan <nolan.quinn@pc.ola.org>; eric.duncan@parl.gc.ca <eric.duncan@parl.gc.ca>; stephane.sarrazin@pc.ola.org <stephane.sarrazin@pc.ola.org>

**Cc** info@abca.ca <info@abca.ca>; communications@catfishcreek.ca <communications@catfishcreek.ca>; admin@erca.org <admin@erca.org>; grca@grandriver.ca <grca@grandriver.ca>; explore@greysauble.on.ca <explore@greysauble.on.ca>; web@hrca.on.ca <web@hrca.on.ca>; nature@conservationhamilton.ca <nature@conservationhamilton.ca>; info@kettlecreekconservation.on.ca <info@kettlecreekconservation.on.ca>; conservation@lprca.on.ca <conservation@lprca.on.ca>; info@ltvca.ca <info@ltvca.ca>; maitland@mvca.on.ca <maitland@mvca.on.ca>; info@npca.ca <info@npca.ca>; customerservice@svca.on.ca <customerservice@svca.on.ca>; stclair@scrca.on.ca <stclair@scrca.on.ca>; infoline <infoline@thamesriver.ca>; mail@cloca.com <mail@cloca.com>; info@cvc.ca <info@cvc.ca>; info@grca.on.ca <info@grca.on.ca>; geninfo@kawarthaconservation.com <geninfo@kawarthaconservation.com>; r.baldwin@lsrca.on.ca <r.baldwin@lsrca.on.ca>; admin@nvca.on.ca <admin@nvca.on.ca>; otonabeeca@otonabeeconservation.com <otonabeeca@otonabeeconservation.com>; info@trca.ca <info@trca.ca>; info@crca.ca <info@crca.ca>; info@crowevalley.com <info@crowevalley.com>; information@lrc.on.ca <information@lrc.on.ca>; water-management@mvc.on.ca <water-management@mvc.on.ca>; info@quinteconservation.ca <info@quinteconservation.ca>; info@rrca.on.ca <info@rrca.on.ca>; info@rvca.ca <info@rvca.ca>; South Nation - ROAD CLOSURE CONTACT <info@nation.on.ca>; info@lakeheadca.com <info@lakeheadca.com>; info@mattagamiregion.ca <info@mattagamiregion.ca>; ndca@ConservationSudbury.ca <ndca@ConservationSudbury.ca>; nbmca@nbmca.ca <nbmca@nbmca.ca>; nature@ssmrca.ca <nature@ssmrca.ca>; Kimberley Casselman - ZONING AMENDMENT CONTACT <kcasselman@sdgcounties.ca>

📎 1 attachment (483 KB)

SDG Counties Resolution - Conservation Authorities.pdf;

You don't often get email from ashley@southstormont.ca. [Learn why this is important](#)

**CAUTION:** This email originated from outside of the UTRCA. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good day,

Please be advised that Council of the Township of South Stormont passed the following resolution on November 26, 2025:

**Resolution No.: 241/2025**  
**Moved By: Deputy Mayor Andrew Guindon**  
**Seconded by: Councillor Jennifer MacIsaac**

**Whereas the United Counties of Stormont, Dundas, and Glengarry (SDG) has called on the Province of Ontario to maintain local, municipally governed conservation authorities;**

**And Whereas local governance ensures accountability, responsiveness, and effective stewardship of conservation lands;**

**Now therefore be it resolved that the Township of South Stormont supports the SDG resolution advocating for the preservation of local control over conservation authorities and opposes provincial consolidation that would reduce local representation;**

**And further, that a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of Ontario, the Rural Ontario Municipal Association, and all municipalities and Conservation Authorities in Ontario.**

**Result: CARRIED**

Kind regards,



**Ashley Sloan, AMP**

Manager of Information and Customer Services

Deputy Clerk

Marriage Officiant



Email: [ashley@southstormont.ca](mailto:ashley@southstormont.ca)

Phone: 613-534-8889 ext. 204

2 Mille Roches Road, PO Box 84, Long Sault, ON K0C 1P0

<https://www.southstormont.ca>



**COUNCIL RESOLUTION:**

Township of Conmee

**Resolution No.: 2025-~~030~~ 234**

**Date: December 8, 2025**

**Moved By: Councillor Grant Arnold**

**Seconded By: Councillor David Halvorsen**

**WHEREAS** the *Conservation Authorities Act* (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

**AND WHEREAS** the municipalities within Lakehead Region established the Neebing Valley Conservation Authority in 1954 which enlarged to the Lakehead Region Conservation Authority (LRCA) in 1963;

**AND WHEREAS** local municipalities currently provide approximately 50% of total conservation authority funding, while the Province of Ontario provides approximately 5%;

**AND WHEREAS** municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

**AND WHEREAS** conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

**AND WHEREAS** Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

**AND WHEREAS** the Province already possesses the authority to establish overarching legislation, regulations, and standards through the *Conservation Authorities Act* and the Ministry of the Environment, Conservation and Parks;

**NOW THEREFORE BE IT RESOLVED THAT** the Township of Conmee calls on the Government of Ontario to maintain local, independent, municipally governed,

watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

**AND THAT** while the Township of Conmee supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

**AND THAT** the Township of Conmee supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives;

**AND THAT** the Township of Conmee is opposed to the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257;

**AND THAT** the Township of Conmee recommends that the Lakehead Region Conservation Authority form the "Northwestern Ontario Regional Conservation Authority";

**AND THAT** the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;

**AND THAT** a copy of this resolution be forwarded to the Environmental Registry of Ontario consultations and to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics;
- local Members of Provincial Parliament;
- local Members of Parliament;
- the Association of Municipalities of Ontario;
- Conservation Ontario;
- All local municipalities; and
- All Conservation Authorities in Ontario.

Carried  Defeated  Amended  Deferred

Signed this 8th day of December, 2025

Mayor: Sheila Maxwell Sheila Maxwell

Clerk: Karen Paisley Karen Paisley



December 5, 2025

VIA EMAIL: [minister.mecp@ontario.ca](mailto:minister.mecp@ontario.ca)

Honourable Todd McCarthy  
Minister of the Environment, Conservation and Parks  
5<sup>th</sup> Flr, 777 Bay St.  
Toronto, ON M7A 2J3

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

Dear Minister McCarthy,

Council of the Municipality of Neebing reviewed your Ministry's proposal related to boundaries for the regional consolidation of Ontario's conservation authorities (ERO Posting 025-1257).

At their meeting on December 3, 2025, Council carried the following resolution:

WHEREAS the *Conservation Authorities Act* (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the municipalities within Lakehead Region established the Neebing Valley Conservation Authority in 1954 which enlarged to the Lakehead Region Conservation Authority (LRCA) in 1963;

AND WHEREAS local municipalities currently provide approximately 50% of total conservation authority funding, while the Province of Ontario provides approximately 5%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents as a personal legacy for long-term protection, stewardship, and the public good;

AND WHEREAS proposed governance changes risk undermining community trust and donor confidence, as these contributions were made with the expectation of local accountability and decision-making in the care and management of these lands;

AND WHEREAS Bill 68 (Schedule 3) proposes creating the Ontario Provincial Conservation Agency (OPCA), a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities; however, municipal cost apportionment, the overall cost of establishing and operating the OPCA, and the anticipated cost of consolidation remain undisclosed, creating significant uncertainty for municipalities and ratepayers, even as local watershed advisory boards would still be needed for oversight;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the *Conservation Authorities Act* and the Ministry of the Environment, Conservation and Parks;

AND WHEREAS such consolidation risks the loss of local viewpoints and representation, reducing the ability of communities to influence decisions that directly affect their watersheds, conservation lands, and municipal levies;

AND WHEREAS the Lakehead Region is located over 1,300 kilometers away from the other conservation authorities, making the proposed "Huron-Superior Regional Conservation Authority" boundary configuration geographically impractical and disconnected from local watershed realities;

NOW THEREFORE BE IT RESOLVED THAT the Council of the Municipality of Neebing calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND THAT the Council of the Municipality of Neebing requests that the Province provide full transparency regarding the projected costs of establishing the OPCA and consolidating conservation authorities, including the impact on municipal levies and ratepayers, before implementing any governance changes;

AND FURTHER THAT the Council of the Municipality of Neebing supports provincial goals for consistent permit approval processes, shared services, and digital modernization, but imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND FURTHER THAT the Council of the Municipality of Neebing supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives;

AND FURTHER THAT Council of the Municipality of Neebing is opposed to the proposed “Huron-Superior Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257;

AND FURTHER THAT the Council of the Municipality of Neebing recommends that the Lakehead Region Conservation Authority form the “Northwestern Ontario Regional Conservation Authority”;

AND FURTHER THAT the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;

AND FURTHER THAT a copy of this resolution be forwarded to the Environmental Registry of Ontario consultations and to the Minister of the Environment, Conservation and Parks and his Opposition critics; MPP Kevin Holland; the Association of Municipalities of Ontario; Conservation Ontario; all local municipalities; and all conservation authorities in Ontario.

Thank you for your consideration in this matter and I look forward to your response.

Sincerely,



Erika Kromm  
Clerk Treasurer  
(Resolution No. 2025-12-281)

cc: Public Input Coordinator, MECP Conservation and Source Protection Branch  
Peter Tabuns, Opposition Critic, [tabunsp-qp@ndp.on.ca](mailto:tabunsp-qp@ndp.on.ca)  
MPP Kevin Holland, [kevin.holland@pc.ola.org](mailto:kevin.holland@pc.ola.org)  
Association of Municipalities of Ontario, [resolutions@amo.on.ca](mailto:resolutions@amo.on.ca)  
Conservation Ontario, [info@conservationontario.ca](mailto:info@conservationontario.ca)  
All Conservation Authorities  
All Local Municipalities



# TOWNSHIP OF O'CONNOR

330 Highway 595, R.R. #1, Kakabeka Falls, Ontario P0T 1W0  
Tel. (807) 476-1451 Fax (807) 473-0891  
E-Mail - [twpoconn@tbaytel.net](mailto:twpoconn@tbaytel.net) [www.oconnortownship.ca](http://www.oconnortownship.ca)

Mayor  
Jim Vezina

Clerk-Treasurer  
Lorna Buob

Councillors  
Alex Crane  
Brendan Rea  
John Sobolta  
Carly Torkkeli

November 26, 2025

Honourable Todd McCarthy  
Minister of the Environment, Conservation and Parks  
Macdonald Block Mailing Facility  
77 Wellesley St W, 11th Fl  
Toronto, ON  
M7A 1N3

[minister.mepc@ontario.ca](mailto:minister.mepc@ontario.ca)

Dear Minister McCarthy:

Council, at their meeting held on November 24, 2025, passed a resolution calling on the Government of Ontario to maintain local, independent, municipally governed, water-shed conservation authorities. The Township of O'Connor is opposed to the proposed Huron-Superior Regional Conservation Authority boundary configuration outlined in the Environmental Registry Notice 025-1257.

I have enclosed a copy of the resolution for your consideration and trust you will give it your full consideration and support.

Yours truly

Lorna Buob  
Clerk-Treasurer

Encl.

Cc: Kevin Holland, MPP – Thunder Bay – Atikokan [kevin.holland@pc.ola.gc.ca](mailto:kevin.holland@pc.ola.gc.ca)  
Lise Vaugeois, MPP, Thunder Bay – Superior North [LVaugeois-QP@ndp.on.ca](mailto:LVaugeois-QP@ndp.on.ca)  
Marcus Powlowski, MP – Thunder Bay – Rainy River [marcus.powlowski@parl.gc.ca](mailto:marcus.powlowski@parl.gc.ca)  
Hon. Patty Hajdu – MP Thunder Bay – Superior North [patty.hajdu@parl.gc.ca](mailto:patty.hajdu@parl.gc.ca)  
Association of Municipalities of Ontario [amo@amo.on.ca](mailto:amo@amo.on.ca)  
Conservation Ontario [bfox@conservationontario.ca](mailto:bfox@conservationontario.ca)  
Lakehead Region Conservation Authority [tammy@lakeheadca.com](mailto:tammy@lakeheadca.com)  
All local municipalities  
All Conservation Authorities in Ontario

TOWNSHIP OF O'CONNOR  
R. R. #1 KAKABEKA FALLS, ONTARIO POT 1W0

NOVEMBER 24, 2025 NO. 10

Moved by J. Sobolta

Seconded by C. Torkkeli

WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the municipalities within Lakehead Region established the Neebing Valley Conservation Authority in 1954 which enlarged to the Lakehead Region Conservation Authority (LRCA) in 1963;

AND WHEREAS local municipalities currently provide approximately 50% of total conservation authority funding, while the Province of Ontario provides approximately 5%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

AND WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Township of O'Connor calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND THAT while the supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure

without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND THAT the Township of O'Connor supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives;

AND THAT the Township of O'Connor is opposed to the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257;

AND THAT the Township of O'Connor recommends that the Lakehead Region Conservation Authority form the "Northwestern Ontario Regional Conservation Authority";

AND THAT the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;

AND THAT a copy of this resolution be forwarded to the Environmental Registry of Ontario consultations and to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics;
- local Members of Provincial Parliament;
- local Members of Parliament;
- the Association of Municipalities of Ontario;
- Conservation Ontario;
- All local municipalities; and
- All Conservation Authorities in Ontario.

J. Vezina  
MAYOR

CERTIFIED TRUE COPY  
TOWNSHIP OF O'CONNOR

CARRIED

DEFEATED

RECORDED VOTE

ALEX CRANE   
BRENDAN REA   
JOHN SOBOLTA

Lorna Buob  
CLERK-TREASURER  
CARLY TORKKELI   
JIM VEZINA

November 27, 2025

Re: Proposed Regional Consolidation of Conservation Authorities, ERO Notice #025-1257  
Lakehead Region Conservation Authority Resolution #130/25

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With the passing of Bill 68 on November 25, 2025, the Province of Ontario has established a new oversight body called the “Ontario Provincial Conservation Agency” (OPCA) to oversee Conservation Authorities (CAs) and the transition to a regional watershed-based framework for CAs in Ontario.

At the November 26, 2025 Lakehead Region Conservation Authority (LRCA) Board Meeting, the LRCA Board of Directors passed a resolution opposing the Province’s proposed “Huron-Superior Regional Conservation Authority” boundary configuration as outlined in Environmental Registry Notice 025-1257, which proposes to consolidate the LRCA into a region 1,500 kilometres from the Lakehead Watershed with 72 other southern Ontario municipalities. The resolution also recommends that the LRCA form a stand alone independent Regional Conservation Authority, as the “Northwestern Ontario Regional Conservation Authority” to ensure that the interests of Northwestern Ontario are equitably represented. Additionally, the Board is also requesting that the Ministry engage directly with affected municipalities of the LRCA before finalizing any consolidation boundaries.

The Board of Directors acknowledges the Province’s goals in amalgamating conservation authorities; however, strongly believes that the LRCA is unique both in location and the region that it serves and therefore should not be amalgamated with conservation authorities with no watershed or municipal connection.

LRCA Resolution #130/25 has been attached. The LRCA encourages all partners to review the posting <https://ero.ontario.ca/notice/025-1257> and submit comments prior to the closing date of December 22, 2025.

For further information, please contact the undersigned at [info@lakeheadca.com](mailto:info@lakeheadca.com).

Yours truly,



Donna Blunt  
Chair

Encl.: LRCA Board Resolution #130/25

c.c.:

*Hon. Todd McCarthy, Minister of the Environment, Conservation and Parks*  
*Peter Tabuns, MPP, Critic, Environment, Conservation and Parks*  
*Kevin Holland, MPP, Thunder Bay – Atikokan*  
*Lise Vaugoeis, MPP, Thunder Bay- Superior North*  
*Marcus Powlowski, MP – Thunder Bay – Rainy River*  
*Hon. Patty Hajdu – MP Thunder Bay – Superior North*  
*Association of Municipalities of Ontario*  
*Conservation Ontario*  
*All local municipalities*  
*All Conservation Authorities in Ontario*

**LRCA Resolution #130/25**Moved by: Sheelagh Hendrick  
Seconded by: Brian Kurikka

*With Respect to the posting by the Ministry of the Environment, Conservation and Parks Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Ontario’s 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 THAT** *under this proposal, the Lakehead Region Conservation Authority (LRCA) would be merged into a new “Huron-Superior Regional Conservation Authority” together with:*

- *Grey Sauble Conservation*
- *the Saugeen Valley Conservation Authority*
- *the Maitland Valley Conservation Authority*
- *the Ausable Bayfield Conservation Authority*
- *the Nottawasaga Valley Conservation Authority*
- *the Lake Simcoe Region Conservation Authority*

*forming a single organization encompassing the eastern shores of Lake Huron, the southern shores of Georgian Bay, Lake Simcoe, and the western shores of Lake Superior in Northwestern Ontario;*

**AND THAT** *the LRCA Board acknowledges and supports the Province’s goals of improved efficiency, consistency and fiscal prudence in conservation delivery,*

**AND THAT** *the Lakehead Region Conservation Authority is a self-sufficient entity that is; accountable to its member municipalities;*

- *financially resilient;*
- *consistently processes permits in less than 7 days;*
- *operates in the City of Thunder Bay that has exceeded their housing target by 143%;*
- *has modern financial and IT processes that prioritize security and redundancy; and*
- *is a locally recognized leader in the conservation and protection of the Lakehead Watershed; and*
- *all staff are front line workers,*

**AND THAT** *the Board further recognizes that the Lakehead Region Conservation Authority is unique as it does not abut any other Conservation Authority and solely serves Northwestern Ontario communities that face vastly different climatic, hydrological, geographic and infrastructure realities, and would be disconnected to the proposed larger overarching*

administrative structure that is physically based 1,500 kilometres from the north with 72 other municipalities;

**The Board finds that the proposed “Huron-Superior Region” configuration would :**

- Create a geographically vast and administratively complex entity, joining Northwestern Ontario with fast-growing Southern Ontario municipalities that are 1,300-1,500 kilometres apart with no shared watershed connection or economic alignment;
- dilute local accountability and municipal partnership, contrary to the principle that decisions are best made at the local level;
- generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization, rebranding — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province’s business-planning principles of value for money, cost containment and service continuity; and
- risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with local conditions are replaced by distant regional structures, making it harder for applicants to obtain timely local advice, resolve issues or expedite housing and infrastructure approvals that support the Province’s “Get It Done” agenda;

**THEREFORE BE IT RESOLVED THAT:**

The Board of Directors is opposed to the proposed “Huron-Superior Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257;

**AND THAT** the Board recommends that the Lakehead Region Conservation Authority form the 8<sup>th</sup> Regional Conservation Authority as the “Northwestern Ontario Regional Conservation Authority”;

**AND THAT** further provincial evaluation is conducted with a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government’s priorities of efficiency, red-tape reduction and timely housing delivery;

**AND THAT** the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;

**AND THAT** this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics;
- local Members of Provincial Parliament;
- local Members of Parliament;
- the Association of Municipalities of Ontario;
- Conservation Ontario;
- All local municipalities; and
- All Conservation Authorities in Ontario.

**Carried**

## **LTVCA Board Resolution in Response to Bill 68**

**Paul Tiessen**

**LTVCA Chair**

On November 20, 2025, the Lower Thames Valley Conservation Authority (LTVCA) held a special board meeting, its main point of discussion was the Province's proposal to consolidate Ontario's 36 Conservation Authorities into seven regional entities under Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025. The plan, announced on October 31, includes creating an Ontario Provincial Conservation Agency to oversee the consolidation and consult on proposed boundaries.

As proposed the LTVCA would become part of the Lake Erie Regional Conservation Authority (LERCA), which would include eight local Conservation Authorities, 81 municipalities and an approximate population of 2.2 million across the proposed region.

The LTVCA Board had many concerns with the proposed boundary change, especially in regards to geographical size. The current LTVCA board has representation from all 10 member municipalities, however under the proposed boundaries the Lake Erie Regional Conservation Authority Board would represent and make decisions for 81 municipalities. The main concern was accountability from the Regional Conservation Authority to the local municipalities. Local service delivery is critical to maintaining on the ground services to builders, developers and residents. The creation of a huge regional conservation authority will not only decrease accountability but increase bureaucracy, costs and timelines for local communities.

The Provincial goals for consistent permit approval processes, shared services, and digital modernization can be realized by the current Conservation Authority structure without imposing a new top-down agency structure without strong local accountability and increased costs to taxpayers.

Following significant discussion regarding this proposal, the Board unanimously passed the following resolution, which states:

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

**WHEREAS** under this proposal, the Lower Thames Valley Conservation Authority (LTVCA) would be merged into a new "Lake Erie Regional Conservation Authority" together with the:

Essex Region CA  
St. Clair Region CA  
Upper Thames River CA  
Kettle Creek CA  
Catfish Creek CA  
Long Point Region CA  
Grand River CA

forming a single organization stretching from Windsor, London and Sarnia, through to Waterloo region; and

**WHEREAS** the Board acknowledges and supports the Province’s goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed “Lake Erie Region” configuration would:

- Create a geographically vast and administratively complex entity, joining south western rural and urban municipalities throughout the province with little shared watershed connection or economic alignment;
- Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;
- Generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province’s own business-planning principles of value for money, cost containment and service continuity; and,
- Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely on the ground local advice, resolve issues or expedite housing and infrastructure approvals that support the Province’s “Get It Done” agenda; and

**WHEREAS** the LTVCA has already undertaken significant modernization work aligned with provincial objectives, including:

- Implementation of a Customer Service Delivery Program;
- Continually improvement of delivery standard well above the standard required by the province – 2024 – 81.7% met standard, 2025 – 96.8% are meeting standard
- Continual improvements in transparency and client communication through a number of recent strategic planning initiatives;
- Improvement in data and network systems, including security and redundancy

- Maintenance of a very low administrative overhead cost (e.g.10.7% (2024) of total operating costs).

And has done this while retaining in person local support to developers and permit recipients and

Maintained a very limited levy increase to municipalities over the last 8 years.

This demonstrates that cost effective and meaningful modernization can occur within the current watershed-based governance framework; and

**WHEREAS** the Board further recognizes that the Lower Thames Valley Conservation Authority serves Southwestern Ontario communities facing vastly different climatic, hydrological and infrastructure realities (e.g. large diking and pumped systems) based on the needs of vibrant rural and urban communities that are very different than the large urban communities found in the proposed regional conservation authority,

THEREFORE BE IT RESOLVED THAT:

The Board of Directors **does not** support the proposed “Lake Erie Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257; and

The Board instead endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government’s priorities of efficiency, red-tape reduction and timely housing delivery; and

The Board requests that the Ministry engage directly with affected municipalities and conservation authorities across Southwestern Ontario most specifically, the Lower Thames Valley municipalities before finalizing any consolidation boundaries or legislative amendments.

Sincerely,



Paul Tiessen

Lower Thames Valley Conservation Authority  
Board Chair



**Ganaraska Region  
Conservation Authority**

2216 County Road 28  
Port Hope, ON L1A 3V8

Phone: 905-885-8173  
Fax: 905-885-9824  
[www.grca.on.ca](http://www.grca.on.ca)

MEMBER OF  
CONSERVATION ONTARIO

November 28, 2025

**Proposed Regional Consolidation of Conservation Authorities, ERO Notice #025-1257  
Ganaraska Region Conservation Authority Resolution GRCA 51/25**

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On October 31, 2025, Minister Todd McCarthy, Minister of the Environment, Conservation and Parks (MECP), announced that the provincial government will introduce legislation to amend the *Conservation Authorities Act* to create a new provincial agency, the Ontario Provincial Conservation Agency (OPCA) under Bill 68. On November 27, 2025, Bill 68, *Plan to Protect Ontario Act* (Budget Measures), 2025 (No. 2) received Royal Assent.

Another key action announced at this time, by the Minister of the Environment, Conservation and Parks, together with the Chief Conservation Executive, is the proposal to consolidate the province's 36 conservation authorities into seven regional conservation authorities, while maintaining alignment with watershed boundaries. On Friday, November 7th, the MECP posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), the ERO posting remains open for public comment for a total of 45 days until December 22, 2025 at 11:59 p.m.

The proposed consolidation recommends Ganaraska Region Conservation Authority (GRCA) join with Central Lake Ontario, Kawartha Region, Otonabee Region, Lower Trent Region, Crowe Valley and Quinte Region Conservation Authorities forming the Eastern Lake Ontario Regional Conservation Authority (ELORCA). This regional conservation authority would include 48 municipalities across the proposed region. As well, the area covered by the ELORCA is 16 times the current jurisdiction of the GRCA and larger than the area covered by the island of Jamaica. The population included is more than the population of some Canadian Provinces.

At the November 27, 2025, Ganaraska Region Conservation Authority Board of Directors meeting, a staff report entitled "Bill 68, Schedule 3 Proposed Changes to the *Conservation Authorities Act* and Proposed Boundaries for Regional Consolidation of Ontario Conservation Authorities" which can be found at the following link, [https://qrca.on.ca/wp-content/uploads/2025/11/qrca\\_ca-act-amendments-as-per-bill-68-update.pdf](https://qrca.on.ca/wp-content/uploads/2025/11/qrca_ca-act-amendments-as-per-bill-68-update.pdf), was presented and the following resolution was received as written in the report:

**GRCA 50/25**

**MOVED BY:** Joan Stover

**SECONDED BY:** Miriam Mutton

**WHEREAS** the Ganaraska Region Conservation Authority Board of Directors acknowledges and supports the Province's goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology; and

**WHEREAS** consistent policies, and resources across the existing conservation authority boundaries could be achieved without structural consolidation through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario; and

**WHEREAS** conservation authorities are locally-based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. In the case of the GRCA, supported by its seven municipalities, this vision has proven a successful model for nearly 80 years; and

**WHEREAS** the GRCA, with the guidance and support of our seven member municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. GRCA has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through *GRCA's Conservation Land Strategy* and the *Watershed Based Resource Management Strategy*; and

**WHEREAS** GRCA consistently meets or exceeds provincial service standards, and participates in staff-sharing initiatives with neighbouring conservation authorities that already deliver many of the efficiencies the Province seeks; and

**WHEREAS** plans to regionalize conservation authorities through consolidation would dilute local accountability and municipal partnership and is contrary to the basic principle that decisions are best made closest to the communities they affect. Effective representation by municipal partners remains core to the success of conservation authorities. The GRCA, while not unique among conservation authorities in this respect, is effective in working with our community to support sustainable development, and keeping communities safe; and

**WHEREAS** being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, staff and Board are responsive and accountable to the

needs of the watershed community, while meeting or exceeding provincial service standards. The staff and Board are reachable through publicly available contact information. Local governance and direction combined with local service provision allows the GRCA to continue to be responsive to our community; and

**WHEREAS** consolidation will result in substantial transition costs, not the least of which is time. In all facets, that would divert resources from front-line service delivery and delay desired outcomes. Further, the loss of local watershed knowledge and community relationships will add greater uncertainty, loss of trust, and delay for our watershed residents. This includes the agricultural community, businesses, builders, developers, and our municipal partners that seek timely and effective local advice, which is provided through local pre-consultation; and

**WHEREAS** a proposed regional watershed would create a geographically vast and administratively complex organization when joining the seven conservation authorities as proposed in eastern Lake Ontario. This would be considerably worse if local offices do not remain available and accountable to its membership, partners and the communities they serve.

**THEREFORE BE IT RESOLVED:**

**THAT** the Ganaraska Region Conservation Authority Board of Directors does not support the proposed “Eastern Lake Ontario Regional Conservation Authority” boundary configuration as outlined in Environmental Registry Notice 025-1257; and

**FURTHER THAT** meaningful modernization can occur within the current watershed-based governance framework; and

**FURTHER THAT** the GRCA Board endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely home construction; and

**FURTHER THAT** the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Eastern Lake Ontario through a working group; and

**FURTHER THAT** the Board of Directors direct staff to make a submission to the Environmental Registry of Ontario consultations asking the Province to pause any consolidation until more consultation can take place; and

**FURTHER THAT** a letter from the Chair containing this resolution, be forwarded to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics; and
- the Ministry of the Environment, Conservation and Parks (CA Office); and
- Ontario's Chief Conservation Executive, Hassaan Basit; and

- Local Member of Provincial Parliament David Piccini, Northumberland – Peterborough South and
- All local watershed municipalities, all municipalities in Ontario, and Counties within GRCA's watershed.

**CARRIED UNANIMOUSLY.**

The GRCA encourages all partners to review the posting at the following link: <https://ero.ontario.ca/notice/025-1257>, and submit comments prior to the closing date of December 22, 2025.

For further information, please contact the undersigned at [info@grca.on.ca](mailto:info@grca.on.ca)

Yours sincerely,



Vicki Mink  
Chair, Ganaraska Region Conservation Authority

CC:

- the Minister of the Environment, Conservation and Parks and his Opposition critics; and
- the Ministry of the Environment, Conservation and Parks (CA Office); and
- Ontario's Chief Conservation Executive, Hassaan Basit; and
- Local Member of Provincial Parliament David Piccini, Northumberland – Peterborough South and
- All local watershed municipalities, all municipalities in Ontario, and Counties within GRCA's watershed.



**CATFISH CREEK CONSERVATION AUTHORITY**  
8079 Springwater Road, RR# 5, Aylmer, Ontario N5H 2R4  
PHONE: (519) 773-9037 • FAX: 519-765-1489  
e-mail: [admin@catfishcreek.ca](mailto:admin@catfishcreek.ca) • [www.catfishcreek.ca](http://www.catfishcreek.ca)

## **Re: Resolution (Bill 68 and ERO Posting 025-1257)**

On October 31, 2025, the Ministry of Environment, Conservation and Parks (MECP) released a media statement titled “Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities,” announcing the Province’s intention to establish a new, board-governed Ontario Provincial Conservation Agency “[Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities | Ontario Newsroom](#)”. This new agency is expected to provide leadership, governance, and strategic oversight to all Conservation Authorities (CAs) across Ontario. The announcement was made without prior consultation with Conservation Authorities—including the Catfish Creek Conservation Authority (CCCA)—or with the watershed experts, municipal partners, and staff who possess decades of local, on-the-ground knowledge. For a watershed the size of Catfish Creek, which relies heavily on close local partnerships, this absence of engagement raises significant concerns about transparency and informed decision-making.

Shortly after this announcement, on November 6, 2025, the government introduced Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2) “[Bill 68, Plan to Protect Ontario Act \(Budget Measures\), 2025 \(No. 2\) - Legislative Assembly of Ontario](#)”. The bill passed First Reading and is expected to move quickly through the Legislature, with enactment anticipated in early December 2025. Schedule 3 of Bill 68 proposes amendments to the Conservation Authorities Act to formally create the Ontario Provincial Conservation Agency, outlining its objects, governance structure, and funding model. For a smaller watershed authority like CCCA, these proposed changes represent substantial structural and operational shifts, the impacts of which have not yet been fully articulated by the Province.

On November 7, 2025, the MECP posted Environmental Registry of Ontario (ERO) posting #025-1257, Proposed boundaries for the regional consolidation of Ontario’s Conservation Authorities, with a public commenting period running to December 22, 2025 “[Proposed boundaries for the regional consolidation of Ontario’s conservation authorities | Environmental Registry of Ontario](#)”. This proposal reduces Ontario’s 36 Conservation Authorities to seven large regional entities. As a watershed-based agency, CCCA’s jurisdiction is defined by ecological and hydrological boundaries rather than municipal borders. The proposed regional map places Catfish Creek into an extremely large regional authority where watershed conditions, community needs, development pressures, and local priorities differ substantially from those of neighbouring watersheds. The geographic scale of this proposed region surpasses what is practical for meaningful representation of Catfish Creek’s specific watershed characteristics.

The consolidation proposal carries potentially significant implications for municipalities, residents, and partner organizations within the Catfish Creek watershed. No evidence-based analysis has been provided by the Province to justify the transition to such large regional entities, nor has a detailed rationale been offered for establishing a separate provincial oversight agency to replace functions historically carried out by a Ministry. The dissolution of 36 Conservation Authorities—including Catfish Creek—and the creation of shared provincial systems for finance, HR, IT, and administration would create substantial costs and added layers of complexity. Instead of streamlining service delivery, this approach may fragment existing networks and delay local decision-making.

The absence of meaningful consultation is especially concerning. If the Province intends to proceed transparently, then all existing Conservation Authorities, including Catfish Creek—should be fully engaged before legislation advances to Second and Third readings. At present, consultation is limited to the boundary-setting ERO posting. This leaves numerous critical questions unanswered. These include the funding model for the proposed Ontario Provincial Conservation Agency; the governance model for the new regional CAs and whether Catfish Creek’s municipalities will have adequate local representation; the feasibility of merging diverse watershed policies into a “one-size-fits-all” framework; and the risks associated with centralizing programs that are currently tailored to local watershed conditions, needs, and funding capacities.

Significant human-resource and organizational concerns also remain unresolved, including how staff redeployment will occur across large geographic distances; how charitable foundations that support individual conservation authorities will be affected; how dissolution may impact foundations’ status under the Income Tax Act; and how locally owned assets—such as conservation areas, infrastructure, and other capital holdings—will be transferred or managed under a regional model. For Catfish Creek, which manages a unique suite of natural areas and infrastructure on behalf of its partner municipalities, these uncertainties pose real operational risks.

Under the proposed regional structure, Catfish Creek would join an amalgamated entity encompassing numerous municipalities—far too many for any one watershed to maintain meaningful influence. This stands in contrast to CCCA’s current governance model, which ensures strong local representation and accountability to its participating municipalities. The proposed system risks creating an unwieldy regional board disconnected from the day-to-day realities of the Catfish Creek watershed, and it may dilute the ability of local municipal councils and residents to shape watershed priorities.

As the Province advances its consolidation plan, Catfish Creek Conservation Authority encourages the government to commit to full and meaningful consultation with municipalities regarding both the funding of the new Agency and the establishment of new regional conservation authorities. CCCA emphasizes the need to preserve a strong local voice accountable to watershed residents; maintain local expertise capable of delivering programming rooted in local conditions; retain accessible local offices;

provide clarity regarding the future of charitable foundations; and transparently disclose the anticipated costs of amalgamation. These measures are essential to safeguarding the long-standing, community-based watershed management model that has served the Catfish Creek region effectively for decades.

Attached to this correspondence is a resolution passed by the CCCA Board of Directors at a meeting held November 27, 2025.

Sincerely,



Morgaine Griffin  
Chairperson  
Catfish Creek Conservation Authority



Dusty Underhill  
General Manager/ Secretary Treasurer  
Catfish Creek Conservation Authority

**Attached:** CCCA Recommendation Resolution

**CC:** The Honourable Todd McCarthy, Minister of the Environment, Conservation and Parks  
Rob Flack, MPP (Elgin, Middlesex, London); Ernie Hardeman MPP (Oxford);  
Local Municipal Councils  
Chief Todd Cornelius, Oneida Nation  
Association of Municipalities of Ontario  
Conservation Ontario  
Conservation Authorities in Ontario  
Local environmental groups and other stakeholders

**Moved By: Paul Buchner**

**Seconded By: Arthur Oslach**

**WHEREAS** the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Ontario’s 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 Catfish Creek Conservation Authority (CCCA) would be merged into a new “Lake Erie Regional Conservation Authority” together with the:

- Lower Thames Valley CA
- St. Clair Region CA
- Upper Thames River CA
- Kettle Creek CA
- Essex Region CA
- Long Point Region CA
- Grand River CA

forming a single organization stretching from Windsor, Essex County and Pelee Island, through north of Waterloo region; and

**WHEREAS** the Board acknowledges and supports the Province’s goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed “Lake Erie Region” configuration would:

1. Create a geographically vast and administratively complex entity, joining northern, rural and fast-growing southern municipalities throughout the province with little shared watershed connection or economic alignment;
2. Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;

3. Generate substantial transition costs, including human-resources integration, governance restructuring, IT migration and policy harmonization, that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's own business-planning principles of value for money, cost containment and service continuity; and,
4. Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely local advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda; and

**WHEREAS** the CCCA has already undertaken significant modernization work aligned with provincial objectives, including:

- implementation of a digital permitting and inspection system that has reduced turnaround times;
- improvements in transparency and client communication;
- data and network systems, including security and redundancy
- numerous internal reviews to identify opportunities for cost savings and efficiencies
- conversion of redundant support and non-mandatory positions to front-line mandatory service positions
- demonstrating that meaningful modernization can occur within the current watershed-based governance framework; and

**WHEREAS** the Board further recognizes that the Catfish Creek Conservation Authority serves Southwestern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, which would be ill-served by a larger overarching administrative structure extending over 300 kilometers to townships north of the Kitchener-Waterloo Guelph area;

**THEREFORE BE IT RESOLVED THAT:**

The Board of Directors does not support the proposed "Lake Erie Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257; and

The Board instead endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative

that advances the government's priorities of efficiency, red-tape reduction and timely housing delivery; and

The Board requests that the Ministry engage directly with affected municipalities and conservation authorities across Southwestern Ontario most specifically, the municipalities within the Catfish Creek administrative area before finalizing any consolidation boundaries or legislative amendments; and

That this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:

the Minister of the Environment, Conservation and Parks and his Opposition critics;

- local Members of Provincial Parliament;
- local Municipal Councils
- the Association of Municipalities of Ontario and Conservation Ontario;
- local First Nations
- local environmental groups and other stakeholders, and
- all Conservation Authorities in Ontario

**CARRIED**

*Mission Statement: "To communicate and deliver resource management services and programs  
In order to achieve social and ecological harmony for the watershed"*



December 5, 2025

**SENT ELECTRONICALLY**

**RE: NPCA Position on the regional consolidation of Ontario's conservation authorities**

---

Please be advised that at the NPCA's Special Meeting held on December 5, 2025, the following resolution was passed:

**Resolution No. FA-131-2025**

Moved by: Stew Beattie

Seconded by: Brian Grant

**WHEREAS** the municipalities of the Niagara Peninsula watershed agreed to form the Niagara Peninsula Conservation Authority in 1959 under the *Conservation Authorities Act* to protect people, property, farmland and natural resources through watershed-based decision making informed by local science and knowledge, and municipal representation;

**AND WHEREAS** the Provincial Government has amended the *Conservation Authorities Act* through Bill 68 "Plan to Protect Ontario (Budget Measures)" that allows for establishing the Ontario Provincial Conservation Agency to oversee the transition to Regional Conservation Authorities, and direct the strategic direction, finances, and operational activities of the new Regional Conservation Authorities, imposing additional costs on municipalities to fund the Agency via fees levied on the new Regional Conservation Authority;

**AND WHEREAS** the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring;

**AND WHEREAS** under this proposal, the Niagara Peninsula Conservation Authority would be consolidated into a new "Western Lake Ontario Regional Conservation Authority" together with the Hamilton Conservation Authority, Halton Region Conservation Authority and Credit Valley Conservation, forming a single organization extending along the western Lake Ontario shoreline from Niagara through Halton and Peel, encompassing urban and rural watershed that support the Greater Toronto-Hamilton corridor;

**AND WHEREAS** the proposed "Western Lake Ontario Regional Conservation Authority" is to span approximately 4,900 square kilometres and serve 28 municipalities comprised of nearly 2 million people, thereby risking local representation and the delivery of locally-focused programs and services;

**AND WHEREAS** the participating municipalities lying within NPCA's jurisdiction fund approximately 52% of the annual operating budget of NPCA through municipal levies, compared to the annual provincial transfer payment of approximately 0.5%;

December 5, 2025

**SENT ELECTRONICALLY**

**AND WHEREAS** in September 2018, the Auditor General of Ontario published their report on the Special Audit of the Niagara Peninsula Conservation Authority, with 20 recommendations to the conservation authority and 4 recommendations to the Ministry of the Environment, Conservation and Parks to improve governance, operations, policies and processes to strengthen the delivery of programs and services, which have been fully implemented by Niagara Peninsula Conservation Authority, who is committed to continuous improvement;

**AND WHEREAS** NPCA has consistently met provincial permitting review standards 96% of the time;

**AND WHEREAS** watershed municipalities benefit from having conservation authority staff available locally that know our watersheds, municipal staff, communities, Indigenous community representatives, developers, consultants, and environmental non-government agencies;

**Now Therefore Be It Resolved:**

**THAT** the NPCA Board of Directors (“the Board”) does not support the proposed “Western Lake Ontario Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and

**AND THAT** the Board affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs.

**AND THAT** the Board further asserts that restructuring at this scale would erode local decision-making, weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management;

**AND THAT** the Board urges the Province to strengthen centralized standards, resources, and communication rather than undertaking broad structural amalgamation and to provide sustainable, predictable provincial funding across conservation authorities—particularly where gaps exist—to enable local conservation authorities to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years;

**AND THAT** the Board requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local First Nations before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation;



December 5, 2025  
**SENT ELECTRONICALLY**

3350 Merrittville Hwy. Unit 9  
Thorold Ontario L2V 4Y6  
905.788.3135 | info@npca.ca | npca.ca

**AND THAT** the Board believes that the Province’s proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation;

**AND THAT** this resolution be included as part of the Niagara Peninsula Conservation submission to the Environmental Registry of Ontario and forwarded to Niagara Region, the lower-tier municipalities within Niagara Region, City of Hamilton, Haldimand County, Mississaugas of the Credit First Nation, Six Nations of the Grand River, Niagara Peninsula Source Protection Committee, Association of Municipalities of Ontario (AMO), Conservation Ontario, local area MPPs, and all Conservation Authorities in Ontario.

