

Upper Thames River Conservation Authority: ERO Questions and Responses

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

Commenting Period: November 7 – December 22, 2025 through the [ERO posting](#) or by email to ca.office@ontario.ca.

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.

In the Province's proposal, the UTRCA watershed would be consolidated with seven other Conservation Authorities representing 81 member municipalities to form the Lake Erie Regional Conservation Authority.

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.

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

While the UTRCA supports the 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.

ERO Questions	UTRCA Recommendations	UTRCA Comments
<p>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?</p>	<p>Recommendation 1: 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.</p> <p>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.</p> <p>Recommendation 2: 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</p>	<p>The provincial goals for consistent permit approval processes, shared services, and digital modernization can be realized within the current Conservation Authority structure without imposing a new top-down agency structure that does not have strong local accountability but increases costs to taxpayers.</p> <p>1a. Avoid Delaying Performance Improvements Currently Underway The proposed changes risk undermining the implementation of provincial improvements that have already been introduced.</p> <p>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.</p> <p>Given the volume and speed of legislative changes, industry interest-holders are still processing the effect and significance of various legislative changes. All interest-holders, including the development industry, benefit from certainty. The proposed consolidation will introduce additional unknowns and new processes at an already uncertain time in the market.</p> <p>1b. 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:</p> <ul style="list-style-type: none"> • 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),

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	<p>standards, guidelines, and directives across all CAs before any consolidation (should consolidation be required at all) offers greater stability and predictability.</p> <p>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.</p>	<ul style="list-style-type: none"> • Potential HR costs and consolidation implications of merging multiple HR policies, • Fee and policy alignment, • Corporate service model consolidation, • Rebranding, signage, and legal transitions, and • Asset and liability assessment. <p>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.</p> <p>1c. 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.</p> <p>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.</p> <p>Centralization will not happen overnight, and effectiveness will likely decline before improvements occur. This could slow permitting in the near term.</p>

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		<p>1d. 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.</p> <p>1e. 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.</p>
	<p>Recommendation 3: That the Province consider achieving modernization goals through the current 36 CA corporations using legislative and regulatory amendments, technological solutions, and compliance verification.</p> <p>Recommendation 4: That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Conservation Ontario, CAs, First</p>	<p>1f. Preserve Local Municipal Governance and Decision-Making The proposed Lake Erie Region Conservation Authority would consolidate 8 CAs, encompassing 81 local municipalities and 11 First Nation communities (there are none within the UTRCA watershed), and covered by more than 10 Treaties signed with multiple First Nations.</p> <p>Without a doubt, 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.</p> <p>As the largest contributor to CA budgets, municipalities must continue to have the same equitable representation and voice they</p>

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	<p>Nations, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.</p>	<p>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.</p> <p>To deliver on its mission, a new regional conservation authority model must be grounded in fundamentals of effective watershed management, including:</p> <ul style="list-style-type: none"> • Protecting life and reducing property damage from flooding and erosion, • Supporting municipal partners, Indigenous communities, 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. <p>If regionalization stretches teams too broadly, we risk losing:</p> <ul style="list-style-type: none"> • 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,

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		<ul style="list-style-type: none"> • 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. <p>To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, CAs must be appropriately accountable.</p> <ul style="list-style-type: none"> • The principle of “pay for say” should be reflected in the design of new CAs, as it is today. <p>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.</p>
<p>2. Potential Opportunities or Benefits: What opportunities or benefits may come from a regional conservation authority framework?</p>	<p>Recommendation 5: That the Province demonstrate the statutory objects of the CAs can be effectively delivered within the proposed new regional boundaries.</p> <p>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.</p>	<p>The provincial proposal for regional consolidation does not include enough information to effectively evaluate the benefits.</p> <p>2a. Ensure Consistent Standards Funding that would be directed into the consolidation costs mentioned above would be better spent on front-line resources that would improve consistency and modernize tools and resources equitably across all CAs. Provincial 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.</p>

