



December 4, 2025

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Blewater

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Huron East

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Lucan Biddulph

Middlesex Centre

North Middlesex

Perth South

South Huron

Warwick

West Perth

**Ausable Bayfield Conservation Authority Submission to ERO 025-1257
Consultation on Proposed boundaries for the regional consolidation of
Ontario's conservation authorities**

The Ausable Bayfield Conservation Authority (ABCA) is one of Ontario's 36 conservation authorities delivering programs and services that further the conservation, restoration, and management of natural resources to fulfil a vital role in watershed management and protect communities from natural hazards. As leaders in watershed management, conservation authorities collaborate with the public, municipalities, Indigenous communities, the agricultural sector, and other partners to fulfil our mandate while meeting both local needs and provincial priorities. We have reviewed ERO 025-1257: consultation on *Proposed boundaries for the regional consolidation of Ontario's conservation authorities* and offer the following comments for consideration.

Watershed management is complex – challenges such as flooding, erosion and declining water quality are typically the result of upstream activities on the landscape and can impact communities unevenly as the results of these decisions, and activities cumulate through the watershed. This often results in a disproportionate burden of management challenges, and costs on downstream communities; however, maintaining local governance helps ensure that the costs and responsibilities of preventative measures and management are shared across the watershed. This local governance, and current framework of conservation authorities promotes an effective scale for delivering front-line resources in partnership with our local communities, alongside provincial priorities, to apply science-based decisions that protect communities from

natural hazards. While ABCA acknowledges and supports the province's goals of improved efficiency, through the implementation of a digital applications and permitting system, consistent policies, flood standards, fees and technology, it does not support the proposed "Huron-Superior Regional Conservation Authority" boundary and encourages the province to consider meaningful modernization within the current watershed-based governance framework.

It is therefore recommended that a feasibility study should be completed that will guide and risk-manage the creation of regional watershed boundaries based on strategic alignment, governance and leadership, financial efficiency and partner/community relations.

LOCAL

References to local throughout this ERO submission go well beyond the ABCA watershed in a geographic context. Local means so much more:

It is established relationships with the community in which we work and live. Decades of partnerships and service with our watershed residents and neighbours has developed trust and brand recognition. Being associated with the very rivers for which we are named establishes a relationship between the community and the landscape. Local is being responsive and accountable to the needs of our watershed residents and working collaboratively with them to balance environmental needs, community interests and provincial priorities.

Posting Discussion Questions

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

Locally relevant geographic boundaries:

A priority for the Ontario Provincial Conservation Agency (OPCA) is 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. We do not support the proposed "Huron – Superior Regional Conservation Authority" boundary, as we do not believe it adequately meets this criterion. A key factor to support a successful transition and outcome is considering the landscape, land uses, and economy throughout the boundary of each regional conservation authority. For example, the County of Huron, within the proposed boundary of the "Huron – Superior Regional Conservation Authority" contributes more than \$1 billion annually in agriculture revenue to

the Canadian economy. The landscape that supports this economy, and influences local, effective watershed management considerations, cannot be compared to fast-growing municipalities throughout the province, such as the urbanizing shoreline of Lake Simcoe, or the landscape, and the needs of the residents of Thunder Bay. Although agriculture is noted as a consideration of other proposed regional conservation authorities, we are concerned that agriculture, despite its significant contribution to the national economy, is not appropriately recognized in the proposed “Huron – Superior” boundary. This suggests that local land uses may not be adequately considered at the proposed scale.

Strong governance with local representation:

The ABCA affirms that strong, local municipal governance and oversight is fundamental to effectively deliver the vital watershed management programs and services that protect communities from natural hazards. Locally relevant watershed boundaries, supported by strong local governance, create a cohesive framework that overcomes jurisdictional barriers by enabling collaboration to meet both community and environmental needs. This collaboration between the community, industry and other employment sectors; municipalities, and the province, to address complex watershed management challenges, helps realize tangible outcomes by supporting the local community to build a more resilient Ontario.

Watershed-based management, which is the founding principal of conservation authority boundaries, is recognized internationally as the most effective means of addressing complex watershed management challenges. However, the true success of conservation authorities lies in the governance under which they were established and operate in, the structure that balances local environmental, economic and societal needs across a landscape and watershed scale that is meaningful to the people who live and work within it.

Regional support with local delivery:

The province has identified that its proposed amalgamation would improve conservation authorities by providing better tools and more resources; provide greater consistency and transparency; and deliver faster services to municipalities and permit applications, while ensuring decisions continue to be based on sound science.

Permitting administered by conservation authorities helps to ensure that development does not happen in unsafe areas and that it does not worsen the impacts in flooding or erosion in surrounding areas. ABCA understands that the OPCA will be tasked with streamlining and standardizing more consistent service delivery by setting provincewide service delivery standards. However, ABCA emphasizes that local delivery allows applicants to work with responsive staff through effective pre-consultation that may result in an outcome that

directs development away from regulated areas affected by the risk of natural hazards. Through this pro-active and effective working relationship, staff work with applicants to establish more resilient infrastructure and often eliminates the need for a permit altogether. Effective local delivery, enabled by knowledgeable and responsive staff, is fundamental to this success; however, this strength of the current conservation authority framework is not adequately captured within existing service delivery standards.

Therefore, the ABCA encourages the province to provide better tools and more resources that enhance consistency and transparency; and help deliver faster services to municipalities; within the existing conservation authority framework, enabling knowledgeable and responsive staff to deliver consistent services that continue to be based on sound science, supported by modern tools and resources, and backed by the region.