**CARRIED**

A copy of the submission for NPCA Comments on ERO #025-1257 has been attached for your convenience.

Sincerely,

Melanie Davis  
Manager, Office of the CAO & Board  
Niagara Peninsula Conservation Authority

cc: Leilani Lee-Yates, Chief Administrative Officer/Secretary-Treasurer

December 5, 2025

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

Sent Via Email: [ca.office@ontario.ca](mailto:ca.office@ontario.ca)

**RE: Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities**

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Thank you for the opportunity to provide comments on the proposed boundaries and criteria for the regional consolidation of Ontario’s Conservation Authorities (CAs). On Nov. 27, 2025, Bill 68, *Plan to Protect Ontario Act (Budget Measures), 2025 (No.2)* received Royal Assent and the amendments to the *Conservation Authorities Act* allow for the establishment of the Ontario Provincial Conservation Agency (OPCA). It is our understanding the OPCA is intended to:

- Streamline and standardize service delivery by setting clear, province-wide performance standards;
- Support the consistent application of provincial standards for assessing, managing and mitigating flood risks across Ontario, including managing centralized data, updated floodplain mapping and overseeing improved maintenance of CA-managed infrastructure like dams, to manage flood and other natural hazards;
- Develop a single, digital permitting platform to provide a faster, more predictable approvals process and improved customer service, while maintaining high environmental standards;
- Develop clear performance goals of CAs to report on annually to support continuous improvements; and
- Oversee the implementation of a regional watershed-based consolidation of CAs, following consultation with the public, municipalities, and other partners including Indigenous communities.

Further, on November 7, 2025, the Province posted a policy proposal to consolidate Ontario’s 36 CAs into seven Regional Conservation Authorities (RCAs) on the Environmental Registry of Ontario (ERO) and is seeking feedback on proposed boundaries and the criteria applied to inform the proposed boundaries, with a deadline of December 22, 2025. The seven proposed RCAs are Lake Erie RCA, Huron-Superior RCA, Western Lake Ontario RCA, Central Lake Ontario RCA, Eastern Lake Ontario RCA, St. Lawrence RCA, and Northeastern Ontario RCA.

Under this proposal, NPCA would fall under the Western Lake Ontario RCA, along with Hamilton Conservation Authority (HCA), Conservation Halton (CH) and Credit Valley Conservation (CVC). The boundaries of the Western Lake Ontario RCA extend along the western Lake Ontario shoreline from Niagara through Halton and Peel, encompassing urban and rural watersheds that support the Greater Toronto-Hamilton corridor. The RCA is primarily based on the western portion of the Northern Lake Ontario and Niagara River Secondary Watershed.

The proposed Western Lake Ontario RCA would also include the Niagara Peninsula Source Protection Area, Halton-Hamilton Source Protection Region and Credit Valley Source Protection Area (which belongs to the Credit Valley – Toronto and Region – Central Lake Ontario Source Protection Region).

NPCA staff and Board of Directors appreciate the engagement sessions organized by Todd McCarthy, Minister of Environment, Conservation and Parks, Hassaan Basit, Chief Conservation Executive, and MECP staff to provide further information on the provincial proposal and role of OPCA. NPCA senior leadership has engaged with NPCA and municipal staff and reached out to Indigenous partners (Mississaugas of the Credit First Nation (MCFN), Six Nations of the Grand River, and Niagara Region Métis Council) to inform them of the provincial proposal and how we may continue to work together during any transition process. NPCA was circulated comments prepared by MCFN staff, dated Dec. 1, 2025, and we agree with and support their comments and concerns.

While we support the proposed provincial investments in technology, standardization and modernization, the proposed RCA framework would create complexities and risks to local municipal representation and decision-making, local expertise, and delivery of programs and services. Given the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the NPCA does not support the proposed RCA framework. Comments and concerns related to the proposal are highlighted below. Detailed responses to the questions included in the ERO posting are provided in Appendix I. NPCA Board of Directors Resolution FA-131-2025 is appended as Appendix II.

#### Justification for a Regional Conservation Authority Framework

While it is understood that OPCA and the proposed RCA framework are intended to help get shovels in the ground faster on building homes and other local infrastructure projects while strengthening the vital role CAs play in managing watersheds and protecting communities from floods and natural hazards, CAs have not benefited from reviewing any assessments or analyses that have determined the need to restructure Ontario's current CA framework. With the various amendments to the *Conservation Authorities Act* and the standardization of regulated areas and development permit requirements through *Ontario Regulation 41/24*, CAs have been responsive to implement legislative changes and improve policies and processes through a coordinated approach.

For the NPCA and stemming from the 2018 Auditor General of Ontario report of the NPCA, we have undertaken tremendous work over the last several years to improve our governance, operations, policies and processes to strengthen the delivery of programs and services. NPCA has implemented all 20 recommendations within the Auditor General report and is focused on continuous improvements through updating planning and permitting policies, updating corporate policies, developing new guiding strategies, enhancing procedures, and implementing other modernization initiatives, including investments in software and data management. We have set an example for how CAs can implement best management practices and we remain committed to improving the delivery of our programs and services for the health and well-being of our local watersheds and communities.

Currently, NPCA is meeting provincial government set timelines for issuing development permits 96% of the time and continues to coordinate with municipal partners and developers while taking a solutions-focused approach to improving service delivery. We have invested in a permit management system, CityView, and will soon launch an online portal for permit submissions and tracking. We have also been investing in creating new and updated floodplain mapping as well as maintaining our online regulation mapping and open data

portal. For NPCA, it would be more beneficial to have clearer goals and guidelines that are evidence-based to drive further modernization and streamlining than restructure the CA framework. With the current CA framework in place, OPCA could provide added value by coordinating future enhancements across the CAs.

### Governance of Regional Conservation Authorities

The proposed Western Lake Ontario RCA would cover approximately 490,000 ha of land and a population of nearly two million people. The new regional watershed-based boundaries would include portions of five upper-tier municipalities (Niagara, Halton, Peel, Dufferin and Wellington), three single-tier municipalities (Hamilton, Haldimand, and Toronto), and 25 lower-tier municipalities. Currently, the four governing Boards of Directors include a total of 53 members. While all four CAs offer similar watershed-based programs and services, they are scaled to unique local community needs and watershed management objectives.

The Niagara Peninsula watershed alone spans over 242,000 ha of land, includes 15 municipalities with approximately 480,000 residents. The watershed encompasses approximately 90 km of the Lake Erie shoreline, approximately 50 km of the Lake Ontario shoreline, the Niagara River, portions of the Niagara Escarpment, and the northernmost range of the Carolinian Life Zone. The Welland Canal supports cargo shipping between Lake Ontario and Lake Erie, bypassing the Niagara Escarpment and Niagara Falls.

There are nearly 5,000 km of watercourses in NPCA's watershed jurisdiction that are part of three major drainage basins: Lake Ontario, Lake Erie, and the Niagara River. Numerous streams, rivers, and creeks, such as Twelve Mile Creek and Twenty Mile Creek, flow into Lake Ontario, while the Welland River and other tributaries drain into the Niagara River, a critical waterway connecting the two Great Lakes. The Lake Erie basin includes the southern portion of the watershed, with its own network of smaller streams and wetlands. Together, these interconnected water systems form the hydrological foundation of NPCA's jurisdiction.

In general comparison to the three other CAs within the proposed Western Lake Ontario RCA, the NPCA has the largest watershed jurisdiction with the least number of staff, and smallest operating budget. In terms of land holdings, NPCA and CVC have a similar size of CA-owned lands, followed by CH and then HCA with the largest land holdings. With the two Great Lakes Shorelines, the NPCA jurisdiction represents the largest length of coastal shorelines and communities.

For the Western Lake Ontario RCA, going from the current combined oversight of 53 Board representatives to anything less will be challenging and risks losing diverse voices at the table. It is difficult to understand how the RCA Board would result in more efficient decision-making with less costs incurred by funding municipalities. Further, the functional separation from local communities risks the 70-80 years of relationships and trust that have been built up in each CA watershed.

### Consolidation of Assets and Liabilities

Each CA is an independent corporate entity that manages its own budgets, expenditures, reserves, infrastructure and landholdings. Further, each CA within the proposed Western Lake Ontario RCA has its own Foundation, which are also independent corporate entities with the focused mandates of raising funds for the projects and programs of their CAs.

As independent corporations, the four CAs within the Western Lake Ontario RCA have their own internal financial processes and systems, contracts with banking institutions for financial and investment services, and financial assets and liabilities (e.g. debt servicing). The process to consolidate assets and liabilities of the four CAs and their Foundations would be complex and lengthy. A cost-benefit analysis and legal review of such a merger should be completed before any consideration of implementing an RCA framework.

Amalgamating landownership and land management will be equally complex. Legal instruments such as land titles, surveys, easement agreements, etc. will need to be reviewed in detail, and the costs and legal implications assessed prior to any CA consolidation.

Further, CAs are actively increasing self-generated revenues through sources such as user-fees, plan review and permit fees, facility rentals, annual park passes, camping, and external grant funding to decrease reliance on municipal levies. Operating and Capital Budgets to deliver watershed programs and services are established based on the performance of self-generated revenues. Should the Provincial Government move forward with an RCA framework, any self-generated revenues, municipal levies and financial assets must be committed to the jurisdiction from which they were collected.

#### Costs to Regional Conservation Authorities and Municipalities

NPCA is concerned that the proposed RCA framework will result in increased costs incurred by the RCAs and their municipal funding partners. The OPCA funding model allows a provincial agency to charge back fees to RCAs for providing support services to implement agency directives and can cost apportion operating costs to RCAs. Before the OPCA is established, a cost-benefit analysis should be undertaken to demonstrate that there will be no increased costs incurred by CAs and their funding municipalities and specify the value-added services of the Agency.

Costs associated with consolidation would include without limitation, legal services, harmonizing HR systems and policies, harmonizing salaries and benefits, integrating IT and GIS services, harmonizing services and delivery processes, equipment and facility upgrades, communications and marketing, additional debt service to cover costs, and increased levies. While some costs would be one-time transition related costs, others will be ongoing costs to maintain operations and infrastructure of the larger corporation.

The participating municipalities within NPCA's jurisdiction (Niagara, Hamilton and Haldimand) fund approximately 52% of the annual operating budget of NPCA through municipal levies, compared to the annual s. 39 natural hazard provincial transfer payment of approximately 0.5%. The remaining revenues are obtained through self-generated program revenues (27%), federal grant funding (6.5%), provincially funded programs such as Drinking Water Source Protection Program and the Niagara River Remedial Action Plan (3%), and other sources through cost-sharing programs and fundraising efforts (11%). NPCA's increased self-generated revenue efforts has resulted in a decreased reliance on municipal contributions since 2021. NPCA's ability to generate additional revenues or increase dependence on municipal levies to cover costs incurred resulting from the transition to an RCA framework will be very limited and resources would be diverted away from front-line natural hazard and watershed management programs that support local communities.

As noted, we support and welcome renewed provincial investment in CAs to enhance process improvements, IT transformations and modernization efforts. It is recommended that the province immediately reassess the s. 39 natural hazard transfer payments to provide sustainable, predictable provincial funding across conservation

authorities—particularly where gaps exist—to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years.

### Risks to Delivery of Local Watershed Programs and Services

With the additional administrative oversight of the OPCA, RCA Boards representing larger and more diverse communities and potentially complex budgeting processes, there is a serious concern that our dedicated expert staff will be unable to deliver the same quality of programs and services that our communities expect. The NPCA recommends that the province pause any further implementation of OPCA and consideration of an RCA framework, and instead assess the use of legislative, regulatory and incentive tools that are already available to achieve the desired standardization and modernization of CAs.

Should the Province decide to move forward with the RCA framework, it will be imperative that existing staff complements be maintained, and RCAs can fill roles that will enable the continuation of current programs and services, to ensure continuity of front-line services without disruption, including commitments under agreements with our member municipalities. It is worth noting that the NPCA is a unionized work environment. The Collective Agreement between the NPCA and OPSEU Local 212 expires at the end of 2025 and bargaining is expected to begin in the Spring of 2026.

Thank you again for the opportunity to participate in discussions with the Minister, Chief Conservation Executive, and MECP staff and provide constructive input to ensure that any future framework continues to address the unique needs of our watersheds and achieves an effective balance between watershed protection and housing goals.

Should further amendments to the *Conservation Authorities Act* and related regulations to implement OPCA and the RCAs be proposed, we would welcome the opportunity to provide further comments related to policy reform.

Sincerely,



John Metcalfe  
Chair, NPCA Board of Directors



Leilani Lee-Yates, BES, MSPL.RPD, MCIP, RPP  
Chief Administrative Officer/Secretary-Treasurer

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

Theme	Comments
Preserve and Promote Local Institutional Knowledge	<p>A transitional framework that incorporates and promotes the involvement of CA front-line staff is essential to ensure localized expertise and input is built-in from the beginning. To maintain and enhance service delivery there must not be any job losses during and post-transition to an RCA framework.</p> <p>Position needs and skills may be specific in each CA based on the local watershed objectives, and as such, the mandate for the structure and/or design of roles must be maintained at the local CA level.</p>
Preserve Municipal Governance and Decision-Making	<p>Consolidation of CAs poses risks to local, grassroots initiatives, it is imperative that local presence is maintained and strengthened to keep our communities informed throughout transitional phases.</p> <p>To further preserve local decision-making, transparency and clear delineations of authority of the OPCA and RCAs need to be established and communicated effectively.</p>
Phasing Transitional Periods with a focus on Standardization before Amalgamations	<p>Many areas of focus proposed for the OPCA (i.e. province-wide permitting platform and digital innovations) are initiatives that could be established across conservation authorities under their current structures.</p> <p>Software and standard processes can be CA lead and be prioritized, followed by amalgamations with existing local CA Boards in place to oversee their own amalgamations.</p> <p>Preventing transformation saturation will ensure these priority initiatives are implemented efficiently and successfully.</p>
Consider alignment of Source Protection Boundaries	<p>Source Protection Regions were identified as a key factor in establishing proposed boundaries for regional conservation authorities.</p>

Theme	Comments
	<p>The proposed regional consolidation has the Niagara Peninsula Source Protection Authority merge with the Halton-Hamilton Source Protection Region and the Credit Valley Source Protection Area (which belongs to the Credit Valley – Toronto and Region – Central Lake Ontario Source Protection Region). The Niagara Peninsula is the only standalone Source Protection Authority included in the Western Lake Ontario RCA along with two Source Protection Regions.</p> <p>If the regional consolidation of the conservation authorities proceeds as proposed, there are several potential upcoming changes to the Source Protection Program as a result.</p> <p>Some of these potential changes could include:</p> <ul style="list-style-type: none"> <li>• Reduction of 19 Source Protection Regions/Areas down to 7 to match the proposed regional conservation authorities.</li> <li>• Subsequent reduction of 19 Source Protection Committees down to 7.</li> <li>• Restructuring of Source Protection Committees and their member allocations.</li> <li>• Consolidation of Source Protection Plans and Assessment Reports.</li> <li>• Source Protection Plan policy review and restructuring.</li> </ul> <p>Should the Province proceed with a RCA framework, it is recommended that the boundaries of the RCAs align with the boundaries of the 19 Source Protection Regions/Areas.</p>
Clear Communication and Collaboration on Transition Frameworks	Engaging appropriate staff from RCAs through targeted working groups would ensure subject matter experts co-develop components of transitions that relate to their work.

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

Theme	Comments
Provincial investments to enhance conservation authority operations while maintaining recognition of unique watershed characteristics / challenges	There are opportunities to enhance conservation authority operations with consistent policies and procedures while maintaining recognition for the diversity of landscapes across Ontario. However, enhancements can be coordinated through the OPCA under the current CA framework.
Investing in and empowering CA strengths through a standardized framework.	<p>Ensuring CAs have access to similar expertise and resources across Ontario is welcomed, but priority should be given to implementing changes where CAs have identified demonstrable need.</p> <p>Given that CAs currently meet Provincial Government legislated permit review timelines 90% or more of the time, the proposed changes would likely result in diminishing returns for the taxpayer. The benefits, therefore, would come from avoiding the many risks of moving quickly without evidence of needed changes and real measurements.</p>
A provincially sponsored integrated watershed management program	Provincial guidance and sponsorship of the next generation of integrated watershed management programs is welcomed to support economic and environmental resilience across Ontario, and conservation authorities are uniquely positioned to deliver these programs alongside their natural hazard mandate. There is an opportunity to reduce long-term costs by preventing flood damage, erosion, and infrastructure failures while protecting property values by maintaining healthy watersheds and greenspaces that attract growth in the community. It remains unclear how an RCA framework would be more beneficial than coordinating integrated watershed programs through the OPCA under the current CA framework.

**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?**

Theme	Comments
<p>Ensure Board composition of RCAs accounts for the vast complexities and size of jurisdictions</p>	<p>Current governance structures rely on population and property value-based approaches to determine municipal representation on Boards that would not capture the needs of the larger RCA watershed. This would result in the largest municipal jurisdictions having disproportionately low rates of representation.</p> <p>Under the proposed RCA structure, it is imperative that governance models reflect the size of jurisdictions served to ensure that all urban and rural areas are appropriately represented on the Board.</p> <p>A “one-size fits all” approach may not work. It is recommended that the OPCA consult with the municipalities within each RCA to determine the best formula/methodology for ensuring local representation balanced with ensuring efficiency of the Board.</p> <p>A set of core competencies should be developed to ensure RCA Board members have the desired experience and expertise to make local decisions related to CA mandates and responsibilities. Further, the Ministry or OPCA should provide a Board orientation and training session for each term of service.</p>
<p>Municipal appointments must be maintained</p>	<p>Participating municipalities provide substantial levy support to conservation authorities and should maintain their autonomy to appoint their allotted number of board members. In addition to elected official appointments, citizen and Indigenous community representation should be included.</p> <p>With changes to the <i>Planning Act</i> regarding removal of planning responsibilities from upper-tier municipalities there is an opportunity to explore how to best align RCA governance with local municipal planning responsibilities.</p>

Appendix I – Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257

Theme	Comments
<p>Consider transitional supports for newly established RCA Boards</p>	<p>If RCA Boards are enacted after the 2026 municipal election, new Board members will be facing a plethora of information as they join a Board for brand-new institutions.</p> <p>The Province should explore establishing transitional supports to ensure newly established RCA Boards have institutional knowledge readily available for a pre-determined transitional period.</p> <p>This could include: extending current board terms for 2 years to support the RCA, appointing staff and/or Indigenous representatives</p>
<p>Maintain local watershed offices with independent delegated authority to serve local communities</p>	<p>The current CA offices should remain as local watershed offices with delegated responsibilities from the RCA Boards to ensure the continuous delivery of local programs and services, such as permit approvals, procurement and contract approvals, recruitment and management of staff, executing agreements and binding the authority, and preparing operating and capital budgets.</p> <p>Senior leadership of local offices could coordinate across the RCA through staff committees and report to the RCA Board or Committees, such as an Executive Committee, Governance Committee, or Finance Committee.</p> <p>The option to form public advisory committees or ad-hoc committee at the local level should remain.</p> <p>Equally important to maintain are the current local CA Foundations and their Boards who connect with donors and the community to raise funds to directly support the work of CAs. Foundations are a key source of revenue for non-mandatory programs and services, and have built community trust and confidence over several decades. Foundations must continue to operate without disruption.</p>

**Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?**

Theme	Comments
<p>Prioritize Municipal Engagement in Budget Development</p>	<p>A transparent and consultative budgeting process should clearly outline the scope of services and timelines for delivery, with measurable outcomes that are co-developed to meet the unique needs of participating municipalities.</p> <p>Maintain meaningful local representation directly in the budget process so that each local CA has clear input and influence, and local priorities drive levy discussions.</p> <p>Respecting local special levies/funding and municipal service agreements so that locally funded initiatives—such as land acquisition, land management, trail maintenance, restoration projects, or capital works—remain under local control and cannot be redirected without municipal consent.</p> <p>Using a clear, standardized regional budget framework in which each local CA develops its own budget in alignment with local municipalities, and these are then consolidated at the regional level for transparency and oversight.</p>
<p>Consolidation-related Costs must be funded by the province.</p>	<p>NPCA has made significant investments in software, systems and process improvements in recent years. It would be unreasonable for municipal partners to shoulder the cost of Agency-directed initiatives without involvement in the decision-making process.</p> <p>It is recommended that the OPCA fully fund the transitional costs and not download those costs to the municipalities who fund CAs. Costs related to lost opportunity and investments made by CAs should be accounted for and supported by the OPCA. Further, it is recommended that there is an annual audit of OPCA performed, versus the initial 3-year reporting schedule.</p>

Appendix I – Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257

Theme	Comments
<p>Funds generated by watershed jurisdictions must be retained in their communities</p>	<p>Participating municipalities need to be consulted on any changes and remain confident that the apportionment model is sustainable and equitable.</p> <p>Any self-generated revenues and financial assets rolled into newly established RCAs must be committed to the jurisdiction they were collected from.</p> <p>Ensuring full disclosure and due diligence on assets, liabilities, capital obligations/asset management for all local CAs before any apportionment or levy model is adopted.</p>

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

Theme	Comments
<p>Proactive engagement and awareness initiatives is critical to mitigate risks of disconnection with communities</p>	<p>Locally relevant communications and brand identities are at risk of being lost; communication must be consistent and proactive to ensure interested parties stay informed.</p> <p>There are concerns that RCAs would erode long-standing working relationships that have enabled the collaborative, grassroots approach that underpins NPCAs programs and services.</p> <p>A very cautious implementation process that engages with local communities and interested parties would reduce risk and disruption of programs and services.</p>
<p>Co-development of Transitional Period Phases</p>	<p>Implementation of the transition to RCAs will require a resource shift to focus on consolidating organizational structures, municipal relationships, financial systems, software, and internal processes, pulling resources away from providing programs and services to the communities CAs serve.</p> <p>Co-developing these transition periods will enable CAs and participating municipalities to determine what priorities would best serve their communities now, and how they will get there.</p> <p>It is recommended that the current Board structures for each local CA office remains as is and the amalgamation of Boards is formulated and lead by the local Board representatives. This would provide a sufficient transition period at which time the new RCA Boards would take effect after the 2030 municipal elections. This would mitigate operational disruptions and build trust and confidence in the new governance model.</p>
<p>Ensure responsive representation and accessible staff remain in the communities they serve</p>	<p>Local offices, staff, and programs are essential for timely permitting, service delivery, and effective stewardship. Delivering on community needs is at risk without a known local presence.</p>

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**To: UTRCA Board of Directors**  
**From: Tracy Annett**  
**Date: December 16, 2025**  
**File Number: BoD-12-25-85**  
**Agenda #: 6.1**  
**Subject: UTRCA Strategic Plan 2025-2030**

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## **Recommendation**

That the Board of Directors approve the Upper Thames River Conservation Authority's 2025-2030 Strategic Plan.

## **Background**

Reports on the development of the Strategic Plan were provided to the Board of Directors in May and August 2025. Following the presentation of the Draft Strategic Plan at the August Board meeting, staff incorporated the Board's feedback and updated the plan. Most revisions focused on simplifying the language to support broader understanding and ensuring both urban and rural perspectives are clearly reflected, particularly in recognition of the significant agricultural areas within the watershed.

The UTRCA Strategic Plan 2025–2030 advances key initiatives aimed at strengthening the organization during a period of significant change, while complementing provincial objectives to streamline approvals, free up resources for front-line service delivery, protect communities, and better align the work of conservation authorities with provincial priorities.

Staff are now focused on refining key actions to support implementation of the plan and have initiated work to identify performance indicators to measure and report on progress.

## **Discussion**

The UTRCA prioritized engaging staff, Board members, and the watershed community throughout the development of this Strategic Plan. The Draft Strategic Plan reflects the diverse perspectives and feedback gathered during this process, ensuring alignment with the priorities identified by the upper Thames River watershed community.

The Strategic Plan is designed to support long-term growth and innovation beyond 2030. It helps the UTRCA remain adaptable and responsive to the evolving needs of our communities and watershed.

In addition, the Strategic Plan complements Ministry objectives, which emphasize that:  
“... conservation authorities will continue to focus on managing natural hazards and watershed health, drawing on decades of local knowledge and partnerships. With better tools and more resources for front-line staff, regional conservation authorities will operate with greater consistency and transparency, deliver faster

services to municipalities and permit applicants, while ensuring decisions continue to be based on sound science.”

The Strategic Plan priority, goal, and objectives focused on Organizational Excellence align strongly with the Ministry’s objectives. Additional examples of alignment include enhanced asset management planning, modernizing digital tools, and strengthening internal systems to support transparency and efficiency. The plan also identifies opportunities for improved tools and increased resources to help achieve the Strategic Plan objectives and ensure the organization is well-positioned to meet future needs.

### **Draft Operational Plan**

Alongside the Strategic Plan, this report includes a summary chart to show work underway to “operationalize” the plan. This Draft Operational Plan outlines the actions that will occur under each priority over the next five years. Some projects will span multiple years, while others will be completed annually. The Draft Operational Plan lists each goal and objective from the Strategic Plan, along with corresponding draft actions and performance indicators. Staff are continuing to refine these actions and are working to identify performance indicators to support implementation, measure progress, and enhance reporting. The Board’s feedback on these key actions is welcomed.

The intention is to align actions with existing programs and budgets and then integrate the Strategic Plan into the annual planning process.

### **Summary**

The UTRCA’s Strategic Plan 2025-2030 reflects the priorities of the upper Thames River watershed as identified through extensive interest-holder engagement and input. The objectives and key actions align with the recommendations of the UTRCA’s Watershed Strategy and Lands Strategy, as well as with input from staff, while complementing the goals of the Ministry of Environment, Conservation, and Parks. Annual workplans will integrate the intentions of the Strategic Plan and allow staffing, resources, and funding to be adjusted to align with emerging opportunities.

### **Recommended by:**

Tracy Annett, General Manager

Teresa Hollingsworth, Manager of Community and Corporate Services

### **Attachments:**

Upper Thames River Conservation Authority Strategic Plan 2025-2030 (Draft 11, November 2025)

UTRCA Draft Operational Plan

# Strategic Plan

## 2025-2030

Draft 11, November 2025



# Upper Thames River Conservation Authority Strategic Plan, 2025-2030

(Draft 11, November 2025)

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## The Watershed and Traditional Territory

We acknowledge that the Upper Thames River watershed is within the traditional territory of the Attawandaron, Anishinaabeg, Haudenosaunee, and Lunaapeewak peoples, who have deep, longstanding, and intrinsic relationships to the land, water, plants, and animals of southwestern Ontario.

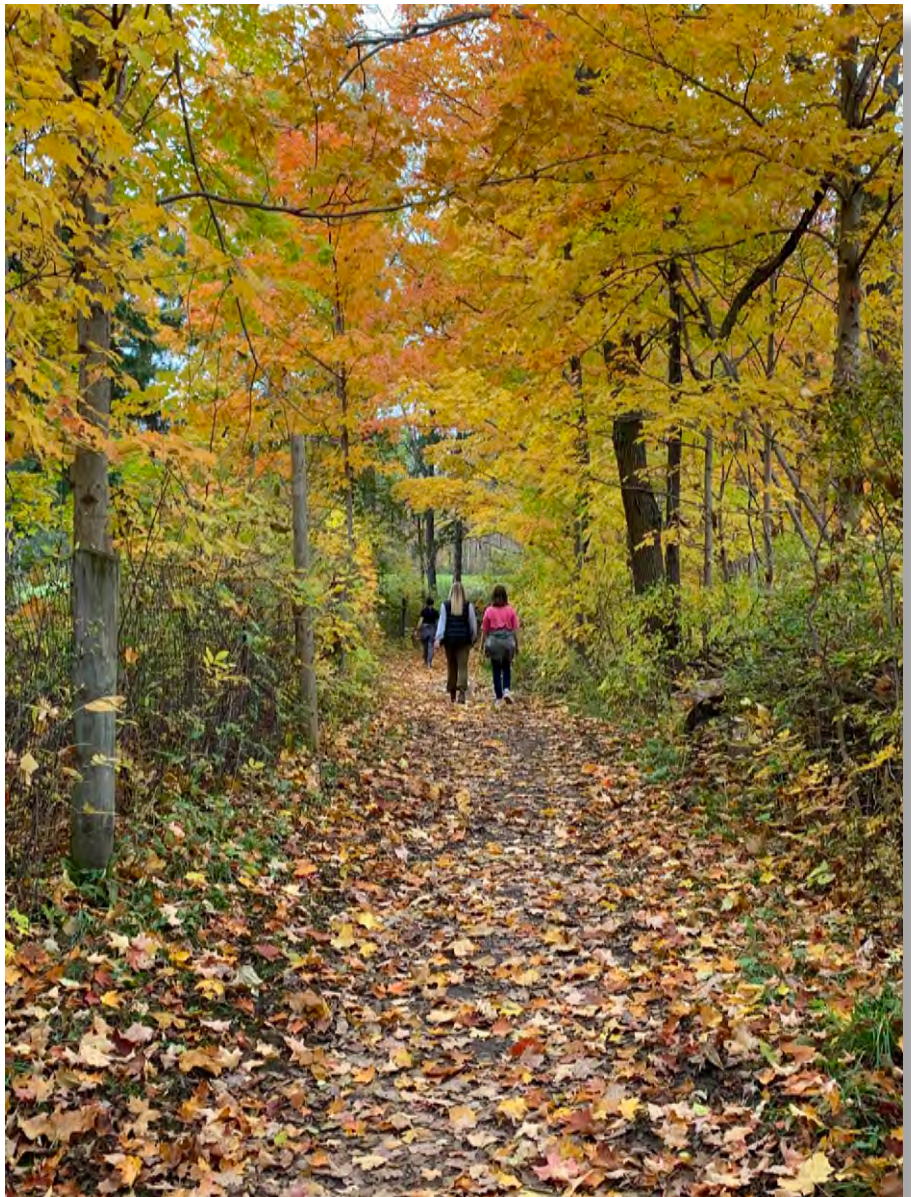
We acknowledge the First Nation communities within the Thames River watershed who are connected to and by the Thames River. These nations include Chippewas of the Thames First Nation, Oneida Nation of the Thames, Munsee Delaware Nation, and Delaware Nation at Moraviantown. In the region, there are 11 First Nation communities and a growing and diverse Indigenous urban population.

We acknowledge and respect local and regional First Nations as original, contemporary, and future caretakers of this watershed, and we are committed to working alongside Indigenous peoples from across the region and Turtle Island to strengthen relationships, honour treaty rights, and improve watershed health.

## Acknowledgements

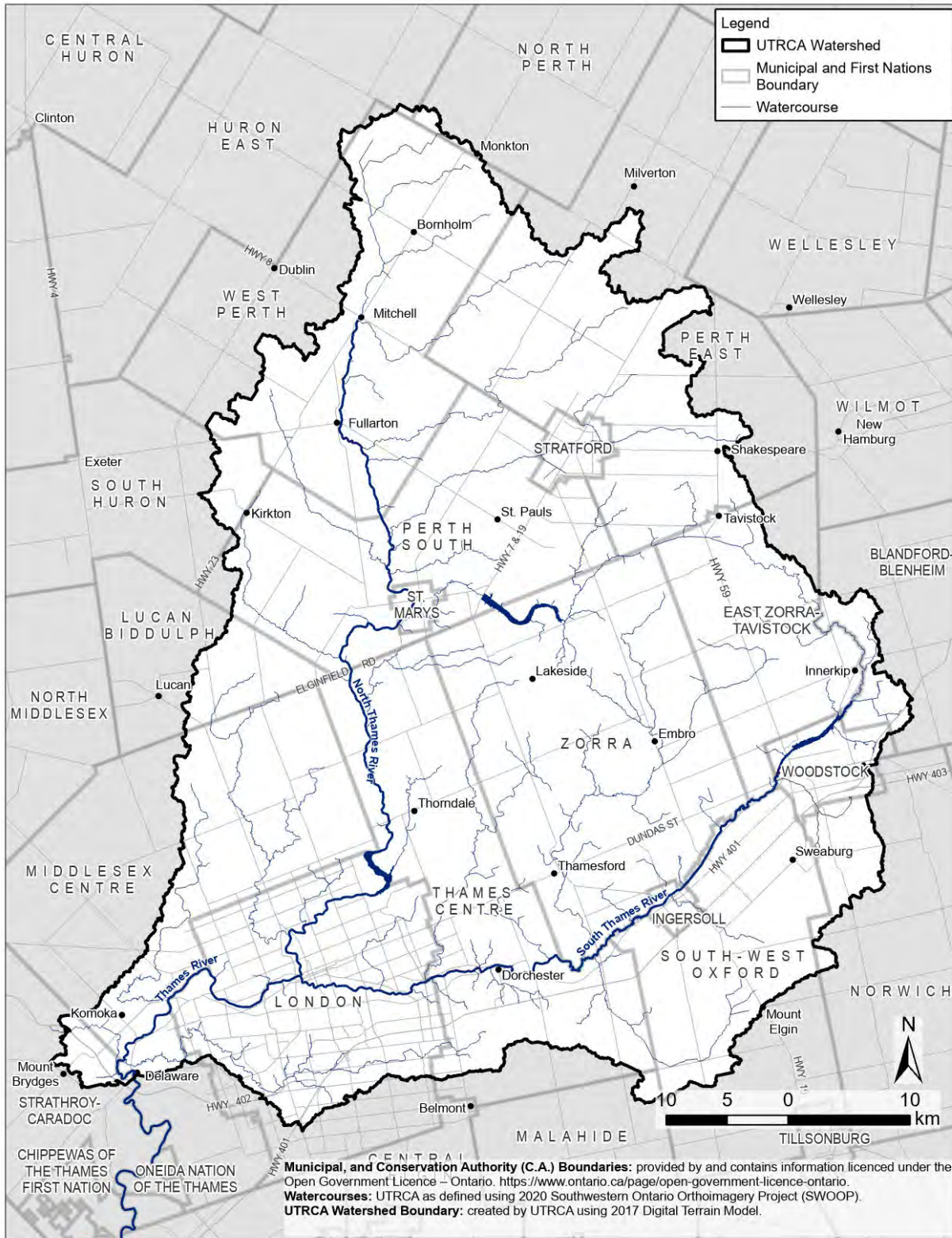
Strategic planning is both a reflection of where we are and a vision of where we are going. The Upper Thames River Conservation Authority's (UTRCA) new plan is the result of a collaborative process enriched by those who live, work, and steward this watershed.

We extend our sincere thanks to all who participated – municipal partners, partner organizations, non-governmental organizations, community members, land development groups, other conservation authorities, school boards, and, of course, UTRCA employees, managers, and Board members past and present. We appreciate that you shared your experiences and perspectives. Together, you have helped chart a grounded and forward-focused course for UTRCA's future built on our shared vision for the local environment.