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	<p>Recommendation 7: That the Province invest stable, adequate, multi-year funding into CA programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.</p> <p>Recommendation 8: That the Province recalibrate and increase the funding for the Water and Erosion Control Infrastructure funding program as part of the consolidation process, in time for the 2027 budget.</p>	<p>2b. Provide Additional Investment Additional investment is required to ensure mandatory programs and services are supported. Municipal levies currently fund 67% of the total costs of UTRCA mandatory programs and services, with the Province contributing less than 6%. The remaining costs are covered by leveraging the municipal investment with funds from user fees, grants and contracts.</p> <p>The UTRCA has aging major flood control structures requiring ongoing monitoring and maintenance. The current provincial Water and Erosion Control Infrastructure funding program cap of \$5 million for the entire province is completely inadequate.</p>
<p>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?</p>	<p>Recommendation 9: That the Regional Conservation Authority Board should be:</p> <ul style="list-style-type: none"> • 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. 	<p>3a. Reduce the Geographical Area of the Proposed Consolidation In developing the proposed regional CAs the province-based decisions on watershed-based jurisdiction, administrative duplication and balancing expertise. This resulted in geographically vast regions that do not account for existing working relationships between CAs and municipalities.</p> <p>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.</p>

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		<p>3b. Create a Governance Model that is Functional and Fair Applying current legislative population formulas would produce a Lake Erie Regional CA Board of 120 members, which is unmanageable and 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.</p> <p>3c. Maintain Municipal Appointment Authority and Add Indigenous Appointments Appointments to the regional conservation authorities must remain municipal to ensure transparency, accountability, and local alignment. Appointments to the Ontario Provincial Conservation Agency should include municipal appointments from each of the RCA boards.</p> <p>A new structure provides an opportunity for appointments to include Indigenous representation on CA Boards as a vital step toward strengthening partnerships and ensuring programs reflect diverse perspectives. This representation would deepen cultural connections, enhance decision-making, and align with previous recommendations to create more inclusive and effective governance.</p>
<p>4. Maintaining a Transparent and Consultative Budgeting Process: Do you have suggestions on how to maintain a transparent and consultative budgeting process across member</p>	<p>Recommendation 10: 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.</p>	<p>4a. Engage Municipalities in Budget Development Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Issues of budgeting, reserve allocations, Category 3 program funding, and other financial matters require provincial consultation with current CAs and need to be in place prior to consolidation.</p> <p>Another key factor to consider is protecting watershed reserves, infrastructure, and land assets. Many watershed municipalities are</p>

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municipalities within a regional conservation authority?		<p>concerned how locally funded reserves, land assets, and long-term capital programs will be treated within the proposed consolidated structure.</p> <p>4b. Ensure Fair Apportionment Municipalities risk subsidizing areas with a smaller tax base. Local apportionment should be able to be directed to local assets.</p> <p>4c. Fully Fund the Transition Provincially Costs for integration—IT, HR, capital, data, governance, and branding—are extensive and must not fall to municipalities.</p>
<p>5. Maintaining and Strengthening Local Relationships: How can regional conservation authorities maintain and strengthen relationships</p>	<p>Recommendation 11: That local offices be retained to deliver programs.</p>	<p>5a. Retain Local Presence Local offices and staff are essential for timely permitting, program delivery, flood forecasting and warning operations, environmental monitoring, community engagement, and effective stewardship. It is imperative that local knowledge be retained, and decisions reflect local conditions.</p> <p>5b. Protect Local Programs Locally delivered conservation authority programs such as the UTRCA’s Southern Ontario At Risk Reptiles (SOARR), Green Leaders, Tree Power / tree planting, stewardship services, environmental monitoring, education, community partnerships, and parks are rooted in community identity. They must be preserved.</p> <p>5c. Preserve Community Access to Greenspace Many municipalities rely on UTRCA lands for recreational opportunities because local land acquisition is cost prohibitive. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities.</p>

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.

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