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

The ABCA recognizes that a more regional jurisdiction may improve our access to tools and resources to enhance consistency and transparency; and help deliver faster services; as conservation authorities collaborate to share resources, tools, knowledge and skills. However, ABCA reiterates that local delivery, by responsive staff is critical to successfully deliver watershed management programs and services, while fostering and maintaining strong relationships, as we work together, to build a more resilient Ontario.

The Healthy Lake Huron Initiative (HLH) is an example of how a regional conservation authority may operate to support a resilient landscape and provide opportunities and benefits to the conservation authority within its region. As a lead organization delivering the HLH, ABCA recognizes how separate, local entities, working together within a regional framework may generate opportunities that improve our individual program and service delivery. Through HLH, ABCA and its partners demonstrate that effective collaboration enhances access to improved resources and tools, and leverages shared technical skills and knowledge to strengthen the local delivery of programs and services across the HLH region.

The ABCA welcomes the opportunity to work with the province, to share our experience and build upon the success of the HLH framework. The HLH Initiative demonstrates that collaboration on a regional scale enhances opportunities, while still delivering local, efficient, and effective watershed management programs and services through our respective conservation authorities.

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?

The ABCA reiterates that strong, local municipal governance and oversight is fundamental to effectively deliver vital watershed management programs and services that protect communities from natural hazards.

Watershed management is complex – it involves balancing the cumulative effects of previous land use decisions; local priorities and economic drivers; and provincial priorities including housing, the economy and infrastructure; while making sound, science-based decisions to protect communities from natural hazards. Strong, local governance, that recognizes watershed boundaries, as opposed to political boundaries is fundamental towards achieving this balance.

The ABCA welcomes the opportunity to work with the province to ensure that local governance is integrated into a regional framework. Through the successful HLH Initiative that ABCA described, governance at the regional conservation authority level could be structured with a tiered system. The tiered system would allow for:

- The retention of the local Board structure, creating a local Watershed Advisory Committee (Ausable Bayfield Watershed Advisory Committee) that includes representation from each member municipality.
- The local conservation authority Board or Advisory Committee to appoint member(s) to the Regional Conservation Authority Board of Directors
- The Regional Conservation Authority Board of Directors to appoint member(s) to the OPCA Board of Directors

The tiered system enables centralized leadership, efficient governance, strategic direction and transparent oversight to the decisions that are consistent across the region, or province, while enabling strong, local governance that facilitates effective and efficient watershed management.

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

The ABCA is concerned about the financial implications for Ontarians associated with transitioning to regional conservation authorities. To ensure full transparency and informed decision making, a comprehensive cost-benefit analysis must be completed prior to

undertaking any transition. Further, any modernization of conservation authorities must be supported by provincial funding so that it does not affect service delivery.

With the guidance and support of our twelve member municipalities, ABCA demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. Through strong partnerships, the ABCA successfully leverages funding to support programs and services that are locally important, based on sound science, and driven by community engagement. The ABCA affirms that a transparent and consultative budgeting process across member municipalities within a regional conservation authority must retain municipal representation and authority. Please refer to the reference in the previous answer as it relates to the need for a local watershed Board or advisory committee. Retaining the involvement of member municipalities ensures transparency, effective consultation, and balances local, regional, and provincial priorities.

The ABCA acknowledges and supports the province's goal to improve efficiency of watershed management by implementing digital applications and permitting system, consistent policies, flood standards, fees and technology. The ABCA affirms that achieving this goal involves centralizing information, tools, and resources, rather than assets. To maintain strong, local relationships and community trust, assets must remain at the local level.

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

For nearly eighty-years, conservation authorities have worked with local communities and stakeholders to address complex watershed management challenges, building strong relationships. These strong relationships are built on trust and are reinforced by the community's recognition of our local identity. This trust and brand recognition has been established through the frontline of conservation authorities – local councillors, management, and staff – working collaboratively to balance environmental needs, community interests and provincial priorities.

The current watershed boundaries of the 36 conservation authorities enable effective and efficient administration at a scale that the community relates to. This local scale fosters meaningful connections that help people to understand that they are apart of the natural world and live within a watershed. The existing watershed boundaries:

- Connect the name of the river to people where they live, work and play, to the local organization that delivers watershed management programs and services (e.g., stewardship, lands, education, outreach, etc.)
- Connect the programs and services to local governance (i.e., municipal councillors)

Local offices serve as the community's primary point of contact for conservation, supporting environmental progress through front-line service delivery and direct access to knowledgeable staff who connect individuals with the resources they need. The ABCA emphasizes the importance of not only maintaining our local offices, but also preserving conservation authorities' individual, distinct local identity and brand. A successful transition and outcome of regional conservation authorities must preserve the local identity, while considering opportunities to centralize information, tools, and resources, rather than assets, to build upon strong working relations, backed by the tools and resources of the region.

Any regionalization of conservation authority boundaries must continue to respect the local watershed agreements that are in place, honour donations made to the local conservation authority, the wishes of those donors, and maintain our commitment to partnerships with community organizations.

Conclusion

The Ausable Bayfield Conservation Authority affirms that strong, local municipal governance and oversight is fundamental to effectively deliver the vital watershed management programs and services that protect communities from natural hazards. As currently proposed, the "Huron – Superior" boundary is untenable. The ABCA does not support the proposed boundary configuration as outline in ERO 025-1257 and encourages the province to modernize and support conservation authorities within current watershed-based boundaries and governance. To maintain, and strengthen local relations and community trust, conservation authority boundaries must reflect local landscapes and economic drivers. With our many years of experience, collaborating with Healthy Lake Huron, we welcome the opportunity to work with the province to ensure that strong local governance is effectively integrated into a more regional watershed-based organization. The ABCA volunteers to be on a working group to help inform this transition.