# About the UTRCA

The Upper Thames River Conservation Authority (UTRCA) is a community-based environmental organization dedicated to achieving a healthy, resilient environment on behalf of the 17 municipalities in the Upper Thames River watershed (see map). A watershed is an area of land where all of the water drains into the same body of water, such as a stream, creek, river, or lake. Our area of jurisdiction covers 3,430 square kilometres in southwestern Ontario and is home to approximately 600,000 people in a high-growth area of the province.



# Watershed Management: An Integrated Approach

Ontario's 36 conservation authorities are governed by the *Conservation Authorities Act*, which is administered by the Ministry of Environment, Conservation and Parks (MECP). The purpose of the Act is "to provide for the organization and delivery of programs and services that further the conservation, restoration, development and management of natural resources in watersheds in Ontario" (*Conservation Authorities Act*, R.S.O. 1990, c. C.27). The Act was originally enacted in 1946, as conservation authorities began to be established, but has undergone amendments since then.

Since its inception in 1947, the UTRCA has continued to provide developed a wide range of programs and services to support local environmental needs, legislative requirements, and municipal and public demands for service. The key areas of focus include:

- **Flood Forecasting, Warning, and Protection** - Monitoring and mitigating flood risks to safeguard communities and infrastructure.
- **Drinking Water Source Protection** - Ensuring the long-term safety and sustainability of local drinking water supplies.
- **Watershed Health, Science, and Monitoring** - Recommending and implementing science-based actions to maintain and improve watershed health.
- **Natural Areas and Recreation** - Preserving green spaces and promoting public access to nature for recreation and well-being.
- **Landowner Stewardship and Grants** - Supporting landowners with resources and funding to enhance environmental practices.
- **Environmental Education and Community Engagement** - Fostering awareness and participation through educational programs and public involvement initiatives.
- **Planning Review, Permitting, and Mapping for Safe Development** - Reviewing planning applications, issuing permits, and producing maps to guide and facilitate development that is safe, sustainable, and environmentally responsible.



These programs and services fall within three categories, consistent with Section 21 of the *Conservation Authorities Act* and as required by the Mandatory Programs and Services Regulation (Ontario Regulation 686/21):

- **Category 1** - Mandatory programs and services defined in regulation that may be funded with municipal levy.
- **Category 2** - Programs and services delivered at the request of a municipality, with funding secured through an agreement with the requesting municipality.
- **Category 3** - Other programs and services that the UTRCA determines are advisable to implement within our watershed jurisdiction. These programs and services are funded through cost apportionment agreements with participating municipalities and self-generated funding sources such as user fees, government and other agency grants, donations, etc.

## Current Operating Environment

The UTRCA's new Strategic Plan considers the environmental needs of the watershed and the priorities of communities and interest holders, while complying with legislative requirements and restrictions. It also addresses a range of complex and often conflicting influences shaping the organization's current operating environment, including:

- Ongoing and frequent changes in the legislation that governs conservation authorities.
- Funding uncertainties and limitations.
- Provincial downloading onto municipal governments, intensifying pressure on local budgets.
- Population growth, urban development, and the housing crisis.
- Economic instability and geopolitical uncertainty.
- Increasing impacts of a changing climate and extreme weather on the environment, communities, and natural hazard management.
- Growing demands on UTRCA-owned lands and evolving expectations for how they are managed.
- Changing demographics, especially in urban areas, and the need to increase inclusion, diversity, equity, and accessibility.
- The need to respond meaningfully to the Calls to Action from the Truth and Reconciliation Commission.
- The transformative influence of social media and artificial intelligence on how people access information, form opinions, and make decisions.





## **Strategic Planning: Grounded in Purpose, Guided by Strategy**

The UTRCA's work takes place within complex and ever-evolving environmental, social, and policy landscapes. To remain effective, forward-thinking, and responsive to change, the Authority has invested in strategic planning to guide the organization's efforts.

The strategic plan begins at the headwaters of who the UTRCA is - vision, mission, and values. These foundational elements shape the direction and flow of the work. As the plan progresses downstream, it defines clear priorities, goals, and actions that align programs, partnerships, and resources with meaningful impact.

By bridging the UTRCA's organizational roots with its aspirations for the future, this plan ensures next steps are grounded in purpose. It empowers the UTRCA to act collaboratively and effectively, while remaining flexible and responsive to emerging community and watershed needs.

## Vision, Mission, and Values

Vision, mission, and values form the foundation of an organization, providing it with clarity, purpose, and direction.

- The vision outlines the organization’s long-term aspiration—what it ultimately seeks to achieve,
- The mission defines its core purpose and the work it does to bring its vision to life, and
- The values express the guiding principles and beliefs that shape its decisions, culture, and behaviour.

Together, they align the team, inform strategic priorities, and build trust with partners and the public by clearly communicating what the UTRCA stands for and where it is headed.



- **Vision:** Communities engaged in a healthy, resilient environment.
- **Mission:** To conserve and protect the watershed through science, education, policy, action, and experiences in nature.
- **Values:**
  - **Leadership** - We model and encourage sustainable, innovative stewardship of the watershed.
  - **Collaboration** - We partner to protect and promote a healthy environment and resilient communities.
  - **Integrity** - We act with transparency and accountability and root our work in science.

## Strategic Priorities

The UTRCA's new strategic priorities are based on extensive input from our partners and interest-holders, and reflect the evolving needs of the watershed and its communities. As environmental challenges grow more complex, it is essential to focus our efforts where they can make the greatest difference. Together, these four new strategic priorities represent our collective vision in action, ensuring our efforts remain focused, collaborative, and responsive as we conserve, protect, and steward the natural systems that sustain the region.





## **Priority: Environmental Health**

**Goal:** To build a thriving, healthy ecosystem by gathering and utilizing knowledge of the natural environment to guide the UTRCA's work and inspire action.

### **How we will pursue this goal:**

- Strengthen environmental monitoring, data collection, and other ways of knowing to inform decision-making and action.
- Improve access to and understanding of environmental information through communication and education.
- Enable rural and urban stewardship by informing and supporting actions that protect and improve watershed health.
- Protect the watershed's ecological integrity by building connected natural systems and enhancing the UTRCA's network of lands.



## Priority: Watershed Resilience

**Goal:** To enhance the watershed's resilience and the ability of urban and rural communities to adapt to a changing environment.

### How we will pursue this goal:

- Build watershed resilience by taking action that supports both the environment and local communities in the long term.
- Proactively identify and manage natural hazards to protect people, property, and ecosystems while supporting safe development.
- Identify and manage threats to municipal drinking water sources.
- Model sustainability and resilience on the UTRCA's lands.



## Priority: Engagement and Collaboration

**Goal:** To strengthen relationships with watershed interest-holders and enhance environmental knowledge and understanding to inspire action on shared goals.

### How we will pursue this goal:

- Deepen relationships and improve communication with municipalities, Indigenous communities, the agricultural community, partners, newcomers, and other watershed residents.
- Enable local environmental action and volunteerism by facilitating community-led efforts and sharing expertise.
- Provide environmental education, including hands-on, outdoor experiences, to foster a conservation ethic in young people.
- Connect people with nature and green space to promote environmental awareness, education, appreciation, and action.



## Priority: Organizational Excellence

**Goal:** To be a creative, adaptable, and trusted Conservation Authority.

### How we will pursue this goal:

- Practice good governance through transparent decision-making, effective communications, and accountable results.
- Ensure long-term financial sustainability through sound fiscal practice, asset management, and diversified funding.
- Attract, develop, and support passionate, skilled employees in an inclusive, diverse, and collaborative workplace.
- Deliver high quality service and client-centred engagement.
- Strengthen communication and transparency in regulatory decisions to support a more responsive process for municipalities, developers, and watershed residents.
- Modernize digital tools to improve efficiency and make information and services easier to access for staff and the public.

## Developing the Strategic Plan

Developing a strategic plan that reflects the priorities, values, and realities of the Upper Thames River watershed requires listening, discernment, thoughtful planning, and wide engagement. From the outset, the UTRCA committed to a robust, transparent, and collaborative approach to strategic planning. The goal was to ensure that the voices of those connected to the watershed—including staff, municipalities, Board members, partners and interest-holders, and members of the public—were meaningfully reflected as we discerned the organization’s future direction.

The process unfolded over two phases—internal engagement and external engagement—and was structured to build understanding, foster consensus, and translate insights into strategic direction. More than 200 people provided input through focus groups, interviews, and online surveys. Participants included internal teams—employees, managers, and current and former members of the Board of Directors—as well as external interest-holders such as municipal partners, non-governmental organizations, partner agencies and organizations, school boards, land development representatives, conservation authority colleagues, and community members.

It should be noted that formal engagement efforts did not specifically include Indigenous communities as the UTRCA recognizes the importance of first developing a comprehensive Indigenous engagement strategy. The UTRCA is working with Indigenous consultants to undertake sensitivity training for staff and Board members, to be followed by the development of a respectful engagement strategy. In the meantime, informal discussions are ongoing through established partnerships and relationships with Indigenous communities and individuals, including through the Shared Waters Approach initiative.

The strategic planning process began in Fall 2024 with an internal analysis of the UTRCA’s operating environment, strengths, and areas for improvement. This phase included focus groups and surveys with staff, management, and the Board of Directors. It culminated with a planning workshop where Board members and the leadership team refreshed vision, mission, and values statements. These foundational elements were formally approved by the Board in December 2024.

Spring 2025 focused on external engagement. Through interviews and surveys, we gathered feedback from interest-holders across the watershed on UTRCA’s performance, opportunities for growth, and aspirations for the future. This listening phase brought forth new data for managers and program supervisors to examine as they met to determine the UTRCA’s strategic priorities and goals. The data and analysis affirmed that fostering environmental health, enhancing watershed resilience, strengthening collaboration and engagement, and encouraging organizational excellence are vital to our continued success.

Now, with Board approval of the new Strategic Plan, the UTRCA is shifting to implementation. Our strategic priorities and goals align with our legislative requirements, mandate, vision, mission, values, and capacity. They also align with the UTRCA’s Watershed Strategy (2024) as well as the Conservation Areas and Lands Strategy (2024). Strong operational plans will be developed, incorporating the work undertaken as part of these strategies. The plans will define specific activities, timelines, leaders, and success measures, ensuring we remain focused, agile, and accountable in supporting a healthy, resilient watershed for all.



**UPPER THAMES RIVER**  
CONSERVATION AUTHORITY

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## UTRCA Draft Operational Plan

### Priority: Environmental Health

**Goal:** To build a thriving, healthy ecosystem by gathering and utilizing knowledge of the natural environment to guide the UTRCA’s work and inspire action.

Objective	Operational Actions	Performance Indicator
Strengthen environmental monitoring, data collection, and other ways of knowing to inform decision-making and action.	<ul style="list-style-type: none"> <li>Assess existing monitoring infrastructure and methods to identify gaps and support enhancements in watershed health monitoring.</li> <li>Improve access to centralized data.</li> <li>Partner with Indigenous communities for knowledge sharing.</li> <li>Create and expand community and citizen science programs.</li> </ul>	Complete a Watershed Monitoring Strategy.
Improve access to and understanding of environmental information through communication and education.	<ul style="list-style-type: none"> <li>Provide and expand educational content for schools, community groups, and other interest-holders.</li> <li>Facilitate and partner with community groups, watershed residents, and landowners.</li> <li>Improve and expand access to Watershed Report Card data by creating a digital dashboard, updated annually, and sharing trends every five years. *</li> </ul>	Develop an Outreach, Education, and Stewardship Strategy and implement recommendations.
Enable rural and urban stewardship by informing and supporting actions that protect and improve watershed health.	<ul style="list-style-type: none"> <li>Integrate watershed planning information (e.g., GIS, water quality, biological data) to proactively target restoration efforts.</li> <li>Develop subwatershed plans that consider both environmental needs and cultural values. *</li> <li>Expand existing stewardship programs to include diverse watershed health perspectives and environmental parameters.</li> <li>Provide technical expertise that supports action by local landowners.</li> <li>Facilitate projects with local interest-holders and watershed schools.</li> </ul>	Develop an Outreach, Education, and Stewardship Strategy and implement recommendations.
Protect the watershed's ecological integrity by building connected natural systems and enhancing the UTRCA's network of lands.	<ul style="list-style-type: none"> <li>Facilitate and partner with community groups, watershed residents, and landowners to enhance and restore natural features and linkages.**</li> <li>Identify priority areas for land acquisition and restoration.**</li> <li>Incorporate natural assets and green infrastructure into UTRCA's asset management plan.**</li> <li>Expand metrics and reporting for monitoring watershed health and natural features (e.g., forest health, disease, invasives, etc.).</li> </ul>	Develop a Natural Heritage Strategy that identifies priority areas and linkages to retain, create, and enhance natural systems.

Note: Progress will be measured by the completion of the Strategy and reporting on progress of recommended actions undertaken.

\* Actions implement recommendations of the UTRCA Watershed Strategy.

\*\* Actions implement recommendations of the UTRCA Conservation Areas and Lands Strategy.

\*\*\* Actions implement recommendations of the Planning Service Delivery Review (Blackline report).

## Priority: Watershed Resilience

**Goal:** To enhance the watershed's resilience and the ability of urban and rural communities to adapt to a changing environment.

Objective	Operational Actions	Performance Indicator
Build watershed resilience by taking action that supports both the environment and local communities in the long term.	<ul style="list-style-type: none"> <li>• Implement green infrastructure projects to support environmental and community resilience.</li> <li>• Provide and expand programs that educate watershed residents on climate change adaptation and build community resilience.</li> <li>• Support research and monitoring to inform adaptation actions to build climate change resilience.</li> <li>• Demonstrate climate adaptation practices on UTRCA lands.**</li> <li>• Advocate for the inclusion of planning and development policies for mitigating the impacts of a changing climate relating to natural hazards within Official Plans and Comprehensive Zoning By-laws.</li> </ul>	Develop a Climate Change Adaptation and Mitigation Strategy/ Watershed Resilience Strategy and implement recommendations.
Proactively identify and manage risks related to natural hazards to protect people, property, and ecosystems while supporting safe development.	<ul style="list-style-type: none"> <li>• Continue to implement flood forecasting and warning and dam operations to minimize risk.</li> <li>• Improve flood forecasting and monitoring network's data accessibility, reliability, quality control, and hardware.</li> <li>• Ensure hazard mapping is up to date; complete necessary modelling / technical studies to better understand risk.</li> <li>• Implement planning and regulations policies to protect people and property from hazards.</li> </ul>	Develop a Hazard Management Strategy that integrates the Natural Hazard Asset Management Plan, Operation Plans for the Water and Erosion Control Structures, Flood Contingency Plan, flood forecasting and warning, and regulation map updates, with a timeline to ensure information is kept up to date and assets remain in good repair.
Identify and manage threats to municipal drinking water sources.	<ul style="list-style-type: none"> <li>• Update Assessment Reports for the Thames and Sydenham Region.</li> <li>• Continually improve Thames and Sydenham Source Protection Policies.</li> <li>• Implement risk management services for partners in the Thames and Sydenham Source Protection Region.</li> </ul>	Update and implement the Thames and Sydenham Source Protection Plan.
Model sustainability and resilience on the UTRCA's lands.**	<ul style="list-style-type: none"> <li>• Be a leader in landowner stewardship by demonstrating sustainable land management practices that mitigate climate change and build resilience.</li> <li>• Provide environmental protection and natural hazard management on UTRCA lands to mitigate risk to communities and protect the natural environment.</li> </ul>	Implement the recommendations of the UTRCA's Conservation Areas and Lands Strategy.

Note: Progress will be measured by the completion of the Strategy and reporting on progress of recommended actions undertaken.

\* Actions implement recommendations of the UTRCA Watershed Strategy.

\*\* Actions implement recommendations of the UTRCA Conservation Areas and Lands Strategy.

\*\*\* Actions implement recommendations of the Planning Service Delivery Review (Blackline report).

## Priority: Engagement and Collaboration

**Goal:** To strengthen relationships with watershed interest-holders and enhance environmental knowledge and understanding to inspire action on shared goals.

Objective	Operational Actions	Performance Indicators
<p>Deepen relationships and improve communication with municipalities, Indigenous communities, the agricultural community, partners, newcomers to Canada, and other watershed residents.</p>	<ul style="list-style-type: none"> <li>• Conduct regular interest-holder meetings and engagement sessions, and host workshops and tours (e.g., partners tour, flood coordinators workshop, landowner workshops, demonstration farm tours, etc.).</li> <li>• Partner with newcomers to Canada through cultural centres and community groups.</li> <li>• Undertake Indigenous cultural sensitivity and awareness training for permanent, contract, and seasonal staff as well as board members.</li> <li>• Continue to collaborate with municipal partners to ensure safe municipal drinking water.</li> </ul>	<p>Develop an Outreach, Education, and Stewardship Strategy and implement recommendations. Plans may also be developed for key partners, e.g., Indigenous Engagement Strategy.</p>
<p>Enable local environmental action and volunteerism by facilitating community-led efforts and sharing expertise.</p>	<ul style="list-style-type: none"> <li>• Deliver community programs and volunteer training workshops to communicate the impacts to the environment.</li> <li>• Host and participate in events to enhance on-the-ground environmental action, strengthen collaboration, and empower communities through shared expertise and stewardship.</li> <li>• Provide technical expertise that supports action by local landowners.</li> <li>• Facilitate projects with local interest-holders and watershed schools.</li> </ul>	<p>Develop a Volunteer Strategy and implement recommendations.</p>
<p>Provide environmental education, including hands-on, outdoor experiences, to foster a conservation ethic.</p>	<ul style="list-style-type: none"> <li>• Provide and expand school programs and outdoor learning events.</li> <li>• Create educational opportunities for newcomers to Canada.</li> </ul>	<p>Develop an Outreach, Education, and Stewardship Strategy and implement recommendations.</p>
<p>Connect people with nature and green space to promote environmental awareness, education, appreciation, and action.</p>	<ul style="list-style-type: none"> <li>• Expand outdoor recreational opportunities on UTRCA lands.</li> <li>• Organize nature-focused events (e.g., walks, green space cleanups, community naturalization projects, etc.) and awareness campaigns.</li> </ul>	<p>Develop and implement management plans at UTRCA Conservation Areas to meet the current and future needs of local communities for natural spaces and recreational opportunities. ** Develop an Outreach, Education and Stewardship Strategy and implement recommendations.</p>

Note: Progress will be measured by the completion of the Strategy and reporting on progress of recommended actions undertaken.

\* Actions implement recommendations of the UTRCA Watershed Strategy.

\*\* Actions implement recommendations of the UTRCA Conservation Areas and Lands Strategy.

\*\*\* Actions implement recommendations of the Planning Service Delivery Review (Blackline report).

## Priority: Organizational Excellence

**Goal:** To be a creative, adaptable, and trusted Conservation Authority.

Objective	Operational Actions	Performance Indicators
Practice good governance through transparent decision-making, effective communications, and accountable results.	<ul style="list-style-type: none"> <li>• Implement transparent decision-making processes and improve communication channels.</li> <li>• Improve internal and external information systems through website updates, access to information, etc.</li> <li>• Undertake comprehensive public engagement and Indigenous engagement and/or consultation for Environmental Assessments, significant regulated area updates, and land management planning activities.</li> </ul>	Develop and implement a UTRCA Communication Strategy. Develop and implement an Indigenous Consultation Protocol and an Indigenous Engagement Strategy.
Ensure long-term financial sustainability through sound fiscal practice, asset management, and diversified funding.	<ul style="list-style-type: none"> <li>• Continue to improve and expand asset management planning.</li> <li>• Diversify funding sources that include grant acquisition, revenue generation, partnership development, and donor engagement.</li> <li>• Investigate opportunities for innovative financing models such as conservation finance, carbon credits, and public-private partnerships to support watershed and resilience projects.</li> </ul>	Develop and implement a comprehensive Funding Strategy.
Attract, develop, and support passionate, skilled employees in an inclusive, diverse, and collaborative workplace.	<ul style="list-style-type: none"> <li>• Develop a Diversity, Equity, and Inclusion Strategy to increase diverse and equitable recruitment and hiring and increase inclusion.</li> <li>• Develop and implement a comprehensive Professional Development and Training Program for all staff.</li> <li>• Develop a modern Performance Management System for staff.</li> <li>• Continue to improve health and safety across all areas of the UTRCA.</li> </ul>	Develop a Human Resources Strategy and implement recommendations to enhance training programs and promote inclusive hiring and retention.
Deliver high quality service and client-centred engagement.	<ul style="list-style-type: none"> <li>• Implement client feedback systems and improve service delivery standards.</li> <li>• Implement visitor feedback systems to improve conservation area experiences.</li> </ul>	Develop and implement a Customer Service and Visitor Experience Strategy.
Strengthen communication and transparency in regulatory decisions to support a more responsive process for municipalities, developers, and watershed residents.	<ul style="list-style-type: none"> <li>• Continue education and knowledge sharing through planning and permitting processes with municipalities, industry, interest-holders, partners, and the public to ensure roles and responsibilities related to natural hazards are understood.***</li> <li>• Streamline regulatory processes.***</li> <li>• Enhance public communication by improving on-line permit resources.***</li> <li>• Update planning and regulatory policies and provide access to information to enhance transparency for interest-holders.***</li> </ul>	Implement the recommendations of the Planning Service Delivery Review (Blackline report).
Modernize digital tools to improve efficiency and make information and services easier to access for staff and the public.	<ul style="list-style-type: none"> <li>• Upgrade internal systems and improve public access to digital services.</li> <li>• Explore tools for online permit application system, online payment system for planning and permit fees, database for tracking applications***</li> </ul>	Develop Information Management Strategy and implement recommendations.

## Draft

Note: Progress will be measured by the completion of the Strategy and reporting on progress of recommended actions undertaken.

\* Actions implement recommendations of the UTRCA Watershed Strategy.

\*\* Actions implement recommendations of the UTRCA Conservation Areas and Lands Strategy.

\*\*\* Actions implement recommendations of the Planning Service Delivery Review (Blackline report).

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**To: UTRCA Board of Directors**  
**From: Tracy Annett**  
**Date: December 16, 2025**  
**File Number: BoD-12-25-86**  
**Agenda #: 6.2**  
**Subject: Draft Comments on Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities, ERO #025-1257**

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## **Recommendation**

To seek input from the Board of Directors on the Upper Thames River Conservation Authority (UTRCA) comments related to the implications of the Environmental Registry of Ontario ERO 025-1257 proposal and to request approval to delegate responsibility to the General Manager to prepare and submit final comments on the posting in advance of the December 22, 2025, deadline.

## **Purpose**

The purpose of this report is to seek direction from the UTRCA Board of Directors regarding draft comments prepared in relation to ERO #025-1257 in order to finalize the submission. The deadline for submitting comments on the ERO posting is December 22, 2025. Proposed draft comments are provided; however, further discussion and input may be provided after the Conservation Ontario Council Meeting on December 11 and the Ministry of the Environment, Conservation and Parks (MECP) engagement session in London on December 12. A verbal update will be provided.

## **Background**

A report was provided to the Board of Directors at the November meeting highlighting the proposed changes. A summary of the details is provided below.

## **Proposed Boundaries for Regional Consolidation of Ontario's Conservation Authorities**

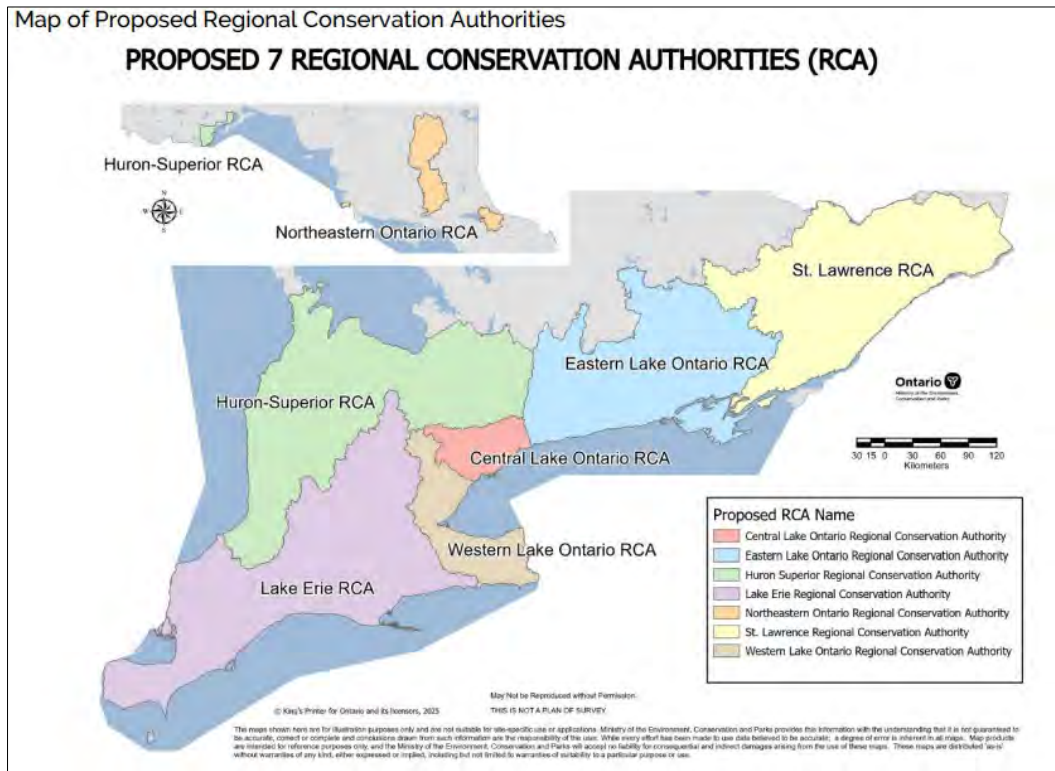
ERO Posting #025-1257

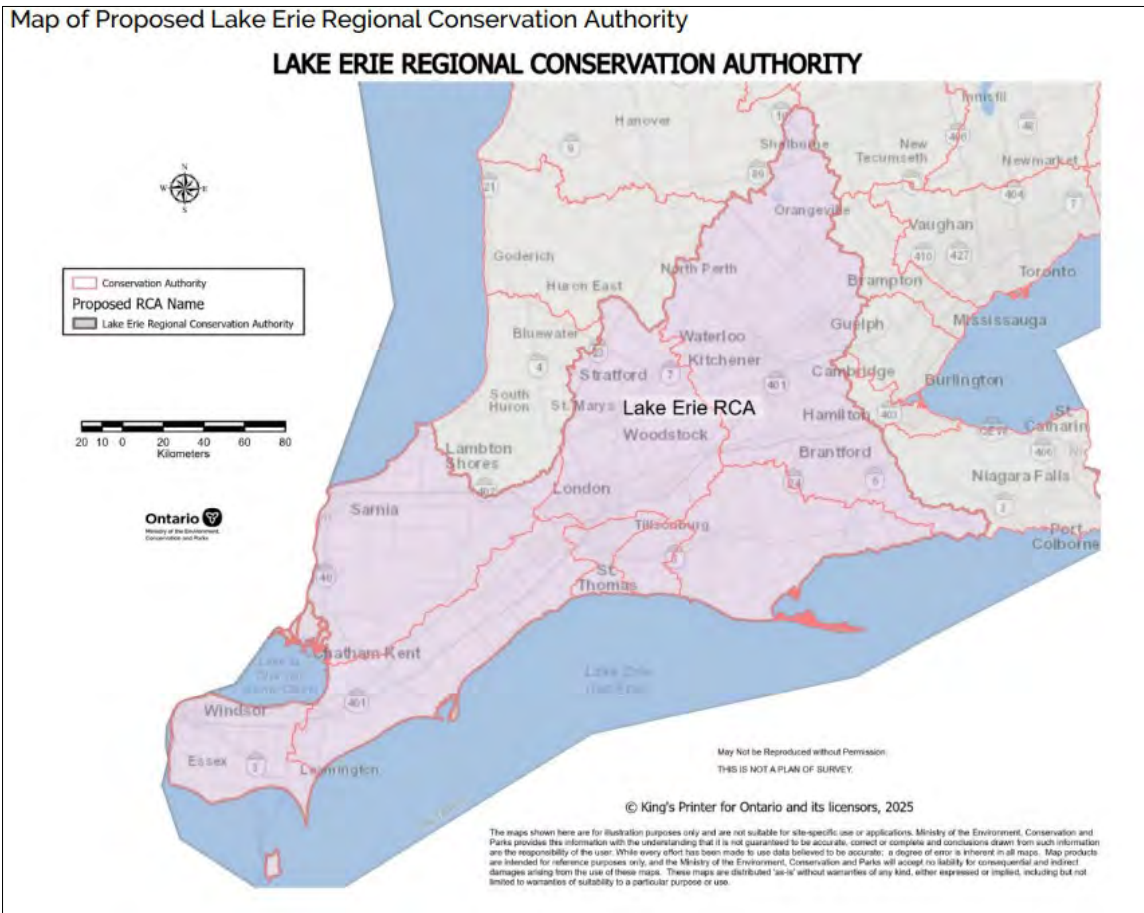
Commenting Period: November 7 – December 22, 2025

The Province is seeking feedback on a proposal to consolidate 36 Conservation Areas (CAs) into seven regional CAs. The proposal states that the boundaries of the new consolidated regions are based on watershed-based jurisdiction, reducing overlap and administrative duties, balancing expertise across CAs, and service continuity. The proposal further states that the regional CAs will continue with current programs and services, including managing their lands and recreational trails.

The proposed Regional Conservation Authorities are as follows:

Proposed Regional CA	Number of Existing CAs Included	Number of Municipalities Included
Lake Erie Regional CA	8	81
Huron Superior Regional CA	7	78
Western Lake Ontario Regional CA	4	28
Central Lake Ontario Regional CA	1	17
Eastern Lake Ontario Regional CA	7	48
St. Lawrence Regional CA	5	46
Northeastern Ontario Regional CA	4	19





## Providing Feedback and Discussion Questions

Comments may be submitted through the [ERO posting](#) or by email to [ca.office@ontario.ca](mailto:ca.office@ontario.ca).

A MECP session held on November 18 further emphasized that responses should also identify “What cannot be lost”. Staff recommend that additional comments be provided to acknowledge and support the Province’s goals of improved efficiency, consistency, and fiscal prudence in conservation delivery, but also explain that the proposed “Lake Erie Regional CA” configuration would:

- Create a geographically vast and administratively complex entity, joining 81 southwestern rural and urban municipalities throughout the province with little shared watershed connection or economic alignment;
- Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;
- Generate substantial transition costs — including human-resources integration, governance restructuring, IT migration, and policy harmonization — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province’s own business-planning principles of value for money, cost containment, and service continuity; and,
- Risk greater uncertainty and delay for builders, developers, and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely on the ground local advice, resolve issues, or expedite housing and infrastructure approvals that support the Province’s housing agenda.

The UTRCA has already undertaken significant modernization work aligned with provincial objectives, including:

- Implementation of the Planning Service Delivery Review related to hazard mapping and policy initiatives;
- Continuous improvement of delivery standards well above the standard required by the Province;
- Commitments to continual improvements in transparency and client communication through recent strategic planning recommendations for organizational excellence; and
- Improvement in data and network systems, including security and redundancy.

Standardization throughout regions can be achieved within the current watershed-based governance framework with updated technical guidance, policy approaches, and modernization tools without losing local input, representation, and fiduciary responsibility.

The UTRCA serves southwestern Ontario communities facing vastly different climatic, hydrological, and infrastructure realities (e.g., large dams and dykes) based on the needs of local communities that are very different than those of the other watersheds included within the proposed regional conservation authority. An alternative approach to recognize these differences and propose a reduced geographic scale of the regional CAs should also be encouraged.

## Discussion

The implementation of the regional consolidation of CAs would be overseen by the newly-created Ontario Provincial Conservation Agency (OPCA). This oversight role would include coordinating the transition process with involvement from CAs, municipalities, Indigenous communities, and interested parties to ensure minimal disruptions. The MECP will provide further details on timelines, engagement opportunities, and transition supports at a future date. It is anticipated that the current CA Boards will complete their current terms at the end of 2026 and the transition process with the new Regional CA Boards would begin in late 2026 to early 2027.

As part of the 45-day ERO consultation period, the Provincial Chief Conservation Executive and MECP staff arranged information sessions. Staff from the 36 CAs were invited to attend an online information session on November 18, and a similar session was arranged for municipal partners later the same day. Further, invitations to Regional Engagement Sessions were extended to Conservation Authority Chairs, General Managers, and municipalities. The in-person engagement session for the Lake Erie Region will be held on December 12, 2025, in London. The session schedule is as follows:

Proposed Regional CA Jurisdiction	Location	Date
Proposed Eastern, Central and Western Lake Ontario Regional CA	Vaughan	December 1 - 2 to 5 pm
Proposed St. Lawrence Regional CA	Ottawa	December 5 - 1 to 3:30 pm
Proposed Lake Huron – Superior Regional CA	Collingwood	December 8 - 9 to 11am
Proposed Northeastern Regional CA	Virtual	December 11 - 2 to 4 pm
Proposed Lake Erie Regional CA	London	December 12 - 1 to 3:30 pm

The criteria the Province applied for determining the proposed boundaries for Regional Conservation Authorities are:

1. Maintaining watershed-based jurisdictions – aligning with natural hydrological boundaries to support effective flood and water management, consistent with drinking water Source Protection Areas and Regions.
2. Relationships between CAs and municipalities – reducing administrative duplication and overlap for municipalities and CAs to simplify accountability and strengthen local partnerships.
3. Balancing expertise and capacity across CAs – enhancing technical skills and resources across conservation authorities to improve service and program delivery.
4. Service continuity – ensuring uninterrupted delivery of local CA programs – including flood forecasting and warning, permitting, and source water protection – during and after consolidation.

As noted, the UTRCA would form part of the proposed Lake Erie Regional Conservation Authority, along with the Catfish Creek, Essex Region, Grand River, Kettle Creek, Long Point Region, Lower Thames Valley, and St. Clair Region Conservation Authorities.

## **ERO Comments**

Through ERO #025-1257, the Province is seeking feedback on the following discussion questions to inform the planning for the future state of CAs:

- 1) What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?
- 2) What opportunities or benefits may come from a regional conservation authority framework?
- 3) 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?
- 4) Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?
- 5) How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

Responses and key concerns with the provincial proposal as noted in the draft ERO comment submission are attached.

## **Partner Engagement**

The UTRCA and other CAs within the Proposed Lake Erie Regional CA have collaborated to share resources to notify our shared municipalities and partners. [ERO Resources](#) are posted on the UTRCA's website and promoted via the UTRCA social media channels, and include:

- Municipally focused materials highlighting the potential economic and legal risks;
- Partner resources highlighting the potential impacts to programs; and
- Social media posts providing information.

There will be an in-person meeting with First Nations communities and General Managers on December 10.

As many municipal councils have included discussions on their agendas at the time of writing this report, an update on passed resolutions will be provided at the Board of Directors meeting. In addition, a summary of support from partners and other interest-holders will be provided.

## **Summary**

While the UTRCA supports the proposed provincial investments in technology, standardization, and modernization, the proposed Regional Conservation Authority (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 UTRCA does not support the proposed RCA framework.

The UTRCA will continue to work with the Province to modernize and improve service delivery. However, consolidation as proposed carries significant risks that outweigh potential benefits, without providing:

- A cost-benefit analysis,
- Strong provincial funding,
- Local decision-making through local municipal representation,
- Continuation and enhancement of local programs, services and staffing.

UTRCA encourages the Province to work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives.

## **Recommended by:**

Tracy Annett, General Manager

## **Attachment:**

Upper Thames River Conservation Authority: ERO Questions and Responses

## **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.

The UTRCA watershed is proposed to be consolidated with seven other Conservation Authorities representing 81 member municipalities to form the Lake Erie Regional Conservation Authority.

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. The UTRCA:

- Supports the broad goals of the government of achieving better outcomes;
- 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.

While the UTRCA 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 UTRCA does not support the proposed RCA framework.

Should the government decide to proceed with the ERO Proposal, we recommend measures to mitigate risks inherent in this ERO Proposal.

### **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?*

#### **a. Preserve Local Municipal Governance and Decision-Making**

The proposed Lake Erie Region Conservation Authority would encompass 81 local municipalities and 8 CAs. This scale risks diluting local municipal representation, particularly for smaller and rural communities. When the UTRCA's Board size was reduced 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, 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; 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, 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; 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.

**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.

**Recommendation 2:** That the Province demonstrate the statutory objects of the CAs 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, Conservation Ontario, CAs, 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 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 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 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 while the other six are not),
- 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.

### **d. Protect and Enhance Existing Service Levels**

Local CA 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, 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 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 CA 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.

### **f. Maintain Local CA 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 CAs 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. Phasing standards, 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 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.

## 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 CAs. 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.

**Recommendation 6:** That the Province update Provincial policies and standards together with AMO, CO, CAs, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

### b. Provide Additional Investment

Additional investment is required to ensure mandatory programs and services are supported.

**Recommendation 7:** That the Province invests stable, adequate, multi-year funding into CA 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 CAs the province-based decisions on watershed-based jurisdictions, 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 relationship 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.

#### **b. 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 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.

#### **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 RCA boards.

A new structure provides an opportunity for appointments to including Indigenous representation on Conservation Authority Boards as a vital step toward 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 30 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. Many 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—IT, HR, capital, data, governance, and branding—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 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.

**c. 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.

**Recommendation 10:** That local offices be retained to locally deliver programs currently offered.

**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 of UTRCA Recommendations

**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.

**Recommendation 2:** That the Province demonstrate the statutory objects of the CAs 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, Conservation Ontario, CAs, 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 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.

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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 6:** That the Province update Provincial policies and standards together with AMO, CO, CAs, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

**Recommendation 7:** That the Province invests stable, adequate, multi-year funding into CA programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

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- Maximum 30 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.

**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 local offices be retained to locally deliver programs currently offered.

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

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**To: UTRCA Board of Directors**  
**From: Tracy Annett**  
**Date: December 16, 2025**  
**File Number: BoD-12-25-87**  
**Agenda #: 6.3**  
**Subject: 2026 Fees Policy & Fee Schedules**

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## Recommendation

THAT the proposed revisions to the Fees Policy and 2026 Fee Schedules be approved by the UTRCA Board of Directors for implementation beginning January 1, 2026.

## Background

The Upper Thames River Conservation Authority (UTRCA) approved the Fees Policy in 2019. In keeping with Board direction, UTRCA charges fees for its services on a cost-recovery basis and the benefit received by the applicant from specific types of services. The policy states the following:

*This Fee Policy & Schedules will be reviewed annually by the UTRCA Management Team, in conjunction with the annual budgeting process. The Management Team will seek information regarding fees, from various sources, as identified in the process and public notification section above; prepare a proposed revised Fee Schedule with a report to members regarding recommendations. The Board of Directors shall receive and make recommendation as to the proposed Fee Schedule.*

Upon annual review only minor policy edits have been made for clarity, as highlighted in the attached.

A direction from the Minister, received December 12, 2024, stated the following:

*"I am writing with regard to conservation authority fees for the 2025 calendar year. Pursuant to my authority under subsection 21.3 (1) of the Conservation Authorities Act, I am issuing a new Direction, attached to this letter as Attachment A, that extends the previous Directions that were in place for the 2023 and 2024 calendar years. The purpose of this Direction, which is effective from January 1, 2025, to December 31, 2025, is to require a conservation authority not to change the amount of the fee it charges or the manner in which it determines the fee for any program or service related to reviewing and commenting on planning and development related proposals or land use planning policies, or for permits issued by conservation authorities."*

Since it is uncertain whether this direction will be extended through 2026, no increases to UTRCA planning, permitting or technical review fees are proposed at this time. Should the fee freeze be lifted, planning and regulations staff will review fees and bring forward proposed changes once that direction has been received.

## **Fee Schedules**

Consistent with policy, an annual review of fee schedules for each program area has been undertaken. Where no changes have been made the column name reflects the 2026 Fees. Where changes have been identified both the 2025 and 2026 fees are provided for comparison purposes. Details regarding fee schedule revisions have been outlined below.

### **Planning and Regulations Fees**

UTRCA's Environmental Planning and Regulations Unit typically updates the fee schedules every year to keep pace with cost-of-living and other initiatives, and to ensure a sustainable revenue source and high level of service. However, as noted above, due to the uncertainty around the continuation of the Provincial direction to freeze conservation authority fees related to planning and development, no changes to fees are currently proposed for 2026. As such, a comparison column has not been included in the schedule.

Minor housekeeping amendments have been made to the wording within the Planning and Regulations fee schedules to update language that reflects current legislation and regulations, or to provide greater clarification and transparency. For example, reference to natural heritage reviews have been removed from the fee schedules as this is a review service that conservation authorities are no longer permitted to provide. These housekeeping amendments are identified through track changes within the attached fee schedules.

### **Conservation Areas**

Conservation Areas fees are reviewed annually by Conservation Areas Unit staff following the end of the camping season in October. Criteria for setting fees are; impact on or opportunity to support the organizational objectives; anticipated operational expenses that will be incurred impacting the overall budget; comments and feedback from Conservation Area users and interest groups; comparison of similar operations and opportunities in the industry, including trends. As part of the fee setting process, staff also review operational policies that pertain to the various aspects of the Conservation Area services and programs.

During our annual review of Conservation Areas (CA) fees and policies, staff considered the introduction of a year-round membership program to be implemented in Spring 2026. This new membership will offer greater value to patrons, provide controlled entry, and extend access throughout the year. In addition to this change, staff also reviewed

new administrative initiatives consistent with practices at neighboring and comparable Conservation Areas.

Planning for and the implementation of Conservation Area infrastructure improvements is well underway, with significant capital projects anticipated to continue through 2026. Aligned with and informed by campground and day-use greenspace planning, the completion of these capital improvements will enhance our ability to remain competitive within the sector and to implement appropriate fee adjustments for the respective programs and services offered within our Conservation Areas.

### **Forestry**

The 2026 forestry fee schedule reflects nursery supplier charges, ensuring recovery of costs tied to stock availability and pricing.

### **Environmental Education Programs**

The per student fee and the minimum per group fee have been updated and increased. These changes reflect the intention to balance cost recovery while at the same time keeping pricing competitive.

### **Land Management - Hunting**

Land Management staff conduct an annual review of the UTRCA hunting program and adjust fees based on user feedback, demand, and operational needs. Fee considerations include anticipated increases in program operating costs, feedback from applicants and permitted hunters, and comparisons with similar hunting programs at other Conservation Authorities.

The review process also evaluates operational policies and program administration. As part of this work, the Hunting Team updates MNRF regulation changes, UTRCA policies, admission agreements, terms and conditions for written permissions, GIS maps, and related fees. Updated information is made available on the UTRCA website and in print.

### **Summary**

The fee increases proposed reflect minor increases to account for inflation or costs associated with program delivery. The proposed increases are consistent with the UTRCA's fees policy.

### **Recommended by:**

Tracy Annett, General Manager

### **Prepared by:**

Jenna Allain, Manager, Environmental Planning and Regulations  
Brent Verscheure, Manager, Lands, Facilities and Conservation Areas  
Teresa Hollingsworth, Manager, Community and Corporate Services  
Tatianna Lozier, Manager (Acting), Integrated Watershed Management

**Attachments:**

Upper Thames River Conservation Authority Fees Policy & UTRCA Fee Schedules

## Upper Thames River Conservation Authority

# Fees Policy

Approved by the Upper Thames River Conservation Authority Board of Directors, November 26, 2019, and amended on October 26, 2022.

- Fee Schedules revised November 24, 2020; effective January 1, 2021; amended May 25, 2021.
- Fee Schedules revised November 23, 2021; effective January 1, 2022; revised June 28, 2022; effective July 1, 2022.
- Fee Schedules revised November 22, 2022; effective December 31, 2022
- Schedule 3: Forestry Services Fees revised September 26, 2023; effective September 26, 2023.
- Fee Schedules revised November 28, 2023; effective January 1, 2024.
- Proposed Schedules revised December 16, 2025; effective January 1, 2026.

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# Upper Thames River Conservation Authority Fees Policy

This Fees Policy was approved by the Upper Thames River Conservation Authority (UTRCA) Board of Directors, November 26, 2019, and amended on October 26, 2022.

## Basis

Amendments to the Conservation Authorities Act were undertaken in 2020 to clarify the programs and services that conservation authorities (CAs) deliver. In 2021, O. Reg. 686/21 Mandatory Programs and Services provided additional clarity regarding the programs and services that CAs are required to provide. In April 2022, the Minister released Policy: Minister's list of classes of programs and services in respect of which conservation authorities may charge a fee ("Minister's List"). CAs may only charge a fee for a program or services that it provides if it is set out in the Minister's List. The Minister's List identifies that CAs may charge a fee for mandatory, municipal, and other programs and services where the user-pay principle is appropriate.

The Minister's List replaces the 1997 Policies and Procedures for the Charging of Conservation Authority Fees which was approved by the Minister of Natural Resources and Forestry. The new Minister's List comes into effect on January 1, 2023.

This policy document is intended to fulfill the requirements for each CA to adopt a written policy with respect to the fees it charges for the programs and services it provides.

The attached Fee Schedules are based on the user-pay principle. The fees and revenues generated are designed to assist with recovering the costs associated with administering and delivering the services on a program basis. Fees take into account estimated staff time, travel, and materials costs to provide the service, but do not exceed the cost of the service.

## Legislative Framework

On January 1, 2023, the Conservation Authorities Act will be amended by enacting section 21.2 (1)-(12) "Fees for Programs and Services." Subsection (1) enables the Minister to determine the classes of programs and services in respect of which a CA may charge a fee. Subsection (2) requires the Minister to publish a List in a policy document. CAs may only charge a fee for a program or service that it provides which falls within this list.

Under the Conservation Authorities Act, programs and services delivered by CAs include:

- **Mandatory programs and services.** Mandatory programs and services that the conservation authority is required to provide [see 21.1 for further details]. These services are further defined in O.Reg. 686/21: Mandatory Programs and Services and may be funded by provincial grants, other sources, municipal apportionment and/or conservation authority self-generated revenue (e.g., user fees) where the user-pay principle is appropriate.
- **Municipal programs and services.** Programs and services that an authority agrees to provide on behalf of a municipality under a MOU or agreement [see 21.1.1 for further details]. The program or service may be funded by the municipality or by other funding mechanisms (e.g., user fees where the user-pay principle is appropriate) as per the MOU or agreement.

- **Other programs and services.** Programs and services that an authority determines are advisable to further the purposes of the Act [see 21.1.2 for further details]. The program or service may be funded by the municipality or by other funding mechanisms (e.g., user fees where the user-pay principle is appropriate) as per the cost apportioning agreement and the Minister's List.

## Policy Direction

When updating existing fee schedules or establishing new fees, the following policy direction will be considered:

- 1) Fees need to be set with regard to legislative requirements and ability to sustain programs, and be based on a user-pay philosophy;
- 2) Fee increases should include inflation;
- 3) Fees must not exceed the costs of delivering the services;
- 4) Refunds of fees may carry an administrative cost/penalty;
- 5) Fees are reviewed at least annually and regular adjustments to fees are desirable;
- 6) Fee schedules are approved on an annual basis to inform the following year's budget.

## Exemptions and In-Kind Services

The Authority may waive fees for non-profit conservation groups contributing to the protection and restoration of the natural environment. Examples include but are not limited to: Ducks Unlimited, Nature Conservancy of Canada, Ontario Federation of Anglers and Hunters, and various "Friends of" watershed groups.

In addition, in-kind technical services are routinely provided by the Authority to assist non-profit conservation groups. Technical services may be required for non-profit groups that do not have qualified professionals or funding to acquire the expertise to undertake projects that further achieve the environmental targets of the Authority.

## Process and Public Notification

When developing and establishing fees, the Authority also considers the fees of Conservation Authorities offering the same level of service and technical advice, fees set by neighbouring Conservation Authorities, fees charged by local municipalities and agencies, and fees charged by the private sector for similar services.

Fees account for estimated staff time, travel, equipment, and material costs plus a reasonable charge to cover administration of the program, which normally includes an allocation for shared corporate services.

This Fees Policy has been established by the UTRCA Board of Directors and is administered and applied by UTRCA staff. The Management Team in consultation with the General Manager may waive or reduce fees under extenuating circumstances.

The public will be notified of any proposed increases or revisions to a fee schedule by way of posting a notice on the UTRCA website that the fee schedule will be reviewed on an identified date at an open meeting of the Authority's Board of Directors.

## Implementation

While cost recovery is a requirement for certain services noted above, the Authority considers other factors when setting fees, such as fees of neighbouring Conservation Authorities, the nature and level of fees charged by local municipalities for related services, and, in some cases, the value of similar services provided by the private sector. It should also be noted that for some circumstances and programs, an attempt to charge a fee that would provide complete cost recovery is not feasible due to inability to pay and would result in reduced demand for the service, e.g., school education programs.

### 1. Planning and Regulations (Section 28 Permit Fees, Planning Act, and Technical Reviews)

The UTRCA administers its fee program for Planning and Regulations to achieve a partial cost recovery to-date for the plan review function. The program aims to achieve a 50-50 user fee to levy ratio to represent the maximum reliance on user fees in order to safeguard the planning and regulations program and its services against economic volatility and subsequent budgetary uncertainty. It is also intended to reflect that significant effort and resources are used for pre-consultation related to activities, proposals, and inquiries prior to application submissions as well as compliance activities. The fee schedules are based on the complexity of the application and technical review required, which influences the staff time and resources needed for the review.

Administration may consider the following issues and data, where relevant, to revise the fee schedules:

- Analysis of trends in workload changes as a result of shifts in the development market and types of applications;
- Consultation with developers/municipalities about work effort, new planning/legislative requirements, and streamlining;
- General overview of status of cost recovery;
- Statistics related to number of applications and annual changes, where required;
- Level of service/review expectation for processing timing;
- Areas of improvement for level of service/staffing demands;
- Cost cutting measures as required;
- Reserve fund requirements;
- Identification of specific/specialized municipal requirements;
- Trends in legal costs associated with appeals to the Ontario Land Tribunal and other legal services.

The UTRCA's objective is to provide an effective and efficient delivery of services consistent with the Client Service Standards for Conservation Authority Plan and Permit Review, endorsed by Conservation Ontario Council, June 24, 2019.

Exemptions to the application of these fees include:

- Non-profit conservation groups contributing to the protection and restoration of the natural environment. Examples include but are not limited to: Ducks Unlimited, Nature Conservancy of Canada, Ontario Federation of Anglers and Hunters;
- UTRCA for permit applications, Planning Act applications, inquiries, and site assessments.

## 2. Conservation Areas Fees

Conservation Areas fees are reviewed annually by Conservation Areas Unit staff following the end of the camping season in October. Criteria for setting fees are:

- Impact on or opportunity to support the organizational objectives;
- Anticipated operational expenses that will be incurred impacting the overall budget;
- Comments and feedback from Conservation Area users and interest groups;
- Comparison of similar operations and opportunities in the industry, including trends.

As part of the fee setting process, staff also review operational policies that pertain to the various aspects of the Conservation Area services and programs. Refund policies are included in this review and adjusted as necessary to ensure consistency with market comparators. Information pertaining to these policies is shared on our websites as well as available in print. Seasonal campers receive an electronic copy of both the fee schedule and applicable policies annually.

During our annual review of Conservation Areas (CA) fees and policies, staff considered the introduction of a year-round membership program to be implemented in Spring 2026. This new membership will offer greater value to patrons, provide controlled entry, and extend access throughout the year.

Historically, our CAs offered a “seasons pass” which was valid only during the operating season, and more recently, during the shoulder seasons. The transition to a year-round membership will coincide with our expanded operating season and infrastructure upgrades, including integrated gate systems, planned for installation at each CA in Spring 2026.

In addition to this change, staff also reviewed new administrative initiatives consistent with practices at neighboring and comparable Conservation Areas. Beginning in the 2026 season, seasonal campsite deposits will be introduced. These deposits, payable at the time of winter storage in the fall, will include a \$200 fee added to the winter storage fee. The deposit amount of \$200 will be credited toward the following year’s seasonal campsite fees upon registration and payment. If the camper does not return, the \$200 deposit is non-refundable.

This initiative is intended to address instances where seasonal campers pay for winter storage but do not intend to return the following season—thereby occupying campsites that could otherwise be marketed, reserved, or permitted during the spring period of high interest and demand.

A similar approach will be implemented for wet and dry dock rentals at Wildwood, including the introduction of a revamped reservation system. This system will ensure that each watercraft is assigned to an appropriately sized dock, optimizing space utilization and maximizing use and capacity.

Planning for and the implementation of Conservation Area infrastructure improvements is well underway, with significant capital projects anticipated to continue through 2026. Aligned with and informed by campground and day-use greenspace planning, the completion of these capital improvements will enhance our ability to remain competitive within the sector and to implement appropriate fee adjustments for the respective programs and services offered within our Conservation Areas.

### 3. Forestry Services Fees

Fees for trees and services are reviewed and updated annually. An attempt is made to balance user fees with program costs while trying to maintain and, over the long term, expand natural areas according to the Environmental Targets Strategic Plan. It must be noted that without cost-sharing opportunities such as the Clean Water Program, 2 Billion Trees Program, Habitat Stewardship Program and others, the program would not be sustainable (i.e., tree numbers planted would drop considerably).

The cost of providing these services is based on the following principles:

- Tree costs are based on wholesale tree costs dependent on individual stock items. A mark-up is applied to cover costs associated with tree delivery and storage requirements;
- Planting fees for both machine planting and hand planting are based on staffing and equipment costs;
- Where the UTRCA is asked to replant areas to comply with court orders (e.g., Woodlands Conservation By-Law, CA Act Permit requirements) or offsetting projects, the fees charged reflect full cost recovery.

### 4. Community Education Program Fees

Conservation Education program fees are reviewed annually and changes implemented in time for promotion of fall programs. The fees advertised in September are in place for the school year. UTRCA conservation education programs are funded through a number of avenues including fees charged directly to the school classes participating, fees charged directly to the School Boards, and through corporate, foundation, or government sponsorships of specific programs.

The UTRCA offers programs on site (within Fanshawe and Wildwood Conservation Areas), off site (at wetlands or watercourses), in-class, and on school grounds. The fees charged for an on-site program is a cost per student per half day program. There is a minimum fee per program and most programs can accommodate two or three classes. This revenue is augmented by Authority levy funds to cover costs. Staff endeavour to control dependency on Authority levy funds by recovering as much of the program costs as the market will bear.

A number of factors are considered to determine the fees charged directly to the school classes, including:

- Availability of similar services;
- Surveys of prices charged by organizations offering similar services; and
- Demand for the program.

Off site, specialty programs are sponsored through corporate, foundation, or government funding. At times, a school board will arrange for the UTRCA to provide programming or professional development to a number of classes or staff. In these instances, the fees charged cover all costs incurred by the Authority.

## 5. Hunting Fees

Land Management staff undertake an annual review of the UTRCA hunting program and continue to refine fees based on applicant/user input and demand. Specifically, the criteria considered when contemplating an increase of the hunting program fees are:

- Anticipated increase in operational expenses to the program;
- Comments and feedback from applicants and permitted users of designated hunting areas;
- Comparison to similar operations and opportunities at other Conservation Authorities.

The fee setting process will include a review of operational policies and program administration. The Hunting Team will incorporate MNRF hunting regulation changes, UTRCA policy changes, admission agreements, terms and conditions (written permission) updates, GIS map updates, and applicable fee updates, which are shared on UTRCA websites and available in print.

## Refunds

The UTRCA does not issue refunds for services or products once the application or order is submitted and the payment has been processed.

The Conservation Areas Unit has policies regarding refunds specific to the different programs and services offered. Policies regarding refunds are posted on the individual conservation area websites, and copies are distributed to seasonal campers. Links to the websites are updated by January 1 for the upcoming operating season. Refunds are not offered for inclement weather, nor are they offered when a permit holder is being evicted from the premises.

## Appeal

The fee appeal process is based on the principles of fairness, opportunity, and notification. Application for an administrative fee review may be received for an appeal, 1) if a fee is contrary to the fees set out in the fee schedule, or 2) if the fee set out in the fee schedule is excessive in relation to the service or program received.

Requests for an administrative fee review must be in writing to the General Manager (or delegate) and specify the reason(s) for the request for review. Upon reconsideration of a fee that was charged by the Authority, the Authority may:

- a) Order the person pay the fee in the amount originally charged;
- b) Vary the amount of the fee originally charged, as the Authority considers appropriate; or
- c) Order that no fee be charged for the program or service.

If not satisfied with the outcome, then an appeal will be directed to the UTRCA Board of Directors for a decision. Once heard, the appeal will be dismissed or upheld through a resolution passed by the Board of Directors. The appellant will be notified accordingly of the Board's decision.

A decision for requests for an administrative fee review related to permit applications must be made within 30 days after receiving the request in accordance with section 21.2(13) of the Conservation Authorities Act.

If a refund is approved, a 10% administration fee will apply.

## **Date of Effect**

The Fee Policy becomes effective as of the date of UTRCA Board of Directors approval unless stated otherwise.

## **Transition**

The establishment of this Fee Policy supersedes and replaces all previous fee policies and/or schedules. The Fee Policy also applies to proposals not previously invoiced, such as draft approved plans of subdivision which predated any fee schedule.

## **Review**

The UTRCA Fee Policy and Schedules will be reviewed annually by the UTRCA Management Team, in conjunction with the annual budgeting process. The Management Team will seek information from various sources regarding fees, as identified in the process and public notification section above; prepare a proposed revised Fee Schedules with a report to members regarding recommendations. The Board of Directors shall receive and make a recommendation as to the proposed Fee Schedules. Once approved, the revised Fee Schedules to this policy will be published on UTRCA's website, distributed to Municipal Clerks for posting, and provided in other materials used by the public.

## Fee Schedules

Schedule 1: Planning and Regulations Fees (includes UTRCA Section 28 Permit Fees, Plan Review Fees, Technical Review Fees, and other fees)

Schedule 2: Conservation Areas Fees

Schedule 3: Forestry Services Fees

Schedule 4: Community Education Program Fees

Schedule 5: Hunting Fees

## Schedule 1: Planning and Regulations Fees

Includes Upper Thames River Conservation Authority Section 28 Permit Fees, Plan Review Fees, Technical Review Fees, and other fees.

### 1a. UTRCA Section 28 Permit Fees

Category	Type	2026 Fee
Pre-consultation	Presubmission-consultation with the applicant regarding application requirements	No Charge
Change or Interfere with Wetlands and Watercourses	Routine - No engineering drawings required	\$555.00
	Minor - Engineering drawings required	\$1,160.00
	Major - Involves comprehensive review by various technical staff	\$1,590.00
Development Applications	Routine - Limited review, minor in nature location, or impact (decks, patios, etc.)	\$265.00
	Minor - Small scale (less than 500 square feet), and/or consistent with policy	\$1,160.00
	Major - Medium scale, primary structures (greater than 500 square feet) and/or consistent with policy	\$1,590.00
Linear Utility Corridor	Routine - May include linear utility crossings adjacent to watercourses and wetlands	\$1,160.00
	Minor - May include linear utility corridors where a watercourse or wetland crossing is proposed	\$1,590.00
	Major - May include linear utility corridors where multiple watercourse or wetland crossings are proposed	\$6,360.00
Municipal Drain Review	Routine - Limited review, minor in nature	\$290.00
	Minor - Review of engineer's report and/or within regulated wetland limits	\$900.00
	Major - Requires multiple site visits, and/or detailed review of engineering reports, and/or within regulated wetland limits	\$1,590.00
Municipal Project Review	Routine - Does not require any technical reports or analysis (may include bridge or culvert repairs)	\$1,160.00
	Minor - Requires technical reports or analysis to support application (may include minor bridge or culvert replacements)	\$1,590.00
	Major - Works that cover large geographic areas such as multiple road culvert or bridge replacements	\$5,300.00

**Upper Thames River Conservation Authority Fees Policy**

<b>Category</b>	<b>Type</b>	<b>2026 Fee</b>
Complex Applications	Large scale development proposal and/or inconsistent with policy (e.g., multi-lot development, large scale municipal project, golf course, renewable energy project, etc.)	\$6,360.00
	Large Fill - Volumes > 1000 m <sup>3</sup>	\$6,360.00 Plus \$0.50/m <sup>3</sup> fill
	Aggregate Resources Act - Above water table	\$6,360.00
	Aggregate Resources Act - Below water table	\$11,130.00
Environmental Assessments	Standard	\$1,160.00
	Intermediate	\$5,300.00
	Full/Comprehensive	\$10,600.00
Hearing Request	Streamlined Hearing	\$850.00
	Full Hearing – Intermediate	\$1,270.00
	Full Hearing – Major	\$5,300.00
Clearance	Verification Letter (Hazards or Areas of Interference)	\$265.00
Extensions	Minor application revisions and minor permit revisions and/or extensions	\$140.00
Violation (work commenced prior to approval)	First occurrence	100% surcharge (cost recovery)
	Second and subsequent occurrences Note: Applications will only be accepted retroactively where works undertaken meet UTRCA board approved policies or where works are proposed that are intended to bring a project into compliance with said policies.	200% surcharge
Minister's Zoning Order (MZO)	Permit associated with Minister's Zoning Order (MZO)	100% surcharge of permit fee (cost recovery)

**Definitions:**

**Routine** - Routine permit applications are activities that are documented through another approval process or are determined to have limited impacts on the control of flooding, erosion, or unstable soil or bedrock.

**Minor** - Permit applications for development projects could be considered minor in nature due to project size, level of risk, location, and/or other factors. These projects have minor impacts on the control of flooding, erosion, or unstable soil or bedrock. Based on the proximity of the project to the hazard, minor permit applications are reviewed by UTRCA staff and generally require standard recommendations or conditions. Minor permit applications could be those

involving, for example, minor fill, minor development, and minor site alteration where there is a high degree of certainty that issues associated with natural hazards are minimal.

**Major** - Major applications for Section 28 permits require significant UTRCA staff involvement. They could be highly complex projects, for example, large subdivisions requiring technical review supported by comprehensive analysis, or smaller scale site specific applications that require complex technical reviews. The proposals may involve developments with significant natural hazards or multiple approval process requirements. Generally, these would include Plans of Subdivision and Condominium, large Site Plan Control applications, and major infrastructure development. Major applications could also include those where works have been undertaken or are in the process of being undertaken, without prior approval from the UTRCA, and those where works have been undertaken that do not comply with UTRCA Section 28 policies and restoration/remediation measures are required.

**Large renewable energy projects** are defined as:

- a. Class 3 solar facilities with a nameplate capacity greater than 10 kW.
- b. Class 3, 4 or 5 wind facilities equal to or greater than 50 kW.
- c. Any waterpower project involving construction of a new dam or retrofit of an existing dam.
- d. Any bio-fuel project (anaerobic digestion, biofuel, biogas, or thermal treatment facility) that would not fall under our general categories for buildings or building additions as outlined in the table above.

**Large scale municipal projects** – Projects that have generally come forward following a Class Environmental Assessment (EA), where input from the UTRCA has been solicited and the need for Section 28 approval has been acknowledged. UTRCA costs are related to multiple technical report reviews, preparation of correspondence, attendance at pre-consultation meetings, and site inspections. The UTRCA reserves the right to charge additional fees for significant technical report review.

**Large fill projects** involve proposals for fill movement which exceed 1000 m<sup>3</sup>. Smaller fill projects will be covered under other categories of the fee schedule.

#### **General Notes for All Permit Fees:**

1. The UTRCA reserves the right to charge technical report review fees over and above the permit fees for projects that require a detailed technical report or reports covering one or more issues.
2. Applications that fall under more than one category will be charged at the highest rate.
3. Costs associated with legal review for agreements required for permits issued under a Minister's Zoning Order (MZO) shall be paid by the applicant.
4. For EAs undertaken by private proponents (i.e., non-municipal EAs), standard, intermediate, and full/comprehensive categories are distinguished by the anticipated amount of staff time required for review. For the purposes of the fee schedule, intermediate will be defined as projects with estimated cumulative staff review time required of greater than 15 hours and major will be defined as projects with estimated cumulative staff review time required of greater than 30 hours. The UTRCA reserves the

right to charge additional fees if peer review requirements warrant additional cost-recovery.

5. For Municipal Drain applications where only a scoped review of the engineer's report is undertaken, the lesser fee may be charged.
6. Projects carried out by the UTRCA or under the supervision of the UTRCA Clean Water Program may be exempt from this fee schedule.
7. The applicant is responsible for undertaking required reports/studies required for the application to be deemed complete. Fees determined through the pre-submission consultation process are approximate only and based on the fee schedules in place and information available at the time of consultation. The final fee may change at the time of application submission if the technical review requirements have changed due to the availability of new information or if the fee schedule has changed subsequent to the date of consultation.
8. Fees charged are for the administration purposes and are non-refundable. Permit applications will be closed if information/studies have been required by the UTRCA have not been received from the applicant within two years.
9. Where an application exceeds one year to process due to other approval processes (e.g. site plan, etc...), it may remain active for a period of two years, if there are no major revisions. Where major revisions are required, a new permit application and fee will be required.
10. Any dispute of fee calculations that cannot be resolved through consultation with UTRCA's Manager of Environmental Planning and Regulations and/or UTRCA's Regulation Coordinator, the applicant may request review by the General Manager/Secretary Treasurer or the UTRCA Board of Directors in accordance with UTRCA Fees Policy.

Please contact UTRCA Regulations staff at 519-451-2800 to arrange a pre-consultation discussion prior to submission, or email [regulationsinquiry@thamesriver.ca](mailto:regulationsinquiry@thamesriver.ca)

## 1b. UTRCA Plan Review Fees

Application Review Type		2026 Fee
Formal Pre-consultation	Fee will apply when a formal pre-consultation has been completed. This fee will be deducted from subsequent review fees once a formal application is submitted.	\$320.00
Official Plan Amendment (OPA)	Comprehensive reviews and housekeeping amendments initiated by Municipality	No charge
Official Plan Amendment	Minor/Routine	\$580.00
	Major - Large scale, complex features, requiring technical studies	\$1,590.00
Zoning By-law Amendment (ZBA)	Comprehensive ZBA initiated by Municipality	No charge
	Minor/Routine	\$580.00
	Major - Large scale, complex features, requiring technical studies	\$1,380.00
Consent	Minor/Routine	\$425.00
	Major - Large scale, complex features, requiring technical studies	\$850.00
Minor Variance	Minor/Routine	\$265.00
	Major - Large scale, complex features, requiring technical studies	\$1,325.00
Site Plan	Minor/Routine	\$580.00
	Intermediate - Intermediate scale requiring scoped technical studies	\$1,325.00
	Major - Large scale, complex features, requiring technical studies	\$3,200.00
Draft Plan of Subdivision or Condo	-	\$170 per lot/unit to a maximum of \$14,300.00
Processing Fee	-	\$265.00

### General Notes for all Application Fees

1. Fees are only collected for applications where natural hazard features affect the property.
2. The UTRCA reserves the right to waive the application fee or reduce the fee on a case-by-case basis.

3. Major applications include complex natural hazard issues involving multiple meetings and peer reviews to be completed by the UTRCA and/or other qualified professionals. The UTRCA reserves the right to determine what is considered to be a major application on a case-by-case basis.
4. Fees for multiple applications made for the same parcel within one year will be discounted as follows:
  - First application: full fee per lot/application,
  - Additional applications: 50% of the lesser of the application fee per lot/application.
5. A processing fee can be charged in the following cases:
  - Provision of an extension letter,
  - Provision of a letter for a Draft Plan of Condominium for those proposals that are limited to conversion of existing buildings with no new construction or as long as the design complies with criteria established through a previous circulation (e.g., Subdivision or Site Plan).
  - Other relevant reviews.
6. Where an exception to a permit may be granted through the *Planning Act*, the review fee will be doubled.

## 1c. UTRCA Technical Review Fees (to support Section 28 and Plan Review Services)

Technical Review	2026 Fee
Environmental Impact Studies (EIS) (Minor) – Limited assessment, adjacent to feature	\$795.00
EIS (Scoped) – Scoped assessment, adjacent to or within feature	\$1,270.00
EIS (Comprehensive)	\$2,330.00
Stormwater Management (SWM) Studies – Preliminary	\$1,270.00
SWM Studies – Detailed Design	\$2,330.00
Sediment and Erosion Control (SEC) Plan – Minor/Routine	No charge
SEC Plan/Report – Intermediate	\$265.00
SEC Plan/Report – Major	\$530.00
Geotechnical or Slope Stability Assessment – Scoped Report	\$795.00
Geotechnical or Slope Stability Assessment – Full Report (1 lot)	\$1,270.00
Geotechnical or Slope Stability Assessment – Full Report (multiple lots)	\$1,700.00
Hydrogeology Assessments	\$1,700.00
Other Technical Report	\$1,270.00
Technical Expert Peer Review - External (Instance where there is a need for an outside Technical Expert)	\$555.00 + TBD Technical Review

### General Notes for Technical Review Fees

1. It is required that the proponent pre-consult with the UTRCA and the municipality prior to preparation and submission of a detailed technical report.
2. For the purpose of this fee schedule, Scoped Studies are generally recommended in situations where the nature of the natural hazard is well documented, similar development has been previously proposed, modelled and analyzed, impacts are not anticipated due to the location or nature of a proposed development, and mitigation options have been developed.
3. For the purpose of this fee schedule, Comprehensive Studies are generally recommended in situations that are more complex, where information is lacking, or where the risk or significance of the impact is high.
4. The fees for technical report review include one comprehensive report review and one revised report review. The UTRCA reserves the right to charge a processing fee or additional technical report fees for additional reviews.

## 1d. Other UTRCA Fees

Category	Type	2025 Fee	2026 Fee
Inquiry or Release of Agreements	Written response provided	\$390.00	\$390.00
	Written response provided (rush request)	\$775.00	\$775.00
	Verbal response provided	No charge	No charge
	Regulation Maps provided as digital pdf via email	No charge	No charge
Maps	Printed standard legal sized hardcopy	\$25.00	\$25.00
	Custom Map Fees - Contact GIS staff for exact prices	Administrative Fee \$50.00 plus hourly rate Hourly rates \$90.00 GIS \$135.00 Engineering	Administrative Fee \$55.00 plus hourly rate Hourly rates \$90.00 GIS \$135.00 Engineering
Data Requests	Specialized Data request – Contact staff for exact prices	Administrative fee \$50.00 plus hourly rate Hourly rates \$90.00 GIS \$135.00 Engineering	Administrative Fee \$55.00 plus hourly rate Hourly rates \$90.00 GIS \$135.00 Engineering
Data Portal	Open data portal – self serve	No Charge	No Charge
Other	GPS Surveying (generally involves a crew of two staff)	Administrative fee \$50.00 plus hourly rate \$135.00/hr + expenses, minimum 2 hr charge	Administrative fee \$55.00 plus hourly rate \$135.00/hr + expenses, minimum 2 hr charge
	Aquatic Ecosystem – Preliminary Assessment (generally involves a crew of two staff)	Administrative fee \$50.00 plus hourly rate \$135.00/hr + expenses, minimum 2 hr charge	Administrative fee \$55.00 plus hourly rate \$135.00/hr + expenses, minimum 2 hr charge

**Upper Thames River Conservation Authority Fees Policy**

<b>Category</b>	<b>Type</b>	<b>2025 Fee</b>	<b>2026 Fee</b>
	Terrestrial Ecosystem – Preliminary Assessment (generally involves a crew of two staff)	Administrative fee \$50.00 plus hourly rate \$135.00/hr + expenses, minimum 2 hour charge	Administrative fee \$55.00 plus hourly rate \$135.00/hr + expenses, minimum 2 hr charge
	Photocopies	\$0.10 per standard copy	\$0.10 per standard copy

## Schedule 2: Conservation Areas Fees (Fanshawe, Pittock and Wildwood)

All fees effective January 1, 2026

### Day Use Revenue Centres

Service	Details	2025 Fee	2026 Fee
Day Use Fee	Membership – 12 months (seasons pass)	\$150.00	\$170.00
	Vehicle day pass (May 1 to Oct 17)	\$16.00	\$17.00
	Non-vehicle day pass (Apr 1 – Dec 31)	\$8.00	\$8.00
	Off season Vehicle day pass (Oct 18 to Dec 31)	\$10.00	\$11.00
	Bus day pass	\$175.00	\$175.00
Watercraft Fee	Motor/sailboat seasons pass	\$150.00	\$160.00
	Motor/sailboat daily	\$17.00	\$17.00
	Wet dock seasonal	\$575.00	\$600.00
	Wet dock monthly	\$275.00	\$275.00
	Wet dock daily	\$30.00	\$30.00
	Dry dock seasonal	\$275.00	\$285.00
	Dry dock monthly	\$165.00	\$165.00
	Dry Dock daily	\$25.00	\$25.00
	Wet/Dry Dock Deposit	New in 2026	\$50.00
Equipment Rental Fee	Kayak – 2 hours	\$40.00	\$45.00
	Kayak – 4 hours	\$60.00	\$65.00
	Canoe/tandem kayak – 2 hours	New in 2026	\$50.00
	Canoe/tandem kayak – 4 hours	New in 2026	\$75.00

**Upper Thames River Conservation Authority Fees Policy**

<b>Service</b>	<b>Details</b>	<b>2025 Fee</b>	<b>2026 Fee</b>
	Paddle board (WCA) – per hour	New in 2026	\$25.00
	Backcountry canoe – daily rental (with Backcountry campsite reservation)	\$50.00	\$35.00
Pavilion Rental Fee	Watson Porter Pavilion – 3-day wedding package (Friday to Sunday)	New for 2026	\$7,345.00
	Watson Porter Pavilion – 2-day wedding package (Friday to Saturday)	New for 2026	\$6,215.00
	Watson Porter Pavilion* - inclusive (Friday to Sunday, stat holidays)	New for 2026	\$2,260.00
	Watson Porter Pavilion* - inclusive (Monday to Thursday)	New for 2026	\$1,356.00
	Watson Porter Pavilion – standard (Friday to Sunday, stat holidays)	New for 2026	\$1,130.00
	Watson Porter Pavilion – standard (Monday to Thursday)	New for 2026	\$904.00
	Lakeview Pavilion* - inclusive (Friday to Sunday, stat holidays)	New for 2026	\$1,017.00
	Lakeview Pavilion* - inclusive (Monday to Thursday)	New for 2026	\$850.00
	Lakeview Pavilion – standard (Friday to Sunday, stat holidays)	New for 2026	\$600.00
	Lakeview Pavilion – standard (Monday to Thursday)	New for 2026	\$480.00
	Day Use Shelter (FCA/WCA) - Friday to Sunday, Stat holidays	New for 2026	\$200.00
	Day Use Shelter (FCA/WCA) - Monday to Thursday	New for 2026	\$160.00

**Notes:**

- \*Inclusive fee refers to the user paying an all-inclusive fee which includes the pavilion rental and entry for up to 75 (Watson Porter) or 25 (Lakeview) vehicles.

## Campground Revenue Centres

### Nightly Camping Fees

Service	Details	2025 Fee	2026 Fee
Nightly Camping Fee	Electrical – Double Unit (WCA)**	\$117.00	\$123.00
	Electrical – Double Unit (WCA)*	\$109.00	\$113.00
	Electrical – 50 amp**	\$72.00	\$74.00
	Electrical – 50 amp*	\$67.00	\$69.00
	Electrical – 30/15 amp**	\$61.00	\$64.00
	Electrical – 30/15 amp*	\$57.00	\$59.00
	Non-electrical - Premium (FCA)**	\$59.00	\$62.00
	Non-electrical – Premium (FCA)*	\$56.00	\$57.00
	Non-electrical – Backcountry (WCA/PCA)	\$56.00	\$62.00
	Non-electrical**	\$50.00	\$54.00
	Non-electrical*	\$46.00	\$49.00
	Additional Vehicle Pass (daily/overnight)	\$16.00	\$16.00
	Reservation fee (call centre, Internet, campground)	\$16.00	\$16.00
	Change fee	\$16.00	\$16.00
Cancellation fee	\$32.00	\$35.00	

#### Notes:

- \*\*Peak Season – June 19 to September 7, 2026, Victoria Day long weekend (May 15-18, 2026), Thanksgiving long weekend (October 19-12, 2026)
- \*Non-Peak Season – May 1 to June 18, September 8 to October 18, 2026
- Fees for nightly camping and operating dates for individual Conservation Areas are subject to change.
- Fees listed are per campsite per night.

### Group Camping Fee

Service	Details	2025 Fee	2026 Fee
Group Camping Fee	Electrical - 30 amp (WCA/FCA) (to a maximum/equivalent of 6 campsites)	\$396.00	\$408.00
	Electrical – 30 amp (WCA B Shelter) (to an equivalent of 6 campsites, with maximum capacity of 12 campsites; for reservations beyond 6 campsites, please contact CA directly for fee details)	\$396.00	\$408.00

## Seasonal Camping Fees

Service	Details	2025 Fee	2026 Fee
Seasonal Camping Fee	Seasonal 50 amp (FCA)	\$4,070.00	\$4,100.00
	Seasonal 30 amp – Premium	\$4,675.00	\$4,550.00
	Seasonal 30 amp – Waterfront (PCA)	\$4,150.00	\$4,350.00
	Seasonal 30 amp	\$3,825.00	\$3,925.00
	Seasonal 15 amp	\$3,450.00	\$3,550.00
	Seasonal non-electric – Waterfront (FCA)	\$3,125.00	\$3,275.00
	Seasonal non-electric	\$2,750.00	\$2,900.00
	Additional Vehicle Pass - Seasons Pass*	\$150.00	\$150.00
	Seasonal Site Administration Fee	\$400.00	\$400.00
Storage Fee	Trailer Storage & Deposit**	\$475.00	\$675.00
	Shed / deck Storage & Deposit**	\$250.00	\$450.00
	Motor/sailboat storage	\$275.00	\$275.00
Sewage Fee	Sewage disposal - weekly	\$825.00	\$825.00
	Sewage disposal - bi-weekly	\$415.00	\$450.00
	Sewage disposal - single	\$65.00	\$70.00
	Sewage disposal - unscheduled request	\$125.00	\$140.00
	Sewage disposal - non camper	\$50.00	\$50.00

Notes:

- \*Additional Vehicle Pass valid for campground operating season only (May 1 – Oct 18)
- \*\* The deposit forms part of the winter storage fee and that \$200.00 will be applied against seasonal camping permit in the following season for the reserved campsite.
- \*\* Implementation in 2026, deposit applied against seasonal campsite fees in 2027.

## Schedule 3: Forestry Services Fees

### Planting Fees

#### UTRCA Planting: Seedlings

Planting Type	300-999 Trees	1000-2499 Trees	> 2500 Trees
Machine Planting	\$3.00/tree	\$2.40/tree	\$1.35/tree
Hand Planting	\$3.00/tree	\$3.00/tree	\$3.00/tree

Note: Plus cost of trees and HST. Includes 2 applications of herbicide.

#### UTRCA Planting: Large Stock

Tree Type	Notes	Planting Fee/Tree
Large Stock Coniferous	Minimum order 50 trees	\$18.00
Large Stock Deciduous	Minimum order 25 trees	\$42.00

Note: Plus cost of trees and HST.

#### Landowner Planting

Tree Type	Notes	Fee (Administration/ Shipping and Handling)
Seedlings	Minimum order 50 trees, must be ordered in lots of 10/species	\$40.00 + HST
Large Stock	Minimum order 25 trees, can include both coniferous and deciduous large stock trees	n/a

### Tree Prices

Tree Type	2025 Price/ Tree (+HST)	2026 Price/ Tree (+HST)
Coniferous Trees Large Stock	\$17.30-\$22.00	\$17.50-\$22.50
Deciduous Trees Large Stock	\$29.00-\$47.00	\$30.00- \$53.00
Wildlife Shrubs Large Stock	\$24.00- \$27.00	\$14.50-\$16.00
Coniferous Seedlings (18-40 cm)	\$1.55- \$1.85	\$1.60-\$2.20
Deciduous Seedlings (26-90 cm)	\$1.90-\$2.10	\$1.95-\$2.40
Wildlife Shrub Seedlings (20-35 cm)	\$2.03-\$2.99	\$1.95-\$2.65

**Note: Price is dependent on species and nursery availability.** Tree Care

Tree Protection Item	Notes	Fee/Item
Wooden Stake and Tie	2x2 wooden stake with tie	\$4.00
Tree Guard	Spiral rodent guard	\$1.25

Note: Plus HST.

## Schedule 4: Community Education Program Fees

Fee schedule effective in September to align with the school year.

Program Type	Program Details	Fee Details	2025 Fee	2026 Fee
Conservation Education	Conservation Area Programs	Per student Per group minimum	\$8 \$136	\$8.5 \$170
	In-Classroom and Off-site Programs	Per group	\$150 - \$250	\$150-\$250
Nature School	Half-Day and Full-Day Programs	Per Season	\$100 - \$360	\$150 - \$360
Specialist High Skills Major Certifications	On-Site and Off Site, Half-Day and Full-Day Programs	Per student	\$15-\$100	\$15-\$100
		Per group minimum	\$250-\$600	\$300-\$600
GREEN Leaders	Multi-Visit, Year Long Program	Per Class	\$5,000	\$5,000
Flooding STEM Programs	On-Site, Full-Day Programs	Per Class	\$550	\$550
Stream of Dreams	Whole School Program	Per Student	\$10	\$10
		Per Fish	\$8	\$8
Children's Water Festival	Full-Day Festival	Per Student	\$12	\$12

Note: In some instances, educational program fees are supported by a sponsor or grant.

## Schedule 5: Hunting Fees

Permit Type or Location	2025 Fee	2026 Fee
Hunting Area Draws	\$85	\$90.00
Ellice and Gads Hill Swamps	\$85	\$90.00

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**To: UTRCA Board of Directors**  
**From: Jenna Allain, Manager, Environmental Planning and Regulations**  
**Date: November 25, 2025**  
**File Number: BoD-11-25-80**  
**Agenda #: 8.1**  
**Subject: Planning and Permitting Service Delivery Review – Deferred from November 2025 Meeting**

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## **Recommendation**

THAT the Board of Directors receives the Planning and Permitting Service Delivery Review Report for information.

## **Background**

Late last year, following Board direction, the Upper Thames River Conservation Authority (UTRCA) requested proposals from qualified consultants to conduct a Service Delivery Review of mandatory planning and permitting program areas within the Environmental Planning and Regulations Unit. The purpose of the Service Delivery Review was to develop an understanding of current service levels, consider constraints to current processes and practices, and provide recommendations for digital modernization, improving operational efficiencies, and delivering equitable and cost-effective services.

Early in 2025 Blackline Consulting was awarded the contract for undertaking the Service Delivery Review of UTRCA's planning and permitting program areas. The review was undertaken between the Spring and Fall of 2025, and it included interviews and process shadowing with staff, consultation with member municipalities, the development community, and other conservation authorities, and the preparation of an interim and final report. The Final Report and Recommendations have been received and are attached to this report.

## **Final Report and Recommendations**

The Final Report from Blackline Consulting includes a set of 9 recommendations that are grouped into three key objectives as outlined below. The report identifies implementation actions specific to each recommendation.

### Objective A - Creating an Efficient and Responsive Unit

This objective involves changing the UTRCA's approach to elements of permitting and planning reviews and includes the following recommendations:

1. *Coordinate with member municipalities* – work with member municipalities to improve coordination of planning application reviews.
2. *Implement a risk-based decision framework* – that informs how the UTRCA reviews development activity, based on the level of risk associated with each application.
3. *Accelerate the planning comments process* – by defining review cycles, effectively distributing workloads, and triaging files.
4. *Creating a protocol for the Planning and Regulations Unit's use of floodplain mapping* – establish a clear protocol that defines how staff apply and transition between versions of the UTRCA's floodplain mapping.

### Objective B - Enabling our Team

This objective requires implementing tools and methods that best support staff and include the following recommendations:

5. *Implement Suitable Technology* – implement a system, such as a customer relationship management system (CRM) or case management software, to track client interactions, link applicable permitting/planning files in one location and reduce manual work.
6. *Promote a culture shift to be more solution-oriented* – Foster a culture that positions UTRCA as a collaborative and solution-oriented partner.
7. *Implement a continuous improvement program* – utilize Lean continuous improvement principles to enhance existing processes and service delivery.

### Objective C - Measuring our Performance

This objective will help the UTRCA build on its relationships with outside interest holders by demonstrating that the Authority effectively meets its goals through implementation of the following recommendations:

8. *Create service standards and metrics* – Establish internal KPIs and service standards to guide staff workload, resource allocation and client expectations.
9. *Inform relevant groups of changes to relevant information* – Improve transparency and reduce confusion by proactively informing interest holders of process changes.

## **Report Considerations**

Staff have reviewed the Final Report prepared by Blackline Consulting and generally agree with the observations made, the issues and challenges identified, and the recommended opportunities for improvement. The report offers a thoughtful and balanced assessment, highlighting some strengths of UTRCA's current planning and permitting services, while clearly identifying opportunities for improvement. Staff appreciate that the recommendations are practical, based on observation and feedback,

and are aligned with the challenges that our planning and regulations staff experience day to day.

UTRCA's planning and regulations staff are committed to continuous improvement and are always open to changes that will lead to more efficiency and improved customer service. Many of the issues and challenges identified within the Blackline Report are known issues that staff have been actively working to address. Over the past year, staff have been making process adjustments that already align with some of the recommendations outlined in the Final Report. These include:

- Streamlining and providing planning comments via email for non-regulated properties rather than preparing formal comment letters for all applications (aligns with Recommendations #2 and #3).
- Revising templates for technical review memos that split comments into different sections based on priority (aligns with Recommendations #2 and #3)
- Coordinated meetings for technical review staff when more than one technical reviewer is required to improve collaboration and reduce review overlap (aligns with Recommendation #6).
- Developing resources and providing training for staff on natural hazard risks to support improved risk assessment and increase efficiency when reviewing applications (aligns with Recommendation #2).
- Establishment of a monthly working group with City of London senior staff to improve communication, collaboration and discuss common issues and challenges (aligns with Recommendation #1).
- Regular meetings with technical staff from member municipalities to understand roles and responsibilities in technical reviews to avoid duplication (aligns with Recommendation #1)
- Developed a regulated area map transition protocol as per Board report number BoD-11-25-77 (aligns with Recommendation #4).

## **Next Steps**

Now that the Final Report and Recommendations have been received, an implementation plan will be developed that identifies the timing and costs associated with implementing the report's recommendations. Implementation of certain recommendations may need to be delayed in consideration of the recent provincial announcements regarding conservation authorities (i.e., Recommendation #5 given the proposal to develop a standardized and centralized system for processing applications for permits issued by conservation authorities). An implementation plan will be prepared for Board consideration early in 2026.

## **Recommended by:**

Jenna Allain, Manager, Environmental Planning and Regulations  
Tracy Annett, General Manager, Secretary-Treasurer



BLACKLINE  
CONSULTING

A Higher Standard

# Planning Service Delivery Review

**Upper Thames River Conservation Authority**

**Final Report**

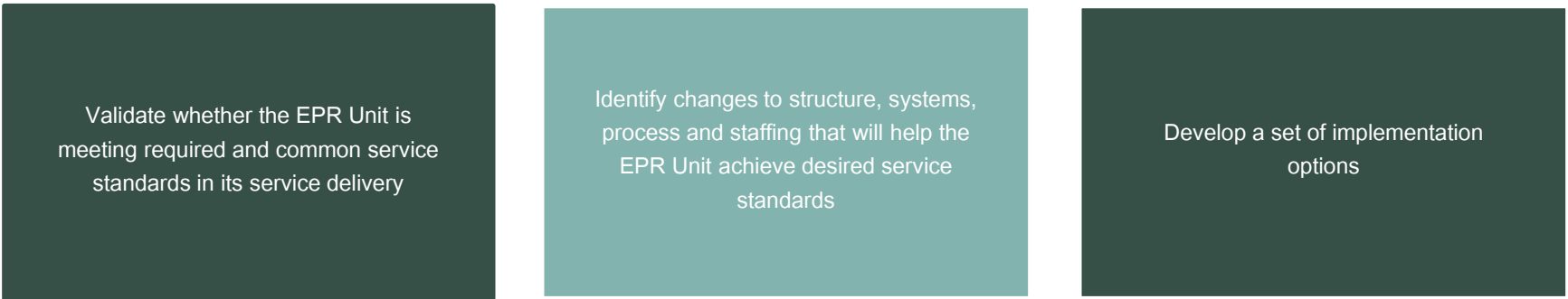
13<sup>th</sup> November 2025

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# We reviewed the UTRCA's permitting and planning process

The Upper Thames River Conservation Authority (the Authority or UTRCA) contracted Blackline to perform this Service Delivery Review within the Environmental Planning and Regulations Unit (the EPR Unit). The objective of our review was to:



This report adds a set of recommendations to our findings that describe changes UTRCA can consider to the EPR Unit that will help it streamline its activities.

# UTRCA is working in an evolving regulatory environment that impacts planning and permitting

## What's already changed

Over the past six years, the UTRCA has had to respond to several regulatory changes that affect what services it provides and the scope of those services.

- ▶ Introduced in 2019, Bill 108: The More Homes, More Choices Act amended the Conservation Authorities Act (CAA) to define mandatory program services. Under these changes, Conservation Authorities can still deliver non-mandatory services, but this requires municipal approval.
- ▶ Bill 23: More Homes Built Faster Act, introduced in 2022, restricted CAs from completing other types of planning reviews on behalf of member municipalities (e.g., technical and natural heritage reviews). Adjusting to this narrowed scope has taken time.
- ▶ In 2024, the Province introduced new regulations under the CAA. *Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits* came into effect on 1<sup>st</sup> April 2024. The Province's changes aim to clarify the role of Conservation Authorities in the development process, streamline development approvals and encourage new housing construction.

## What is changing now

On 5<sup>th</sup> June 2025, the Province enacted both Bill 5: Protect Ontario by Unleashing our Economy Act and Bill 17: Protect Ontario by Building Faster and Smarter Act. Both Bills introduce changes aimed at expediting resource and infrastructure projects.

There are critical changes that will affect the EPR Unit, including but not limited to:

- ▶ Special Economic Zones: the Lieutenant Governor can exempt projects and proponents from any Act or regulation, eliminating the need for a Section 28 permit
- ▶ Bill 17: updates what is required for a complete planning application, adding restrictions to help expedite projects. A critical change is the inability to alter requirements for technical studies after the planning application is deemed complete, with only the Ministry of Municipal Affairs and Housing (MMAH) able to approve new requirements.

**These regulatory changes have the potential to alter UTRCA's authority over development in its watershed significantly.**

# We structured our analysis into three sections

## Current state of planning and permitting processes

**Is the EPR Unit efficient in how it delivers the services?**  
Is the EPR Unit using technology and processes efficiently?  
Does the EPR Unit effectively manage demand?

**No. Processes can be manually intensive, partially due to older technology and out-of-date floodplain mapping**

- ▶ File Handlers consider the risk and complexity of individual files, but there is no EPR Unit-wide risk-based framework to support decision-making.
- ▶ The technology staff use does not support their information management needs.
- ▶ The variable demand the team faces likely created backlogs. This compounded by the team structure and not always having defined targets for review completion.

**Is the EPR Unit Effective?**  
Does the EPR Unit achieve the intended outcomes?

**Yes, the EPR Unit is meeting its mandate to support safe development**

- ▶ As of 2024, the EPR Unit meets permitting and planning timelines over 80% of the time. Despite this, differences in the goals of each interest holder group drive disagreement about the EPR Unit's efficacy.
- ▶ UTRCA structures its core functions similarly to other CAs, but interest holders still believe there is a disconnect between groups which hampers decision-making on files.

**Does the EPR Unit provide an adequate service?**  
Are you meeting legislated standards?  
Are your customers happy with the service?

**No. Customers are not satisfied with the service even though the EPR Unit meets legislated permitting standards**

- ▶ This may be because, at times, the Unit is slow to provide comments back to municipalities on planning applications, missing the deadlines set by the municipality. Staff attribute the slowness to work on technical reviews, which can be complex and require collaboration.
- ▶ The EPR Unit tracks data on planning and permitting but does not use this data to set performance targets beyond what is established in the CAA.

# Based on that analysis, we developed a set of recommendations



## We grouped those recommendations into three key objectives

- ▶ **Creating an efficient and responsive unit** involves changing the UTRCA's approach to elements of permitting and plans review.
- ▶ **Enabling our team** requires implementing tools and methods that best support staff. The Authority has been implementing new technology (e.g., Microsoft O365) to support planning and permitting. However, further investment and updates will help staff with key tasks like file management. Additional continuous improvement efforts will support the EPR Unit to manage change in a quickly evolving environment.
- ▶ **Measuring our performance** helps the UTRCA build on its relationship with outside interest holders by demonstrating that the Authority effectively meets its goals. The EPR Unit's staff manage competing timelines from different interest holders simultaneously; having formal service standards helps set expectations for those customer groups.



### Creating an efficient and responsive organization

-  #1 - Coordinate with member municipalities
-  #2 - Implement a risk-based decision framework
-  #3 - Accelerate the planning comments process
-  #4 - Create a protocol for floodplain map updates

### Enabling our team

-  #5 - Implement Suitable Technology
-  #6 - Promote a culture shift to be solution oriented
-  #7 - Implement continuous improvement measures

### Measuring our performance

-  #8 - Create service standards and metrics
-  #9 - Inform relevant groups of changes to relevant information

An aerial photograph showing a dense forest of evergreen trees on the left, which meets a river on the right. The river has a blueish-grey hue and some white rapids. The text "/ EFFICIENCY" is overlaid in white on the lower-left portion of the image.

**/ EFFICIENCY**

# The EPR Unit is making progress to modernize its operations

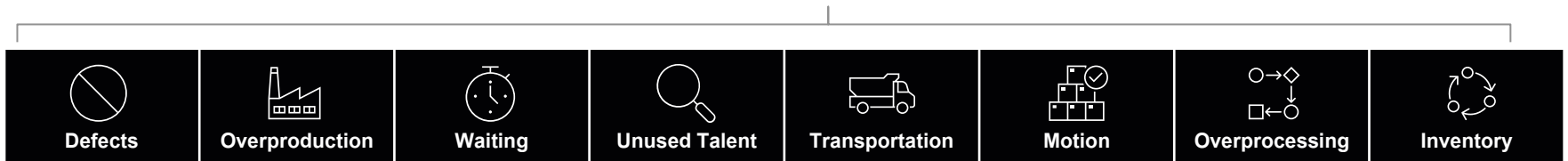
**This includes moving away from older systems like Groupwise, adopting Office 365 and adapting to the changes in legislative responsibilities**

A key objective of these changes is to increase efficiency

**For our review, we assessed efficiency by examining how people, processes and technology complete tasks.**

- ▶ Our findings highlight variations in service delivery across staff, municipalities and developers, revealing efficiencies in the EPR Unit's operations.
- ▶ We mapped the EPR Unit's current processes and analyzed them through the lens of the eight Lean waste types. We especially looked for instances of manual work or hand-offs. Throughout the section, we refer to the appendix for specific examples.

The eight Lean waste categories are:



**Efforts already in-progress include:**

- ▶ Establishing Planning Coordinator (vacant) and Regulations Coordinator positions to provide guidance and leadership on specific programs within the EPR Unit.
- ▶ Ongoing floodplain mapping updates.
- ▶ Changes to the EPR Unit's approach to flood management (i.e. safe versus dry access). Considering establishing a more risk-based approach to assessing permitting and planning applications.
- ▶ Efforts to better collaborate with municipal partners and developers.

# Staff use complexity to determine the level of review a planning and permitting application warrants



## No formal risk framework





- ▶ Staff have access to standardized checklists and tend to treat every planning/permitting application with the same level of risk (see Steps 3.3 in the [Appendix](#)). This can be time-consuming and lead to unnecessary processing for low-risk applications.
- ▶ Several staff in the EPR Unit brought up the desire to move to a formal risk-based approach to triaging applications, whereby requirements for low-risk development could be less strict and detailed. Both internal and external interest holders expressed frustration with the current need to undertake detailed reviews for low-risk activities.
- ▶ Currently, there is no process for triaging files. Files are triaged informally by various staff. Formalizing this triaging process may reduce duplication of effort.
- ▶ Lake Simcoe Region has implemented this triaging concept and found success. This includes having weekly triage meetings for each group (e.g. planners, technical staff, permit officer) where they discuss current challenges or concerns with timelines. They will reprioritize work as needed based on these meetings.



## Customers perceive the EPR Unit processes as conservative and procedurally involved

- ▶ Some municipalities and developers perceive the EPR Unit as overly cautious and process-heavy, which undermines confidence in its role as a collaborative partner. This excessive caution and rigid processes increase the workload and delay applications, as all planning applications are held to the same standard of requirements.
- ▶ These delays contribute to waiting, rework and overprocessing, limiting the UTRCA's ability to deliver timely service (see Steps 1.6 in the [Appendix](#)). Member municipalities feel the EPR Unit brings the same level of rigour to every application, which in turn dilutes the perceived importance of critical matters.

# The EPR Unit's technology does not support information management

	Challenges	Evidence
	<p><b>Technology is being upgraded but there are still gaps in training and integration</b></p>	<ul style="list-style-type: none"> <li>▶ The EPR Unit has recently migrated to Office 365 as its primary toolkit for supporting its processes. EPR staff expressed the desire to receive more training and support on new tools as they are deployed (e.g. knowledge base or how-to guides).</li> <li>▶ Staff also expressed a desire for better integration of tools (document system with GIS), to streamline manual work (see steps 1.2 in the <a href="#">Appendix</a>).</li> </ul>
	<p><b>The absence of integrated systems leads to duplicate manual efforts, risk of errors and reduced accuracy</b></p>	<ul style="list-style-type: none"> <li>▶ Multiple parties (Admin and Finance) manually copy, paste and colour-code payment data in Excel templates. The UTRCA could improve efficiency by assigning full end-to-end tasks to individuals with complete access to the necessary tools. This would reduce motion associated with unnecessary handoffs, reduce wasted time and streamline the process (see Steps 2.8 and 2.9 in <a href="#">Appendix</a>)</li> <li>▶ Technical staff send technical comments in Word, which the file handlers manually copy into application letters. Technical staff can prepare their comments directly in the letter to save time.</li> </ul>
	<p><b>Given current constraints, staff use manual processes and track work using disconnected tools</b></p>	<ul style="list-style-type: none"> <li>▶ Staff store information across multiple locations and use personal to-do lists that others cannot see (occurs in Steps 1.1-1.3 in the <a href="#">Appendix</a>). This increases error-prone updates in the Excel tracker, obscures file ownership and prevents visibility into file status or timelines.</li> <li>▶ When calculating payment fees, staff spend time searching old files for fee precedents since existing fee schedules do not clearly define fees for complex reviews, creating extra work.</li> </ul>
	<p><b>There is no formal prioritization process</b></p>	<ul style="list-style-type: none"> <li>▶ In Planning, file handlers rely on their professional judgment to assign and prioritize files as there is no formal process for prioritization between Planner I and Planner II. These priorities are also influenced by the legislative timelines for permits.</li> <li>▶ Planning and Regulations staff are assigned to specific geographic regions, and workloads in each region can vary, meaning that at times, some staff carry heavier workloads than others. Some files take longer and Planners must balance these demands while still meeting legislative requirements.</li> </ul>

# Prioritizing collaboration, pre-consultations and appeals speeds up the overall application process

## Skipping pre-consultations results in incomplete applications, leading to more rework

- ▶ Although pre-consultations for permit applications are not required and pre-consultations for planning application is typically led by the municipality, they do improve the overall speed and clarity of applications. Applicants often skip this step. This can lead to incomplete applications, requiring staff to request missing files and re-review current and new documents. Currently, this causes re-work for both staff and applicants. Proactively guiding applicants and setting clear expectations during the pre-consultation will help prevent issues, improve submission quality and speed the overall process (see steps 1.3 and 2.1 in the [Appendix](#)).

## Separate work and limited collaboration create disconnects during the application process



- ▶ Planning, regulations and technical staff use separate tracking sheets for workload and case tracking and have inefficient processes for collaboration (see Steps 1.2.1 and 2.3.2 in the [Appendix](#)). Comments on these reviews are difficult to coordinate given current constraints. This separation prevents sharing insights and concerns, which can lead to delays in resolving issues in real time which hinders processing.
- ▶ In contrast, Lake Simcoe has an Infrastructure Analyst role that conducts the initial technical review and expedites simpler tasks and questions. The Infrastructure Analyst also meets with an Engineer on a weekly and one-on-one basis to streamline the review process and ensure timely resolutions to move applications forward efficiently and effectively.

## The EPR Unit is speeding up reviews through the administrative review process for permitting

- ▶ UTRCA has appointed Administrative Review Officers (ARO) to handle certain appeals under the regulation and apply specific policy discretion, to avoid the necessity of a hearing, where applicable. The ARO's will re-review the Section 28 application requirements and take the applicant's reasons into consideration. The ARO's have the delegated powers to make limited decisions when applications do not meet existing policies, but changes are being considered within an updated policy document to be consulted on in the new year. This process helps streamline approval and alignment among staff without requiring a hearing. The Administrative Review Policy reinforces to applicants the importance of the pre-consultation process.

# Stakeholders deemed enhancing communication desirable

Internal and external interest holders reported that communication issues are hindering optimal performance.

Challenges	Evidence
<p><b>Volume of emails can lead staff to reviewing outdated information</b></p> 	<ul style="list-style-type: none"> <li>▶ Most municipalities have a positive experience with UTRCA, however, when municipalities submit a planning application, they often exchange multiple emails to confirm the application meets requirements (see Steps 1.3 in the <a href="#">Appendix</a>). This increases the burden on staff to keep track of individual applicants and communications.</li> <li>▶ Some member municipalities report that the EPR Unit reviews older iterations of files, while more recent versions have already been submitted by the applicant. They also report contradictory comments, causing confusion and inefficiency for the EPR Unit, as they are commenting on aspects of applicants' designs that may no longer be applicable. While this process is improving with speeding up technical reviews, this can also cause frustration or delays for member municipalities.</li> <li>▶ The EPR Unit says that this can stem from poor communication from municipalities. Municipalities often delay circulating reports with key information (e.g. maps and figures), due to AODA formatting issues, which hinder the review process. They also say that the technical reports submitted by applicants can often be contradictory in their own right, leading to more confusion.</li> </ul>
<p><b>Circulation of Information</b></p> 	<ul style="list-style-type: none"> <li>▶ Some external interest holders reported that they were not notified about changes to the EPR Unit's processes which impact their work. In a 2024 Board meeting, a developer expressed the need for better communication and consultation on planning and regulations before they reach the Board. Improved circulation of updated standards and working practices would ensure applicants have all necessary information, reducing rework and streamlining the application process.</li> </ul>

# The percentage of on-time reviews falls significantly when a permit application requires a technical review

**For planning applications, on-time performance falls from 82% to 30% when a technical review was required<sup>1</sup>**

This shows that the technical review process can contribute to significant delays. This outcome is expected: commenting on plans and issuing clearance letters is more straightforward when the EPR Unit does not require a technical review. This can be caused by inefficiencies in coordination, highlighting a need for greater alignment between technical staff and the planning/permitting team. Our interest holder consultations and process shadowing feedback display various perspectives:

	EPR Unit	Member Municipalities	Developers
Technical Review Process	Staff want applicants to submit high-quality studies for their applications. The Province changed the scope of technical reviews (i.e. what CAs can review and comment on) and the adjustment has been challenging.	Technical staff work in silos, delaying progress. Slow response times and uncoordinated comments hinder support for municipalities.	UTRCA's slow responses, uncoordinated communication and rigid processes cause delays and increase development costs. The focus on checklists and scope creep limits effective collaboration.
The Authority's floodplain mapping is inaccessible	There are delays and difficulties caused by the mapping. We rely on another unit within UTRCA with its own priorities and limited capacity.	UTRCA is not fully transparent about its floodplain mapping. This appears to be caused by misalignment between planning and technical staff.	UTRCA updates flood lines and this impeded our projects - resulting in multiple rounds of discussion, redesign and review. This can be disruptive and appears to stem from a reluctance to truly collaborate on this work. We have concerns about transparency even though UTRCA provides interactive mapping online, similar to other CAs.

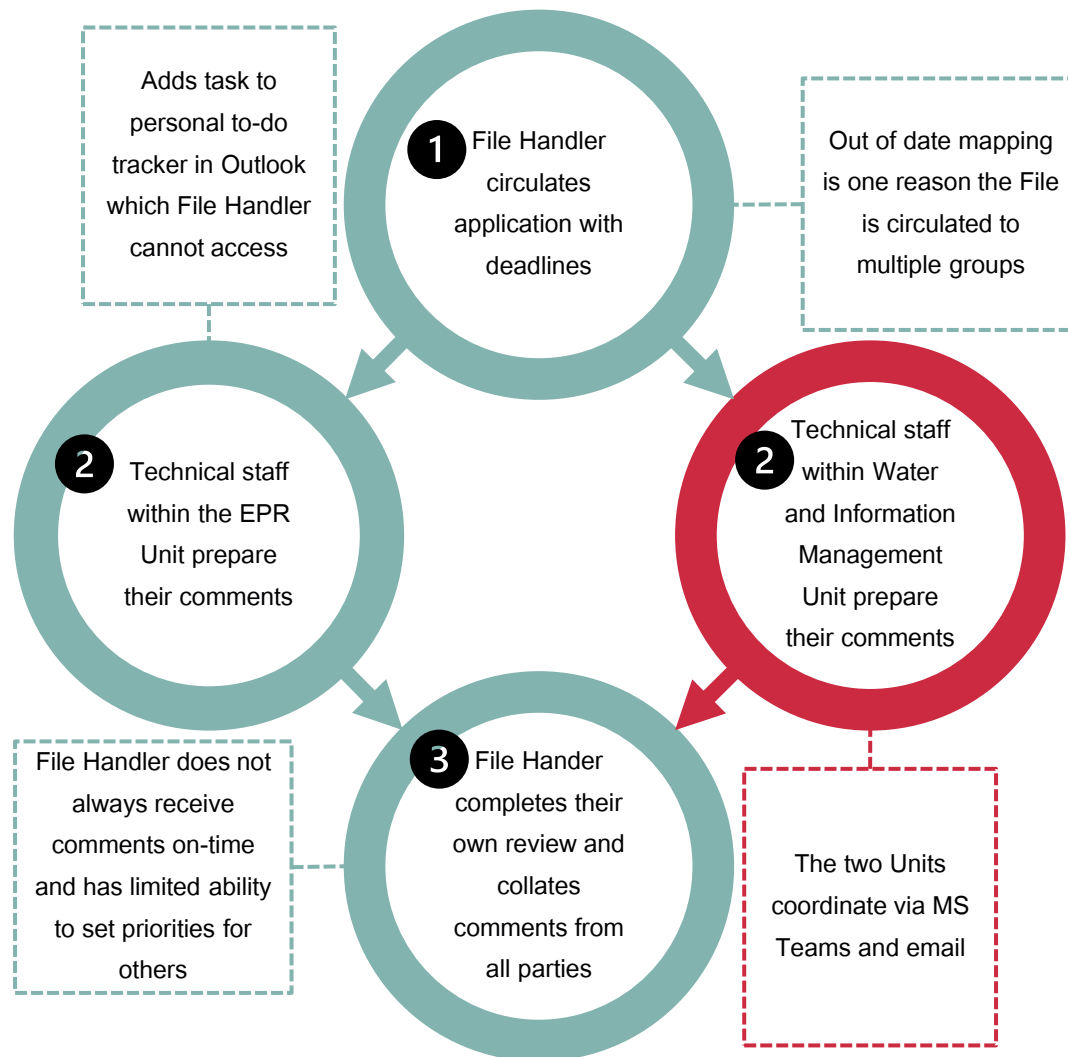
1. [Impact of Technical Review on On-Time Performance](#)

# UTRCA's floodplain mapping is not consistent for staff or external interest holders

## Different versions of the floodplain mapping increase waiting time and cause extra processing for staff

The current flood maps on UTRCA website are old, as technical staff update new versions. As the model is still evolving, the current limits of the floodplain may be revised based on new data. UTRCA has a policy to use the most up-to-date data.

- ▶ Planners often request the latest map from technical staff, which takes additional time and effort.
- ▶ Technical staff in the Water and Information Management Unit have their own processes and file management system that EPR Unit staff cannot access. This extra step, and the need to review both maps, limits processing time. This can prolong timelines as the Engineering team has its own priorities (see steps 1.2 and Technical steps in [Appendix](#)).



# Demand varies by region, leading to workload imbalances

## Application volume is double for the London Planner I compared to the rural Planner I

As shown to the right, there is significant variation in application volume across different roles and regional areas of responsibility. We understand that the applications handled by a Planner II are more complex, requiring more time, hence the lower number compared to the Planner I.

- ▶ However, two discrepancies remain: the number of applications allocated to the Planner I's is materially different and the ratio of applications between the Planner I and Planner II are very different, ~1:10 compared to ~1:4. These differences show how the geographic approach creates different workloads.
- ▶ It's interesting to note that London circulates a higher percentage of applications that are not regulated.
- ▶ Peer CAs also encounter imbalances but have various processes in place to redistribute work as needed. Grand River uses the Tableau software to track demand, decision timelines and distributes the applications to ensure equity across the team.
- ▶ By balancing application volume more evenly across circulated and regulated applications and by geography, staff can focus on higher-risk applications that require more in-depth reviews, improving overall flow and reducing unnecessary delays (see Steps 1.3 and 2.5 in the [Appendix](#)).

2024 London	Applications Circulated	Applications Regulated
Planner II	71	62
<b>Planner I</b>	<b>769</b>	158
Planning Coordinator	26	25
2024 Rural Municipalities	Applications Circulated	Applications Regulated
Planner II	88	78
<b>Planner I</b>	<b>352</b>	167

## Ensuring a fair balance of work would help the UTRCA manage vacancies

- ▶ At present, vacancies have led staff to assume broader responsibilities, such as a Planner II managing both Planner I and Planner II files. When this happens in London it can be all the more impactful due to the high demand in that region.
- ▶ Staff highlighted this imbalance and indicated it is further heightened with vacancies in planner roles contributing to temporary increases in work volume.

# UTRCA does not have baseline targets for processing planning applications...

## **The EPR Unit relies on deadlines set by member municipalities**

The EPR Unit tracks planning applications in an Excel sheet, capturing details like application receipt dates, comment deadlines and when comments are actually received (see steps 1.2.1 in the [Appendix](#)). This helps identify trends and monitor performance over time and can be used to display good work and/or empower a push for more staffing needs. However, the EPR Unit does not use this data to plan for future staffing workloads or set performance targets.

- ▶ The EPR Unit could leverage this data to create key performance indicators (KPIs), benchmark staff performance, set target response times and establish reasonable workload expectations. UTRCA has already created a fee schedule based on complexity and could use a similar approach to set KPIs by complexity to acknowledge that some files require more effort than others. Having KPIs will help staff recognize a normal workload versus a heavier one and plan accordingly. This approach would help forecast staffing needs and ensure the team meets target timelines, ultimately boosting efficiency and service delivery.
- ▶ Rideau Valley has a digital database for tracking timeline performance for both Section 28 permits and planning applicant reviews to ensure service standards are met.
- ▶ Lake Simcoe has set baseline annual targets for the number of planning applications processed that vary between 200 and 300 planning applications per person, depending on the complexity of files. They also review workloads annually to adjust who is responsible for which areas of the watershed to balance demand.

# ...as a result, UTRCA may struggle to manage variable demand

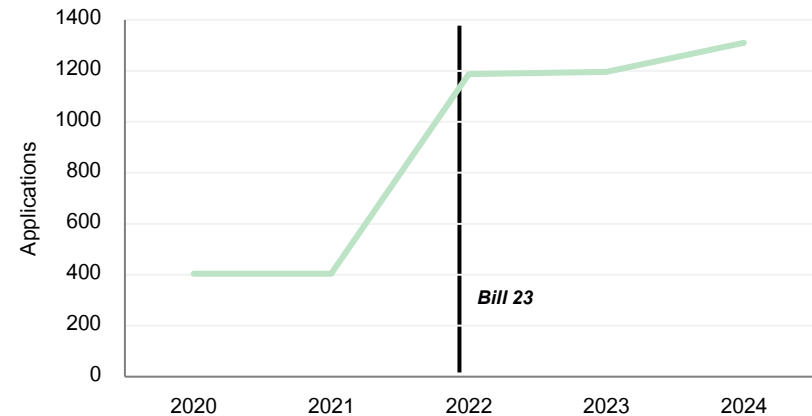
## Staff adhere to planning application deadlines set by municipalities, but turnaround times vary and do not always account for complexity

Combined with the present staff structure and the absence of review targets, means UTRCA has little flexibility to adapt to varying demand, which can lead to backlogs.

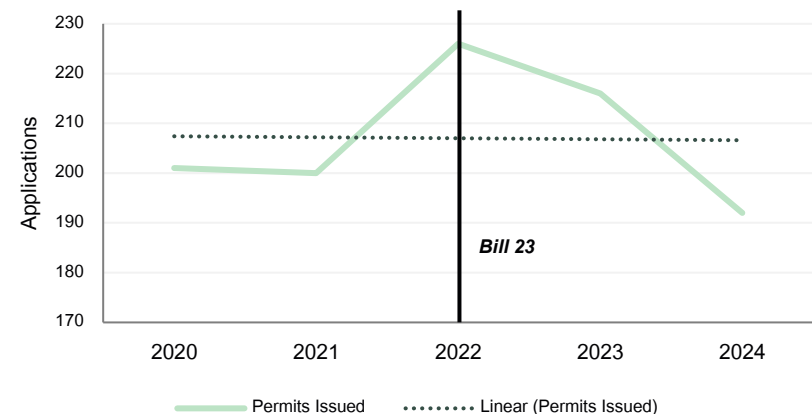
As shown on the right, planning applications have nearly tripled in the last four years. One key factor driving this increase is the introduction of Bill 23 (the More Homes Built Faster Act) in 2022. This surge in planning applications puts pressure on staff to manage the growing workload, highlighting the need for more efficient processes.

- ▶ Sometimes, neither the Municipality nor the EPR Unit will put a deadline for comments, leaving a planning application in limbo. This can increase timelines.
- ▶ The second graph shows an increase in permit applications until 2022, followed by a decline.
- ▶ Variable demand is natural but can be challenging to plan around, which is why efficient work practices can help the UTRCA handle the spikes effectively. Without continuous improvement and improved efficiency, the high volume contributes to a [growing backlog](#) (which we explain further in the next section).

### Planning Applications Issued



### Permit Applications Issued



A close-up photograph of several green leaves with serrated edges, set against a blurred background of more foliage. The lighting is bright, creating a bokeh effect with soft, out-of-focus light spots. The leaves are the central focus, showing detailed vein patterns.

**/ EFFECTIVENESS**

# UTRCA supports safe development in its watershed

## UTRCA is fulfilling its core mandate to prevent unsafe development in regulated areas

Our consultations with internal and external interest holders did not highlight any safety concerns stemming from how UTRCA processes permit applications and provides comments to municipalities on planning applications.

- ▶ Process shadowing also did not identify any shortcomings or concerns about the Unit issuing permits without due regard for natural hazards, staff deliver their analysis with a high degree of rigour.

## As of 2024, the EPR Unit meets permitting and planning timelines over 80% of the time based on available data

- ▶ The table below presents five-year averages (2020-2024) for permitting and plans reviews. [The EPR Unit has actively improved its on-time performance over this period.](#)

	Annual Number	On-time Performance
Permitting	207	86.5% <sup>1</sup>
Plans Reviewed	900	63%

- ▶ The EPR Unit has improved its on-time performance despite a sharp rise in planning volume. Interest holders we met with attributed the increased volume to the Province's focus on boosting housing supply; there was also likely pent-up demand for construction at the end of the COVID-19 pandemic.

1. Note that percentage for permits is based on the number of application reviews complete with 21 days. [Annual Report of Administration and Enforcement.](#)

## The EPR Unit is meeting its mandate despite struggling with turnover and staff vacancies in recent years

Since the implementation of the EPR Unit's current structure, it has not been fully staffed for any significant amount of time.

- ▶ It takes roughly a year to onboard a new Planner or Regulations Officer fully. The niche knowledge the roles require takes time to learn. The current structure helps in this regard: with more junior roles in both program areas who can turn to experienced staff for guidance.
- ▶ The EPR Unit has found recruitment challenging. Applicants tend to have limited work experience in planning and the work of Land Use Regulations Officers is especially niche. Even applicants with planning experience tend not to have CA-specific experience.

## The peers we spoke to echoed these challenges

- ▶ Grand River echoed that fully onboarding new staff can take about a year.
- ▶ Peers also expressed that hiring technical staff can be challenging (e.g. not being able to find a qualified hydrogeologist at all).
- ▶ One peer had a service disruption in 2024 due to vacancies at the same time as the Province implemented new permit timelines.
- ▶ Like the UTRCA, peers have introduced intermediate roles to take on less complex files. They also cite that this tiered structure allows for more upward mobility.

# The EPR Unit is managing significant change

## This includes responding to regulatory changes and updating floodplain modelling<sup>1</sup>

- ▶ In response to Ontario Regulation 41/24 , which we [introduced on page four](#), UTRCA is reviewing and updating its policies and procedures. The EPR Unit has introduced internal changes to support these standards, including new templates and tracking methods. These updates, coupled with technology upgrades, are helping the EPR Unit deliver on its mandate despite rising demand.
- ▶ In September 2024, UTRCA presented a draft update to the Thames River regulatory floodplain to the City of London. These updates stem from a comprehensive review and UTRCA's desire to have the most current information to identify hazards and assess risk.

## The EPR Unit is aware of the frustrations that municipal partners and developers have been expressing in recent years

Staff understand that they have not responded to change as fast as some customers would like.

- ▶ As previously mentioned, Bill 23 restricted the scope of reviews that CAs can provide on the Planning Act applications. The EPR Unit took some time to adjust to these changes in scope and mandate.
- ▶ The EPR Unit is making other changes too. [This includes the ongoing changes to floodplain mapping](#) and updating its approach to flood management.

Change management and responding to public scrutiny have taken a concerted effort from the EPR Unit's staff.

## Differences in the goals of each interest holder group drive disagreement about the EPR Unit's efficacy

This is largely the result of differences in incentives and priorities:



The **EPR Unit** is focused on ensuring development activities within the watershed are carried out safely.



**Municipalities** are focused on increasing housing supply at the direction of their Councils and upper tiers of government.



**Development firms** are looking to keep their costs down in the planning/design phase of their projects

The interest holder groups identified the same challenges with efficacy, but how they interpret and communicate these challenges differ.



This section of our report details these issues and the diverging root causes that the EPR Unit, member municipalities and developers each identify.

1. [Appendix C](#) provides details on UTRCA's adherence to Ontario Regulation 41/24.

# The EPR Unit's work practices are inconsistent, which impacts its ability to fill its role effectively

## Developers and staff at member municipalities both provided examples of inconsistencies in the EPR Unit's decisions on applications

For example, where two applications were substantively similar but where the outcome from UTRCA's review was different. Through interviews and process tracking, we found evidence of work practices that can contribute to inconsistent decision-making, which we detail below. It is important to note that different outcomes on similar applications can arise from evolving data and standards or site-specific conditions.

Problem	Context
<p><b>Inconsistent File Tracking</b></p> 	<ul style="list-style-type: none"> <li>▶ Staff track applications and tasks to varied levels of formality. For instance, some staff track work on large files in personal file folders that are not accessible to others, meaning <b>progress on any one file is harder to track</b> (e.g. Microsoft Word documents). There has been a recent push to more formally track applications for both Section 28 permits and municipal planning applications reviews. However, this tracking is manual (Excel-based), which can lead to errors.</li> <li>▶ Blackline's review of the Planning Applications tracking sheet uncovered input errors such as missing dates or typos in names. These sorts of errors are inevitable when working manually in Excel, but they <b>limit analysis and reporting</b>.</li> </ul>
<p><b>Inconsistent file management system</b></p> 	<ul style="list-style-type: none"> <li>▶ UTRCA does not use a case management tool. By comparison, Lake Simcoe Region (LSR) has used SharePoint for nearly 15 years to track files and timelines, which recently has included due dates for comments back to municipalities. LSR also uses Power BI to report on work that staff manage in SharePoint. Rideau Valley uses OnBase, a case management solution, to track applications. OnBase supports automated tracking of timelines and pushes notifications to staff about time-sensitive work.</li> <li>▶ These modern tools <b>help mitigate data sprawl</b>, making it easier for staff to review historical decisions when needed.</li> </ul>

## Customers have expressed frustration with what they see as inconsistencies in working practices and subsequent decision-making

- ▶ Municipalities: Sometimes we receive comments late or they can be confusing/contradictory.
- ▶ Developers: Similar applications yield different results. We believe that this stems from differences in staff knowledge and ways of working.
- ▶ UTRCA: Different outcomes can stem from different site-specific conditions. Contradictions between technical reviews often stem from poor coordination between reports on the proponent's end (i.e. two different reports contradict each other). We need to do a better job resolving these conflicts to ensure they aren't being perpetuated.

# UTRCA organizes its core functions similarly to other CAs

## Concerns about floodplain mapping may stem from a disconnect between the EPR Unit and the Water and Information Management Unit

Staff noted that the structural separation between the groups can create competing priorities and impact application timelines.

- ▶ However, UTRCA is not unique—most peers separate responsibility for floodplain mapping from permitting/planning application review. The table below shows that there is no singular approach to structure that CAs adhere.
- ▶ Peer interviews suggest this separation does not hinder their effectiveness. Admittedly, other peers did express concerns about out-of-date mapping, but they are not all responding in the same way. For example, LSR is using outdated maps while pushing its Watershed Management group to prioritize updates. They feel that piecemeal analysis for specific development projects could lead to errors and inconsistencies.

Given the variation in structure across the peer groups, it is not clear that UTRCA should combine these functions into a single group.

Conservation Authority	Planning/Regulations	Technical Review	Floodplain Mapping
Upper Thames	EPR Unit	Hybrid	Water Info Unit
Grand River	Planning and Permits	Technical	
Central Lake	Planning and Regulations	Technical	
Lake Simcoe Region	Development Services, Engineering and Restoration		Integrated Watershed Management
Mississippi Valley	Planning & Development	Infrastructure, Engineering & Asset Management	
Nottawasaga	Development Planning & Permits	Technical	Watershed Science
Otonabee	<ul style="list-style-type: none"> <li>▶ Plan Review &amp; Permitting</li> <li>▶ Regulations &amp; Enforcement</li> </ul>	Plan Review & Permitting	Watershed Management Program
Rideau Valley	Planning and Regulations	Watershed Science and Engineering	

# However, that structure may be contributing to backlogs

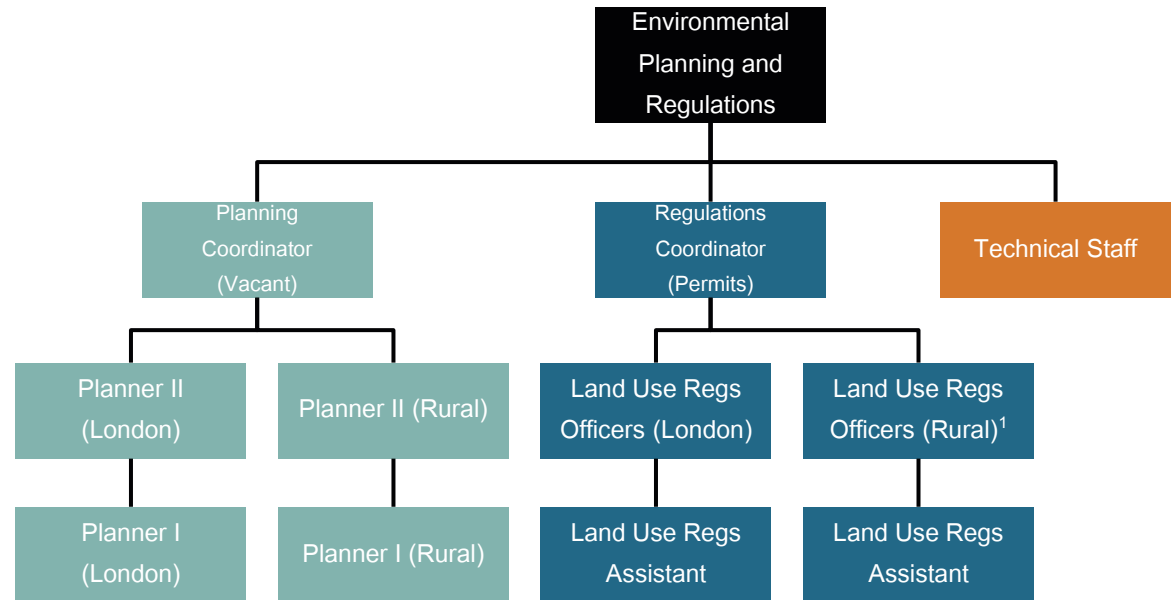
## The EPR Unit is segmented by function and area

Planning and permitting staff are divided by region and complexity (see right).

- ▶ This structure limits the EPR Unit's ability to reassign work when demand increases, which will result in backlogs. Staff report uneven workloads and differences in [application volume data support this](#). As each planner is responsible for a defined scope, files often sit idle when that person is unavailable. This impacts coverage across regions during vacations or absences, even though the underlying process is similar.

## Peer CAs structure their planning and regulations staff in a similar manner

Peers cited area-specific knowledge and strong connections with municipal counterparts as the motivators for a similar structure. LSR reviews workloads annually and adjusts responsibilities amongst staff to account for differences in customer demand (i.e. planners in a certain region managing significantly higher volumes).




## Developers and municipalities said they do not mind getting different staff for different files

However, developers are concerned with not knowing who to turn to for help on more contentious files. To that end, peers have taken different approaches to supporting customers at the point of contact.

- ▶ Grand River's Resource Planners are responsible for commenting on plans and processing Section 28 permits—this way they have continuity throughout. They also have an Intermediate Planner role, which is responsible for responding to questions that can be answered quickly.
- ▶ LSR has an Environmental Regulations Customer Service Analyst who provides customer service on behalf of the Regulation Analysts and responds to general inquiries.

1. Note that different Land Use Regulations Officers are responsible for different municipalities.

An aerial photograph showing a dense forest of evergreen trees on the left, which meets a river on the right. The river has some white water rapids. The text "/ ADEQUACY OF SERVICE" is overlaid in white on the lower part of the forest.

# **/ ADEQUACY OF SERVICE**

# The EPR Unit provides services to facilitate safe development within its boundaries

The EPR Unit must follow legislation and policy priorities set out by the Province, Conservation Ontario and UTRCA for their customers, including municipalities, developers and staff

The overall goal is to facilitate development activity within the Upper Thames watershed while “[protect\[ing\] people and property against](#) the risk of natural hazards, including flood and erosion hazards, watercourses and valleys, as well as wetlands and the area surrounding them”.






- ▶ For the EPR Unit, this involves three services:
  - To provide comments back to municipal planners in a timely manner when requested
  - To process Section 28 permit applications within legislated timelines
  - Otherwise, provide clearance letters (i.e. when development activity is not happening within a regulated area or hazard lands)

## Conservation Ontario highlights these Integrated Watershed Management Policy Priorities CA's must integrate into decision-making

Regarding customer service, three priorities stand out that the EPR Unit should strive to meet:

- ▶ Requires us to manage natural resources and human activities together
- ▶ Considers the interests and needs of not just the environment, but also the economy and society, because they are connected and impact each other in good and bad ways
- ▶ Needs collaborative governance at many levels for shared decision-making and priority setting

Below are the service attributes customers are expecting when they interact with the EPR Unit.

Service Dimensions	
	<b>Tangibles</b> The ability to perform the promised service dependably and accurately.
	<b>Reliability</b> The appearance of facilities, equipment, personnel and communication materials.
	<b>Responsiveness</b> The percentage of customer inquiries or issues that are resolved within a specific timeframe.
	<b>Assurance</b> The knowledge and courtesy of employees and their ability to convey trust and confidence.
	<b>Empathy</b> Individualized attention provided to each unique situation.

# The EPR Unit generally meets timelines, but can be quite late on planning applications

## UTRCA is meeting the legislated standards for permitting

However, with no legislated requirement of maximum time dedicated to planning reviews, the EPR Unit does not have the same enforced motivation as with permitting.

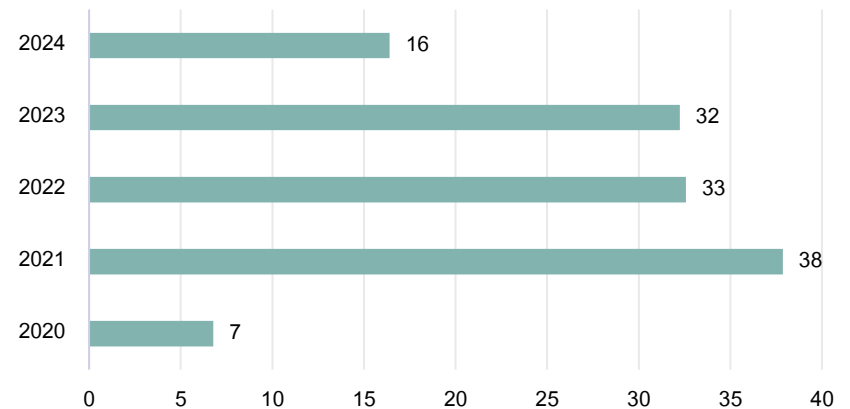
- ▶ Municipalities must follow their own deadlines set out in the Planning Act. They indicated that they will proceed with their established timelines even without the EPR Unit's comments.
- ▶ Permitting process may not be following the intended procedure. Applications are reviewed during the grey area before being deemed complete, leading to short permit turnaround due to paused reporting time.

## When there is a delay, planning comments are often late for over a month

Staff attribute the lengthy late times in planning (on average 25+ days) to complex technical reviews (see [here](#)), but not always.

- ▶ This undermines responsiveness and reliability, with customers losing trust in the EPR Unit.
- ▶ Customers reported that they feel they are driving communication, creating an impression that the EPR Unit is not proactive in helping applicants reach their development timeline goals.
- ▶ Several interest holders described the experience as "open-ended" or a "black box," with little visibility into whether the file is under review or simply waiting in a queue.

Average Days Late on Planning Applications



## Existing regulation (e.g. O.Reg 686/21) informs how CAs support planning application review, but does not set comment timelines

The Planning Act does not directly regulate the Authority. Many interest holders have called for greater accountability when it comes to meeting deadlines, as planning applications can take months or even years to progress. Streamlining communication and processes could reduce delays.

# However, the EPR Unit's on-time performance in Planning is trending in the right direction

## Comments delivered on-time for customers have increased 37% between 2020-2024

Municipalities sometimes circulate planning applications with deadlines, but other times do not. In these cases, the Planner will assign a deadline.

The City of London had received 73% of comments back on time, despite making up almost two-thirds of applications. Technical Staff often prioritize CoL files due to political pressure. All other municipalities received comments back on time 69% of the time.

- ▶ The addition of new technologies has likely helped increase the on-time percentage. UTRCA recently migrated from GroupWise to Outlook, a long-overdue IT upgrade to further employee collaboration and get plans reviewed faster.

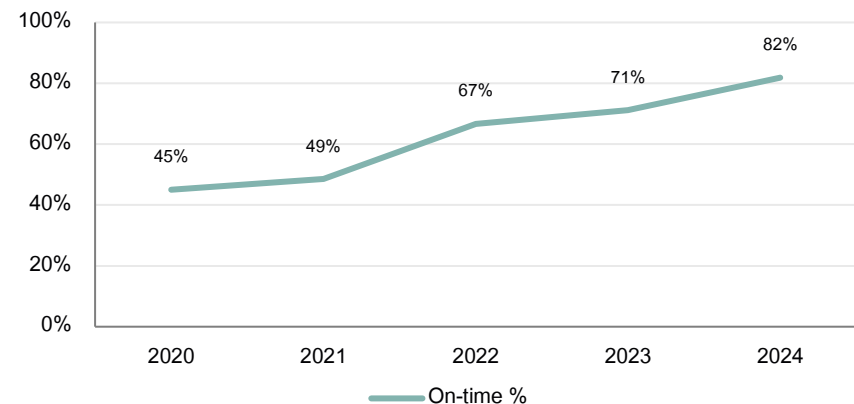
## There is still room for improvement in meeting customer expectations

The right graph only accounts for phased comments and does not consider ad-hoc requests or follow-ups relating to planning.

- ▶ Based on our observations, customers remain frustrated with the 18% gap, as well as the interactions that are not tracked, such as casual inquiries or phone calls.
- ▶ Additionally, municipalities and developers remarked that the quality of comments is sometimes poor and rushed. This means they are not confident that the EPR Unit has the knowledge or ability to complete the review.
- ▶ The Conservation Ontario (CO) Client Service Standards dictate that municipalities and CAs must work together to set a deadline mutually.

Year	2020	2021	2022	2023	2024
<b>On-time count</b>	176	150	652	809	1046
<b>Total</b>	391	309	978	1137	1278
<b>On-time %</b>	45%	49%	67%	71%	82%
<b>Deemed regulated %</b>	24%	49%	43%	42%	39%

**On-time performance**



# The EPR Unit does not have customer service metrics

## The EPR Unit has not updated Client Service Delivery Standards since new legislation was introduced in 2024

While the EPR Unit has both planning and permitting data, it does not use it to track KPI's. Analysis, such as response times, inquiry volumes or customer satisfaction, can help with being proactive in addressing issues.

- ▶ Additionally, without reviews, surveys or CRM tracking, it is difficult to measure whether processes are improving over time. It would allow the EPR Unit to proactively identify the reasons for delays or bottlenecks, and support resource planning/forecasting.
- ▶ Although website updates have occurred to reflect regulatory changes, certain external interest holders felt uninformed about changes to the UTRCA, which further contributes to submission confusion. Some developers have specifically asked to be notified about any major changes to documentation that impact planning and permitting requirements.
- ▶ In contrast to the delivery standards, applicants reported lengthy wait times for a response through email and phone—noting that follow-ups could sometimes take weeks.
- ▶ The 2019 delivery standards commit the EPR Unit to “continuous improvement through customer feedback.” However, the EPR Unit does not run any formal satisfaction surveys or advisory meetings.
  - By contrast, Grand River CA holds quarterly customer advisory meetings to gather client insights and shape process improvements.



## Client Service Delivery Standards for Plan & Permit Review Program

August 27, 2019

At the Upper Thames River Conservation Authority, our staff are well-trained and committed to serving the public and watershed stakeholders. We strive for clear and respectful communications and are committed to providing a high standard of service to all of our clients.

### Who are our clients?

- Clients of plan and permit application review program including watershed residents, legal staff, real estate staff, engineering and consultants;
- Municipal and provincial governments.

### Our service commitment to our clients:

We will:




- Deliver customer service that is timely, welcoming and helpful;
- Provide knowledgeable, professional and courteous service;
- Treat all customers with respect, fairness, openness and equality;
- Ensure it is easy and convenient to contact us;
- Maintain customer confidentiality and abide by all privacy legislation;
- Work to provide accessible services consistent with the Accessibility for Ontarians with Disabilities Act;
- Ensure our customer service locations are safe, convenient, and healthy environments.

These commitments mean that we will:

- Answer telephone calls whenever possible during office hours;
- Ensure all staff provide a courteous and accurate voicemail greeting indicating when they will be available to respond to messages;
- Acknowledge receipt of mail, voicemail and email within two (2) business days;
- Keep clients informed of timelines and explain if there will be a delay;
- When applicable, post notice of service disruptions on website and telephone systems;
- Respect our clients time by keeping scheduled appointments;
- Meet with “walk-in” clients where possible or arrange for follow up if staff are unavailable;

# Customers are not satisfied with the quality of service they receive

**Assurance and reliability are the underlying service dimensions that the EPR Unit is not meeting and which undermine the services it delivers**

Observation	Evidence
 <p><b>Limited online and modern self-service tools</b></p>	<ul style="list-style-type: none"> <li>▶ Municipalities find the checklists on UTRCA’s website somewhat confusing and sometimes contradictory. This leads to downstream work for the EPR Unit when the applicant comes ill-prepared.</li> <li>▶ Customers noted that key information is spread around the website and they are uncertain about submission requirements. This requires applicants to depend on email and staff availability for every step, which slows the process for both planning and permitting.</li> <li>▶ Stakeholders shared that the EPR Unit has been slow to modernize, particularly in adopting tools that support efficient, user-friendly permitting. By contrast, other CA’s, such as Otonabee, have implemented online planning and permitting systems that provide applicants with structured guidance, checklists, digital submissions and status visibility. Progress has been made, with the UTRCA updating the website in February 2025 to match the evolving EPR regulations</li> </ul>
 <p><b>Antagonistic viewpoints</b></p>	<ul style="list-style-type: none"> <li>▶ Several interest holders felt the EPR Unit’s role was primarily to restrict or slow development, not facilitate it. This perception creates early tension and leads to defensive or frustrated applicant behaviour from the outset.</li> <li>▶ Combined with frustration with limited status updates, this perception leaves applicants feeling like they are navigating a hostile debate, entering the process defensively, not cooperatively.</li> </ul>
 <p><b>Unclear and changing expectations</b></p>	<ul style="list-style-type: none"> <li>▶ Often, interest holders are unsure of the requirements and expectations between the planning and permitting process, contributing to confusion and overall delays at the start of the planning process, especially as there is limited employee continuity to link the processes (see <a href="#">here</a>).</li> <li>▶ Customers are unsure why some projects at both stages require different levels of detail – attributing this to be dependent on how experienced the planner or regulations officer working on your file is. Some want phone calls, some want site visits.</li> </ul>

A photograph of a dirt path winding through a dense forest. The trees are tall and thin, with a thick canopy of green leaves. Sunlight filters through the trees, creating a hazy, misty atmosphere. The path is in the foreground, leading into the distance.

## **/ CONCLUSION OF FINDINGS**

# Our report has highlighted opportunities the UTRCA has to improve its service delivery

## Opportunity

## Improvement

01



**Implement Suitable Technology**



Implement a CRM system or case management software to better track client interactions, link applicable permitting/planning files in one location and reduce manual rework.

02



**Eliminate wait times from backlogs and technical reviews**



Implement continuous improvements to existing processes. Integrate more tools for better coordination and increased collaboration to help staff work efficiently. Staff can build on existing meetings and ongoing collaboration with municipalities and the development industry to support these improvements.

03



**Inform relevant groups of changes to relevant information**



Customers noted that changes in documents (e.g. policy changes, check lists, etc.) have not always been clearly communicated, but UTRCA is addressing this through working groups with the development community and municipalities on policy, procedures and floodplain mapping. Including these efforts along with more formal communications and meetings (e.g. a twice annual conference) in the future will further strengthen relationships and build customer confidence.

04



**Create goals and metrics to benchmark service standards**



The EPR Unit would benefit from having internal KPIs and target volume to anticipate what the staff and resource allocation should be, similarly to what has been done at other CAs. Additionally, having targets to support planning goals, similar to permitting, can help with service delivery.

# However, the review also identified a range of factors that exist due to organizational policy and which interest holders disagree upon

## Our review has revealed a nuanced situation that involves many interest holders who each bring their own perspectives and priorities

Our scope relates to reviewing practically how the EPR Unit delivers its services, including the processes it follows, the service standards it achieves, the structure of the team and the technology they use, among other things. In the course of our work, as is commonly the case, we have been made aware by interest holders of a number of other factors that relate to our review but do not result from a delivery inefficiency.

- ▶ While it is fair to say that most interest holders agree on the symptoms that exist, they diverge in their perceptions of the root causes of these symptoms.

Observation	UTRCA Perspective	Municipalities Perspectives	Developers Perspectives
It takes too long to get comments back	Reviews should be thorough and use the most current information	Not respecting the deadlines we are facing	Not as responsive as other CAs
Does not use risk to determine how an application is reviewed, so each application is treated the same way	We apply best judgement based on the current legislation	Minor site changes are scrutinized to the same degree as major development work	Unwilling to be lenient in low-risk situations
Is more conservative than others, assessing more factors than other CAs	We narrowed the scope of our technical reviews in compliance with Bill 23, but effectuating this change has taken time	Smaller CAs do not have the resources to do complete reviews	Use a higher standard even though all CAs follow the same act
Gives the impression that they are unwilling to collaborate with applicants to find solutions	Applicants come unprepared, submitting poor quality reports or do not have all the proper documents, only a few municipalities include us in consultation	Not as flexible and available to collaborate with applicants as other CA's, preventing creative solutions for lower risk applications	We don't necessarily know who to turn to for help with any contentious aspects of the process
Has not finalized floodplain mapping, changes the boundaries and is not transparent	We rely on another Unit within the Authority with its own priorities and limited capacity	UTRCA is not fully transparent about its floodplain mapping	Sometimes mapping changes mid-process

# Reconciling the different viewpoints of interest holders requires UTRCA to ask questions about how it approaches work

## These questions are, essentially, management decisions that UTRCA can make

By answering them, UTRCA will respond to the divergent perspectives presented on the previous page. For instance, if UTRCA decides that it cannot trust other interest holders to perform technical reviews, then it should keep completing work in-house and communicate to municipalities and developers that this will naturally impact processing times.

Observation	Question
It takes too long to get comments back	<ul style="list-style-type: none"> <li>▶ Will UTRCA prioritize getting comments back to member municipalities quickly, only performing detailed and resource intensive analysis in high-risk settings?</li> <li>▶ Will the EPR Unit pool resources to better manage workload imbalances rather than specialize by geography?</li> </ul>
Does not use risk to determine how an application is reviewed, so each application is treated the same way	<ul style="list-style-type: none"> <li>▶ Will UTRCA implement a risk-based decision framework to potentially expedite more low-risk development activity?</li> </ul>
Is more conservative than others, assessing more factors than other CAs	<ul style="list-style-type: none"> <li>▶ Will UTRCA require technical review from its own staff? Or can it leverage the expertise of its larger municipal partners to save time in certain cases?</li> </ul>
Gives the impression that they are unwilling to collaborate with applicants to find solutions	<ul style="list-style-type: none"> <li>▶ Will UTRCA restructure the EPR Unit to prioritize customer service (e.g. introduce front-line customer service staff with some planning/permitting knowledge)?</li> </ul>
Has not finalized its floodplain mapping, changes the boundaries and is not transparent with its information	<ul style="list-style-type: none"> <li>▶ Does the EPR Unit require updated floodplain maps prior to making changes to its processes?</li> </ul>



# / RECOMMENDATIONS

# We have grouped our recommendations into three strategic objectives

Each objective relates to improving service delivery for the Authority's planning and permitting program areas

We developed a set of recommendations based on our interim report findings and assigned them to the corresponding strategic objective.

- ▶ **Creating an efficient and responsive unit** involves changing the UTRCA's approach to elements of permitting and plans review.
- ▶ **Enabling our team** requires implementing tools and methods that best support staff.
- ▶ **Measuring our performance** helps the UTRCA build on its relationship with outside interest holders by demonstrating that the Authority effectively meets its goals.

## Creating an efficient and responsive organization



#1 - Coordinate with member municipalities



#2 - Implement a risk-based decision framework



#3 - Accelerate the planning comments process



#4 - Create a protocol for floodplain map updates

## Enabling our team



#5 - Implement Suitable Technology



#6 - Promote a culture shift to be solution oriented



#7 - Implement continuous improvement measures

## Measuring our performance



#8 - Create service standards and metrics



#9 - Inform relevant groups of changes to relevant information

# Creating an efficient and responsive unit

## #1 – Coordinate with member municipalities (1 of 2)

### Recommendation

Work with member municipalities to improve coordination of planning application reviews. This should include formalizing information-sharing protocols and service expectations, reducing duplicative work in technical reviews and setting regular standing meetings.

### Context

Our review uncovered a few examples of poor coordination with the City of London (CoL), resulting in additional work for EPR Unit staff.

- ▶ Technical review tends to be a bottleneck for [on-time performance](#). At times, this leads the CoL to proceed with the next phase of review with the applicant—meaning that UTRCA feedback can be redundant.
- ▶ Currently, the CoL sends all planning applications to the UTRCA, which then sifts through them and decides which to review and which not to review. The UTRCA can reduce its effort by changing this process.

Some CAs have agreements that delineate application review duties between themselves and member municipalities. Several of these agreements predate the 2024 changes to the CAA. Any MOU the UTRCA enters into will need to reflect the current regulatory environment (e.g., cannot include providing a service that is now prohibited).

- ▶ Several CAs signed an agreement with the City of Ottawa that lays out which body has the authority over what aspects of review.<sup>1</sup>
- ▶ The City of Hamilton has an agreement with several CAs that specifies when the City will lead technical review and when the CA will (see Schedule 3).<sup>2</sup>

- ▶ Last year, the parties in Halton Region created an MOU for an integrated Halton area planning system. The MOU provides a framework for coordinating the roles related to planning. Ontario's changes to the role of CAs have led them to update the agreement.<sup>3</sup>

### MOU for an Integrated Halton Area Planning System

1.10. The remainder of this MOU is structured as follows:

Sections 2 and 3 provide a general overview of the purpose of the MOU, its objectives, and the overall roles of the Parties.

- **Section 2** – Purpose & Objectives
- **Section 3** – Roles & Responsibilities

Sections 4 through 6 outline how the Parties will approach planning processes related to policy, development, and appeals.

- **Section 4** – Policy Review
- **Section 5** – Development Review
- **Section 6** – Appeals

Sections 7 through 9 detail how the Parties will address specific interests through the planning process.

- **Section 7** – Planning for Regional Infrastructure
- **Section 8** – Facilitating Regional Infrastructure & Services
- **Section 9** – Addressing the Natural Environment, Water, & Natural Hazards

Sections 10 through 12 deal with matters related to administering and implementing this MOU.

- **Section 10** – Data & Information Sharing
- **Section 11** – Dispute Resolution
- **Section 12** – Duration & Formal Review

Definitions and Schedules are provided at the end of the MOU.

1. [Memorandum of Agreement between the City of Ottawa and the Conservation Partners.](#)

2. [Memorandum of Agreement between the City of Hamilton, HCA, NPCA and CH.](#)

3. [Memorandum of Understanding for an integrated Halton Area Planning System](#)

# Creating an efficient and responsive unit

## #1 – Coordinate with member municipalities (2 of 2)

### Implementation

- ▶ **Adopt a Memorandum of Understanding (MOU):** this formal document should define the working relationship between UTRCA and the member municipalities. Creating it will likely require a few working sessions between the EPR Unit, UTRCA Management and municipal staff. The MOU should:
  - Specify how the groups will share information
  - Set expectations for when and how each municipality circulates applications to the UTRCA (e.g., a requirement of the CoL might be to scope the areas of London for which they will circulate to the UTRCA)
  - Set a fixed service level for the Authority’s review of planning applications
- ▶ **Reduce duplicative work on technical reviews:** decide on who is responsible for the technical review of any one file and set expectations for response times.
  - Implement a “Lead & Concur” model: name a single technical lead per file circulated to UTRCA for review (municipality or UTRCA). The non-lead will return a notice that they concur with the analysis within a specified timeframe (e.g. five business days) unless a defined risk trigger is hit. For this model to work in practice, the MOU should include a defined set of risk criteria ([see Opportunity #2](#))
  - Optional – expand information sharing: consider leveraging technology to track files and share comments. If the UTRCA has read-access to member municipalities’ analysis, it can reduce the time spent resolving duplicate or conflicting comments.
- ▶ **Establish regular touchpoints:** to facilitate collaboration, schedule regular meetings between member municipalities and UTRCA technical staff to triage files, reprioritize analysis as needed and generally share information.

### Benefits

- ▶ Greater coordination will give technical staff a better sense of what member municipality comments look like, making it easier to avoid duplication.
- ▶ Generally, strengthens the working relationship between the UTRCA and member municipalities.

### Implementation considerations

- ▶ The proposed change to a risk-based decision framework for reviewing development activity will likely inform how the Authority works with member municipalities.
- ▶ A single agreement, like [Halton’s MOU](#), may be easier to manage than several separate agreements. Although there may need to be unique provisions for each member municipality.

**Cost** No direct cost

**Effort** 100 – 150 hours

## #2 – Implement risk-based decision framework (1 of 2)

### Recommendation

Implement a risk-based decision framework that informs how the EPR Unit reviews development activity, based on the level of risk associated with each application. This will change the focus of the Unit to assessing applications based on the risk they pose to natural hazards within the watershed, rather than by the complexity of the development itself.

### Context

External interest holders perceive the EPR Unit as overly conservative and procedurally involved. They say that the Unit often treats applications with different levels of risk with the same level of scrutiny.

- ▶ UTRCA has application categories for both section 28 permits and planning applications, but not a working risk framework to inform the Authority's approach to these different categories.
- ▶ The [Planning and Regulations Fees](#) schedule references risk twice. For section 28 permits, development projects could be considered minor due to "level of risk." The other mention is under technical review fees, the schedule states that comprehensive studies are necessary "where the risk or significance of the impact is high." Neither of these instances adequately describes how the EPR Unit uses risk when assessing how much work is required on a permit or planning application review.
- ▶ More explicitly defined criteria often come back to effort and complexity. For example, EAs are considered intermediate when the estimated cumulative staff review time is greater than 15 hours, whereas major reviews are those with an estimated staff review time of over 30 hours.

Several Ontario CAs differentiate between application types in some way. Although not always tied to risk, their approaches can still serve as precedent for the UTRCA.

- ▶ Conservation Halton (CH) uses a three-tier categorization: minor, intermediate and major. Which tier a planning application falls into depends on how many technical studies are required (none, one or more than one).<sup>1</sup> Differentiating by the number of technical studies required to approve work can be read as a way of considering risk: riskier development requires more thorough technical review. Our recommendation to define levels of risk goes further than this, though.
- ▶ Lake Simcoe Region Conservation Authority (LSRCA) uses a risk-based approach to files—which, at the time of our interview with them, was not yet fully formalized.

1. [Conservation Halton Plan Review Fees 2023](#).

# Creating an efficient and responsive unit

## #2 – Implement risk-based decision framework (2 of 2)

### Implementation

- ▶ **Define risk levels:** the UTRCA should formally define risk levels (i.e. what does moderate risk mean). Describing the specifics of each risk level will require internal collaboration amongst staff. Risk is driven partially by the probability of the event occurring and partially by the damage that such an event (e.g. contamination of groundwater) would cause.<sup>1</sup> The risk-based decision framework would describe the actions to follow at each risk level. Based on Blackline’s research, we can offer an initial suggestion:
  - Routine: proposed development activity that is **low risk** according to the risk-based framework and/or is documented through another approval process.
  - Minor: proposed development poses **moderate risk** according to the risk framework. According to CO’s [Client Service Standards](#), these applications generally require standard recommendations or conditions.
  - Major: **high-risk** development that UTRCA believes is too hazardous to permit without substantial review.
- ▶ **Define necessary review actions:** the level of detail required differs by risk level. The UTRCA will need to define the specific actions required depending on the risk level.
  - At a minimum, for Section 28 permits, this should include flagging high-risk development to EPR Unit management. For planning applications, deeming a proposed development as high risk should trigger a formal touchpoint with the related member municipality.
  - The UTRCA will need to define the scope of technical reports and when they are required.
  - High-risk development may require a fulsome review from the appropriate technical staff at UTRCA, breaking with the [Lead & Concur model](#).
- ▶ **Implement a triage system based on risk:** this way, staff prioritize the most urgent and potentially hazardous development applications.
  - Low-risk: for Section 28 Permits and planning applications in this category, the only expectation is to complete reviews according to prescribed timelines. Consider batching low-risk applications for review by junior staff.
  - Moderate-risk: complete reviews within prescribed timelines.

- High-risk: these reviews are more likely to require additional studies and extra coordination with other groups. As such, when an application is deemed high risk, prioritize initiating the review process before turning back to other applications.

### Benefits

- ▶ The Unit can better match the effort on review to the level of risk the proposed development activity poses.
- ▶ Triageing applications based on risk will help flag more challenging/contentious development proposals.

### Implementation considerations

- ▶ Publishing the risk-based framework for reference by member municipalities may be important so they are aware of how the Unit’s process differs by risk level. Consider distributing the framework, defined risk levels and associated actions as a single document to member municipalities.

**Cost** No direct cost.

**Effort** 150 – 200 hours

1. As mentioned on the previous page, LSRCA has an internal risk-based framework and the specific example they gave is illustrative here: they said they would not require the same level of scrutiny for a new deck as they would for a new dwelling being built in an area prone to significant flooding.

## Creating an efficient and responsive unit

### #3 – Accelerate the planning comments process (1 of 2)

#### **Recommendation**

Streamline the planning comment process by defining review cycles, effectively distributing workloads and triaging files. Cross-training staff across all regions will deliver timely and consistent feedback when vacations arise.

#### **Context**

- ▶ The EPR Unit meets legislated standards for permitting and often [outperforms peers](#), but planning reviews remain inconsistent because no legislated maximum sets timelines for comments. Staff provide comments through separate tracking systems and uneven file assignments, which can slow reviews and create contradictory feedback.
- ▶ On-time comment delivery improved by 37% between 2020 and 2024, but municipalities remain frustrated by delays and outdated or rushed feedback that slows approvals. One peer CA reviews permit and planning files/timelines every five years to link them with cost recovery and show how long applications take by position.
- ▶ Workloads vary significantly across roles and regions, with some Planner I staff managing over twice the number of files as others, illustrating the need to pool planning applications across geographies to ensure fair distribution and generate more flexibility.

## #3 – Accelerate the planning comments process (2 of 2)

### Implementation

- ▶ **Triage priority at intake:** file handlers assess each application upon receipt based on risk, urgency, complexity and completeness. They assign priority level (low, medium, high) and triage to the appropriate planner.
- ▶ **Define formal review cycles:** provide allocated times for staff to check applications, request information or escalate complex cases. Set internal comment deadlines to create predictable touchpoints and keep applications moving. This defined process should support a service level set in an agreement with each member municipality ([starting with the CoL via a new MOU](#)).
- ▶ **Pool all workloads:** train all Planner I staff to work on applications from all municipalities. File handlers would process applications from a centralized queue. Assign applications based on availability, with each Planner I taking the next file in the queue regardless of geographic area. This will minimize [workload discrepancies](#) and make it easier to manage deadlines during busy periods. Enabling such a change will require:
  - Define a clear process: establish a procedure for when and how applications can be reassigned, including triggers (e.g. volume thresholds, staff absence) and approval protocols. Consider giving a supervisory role the authority to reassign files based on urgency—for example, to free up the Planners responsible for a London file [when it is deemed high risk](#).
  - Cross-train staff: deliver targeted training so that planning staff understand the specifics of the geography, policies and planning processes of the 17 member municipalities.
  - Consider technology needs: having more staff involved in planning applications for the CoL will make it pertinent that the EPR Unit effectively tracks work and shares files.
- ▶ **Set average time to process applications:** collect start-to-finish timelines by application type and establish average processing times. Use these benchmarks to assign files more evenly across staff. Monitor application backlogs to evaluate whether time-based targets improve workload and turnaround. For example, LSRCA has [set baseline annual targets](#) for the number of planning applications staff process.

### Benefits

- ▶ Deliver comments within a predictable window, which makes it easier for municipalities to plan for the UTRCA's involvement on a file.
- ▶ Staff can balance workload more effectively across all geographies.
- ▶ Cross-trained staff allow flexibility during absences/vacations.

### Implementation considerations

- ▶ Having document expectations and timelines for application types to hold staff accountable, consider collaborating with municipalities to coordinate their deadlines with the Unit's targets.

**Cost** No direct cost.

**Effort** 400 – 500 hours

## Creating an efficient and responsive unit

# #4 – Create a protocol for the EPR Unit’s use of floodplain mapping

### Recommendation

Establish a clear protocol that defines how the EPR Unit applies and transitions between versions of the UTRCA’s floodplain mapping. Begin by establishing a version of the floodplain map for use by all parties until the Authority makes its next official update of the map.

### Context

The Water and Information Management Unit develops and maintains floodplain mapping, while the EPR Unit relies on these maps to inform planning and permitting decisions. Since mapping is periodically under review or being updated, EPR staff occasionally face uncertainty about which version should guide their decisions. This can lead to inconsistencies across files and confusion for applicants. A defined protocol will ensure that all parties use the same accepted version of mapping until a new one is formally released.

### Implementation

The protocol should:

- ▶ **Define the authoritative map for use in planning and permitting:** Clearly state which version of the floodplain map is considered in force for regulatory and planning decisions until a formally accepted update is published.
- ▶ **Set a process for adopting new mapping:** Establish criteria for when and how the EPR Unit transitions to a new map once it has been finalized and endorsed by the Authority. For example, is the new mapping only applied to applications received after the new map has been approved?
- ▶ **Ensure consistent access:** Require that the current, in-force map be easily accessible to member municipalities and the public through a centralized online source or shared platform. Note that the UTRCA already does this through its Regulated Area Screening Map portal online. When the Authority decides to review and update the mapping, communicate with external groups that this work is underway and be explicit about when the mapping will come into effect.

### Benefits

- ▶ Reduces confusion for staff around what to do when technical modelling has not yet been reflected in floodplain maps.
- ▶ Improves consistency in file review by providing staff with a formal guideline to follow.
- ▶ External interest holders have a better sense of what to expect with a formal cadence for floodplain map updates.

### Implementation considerations

- ▶ This recommendation does not influence the process to make floodplain updates, which still requires coordination with the Water and Information Management Unit.

**Cost** No direct cost.

**Effort** 125 – 175 hours

# #5 – Implement Suitable Technology

### Recommendation

Implement a system, such as a customer relationship management (CRM) or case management software, to track client interactions, link applicable permitting/planning files in one location and reduce manual work.

### Context

- ▶ Presently, UTRCA manages permitting and planning cases using spreadsheets and local file storage. Case information, saved documentation and payment information are in separate systems, requiring staff to move back and forth between applications.
- ▶ Peers have implemented enterprise content management software such as OnBase - used by Rideau Valley. Some have adopted purpose-built software CloudPermit, which is popular with municipalities such as [Kincardine](#) or [Middlesex Centre](#). Others have adapted software they already owned, [like LSRCA adapting Microsoft SharePoint](#).

### Implementation

- ▶ **Gather requirements:** engage staff and interest holders to document business needs. Map out current workflows and redesign the process to take advantage of potential automation opportunities. [Our detailed process observations can serve as a starting point](#). Capture 'must-haves' and 'nice-to-haves' for a system. For example, collaborative document management should be a priority. See [Appendix F: Initial considerations for procuring a CRM or case management software](#).
- ▶ **Issue an RFP:** work with the UTRCA's procurement team to develop an RFP and evaluation matrix, ranking vendors based on cost, fit, integration and implementation support.
- ▶ **Implement the system:** once you select a vendor, migrate existing spreadsheets and data to the platform, ensuring historical case records are captured. Configure workflow logic, deadline tracking and other features. Provide staff training by running a pilot phase and then rollout to the wider team.

### Benefits

- ▶ Centralized records improve organization, reduce errors and save staff time.
- ▶ Deadline tracking and automated reminders can help ensure compliance with both Municipal and legislated timelines.

### Implementation considerations

- ▶ Careful requirement gathering is critical to avoid incorrect scoping and costly changes.
- ▶ Data migration will require cleansing of data before importing into the new system.
- ▶ Ensure staff are equipped with the proper training and transition support.
- ▶ Some software will be external-facing, which can enable UTRCA to move towards a fully digital permitting process.

**Cost** \$200k-250k (one year to implement and three years of support)

**Effort** 300-600 hours

# #6 – Promote a culture shift to be more solution-oriented (1 of 2)

### Recommendation

Foster a culture that positions UTRCA as a collaborative and solution-oriented partner. Encourage EPR unit staff to propose innovative solutions, challenge the status quo and work constructively within legislative and regulatory boundaries. Support this shift by empowering staff through collaborative change, updating service standards, improving communication practices and creating feedback mechanisms that help staff build trust with applicants.

### Context

- ▶ Municipalities and developers perceive the EPR Unit as overly cautious, rigid and unresponsive, which creates the impression that it restricts development by being less collaborative. This perception may stem from the fact that [interest holders have different priorities](#).
- ▶ EPR unit staff thoroughly review all planning and permitting applications. While this approach reflects a commitment to due diligence, it can lead to unnecessary delays for low-risk files and frustrate applicants seeking solution-oriented and innovative solutions.
- ▶ [Peer CAs are using technology](#) to maintain service levels and adapt quickly to meet the needs of staff and interest holders for them to be more solution-oriented.
- ▶ UTRCA has not released an annual report (beyond reporting on timelines) and has not updated the Client Service Standards document since 2019 – prior to new legislation being released.

## #6 – Promote a culture shift to be more solution-oriented (2 of 2)

### Implementation

- ▶ **Empower staff to be solution-oriented:** Promote a culture shift that changes the perception of UTRCA as rigid and conservative in decision-making. Apply structured change management practices by communicating the vision, providing ongoing support and engaging staff to build commitments to change the perceived culture.
- ▶ **Support and maintain this cultural shift by:**
  - Meet regularly to discuss high-risk or complex files: hold recurring meetings where staff review complex or high-risk applications together. These sessions create space to problem-solve early and ensure consistent solutions across similar applications.
  - Refresh standards: update the Client Service Delivery Standards to reflect legislative changes, set clear expectations for responsiveness, collaboration and continuous improvement. Pair the standards with coaching on customer service.
  - Update onboarding for staff: refresh onboarding materials to include training on the Authority’s risk-based decision framework. Over time, collect a set of case studies that exemplify using the framework to guide decision-making in nuanced situations.

### Benefits

- ▶ Builds trust with municipalities and developers.
- ▶ Staff can escalate issues earlier in applications.
- ▶ Structured onboarding enables new staff to contribute quickly/manage files consistently, addressing turnover and hiring challenges.

### Implementation considerations

- ▶ Resource and time to document processes, design training modules and assign mentors for onboarding.
- ▶ Collaboration tools and processes help facilitate meetings for complex files.
- ▶ Managers should set service targets for communication and ensure staffing levels and systems support expectations.
- ▶ Will require time and effort to shift to new culture

**Cost** No direct cost.

**Effort** 140 – 160 hours

# #7 – Implement a continuous improvement program (1 of 2)

### Recommendation

The EPR Unit should utilize Lean continuous improvement principles to enhance existing processes and service delivery. This includes identifying and eliminating inefficiencies, standardizing replaceable tasks and improving coordination across teams by applying [the eight wastes of Lean](#).

### Context

- ▶ The EPR Unit has been addressing interest holder feedback concerning permitting and planning. However, feedback is currently ad hoc and not systematically analyzed for trends or process change opportunities.
- ▶ Peers such as Grand River CA hold quarterly customer advisory meetings with interest holders to gather current insights and trends, using the feedback to inform process improvements.

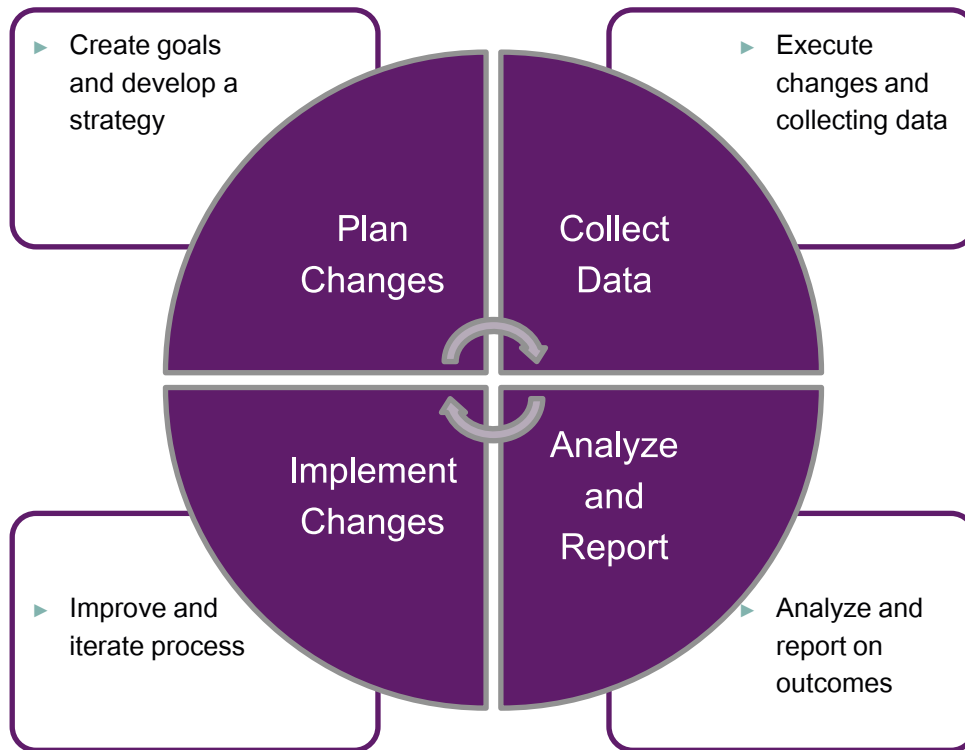
### Implementation

- ▶ **Understand Lean and how it can improve your service offerings:** build organizational awareness and capacity around Lean principles to help staff identify areas for improvement. [Our process observations](#) may be a good place to start to pinpoint where time, effort and resources are wasted or not adding value. The goal of this step is to simplify, clarify and reduce rework. Having one or two staff members trained on Lean methodology will help facilitate this process.
- ▶ **Develop a survey for customer service interactions:** at the completion of service (a one-off question or when payment is issued for planning or permitting reviews). We have developed a sample [survey](#) that uses quick, but to-the-point, questions to capture customer feedback at the end of interactions.

- ▶ **Meet with interest holders quarterly:** host a purpose-led meeting for customers and interest holders of the EPR Unit to solicit candid feedback on performance. Focus on specific themes or concerns and ask for agenda items before the meeting begins. Provide a brief review of performance data and trends (based on KPI's, survey data and case management software). Have a staff member take minutes. Wrap these learnings into your Lean process improvement cycle.
- ▶ **Establish a feedback and insights loop using Lean:** a common method of actioning process improvements is to adopt a robust feedback loop, such as the following, called the “[Plan, Do, Collect, Act](#)” (PDCA) cycle. You can use this feedback loop with both external and internal inputs. Regularly review the outputs from the different KPI's shown in [recommendation #8](#).
- ▶ **Identify and categorize issues to facilitate continuous improvement:** use Lean principles and the PDCA cycle to iterate using feedback to adjust the EPR Unit's operations. This approach can be used for different changes, including:
  - **Quick fixes:** small adjustments that can be implemented immediately with minimal effort or cost.
  - **Process changes:** changes such as redesigning workflows or practices to address recurring inefficiencies.
  - **Tool adoption:** major changes that require expanding or adopting new tools that will have a positive impact on performance.

## #7 – Implement a continuous improvement program (2 of 2)

- ▶ **Action Insights:** use collected data to determine next steps, from quick adjustments to operational changes. Track feedback over time to assess the long-term impact of the changes and to determine if the model is helping improve service delivery.



### Benefits

- ▶ Both the strategic plan and annual report will lay a foundation for current and future goals for staff and interest holders to look to.
- ▶ Better transparency for municipalities, developers and the public.
- ▶ Customer feedback can help catch problems early in the planning and/or permitting process.

### Implementation considerations

- ▶ A new software, as discussed in [recommendation #5](#), will support this goal by tracking and housing data.
- ▶ Be alert not to oversaturate customers with the feedback survey. Implement measures so they only receive it when appropriate.
- ▶ Update all EPR Unit staff on the new Lean principles – this can help increase buy-in and reduce downstream work.

**Cost** No direct cost.

**Effort** 300-600+ hours

# Measuring our performance

## #8 – Create service standards and metrics

### Recommendation

Establish internal KPIs and service standards to guide staff workload, resource allocation and client expectations. These standards should go beyond legislative timelines by including measurable targets for efficiency, transparency and consistency in permitting and related services.

### Context

- ▶ Current reporting already tracks compliance with permitting *O.Reg 41/24* timelines – 21 days for a complete application notice, 90 days for major permit decisions and 30 days for minor permits.
- ▶ The EPR Unit keeps a spreadsheet for planning timelines but does not report on key metrics based on collected data.
- ▶ Conservation Ontario's Client Service Standards advise that each CA develop an MOU with member municipalities to develop timeline standards for planning, as seen [here](#).
- ▶ Unlike some peers, UTRCA does not yet publish internal service standards or workload KPIs that it can use to plan resources and measure performance.

### Implementation

- ▶ **Decide what metrics to track:** the EPR Unit should determine which KPIs are important, for planning, permitting and customer service - working backwards to identify what should be tracked day-to-day. We have identified metrics that the EPR Unit should begin tracking, seen [here](#).
- ▶ **Decide on a process, software or system:** select a system based on recommendation #6 that will help standardize and capture the selected metrics. A purpose-built software will avoid ad-hoc manual tracking while ensuring data integrity.
- ▶ **Create internal dashboards to track and monitor trends:** build simple dashboards to display application volumes, timelines and capacity in real-time. This will increase visibility into trends and help with being proactive.
- ▶ **Create and publish reports:** release consolidated reports on a set schedule to monitor trends.

### Benefits

- ▶ Greater predictability for applicants and municipalities.
- ▶ Metrics will help to support evidence-based staffing and resource planning.
- ▶ Enhances accountability for completing work on time.
- ▶ Allows for insight into classifications of various files, pricing history and seasonal demand patterns.

### Implementation considerations

- ▶ Review what KPIs are tracked annually to see where there may be room for improvement.
- ▶ Requires staff to be trained in inputting and managing their data, for it to be useful and accurate.

**Cost** No direct cost.

**Effort** 80-105 hours

## Measuring our performance

# #9 – Inform relevant groups of changes to relevant information (1 of 2)

### **Recommendation**

Improve transparency and reduce confusion by proactively informing interest holders of process changes. This includes clarifying submission requirements, adopting digital tools and formalizing mapping communication protocols to ensure applicants have consistent and reliable information.

### **Context**

- ▶ Municipalities and developers feel uninformed of process changes, mapping updates and evolving requirements.
- ▶ UTRCA's website can be confusing, making it difficult for applicants to obtain checklists, information and updates to information.
- ▶ All peer CAs held AGMs and released accompanying annual reports. Some peer CA's hold standing meetings with municipalities to bolster communications. Currently, UTRCA holds AGMs annually, presenting only the annual report on permitting.

## #9 – Inform relevant groups of changes to relevant information (2 of 2)

### Implementation

- ▶ **Create an external communications plan:** develop a structured plan that defines how the EPR Unit informs interest holders about process changes, [mapping updates](#) and regulatory requirements. The plan should include details such as expectations for communications channels, frequency and accountability. The plan should take into consideration:
  - Establish roles and responsibilities: The coordinators can draft and identify changes that may impact applicants. The EPR unit Manager will review and approve.
  - Frequency: Establish regular and expected updates for interest holders (e.g. Monthly newsletter, quarterly AGM and annual report).
  - For example: The regulations coordinator is responsible for updating Municipality contacts via a monthly email newsletter. The planning coordinator is responsible for updating the website content and social media platforms (Facebook, X and Instagram).
- ▶ **Release a comprehensive annual report:** in addition to the Section 28 Annual Report on Timelines, the EPR Unit (or UTRCA as a whole) should release a report that highlights current performance metrics, client feedback and updates to strategic initiatives. Additionally, this is a great place to update interest holders on changes throughout the year, as well as positive progress. See [CLOCA's 2024 Annual Report](#).
- ▶ **Redesign the website and strengthen information management:** simplify website materials with clear checklists, step-by-step guidance and FAQs, centralizing all requirements in one location. Align internal processes so that staff regularly review, update and circulate changes to keep information accurate and consistent.

### Benefits

- ▶ Clear guidance helps applicants prepare complete submissions, reducing rework and confusion.
- ▶ Strong communication around updates should improve compliance and prevent disputes.
- ▶ External communication plan increases consistent communication across all channels and enhances accountability.

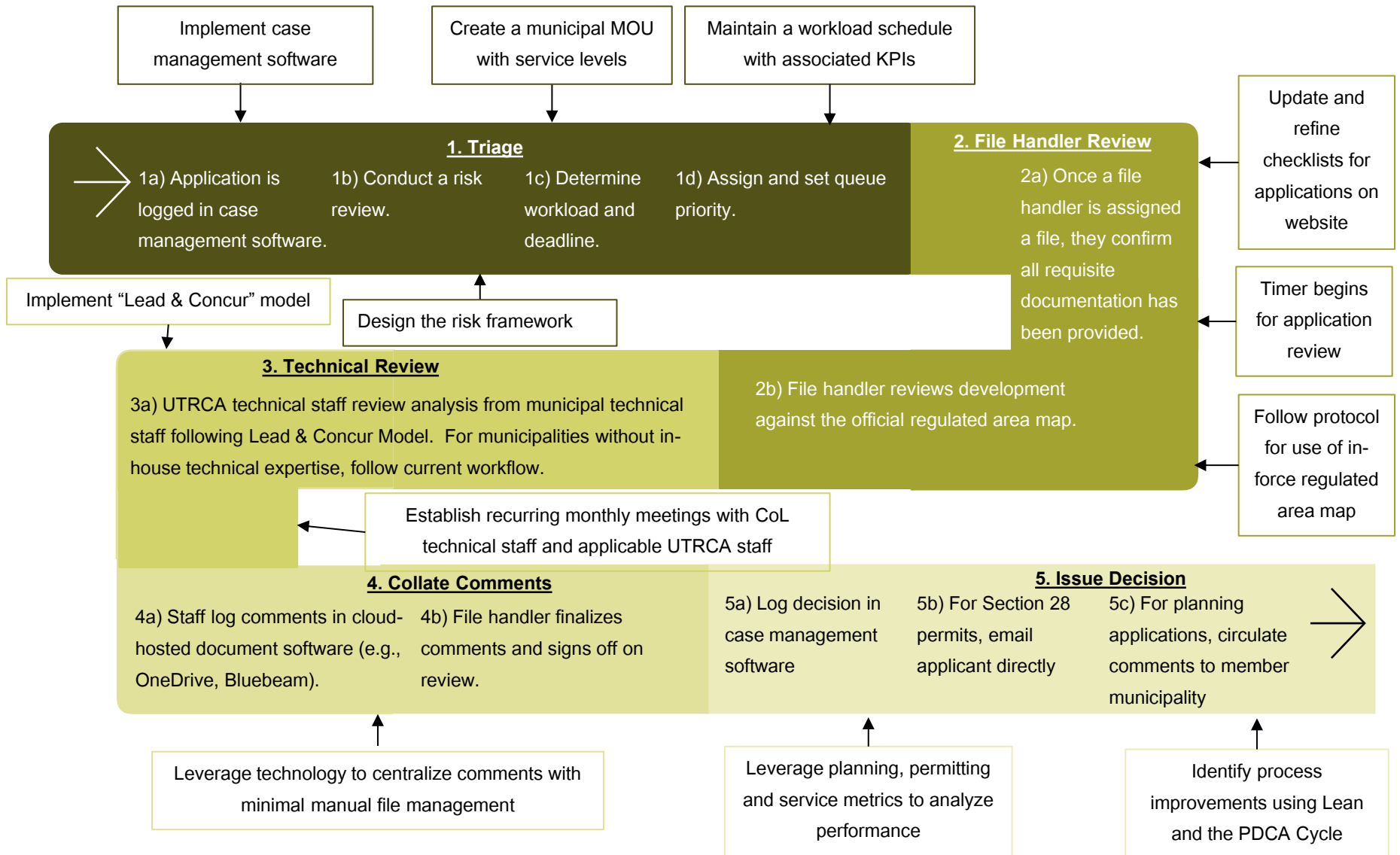
### Implementation considerations

- ▶ Assign accountability and responsibilities for the external communications plan and annual report to ensure consistency.
- ▶ May require collaboration with other departments at UTRCA (e.g., IT, Communications), as well as additional time and effort to create and redesign website functionality.

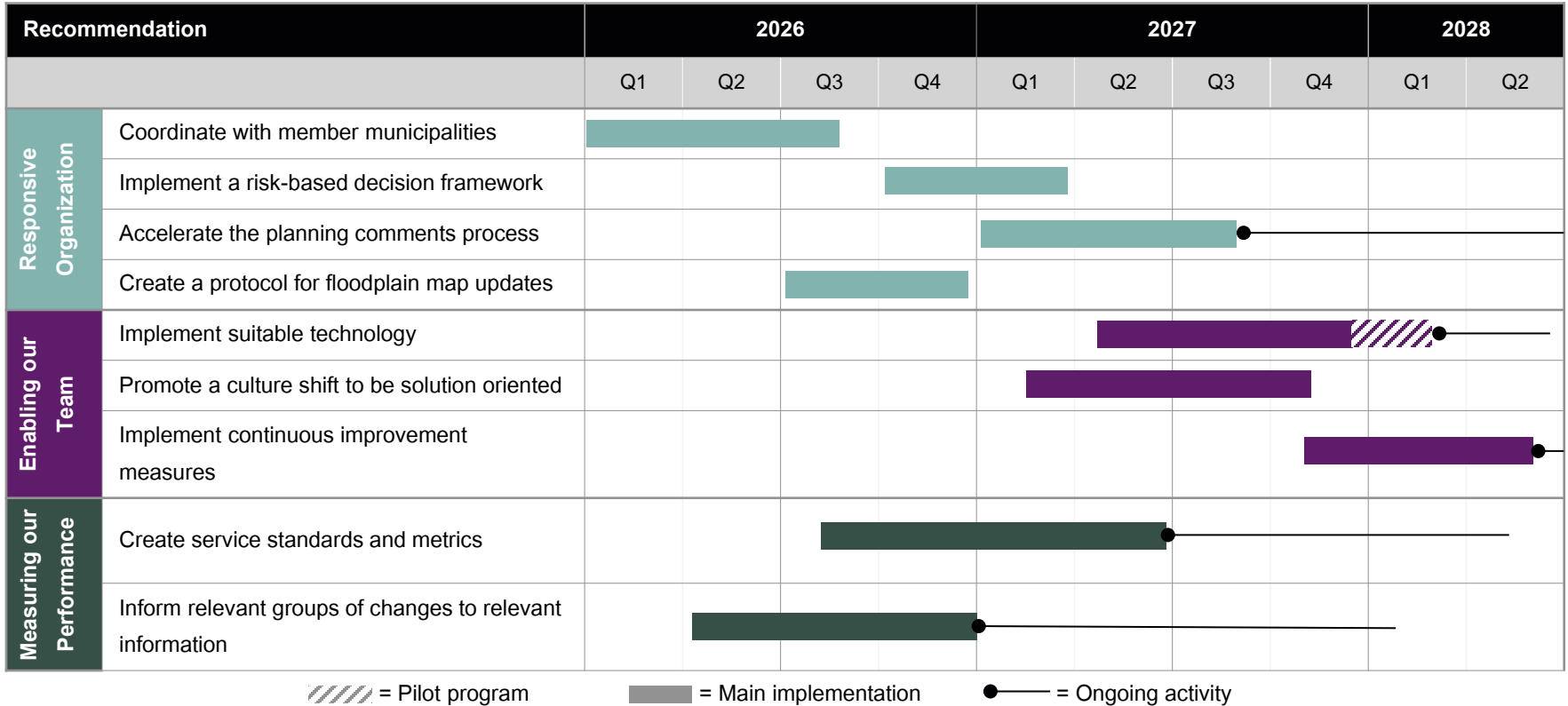
**Cost** No direct cost.

**Effort** 150 – 250 hours

# In practice, these recommendations create a different flow of work



# Implementation Timeline



At the time of writing this report, the Province announced its intent to consolidate the 36 conservation authorities into seven. We do not know the details or timing of this consolidation, so we are presenting our implementation schedule as no changes will impact UTRCA for the next three years. We recommend that UTRCA regularly revisits this schedule as the Province provides more details to mitigate wasted investments. For example, each of the consolidated CAs will move to the same set of IT systems, if that change were to happen sooner, UTRCA might be better to wait rather to implement new systems.



**/ IMPLEMENTING CHANGE**

# Change management will be critical to adopting the recommendations in this report

## **In order to make changes to the processes as we recommend in this report successfully, UTRCA will also need to evolve its culture and values**

While we did not conduct a change readiness assessment, our review observed some characteristics that suggest that if UTRCA does not employ some fundamental change management activities, it will not be able to make the changes we are recommending successfully:

- ▶ **Fatigue:** staff have experienced externally instigated changes from the Province to the organization's mandate and internally instigated changes such as IT systems. A number of them commented on their desire for stability. This situation is often referred to as change fatigue, where staff feel that there has been too much change and that they do not want any more.
- ▶ **Regression:** in the case of the IT system changes, staff have the perception that they have lost functionality when they moved to the new systems. This has led to them continuing to work in the old systems. This suggests a similar regression to past approaches is likely with future changes.
- ▶ **Conviction:** staff have a strong belief in the value of the work they do and the approach they take. Asking them to change their approach or to treat some aspects of their work with less importance than in the past goes against those beliefs. Change in this context is generally more successful when an organization helps people adjust their convictions as well as addressing the mechanical changes to the work.



Change management is the processes, tools and techniques that manage, prepare and support staff in making, realizing, adopting and acknowledging change.

## **We recommend our clients use Prosci's change management methodology**

It is becoming the change management equivalent of what PMI is to project management.

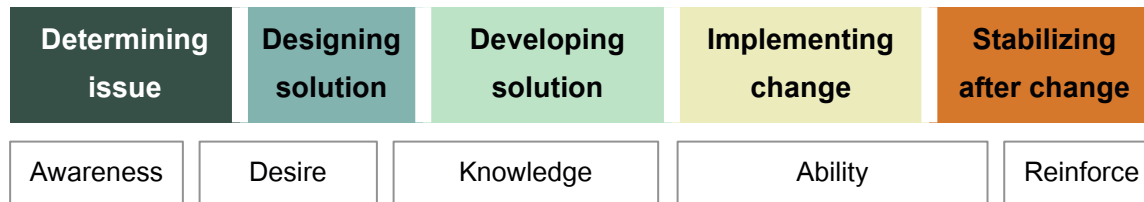
- ▶ We feel it is better than other change management methodologies in two important aspects. The first is that it focuses on the individual and on identifying what each individual needs to make the change in front of them. Second, it provides tools and techniques for executing change management from the earliest moment you consider a change through to beyond going 'live' with your change.

# Having a change management plan will greatly increase the likelihood of successful implementation

Prosci have a model known as ADKAR, which represents the five phases each person will progress through during a successful change

- A** Awareness of the need for change
- D** Desire to support the change
- K** Knowledge of how to change
- A** Ability to demonstrate new skills/behaviours
- R** Reinforcement to make the change stick

This model also broadly aligns with the phases the organization will progress through to implement the change – from determining an issue to stabilizing the organization after the change.



**A change management plan takes the model, tools and techniques from the Prosci methodology and details specifically what the organization will be doing to support its people in making the change**

The key objective is to develop a change management plan that prepares all staff to be able to perform their duties effectively as soon as you implement the change.

- ▶ Prosci provides tools to help determine the needs of each staff member, to provide the support they require, to evaluate the effectiveness and to adjust your approaches as you progress.

# A change management plan (CMP) is structured around the phases of the change

## This CMP discusses four streams of activities in the awareness-building phase

The diagram to the right provides a visual depiction of those streams and some common recommended activities the change management team should establish in each phase.

- ▶ The first phase will determine the size and scale of the subsequent change management activities. For example, some changes might require limited training with all affected staff attending a one-hour briefing. Whereas a very large training might involve multiple classroom training events accompanied by training manuals.
- ▶ The CMP needs to provide guidance on which of these activities you plan to undertake and the scale that you require them to be.

	Communication	Coaching	Resistance	Training
Diagnose (Awareness)	Communication Plan	Engagement Plan	Stakeholder Analysis	Impact Assessment
Design (Desire)	Communication Events	Coaching Plan	Change Readiness	Training Plan
Develop (Knowledge)	Communication Events	ADKAR Coaching	Change Readiness	Training Courses
Implement (Ability)	Communication Events	Expert Users	Knowledge Platform	Hands-on Practice
Stablize (Reinforce)	Communication Events	Recognition Awards	Compliance Audits	

**Stakeholder analysis, engagement planning and change readiness are the key tools to inform the overall CMP**

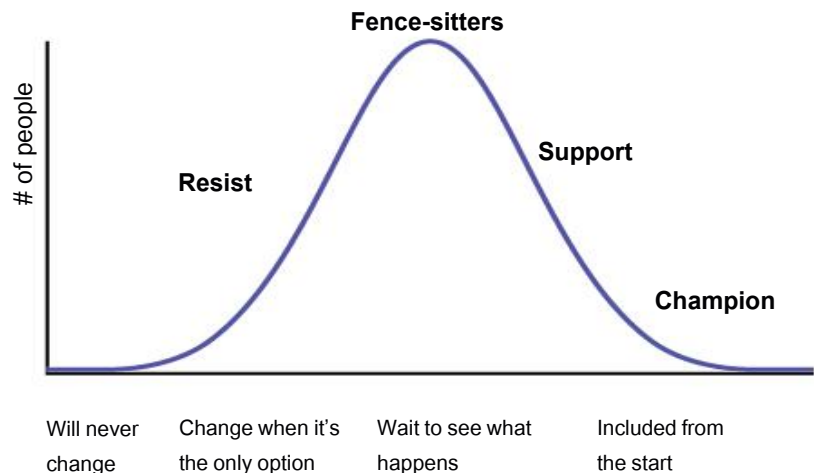
# Profiling the staff across the organization is a solid first step to developing the change management plan

Position	Description
Champions	They're inspired by the possibilities of change. In fact, they may already have tons of ideas on what and how things need to change and will find ways to help it along.
Support	They like the idea of the change typically because they can see its benefits, as it likely addresses some of their major pain points. However, these staff mainly play a supporting role, as they mainly agree with the change but typically do not actively attempt to get others on board.
Fence-sitters	They aren't sure the organization will change—but they aren't sure it won't, either. Therefore, they'll "sit it out" and wait for a sign of the ultimate before helping out. This is typically representative of most staff in an organization.
Resist	They actively oppose the change often because of past experience—someone tried to change the organization and failed. They may believe the change will create more work for themselves. This expectation of an increased workload is sometimes brought about due to the potential high learning curve that may come with training for a new system or process.

## Change management should assess and monitor the climate in the organization

While it would be great for the organization if all changes were enthusiastically welcomed and embraced by staff. The reality is that each person will have a slightly different outlook.

- ▶ Change management offers some categories and suggested approaches to employees in each of the categories. It also suggests that the largest number of people will be in the fence-sitter category.
- ▶ The descriptions to the right help identify which category a person belongs to.



# Once you've identified who falls into which camp, you should adopt approaches that can be effective at addressing the groups needs

## The table to the right provides some guidelines for each of the groups

Key is to understand the motivations of each group and how to use those motivations to progress the changes.

- ▶ These groups are not static, and you do not want them to be. As you progress with your changes, one of the objectives of the CMP is to move resisters to fence sitters and fence sitters to supporters.

For UTRCA, much of the reason for the changes contemplated in this report come not from internal imperatives but in response to external changes.

- ▶ This makes identifying the key benefits even more important. You want to move the sentiment away from 'it's being done to us' and towards 'we will be better off afterwards'.

<b>Begin with champions</b>	<ul style="list-style-type: none"><li>▶ Consider them as candidates in program governance forums or as change sponsors.</li><li>▶ Empower them to assemble others to help. Support their ideas - show appreciation for their enthusiasm.</li></ul>
<b>Engage with resisters</b>	<ul style="list-style-type: none"><li>▶ Education and Communication: One of the best ways to overcome change resistance is to inform and educate people about the change effort beforehand. It helps them see the logic and reduces incorrect rumours concerning the effects on the organization.</li><li>▶ Participation and Involvement: Involving potential resisters in the design and implementation can greatly reduce resistance.</li><li>▶ Facilitation and Support: If the basis of resistance is a perception of a detrimental effect, managerial support can help employees to deal with their fear and anxiety during a transition period.</li><li>▶ Negotiation and Agreement: If the person will really lose out from a change, creating agreements can help. Managers could offer incentives to employees not to resist the change.</li></ul>
<b>Leave the fence-sitters to others</b>	<ul style="list-style-type: none"><li>▶ Champions and converted resisters are the most effective way to move fence sitters.</li><li>▶ Once people see that things are progressing and that others are supportive, they are more likely to become supporters.</li></ul>

# Measure change readiness from the beginning

## Readiness is subtly different from willingness

Readiness is really asking whether I have all the pieces in place to make the change and it aligns closely with the ADKAR framework.

- ▶ As the change progresses, the characteristics of readiness also evolve. In the initial phases, the degree to which staff are aware of the change and its benefits is the measure of readiness.
- ▶ Towards implementation, it becomes a question of having the skills and knowledge to function after the change.

## Surveys are one tool to gauge readiness

The table to the right shows an example survey for the early stage of a project.

- ▶ Conducting surveys like this at the start of the project creates a baseline that you can use to measure the effectiveness of the CMP.
- ▶ The survey should evolve and be administered periodically during the project.

**The results of the surveys are a key input to adjusting the change management plan**

I have heard the reasons why we are undertaking this project	Y/N
I understand the benefits of the project	Y/N
I understand why we are undertaking the project	Y/N
The abc project is in the long-term interests of the organization	Y/N
I have heard how the project is going to impact our organization	Y/N
I've heard about the vision for abc project	Y/N
I can broadly explain the vision of abc project	Y/N
The vision makes sense	Y/N
I know who's involved (people, business areas) in delivering the project	Y/N
I believe our organization will commit enough resources (\$\$, people, technology, etc.) to the project	Y/N
I am aware of our success in making changes	Y/N
I understand why our organization has been successful in the past at changing	Y/N
I believe our organization has the ability to successfully deliver abc project	Y/N
I've heard positive discussion about abc project	Y/N
I am willing to work with the project teams as required	Y/N

**/ APPENDICES**

# Appendix A

## Process Shadowing Services

To best understand how your staff work, we engaged in process shadowing, based on the service index you provided us. We shadowed 10+ staff across planning, permitting and compliance, using real files to assess work and pain points. Each staff member had the opportunity to demonstrate their tasks and processes as it related to planning and permitting.




### We use process shadowing for many reasons, including:

- ▶ See the steps in the process;
- ▶ Understand how technology supports the process;
- ▶ Ask the reasons for the way work is undertaken;
- ▶ Identify the impact of manual processes, including errors and data duplication.

The processes are divided first into three major areas – Planning Reviews, Permitting Reviews and Technical Reviews. The areas are then divided sub-service, which are then followed by our observations of the work.

Each process falls into one of three categories:

- ▶ **Functions Well** - The process is working as intended. There may still be room for improvement.
- ▶ **Minor Issues** – The process is partially effective but has noticeable issues such as delays, unclear roles or inconsistent documentation. These pain points should be addressed in the near term.
- ▶ **Major Issues** – The process is significantly impacting service. It causes delays, confusion or rework and requires urgent attention.

Legend	
	Functions Well
	Minor Issues
	Major Issues

Acronyms	
RO	Regulations Officer
RA	Regulations Assistant

# Appendix A

## Planning Reviews

Sub-Service	1.1 Pre-consultation/Initial Communication	1.2 File Handler Assessment & Triage	1.3 Application Review	1.4 Technical Review	1.5 Memo Finalization	1.6 Regulated Property Assessment	1.7 Finalization & Payment
Process	<p>1.1.1 Applicant emails the shared planning inbox</p>	<p>1.2.1 File Handler forwards app. email to planner or self. Adds app. details to Excel tracker/</p>	<p>1.3.1 Planner reviews application in Geoportal to see if it is in regulated area</p>	<p>Refer to Page 64</p>	<p>1.5.1 Planner cross checks technical comments.</p>	<p>1.6.1 Planner emails comments to Municipality.</p>	<p>1.7.1 Planner saves final PDF to L Drive.</p>
	<p>1.1.2 Planner alerts the Land Use Regulations Officer</p>	<p>1.2.2 Planner saves attachments on L drive, planning folders and files email.</p>	<p>1.3.2A If not regulated planner issues a No Objection letter. Process complete.</p>		<p>1.5.2 Planner send formal comment letter to Municipality. Fees are calculated and included.</p>	<p>1.5 Planner and forwards email chain for invoicing.</p>	<p>1.7.2 Payments processed by UTRCA staff. Planners not involved in invoicing or tracking of payments.</p>
	<p>1.1.3 Planner and Applicant hold scoping meeting</p>	<p>1.2.3 Planner adds files to their "to-do" list.</p>	<p>1.3.2B If regulated, application goes to 1.4: Technical Review.</p>			<p>1.5.2 Planner reviews revisions until sufficient.</p>	
		<p>1.2.4 Planner reviews files, maps and emails applicant missing info.</p>					
Observations	<p>Not all applicants book pre-consultations. Relies on email hand off for triage.</p>	<p>Information stored in multiple places/folders. Need to review multiple maps. Geoportal does not have up-to-date info.</p>	<p>Missed pre-consultations result in delay in timelines and iterations of plans. Manual process to key in information in templates.</p>	<p>Staff memory to triage file to the correct technical staff for technical review.</p>	<p>Manual work to cross reference technical comments. Heavy copy/paste in multiple templates. Risk increase email volume.</p>	<p>Manual process. Need to key in addresses on Word template every time. Back and forth iterations can occur for a long period of time.</p>	<p>Fee schedule is a static PDF, planner eyeballs table. Payments are tracked on Excel. Inquiries are directed to Finance.</p>

# Appendix A

## Permitting Reviews (1/2)

Sub-Service	2.1 Forms, Requirements and Pre-submission Consultations	2.2 File Handler Assessment and Triage	2.3 Application Review	2.4 Technical Review	2.5 Draft Decision Letter	2.6 Application is refused	2.7 Enforcement – Enforce or Amend Conditions
Process	<p>2.1.1 Applicant submits Application for ON Regulations 41/24 and other file documents.</p> <p>2.1.2. Applicant engages in pre-submission consultation</p> <p>2.2.1 Regulations Officer (RO) receives email and assigns file. 21-day clock begins.</p>	<p>2.2 RO checks Fee schedule. Payment is due on submission.</p>	<p>2.3.1 After payment, RO claims next permit number in email chain.</p> <p>2.3.2 RO adds file to Excel tracker. RO matches scope to checklists. Requests missing items. Starts 30-day decision clock (minor) or 90-day clock (major).</p> <p>2.3.3 RO reviews file for completeness. Triages to Regulation Assistant (RA) and Technical for review.</p>	<p>Refer to Page 64</p>	<p>2.5.1 A permit may be issued with/without conditions.</p> <p>2.5.2A If application is granted, a copy of permit will be issued to Applicant.</p> <p>2.5.2B If application is not granted, Skip to Step 2.6.</p>	<p>2.6.1 If application is refused and/or applicant does not agree with conditions, applicant can present application to UTRCA Hearing committee.</p> <p>2.6.2 Authority can receive request for Administrative review.</p>	<p>2.7.1 RO will conduct site visit to confirm conditions.</p> <p>2.7.2 If non-compliant, officer applies Compliance &amp; Enforcement manual</p> <p>2.7.2 Officer logs notes/photos in Ontario black notebook.</p>
Observations	<p>Pre-consultations are often missed and applicants sometimes go directly to submitting a permit. Leads to delays.</p>	<p>RO often struggles to assign fees to permits in unique situations. Delays occur as information is spread across multiple sources.</p>	<p>Email chain is a central source of information. Staff must doublecheck the Excel sheet to stay on top of regulated timelines.</p>	<p>Staff memory to triage file to the correct technical staff for technical review.</p>	<p>Conditions are compiled from multiple emails, which can be inconsistent/missed. Applicant must provide Municipality a copy of permit.</p>	<p>Hearings can be time/labour intensive for staff and difficult to plan for. Can impact staff workload and timelines for other applications.</p>	<p>Records can be inconsistent, depending on who performed the visit. Lack of centralized tracking limits trend analysis.</p>

# Appendix A

## Permitting Reviews (2/2)

Sub-Service	2.8 Finalization and Payment	2.9 Payment	2.10 Finalization	2.11 Extension Assessment <i>(required only if permit passes expiry date)</i>	2.12 Extension Required
Process	<p>2.8.1 Admin Assistant receives email and adds file to Excel Permitting tracking sheet. Colour codes payment to red.</p> <p>2.8.2 Admin Assistant sends Excel invoice to Finance. Finance creates invoice on Sage and sends it to the customer.</p> <p>2.8.3 Admin Assistant sends applicant a note they will receive invoice shortly.</p>	<p>2.9.1 Once payment is received, Finance confirms payment and updates log.</p> <p>2.9.2 Admin Assistant double checks payment and updates Excel. Colour codes payment to black.</p> <p>2.9.3 Admin Assistant notifies RO and RA that payment is confirmed.</p>	<p>2.10.1 After payment is confirm, permit can proceed.</p>	<p>2.11.1A Permit holder reaches out for an extension. RO requests updating documents to capture scope change. If no change, written confirmation is sufficient.</p>	<p>2.12.1 RO completes extension template and determines new fee.</p>
Observations	<p>Overprocessing same data. Unnecessary processing of invoice and double-checking work.</p>	<p>Duplication of work. Admin Assistant does not have the same privileges as Finance. Finance needs to track/trace what app. fee is for.</p>	<p>Manual close. No tracking of process aside from Outlook and Excel spreadsheet. Staff memory to remind RO/RA that payment is confirmed.</p>	<p>Heavy copy/paste from templates. No tracking of technical reviews working on extension requests. Manual email routing/follow-ups.</p>	<p>Templates are inconsistent between Regulations Officers.</p>

# Appendix A

## Technical Reviews

Sub-Service	3.1 Initiate Technical Review	3.2 Track Technical Work	3.3 Complete Technical Review	3.4 Prepare Comments	3.5 Submit Comments
Process	<p>3.1.1 File Handler renames email subject line and forward to Technical Staff.</p>	<p>3.2.1 Reviewer assesses effort level. Adds tasks to own tracker.</p>	<p>3.3.1 Reviewer completes analysis through desk based (e.g. technical report/study, checklist, Geoportal, etc.) and/or onsite visit if required.</p>	<p>3.4.1 Reviewer populates applicant info and technical comments in Word memo template.</p>	<p>3.5.1 Reviewer sends Word version to file handler .</p>
	<p>3.1.2 File Handler logs outreach in Excel tracker.</p>	<p>3.2.2 Reviewer opens L drive file and reviews documents and requests missing documents (as required).</p>		<p>3.4.2 Comments are split into two stages: "Comments Addressed Now" and "Addressed in Detailed Design Stage".</p>	<p>3.5.2 Reviewer saves PDF copy with signature and designation.</p>
Observations	<p>Not all applicants book pre-consultations. Relies on email hand off for triage. Information stored in multiple places. Capturing "to-dos" varies per person.</p>	<p>Each reviewer uses a personal tracker for applications and deadlines. Because these trackers aren't shared, other EPR staff can't view updates on progress.</p>	<p>Technical reviews can be resource and time intensive. UTRCA is currently updating their floodplain mapping.</p>	<p>To not delay work, Tech. staff agree to the designs by deeming certain items in two stages. They communicate to the applicant that they will need this information at some point. This varies per staff.</p>	<p>Manual work to cross reference technical comments. Heavy copy/paste in multiple templates. Risk increase email volume.</p>

## Appendix B

### Peer Data (1/2)

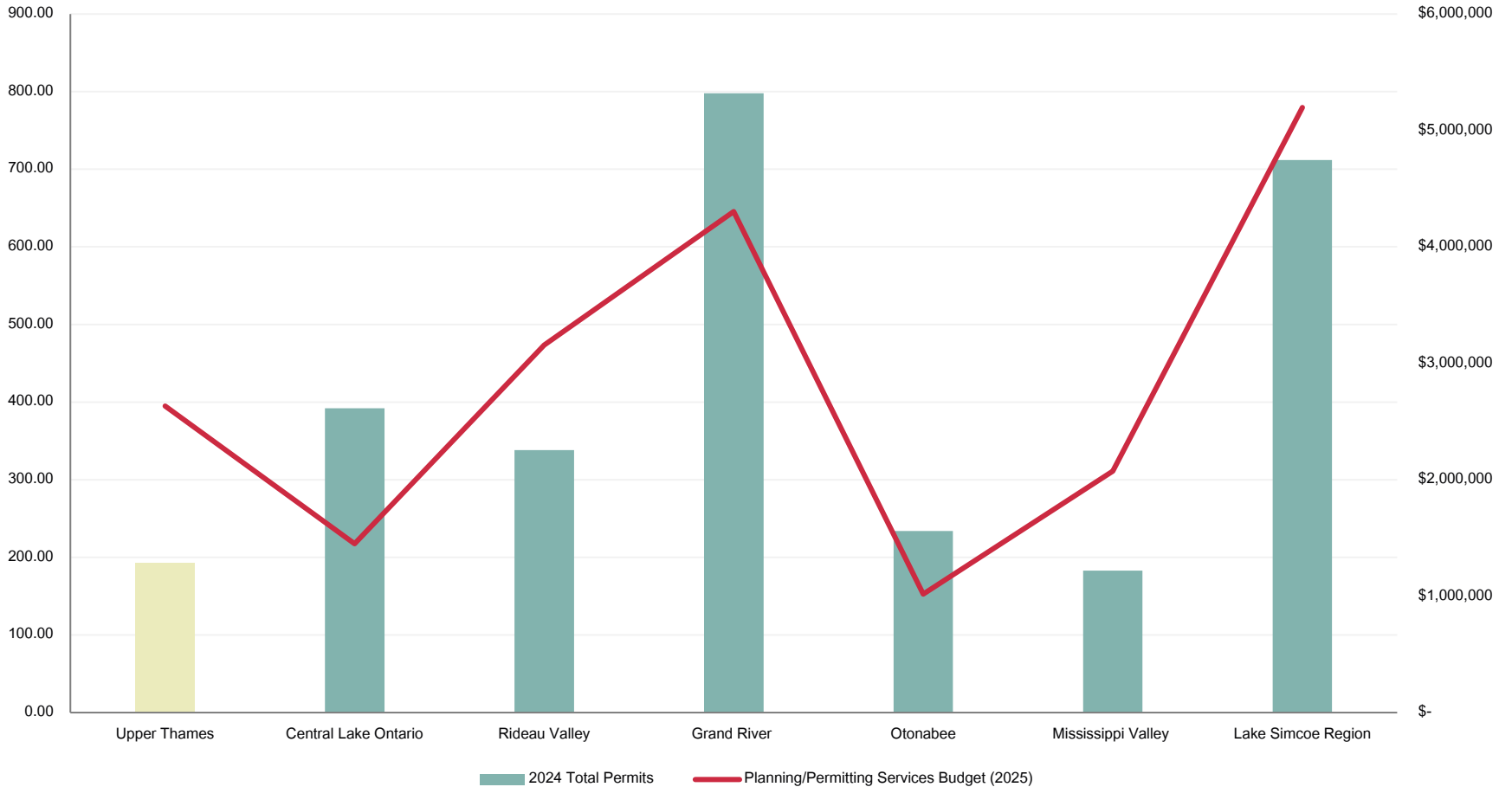
	Number of Permitting Staff	Number of Planning Staff	Number of Technical Staff	Number of Permits (2024)	Average Processing Time (days)	Planning/Permitting Budget
<b>UTRCA</b>	6	4	4	192	6.5	\$2.63M
<b>Central Lake ON</b>	3	3	5	392	17	\$1.45M
<b>Rideau Valley</b>	4	3	5	338	-	\$3.16M
<b>Nottawasaga</b>	4	5	8	523	20	-
<b>Grand River</b>	4.5	4.5	5	798	-	\$4.30M
<b>Otonabee</b>	N/A	N/A	N/A	234	-	\$1.01M
<b>Mississippi Valley</b>	2	2	9	183	6	\$2.07M
<b>Lake Simcoe Region</b>	5	5	6	712	17.5	\$5.20M

Note that from 2020 to 2024 the UTRCA averaged 207 permit requests annually. The EPR Unit staff count was obtained from the online [staff directory](#). Organizational structure, roles and responsibilities will differ between each CA.

# Appendix B

## Peer Data (2/2)

### Planning/Permitting Budget vs Permits Issued



## Appendix B

# Permitting Data Breakdown (2024)

Category	UTRCA <sup>1</sup>	Peer Average <sup>2</sup>	Legislated Timelines
Permits Issued (Major)	103	62	-
Permits Issued (Minor)	38	78	-
Average Permit Processing in Days (Major)	7	11.2	90
Average Permit Processing in Days (Minor)	6	8.4	30
# of application reviews not completed in 21 days	19	19	-

1. UTRCA Annual Permit Activity Report.

2. Data from the Annual Reports of Central Lake Ontario CA, Rideau Valley CA, Nottawasaga CA, Mississippi Valley CA and Lake Simcoe CA.

## Appendix B

# Planning Applications - Impact of Technical Review on On-Time Performance 2023-2024<sup>1</sup>

Technical Review Required	Applications	% of Total Applications	On-Time %
Yes	260	11%	30%
No	2155	89%	82%
Total	2415		

\* Technical review tracking only began in 2023. Data is from 2023-24

## Legislative Review (1 of 6)

We have reviewed O. Reg. 41/24 and identified areas where the EPR Unit does or does not meet the legislated requirements:

### Section 4: Maps of Regulated Areas

Legislation	Observation
<p>4. (1) An authority shall develop maps depicting the areas within the Authority’s area of jurisdiction where development activities are prohibited under paragraph 2 of subsection 28 (1) of the Act which shall be filed at the head office of the authority and made available to the public on the Authority’s website, and by any other means that the authority considers advisable.</p>	<ul style="list-style-type: none"> <li>▶ UTRCA hosts an online viewer with several different layers (e.g. approximate regulated area; screening area; regulation watershed).</li> </ul>
<p>4. (2) At least once annually, the Authority shall:</p> <ul style="list-style-type: none"> <li>▶ (a) review the maps referred to in subsection (1) and determine if updates to the maps are required.</li> <li>▶ (b) make and file such updates to the maps at its head office if required.</li> <li>▶ (c) make the updated maps available to the public on its website and by any other means it considers advisable.</li> </ul>	<ul style="list-style-type: none"> <li>▶ UTRCA is actively working on updating its floodplain mapping, however this has been a lengthy process and in the interim, there have been disputes between UTRCA, developers and municipal partners about certain flood lines.</li> <li>▶ Developers said that UTRCA’s mapping is not as extensive and informative as the online mapping provided by peer CAs. UTRCA staff believe mapping is consistent with the majority of CAs.</li> </ul>

## Legislative Review (2 of 6)

### Section 6: Pre-submission consultation

Legislation	Observation
<p>6. (1) Prior to submitting an application for a permit under section 28.1 of the Act, an authority and the applicant may engage in pre-submission consultation for the purposes of confirming the requirements of a complete application to obtain a permit for the activity in question, which may include:</p> <p>6. (1a) requests by the authority to the applicant for,</p> <ul style="list-style-type: none"> <li>▶ (i) initial information on the proposed activity such as a description of the project and any associated plans, or</li> <li>▶ (ii) details about the property upon which the activities are proposed to be carried out, including copies of plans, maps or surveys;</li> </ul> <p>6. (1b) meetings between the Authority and the applicant prior to the submission of an application, including any site visits to the property where the activities are proposed to be carried out.</p>	<ul style="list-style-type: none"> <li>▶ UTRCA policy encourages pre-submission consultation, but many applicants skip it or cannot secure a timely meeting, leading to extra iterations later.</li> <li>▶ Pre-submission consultation meetings also occur as part of plans review, but these are managed by Planners, with Regulations Officers being involved to varying degrees,</li> </ul>
<p>6. (2) If the applicant requests a pre-submission consultation under subsection (1), the Authority is required to engage in the pre-submission consultation.</p>	<ul style="list-style-type: none"> <li>▶ Regulations Officers hold pre-submission consultations with applicants when requested.</li> </ul>

## Legislative Review (3 of 6)

### Section 7: Application for permit

Legislation	Observation
<p>7. (2) Upon receipt of the information required under subsection (1) and payment by the applicant of the fee charged by the Authority under subsection 21.2 (4) of the Act, the Authority shall notify the applicant in writing, within 21 days, whether or not the application complies with subsection 28.1 (3) of the Act and is deemed to be a complete application.</p>	<ul style="list-style-type: none"><li>▶ In 2024, 86.5% of permit applications were processed on-time.</li></ul>
<p>7. (3) If the Authority notifies an applicant under subsection (2) that the application is complete, the Authority shall not require new studies, technical information or plans under clause (1) (i) from the applicant to make a determination on the application, unless agreed to by the Authority and the applicant. For greater certainty, the Authority may ask the applicant for clarification or further details regarding any matter related to the application.</p>	<ul style="list-style-type: none"><li>▶ We found no evidence of EPR Unit staff asking for additional studies or information after staff deemed a permit application complete.</li></ul>

## Legislative Review (4 of 6)

### Section 8: Request for review

Legislation	Observation
<p>8. (1) An applicant may request a review by the Authority if,</p> <ul style="list-style-type: none"> <li>▶ (a) the applicant has not received a notice from the Authority within 21 days in accordance with subsection 7 (2);</li> <li>▶ (b) the applicant disagrees with the Authority's determination that the application for a permit is incomplete; or</li> <li>▶ (c) the applicant is of the view that a request by the Authority for other information, studies or plans under clause 7 (1) (i) is not reasonable.</li> </ul>	<ul style="list-style-type: none"> <li>▶ UTRCA's supports an Administrative Review Option (ARO) procedure. Applicants can find the Administrative Review form and policy from the central planning and permits page.</li> <li>▶ The EPR Unit tracks the 21-day timeline manually in an Excel-based tracker which puts the onus on staff to doublecheck timelines and maintain adherence to them.</li> </ul>
<p>8. (2) A review requested by an applicant under subsection (1) shall be completed by the Authority no later than 30 days after it is requested and the Authority shall, as the case may be,</p> <ul style="list-style-type: none"> <li>▶ (a) confirm that the application meets the requirements of subsection 7. (1) and is complete or provide reasons why the application is incomplete; or</li> <li>▶ (b) provide reasons why a request for other information, studies or plans under clause 7 (1) (i) is reasonable or withdraw the request for all or some of the information, studies or plans.</li> </ul>	<ul style="list-style-type: none"> <li>▶ UTRCA's ARO policy matches the 30-day limit for completing of reviews. It also notes that in extenuating circumstances if it cannot meet this deadline UTRCA will seek written approval of the applicant to extend the timeline.</li> </ul>

## Legislative Review (5 of 6)

### Section 9: Conditions of Permits

Legislation	Observation
<p>9. (1) An authority may attach conditions on a permit issued under section 28.1 of the Act only if, in the opinion of the Authority, the conditions,</p> <ul style="list-style-type: none"> <li>▶ (a) assist in preventing or mitigating any effects on the control of flooding, erosion, dynamic beaches or unstable soil or bedrock;</li> <li>▶ (b) assist in preventing or mitigating any effects on human health or safety or any damage or destruction of property in the event of a natural hazard; or</li> <li>▶ (c) support the administration or implementation of the permit, including conditions related to reporting, notification, monitoring and compliance with the permit.</li> </ul>	<ul style="list-style-type: none"> <li>▶ Staff will respond to and investigate all compliance matters deemed high priority, including conducting on-site visits to monitor permits granted.</li> </ul>

### Section 11: Period of validity for permits and requirements

Legislation	Observation
<p>11. (2) If a permit is issued for less than the maximum period of validity, the holder of a permit may, at least 60 days before the expiry of the permit, submit an application for an extension of the permit to,</p> <ul style="list-style-type: none"> <li>▶ (a) the Authority that issued the permit, in the case of permits issued under section 28.1 or 28.1.2 of the Act; or</li> <li>▶ (b) the Minister, in the case of permits issued under section 28.1.1 of the Act.</li> </ul>	<ul style="list-style-type: none"> <li>▶ The EPR Unit is often informed less than 60 days in advance but will still grant extensions.</li> </ul>

## Appendix D

# Glossary of change management terminology

Term	Definition	Term	Definition
Communication plan	A structured approach to delivering key messages about the change, ensuring interest holders receive timely and relevant information.	ADKAR coaching	One-on-one or group guidance provided by managers or change leaders to support employees in their transition.
Engagement plan	A strategy to involve and motivate interest holders, fostering commitment and participation throughout the change process.	Expert users	People with deep knowledge of the change who act as champions, providing guidance and support to others.
Stakeholder analysis	The process of identifying individuals or groups affected by the change, assessing their influence and determining how to engage them effectively.	Knowledge platform	A centralized resource for storing and sharing information related to the change, such as FAQs, guides and best practices.
Impact assessment	An evaluation of how the change will affect different parts of the organization, including processes, roles and culture.	Hands-on practice	Practical exercises that allow employees to apply new skills in a controlled environment before full implementation.
Communication events	Specific activities designed to share information, such as town halls, webinars or newsletters.	Training courses	Formal learning sessions designed to educate employees on new processes, tools or behaviours.
Coaching plan	A structured approach to guiding individuals through change, helping them overcome barriers and develop necessary skills.	Change readiness	The assessment of an organization's preparedness for change, identifying gaps and areas requiring additional support.
Recognition events	Celebrations or acknowledgments of employees who successfully adopt and support the change.	Compliance audits	Reviews conducted to ensure adherence to new procedures or practices introduced by the change.
Training plan	A roadmap for equipping employees with the knowledge and skills needed to adopt the change successfully.		

# Appendix E

## UTRCA Client Experience Survey

The Upper Thames River Conservation Authority (UTRCA) is committed to improving how we serve our clients. Whether you contacted us for general information, planning support or a permit application, we'd like to hear about your experience. This short survey should take less than 5 minutes.

### 1. What was the main reason you contacted UTRCA?

- General inquiry or information
- Permit application
- Planning review (e.g. development or site plan)
- Technical/environmental support (e.g. mapping, flooding, regulations)
- Other (please specify)

### 2. How would you rate your overall experience?

- Very positive
- Positive
- Neutral
- Negative
- Very negative

### 3. Which aspects of your interaction worked well? (select all that apply)

- Timeliness of responses
- Clarity of information provided
- Professionalism and courtesy of staff
- Helpfulness in moving my request forward
- Other (please specify)

### 4. Which aspects could have been improved? (select all that apply)

- Timeliness of responses
- Clarity of information provided
- Professionalism and courtesy of staff
- Helpfulness in moving my request forward
- Other (please specify)

### 5. How easy was it to find the information or support you needed?

- Very easy
- Easy
- Neutral
- Difficult
- Very difficult

### 6. What could UTRCA improve to make your experience better in the future?

(Open text box)

### 7. Do you have any other comments or suggestions?






(Open text box)

## Appendix E

# Planning and Permitting Metrics

Area	KPI Measure	What to track	Why
Planning and Permitting	Forecast accuracy	% difference between projected and actual applications per quarter	Helps anticipate workload and allocate staff/resources effectively
Planning and Permitting	Seasonal demand distribution	% of applications received in peak (spring/summer) vs. off-peak months	Identifies seasonal workload patterns to better schedule staff and resources
Planning and Permitting	Staff workload balance	Average number of active files per staff member vs. target threshold	Ensures workloads are distributed fairly and identifies when extra capacity is needed
Planning and Permitting	Level of complexity	% of applications tagged as routine, standard or complex	Shows effort required beyond volume, supports both planning forecasts and performance analysis
Planning and Permitting	Resubmission rate	% of applications requiring additional rounds of review due to incomplete or poor-quality submissions.	Identifies where delays are caused by submission quality and signals areas for applicant guidance or process improvements
Permitting	Pre-consultation rate	% of applications that had pre-consultation before submission	Tracks uptake of pre-consultation and helps show its impact on smoother/faster approvals
Customer Service	Satisfaction rate	% of positive responses from client surveys (overall experience rating)	Measures overall client perception of service and progress toward service goals
Customer Service	Areas of improvement	% of clients identifying each improvement area	Highlights recurring pain points and allows tracking of whether issues decrease over time
Customer Service	Access to information	% of survey respondents reporting information was easy/very easy to find	Indicates how accessible and clear guidance, forms and online tools are for clients

# Initial considerations for procuring a CRM or case management software

 <b>Customization</b>	<ul style="list-style-type: none"><li>▶ Determine what kind of workflows you would need, such as how to define approval structures.</li><li>▶ Consider how to define and route applications that require additional review by technical staff.</li></ul>
 <b>Integration</b>	<ul style="list-style-type: none"><li>▶ List out all internal and 3<sup>rd</sup> party systems and software used by (e.g. GIS, document management) and determine which systems you want to integrate or migrate.</li><li>▶ Consider data migration strategy: how old records (in spreadsheets, email, personal/shared drives) will be cleaned and brought into the new system.</li></ul>
 <b>Payment Processing</b>	<ul style="list-style-type: none"><li>▶ Decide if you would like a system that can integrate payment processing for applications and review fees, and which payment methods would apply.</li><li>▶ Ensure the system can link payments to specific cases so tracking is clear and report on delinquent payments.</li></ul>
 <b>Implementation Support</b>	<ul style="list-style-type: none"><li>▶ Consider how you will roll out the system to staff, and if you will opt to use external support to implement the new system.</li><li>▶ Determine what support you would like from vendors, including a Service Level Agreement based on issue severity and response times.</li></ul>
 <b>Online Portal</b>	<ul style="list-style-type: none"><li>▶ Determine if you would like to embed an online form on your website, which can link to a portal for applicants.</li><li>▶ Consider if you would like all users (applicants, consultants or municipalities) to use the portal, or limit who can access.</li><li>▶ Ensure the forms and/or portal are accessible to the public with clear instructions.</li></ul>

# Appendix G

## Lean Principles

**Lean is an approach to process improvement that focuses on three areas: waste, flow and automation**

- ▶ Automation identifies tasks that computers could perform, typically these are information processing tasks that do not require judgement, and they are governed by a set of clearly defined business rules.
- ▶ Flow is the smooth movement of a work product through a process. Times when work cannot flow, by design or process failures, will indicate opportunities to improve the process from the customer's perspective.
- ▶ Waste are activities that do not add value in the eyes of the customer. The chart below highlights the common types of waste that occur in a process.



### **Defects**

Time spent doing something incorrectly, inspecting for errors or fixing error



### **Overproduction**

Doing more than what is needed by the customer or doing it sooner than needed



### **Waiting**

Waiting for the next process or work activity to occur



### **Unused Talent**

Underutilizing staff talents, skills and knowledge



### **Transportation**

Waste from unnecessary movement of the work product in a system



### **Inventory**

Excess inventory cost through purchasing, storage, spoilage and wastage



### **Motion**

Unnecessary movement of employees in the system



### **Excess Processing**

Doing work that is not valued or helps in the process

# BLACKLINE CONSULTING

**To: UTRCA Board of Directors**  
**From: Jenna Allain, Manager, Environmental Planning and Regulations**  
**Date: December 16, 2025**  
**File Number: BoD-12-25-88**  
**Agenda #: 8.2**  
**Subject: Tentative Implementation Plan for Service Delivery Review Recommendations**

## Recommendation

THAT the Board of Directors receives the Tentative Implementation Plan for Service Delivery Review Recommendations Report for information.

## Background

With the Final Report and Recommendations for the Planning and Permitting Service Delivery Review received, staff have begun considering the implementation of the review recommendations. The table below outlines a tentative plan for implementing the nine recommendations outlined in the Final Report. A comprehensive implementation plan will be prepared for Board consideration early in 2026.

Rec #	Details	Priority	Target Completion	Notes
1	Coordinate with member municipalities (Adopt MOUs, reduce duplication on technical reviews, establish regular touchpoints)	Med-High	Q4 2026	<p>UTRCA had historical MOUs with many member municipalities, including the City of London, that were established in the late 90's and defined UTRCA's role in plan reviews that extended beyond our legislated natural hazard responsibilities (e.g., natural heritage reviews). Efforts were underway to update those MOUs in 2021. However, discussions on MOUs ceased when changes to the Act were enabled in 2022, prohibiting CA's from providing additional review services to municipalities. Staff will initiate discussions with City of London in Q1 of 2026 about new MOUs that define roles and responsibilities. This will include defining the scope of UTRCA technical review and will be used as a template for other watershed municipalities.</p> <p>Through 2025, UTRCA and City of</p>

Rec #	Details	Priority	Target Completion	Notes
				London senior management staff met monthly with meetings intended to continue through 2026. An information sharing day was arranged in November 2025 for all other watershed municipalities. Staff will initiate discussions with other member municipalities to determine the frequency of further meetings moving forward.
2	Implement risk-based decision framework	High	Q4 2026	Currently being provided through management guidance and support. Need to develop a formal framework tool for staff.  Staff will consult with neighbouring CA's for already established framework tools available for UTRCA adoption.
3	Accelerate the planning comment process	Med-High	Q3 2027	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 keep up with ever-changing municipal timelines for planning applications (also because of provincial changes), which vary from municipality to municipality. Further consideration and time for implementation needed for staff structure changes and geographical assignments that will accelerate the planning comment process.  Staff will work to establish average timelines for processing planning applications and consider a process for triaging priority at intake in Q1-Q2 of 2026.
4	Create a protocol for the EPR Unit's use of floodplain mapping	N/A	Complete	Map Transition Protocol approved at the November BOD meeting.
5	Implement Suitable Technology	Low	Undetermined	Staff will explore low/no-cost interim solutions while awaiting further information about provincial plans to implement a province-wide permitting platform.
6	Promote a culture shift to be more solution oriented	Low-Med	Q2 2027	Staff will research and assess costs for third-party customer service training.  Updating client service delivery standards

Rec #	Details	Priority	Target Completion	Notes
				and refreshing onboarding materials for staff will be deferred until completion of the new policy and procedure document.
7	Implement a continuous improvement program	Low-Med	2027-2028	<p>Further training and understanding of Lean approach needed. This may be incorporated with third-party client service training identified through Recommendation #6.</p> <p>Staff will review surveys for customer service interactions from other CAs for possible adoption at UTRCA.</p> <p>Currently, staff are meeting monthly with a development interest group. This group will be consulted with on ways to incorporate feedback from the development community and the establishment of a meaningful feedback loop.</p>
8	Create service standards and metrics	Low	Undetermined	Staff will decide what metrics to track and explore low/no-cost interim solutions for tracking and monitoring trends while awaiting further information about provincial plans to implement a province-wide permitting platform.
9	Inform relevant groups of changes to relevant information	Med-High	Q4 2027	<p>Planning and Regulations staff will work with Communications staff to develop an external communications plan in 2026 with implementation through 2027.</p> <p>Staff will review other CA comprehensive annual reports to consider how UTRCA's annual report can incorporate additional information and metrics.</p> <p>Planning and Regulations webpages on the UTRCA website have been updated throughout 2025 to incorporate the most up to date news, information, and templates. Planning and Regulations staff will continue to work with communications staff through 2026 on a website/webpage redesign to strengthen public awareness and access to information.</p>

**Recommended by:**

Jenna Allain, Manager, Environmental Planning and Regulations

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**To: UTRCA Board of Directors**  
**From: Tracy Annett**  
**Date: November 25, 2025**  
**File Number: BoD-12-25-89**  
**Agenda #: 8.3**  
**Subject: 2026 Board Election Information**

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## Recommendation

That the Board of Directors receives the report for information.

## Background

As required by the *Conservation Authorities Act* (CAA), the Upper Thames River Conservation Authority Board of Directors conducts elections each year. Nominations for the following positions will be accepted verbally during the January 2026 meeting:

- Board Chair (to be nominated and elected)
- Board Vice-Chair (to be nominated and elected)
- Five (5) positions on the Hearing Committee:
  - Past Chair (Appointed, if applicable. If there is no Past Chair, a 3<sup>rd</sup> “at large” member is to be nominated and elected)
  - Current Chair (appointed)
  - Current Vice- Chair (appointed)
  - Two (2) members elected at large (to be nominated and elected)
- Three (3) to five (5) positions on the Finance and Audit Committee:
  - Current Chair (appointed)
  - Current Vice-Chair (appointed)
  - One (1) to three (3) additional members elected at large (to be nominated and elected).
- Source Protection Striking Committee Member/ Committee Liaison (to be nominated and elected)

All Board members are eligible for any of the available positions, except as specified below in the Conservation Authorities Act under Section 17. All appointments are for a one-year term.

Members interested in any of these available positions are encouraged to communicate with their fellow board members to secure a nomination and support prior to the January meeting. Past practice has included calls and/or emails to fellow directors in an effort to secure support. In the event of more than one candidate seeking an individual position, elections will be held according to the Procedure for Election of Officers, Appendix 2, in the UTRCA Administrative By-law. Those interested in positions should be prepared to speak to their nomination and qualifications during the January meeting.

Section 17 of the CAA provided:

(1.1), a chair or vice-chair appointed under subsection (1) shall hold office for a term of one year and shall serve for no more than two consecutive terms. 2020, c. 36, Sched. 6, s. 4.

(1.2) An authority in respect of which more than one participating municipality has been designated shall appoint chairs and vice-chairs from among the members appointed to the authority by each participating municipality on a rotating basis so as to ensure that a member appointed to the authority by a particular participating municipality cannot be appointed to succeed an outgoing chair or vice-chair appointed to the authority by the same participating municipality. 2020, c. 36, Sched. 6, s. 4. 2

**Exception**

(1.3) Despite subsections (1.1) and (1.2), upon application by an authority or a participating municipality, the Minister may grant permission to the authority or participating municipality to, subject to such conditions or restrictions as the Minister considers appropriate,

(a) appoint a chair or vice-chair for a term of more than one year or to hold office for more than two consecutive terms; or

(b) appoint as chair or vice-chair of the authority a member who was appointed to the authority by the same participating municipality that appointed the outgoing chair or vice-chair. 2020, c. 36, Sched. 6, s. 4.

**Summary:**

Election procedures and position descriptions are outlined in the Administrative By-Laws, Appendix 2 and B.2 respectively.

To ensure staff are properly prepared for the elections, please advise Michelle Viglianti at [vigliantim@thamesriver.ca](mailto:vigliantim@thamesriver.ca) and Tracy Annett at [annettt@thamesriver.ca](mailto:annettt@thamesriver.ca) if you are planning to put your name forward for any of the above listed positions.

**Recommended by:**

Tracy Annett, General Manager

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**To: UTRCA Board of Directors**  
**From: Michelle Viglianti, Administrative Assistant**  
**Date: December 16, 2025**  
**File Number: BoD-12-25-90**  
**Agenda #: 10.1**  
**Subject: Notice of Motion – Discussion on Formalizing the General Manager’s Performance Appraisal Process**

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**Submitted by Skylar Franke on November 28, 2025 in compliance with UTRCA By-Law C.14 Notice of Motion**

Dear Board Members,

I am writing to recommend that we formalize and strengthen the performance appraisal process for our General Manager that ensures a consistent process. As a board, one of our core responsibilities is to provide effective governance and clear accountability for the leadership of the organization. Establishing a structured and repeatable process will help us fulfill this duty while supporting the General Manager’s success and development.

To that end, I propose that the board discuss various ways to improve the performance appraisal process, including but not limited to the following;

Consideration of an External Consultant for Annual 360 Reviews To enhance the quality, neutrality, and administrative ease of the process, I recommend that the board engage an external consultant to support the following functions:

- administering a formal 360-degree survey process, including staff, board members, and select external partners;
- administering a self-evaluation of the General Manager;
- compiling, analyzing, anonymizing, and summarizing all results into a clear, actionable report;
- presenting the findings to the board in closed session;
- assisting with the creation a professional development work plan for the General Manager.

Effective feedback supports professional growth and ensures there is clear communication between the board and General Manager. I look forward to discussing this proposal further at an upcoming meeting and welcome any questions or feedback from board members.



Sincerely,  
Skylar Franke