First off - thanks for taking the time to do this!!!! In this current political and societal environment, it takes energy and compassion to even take this step.

I appreciate it immensely :)

→ ***Overview/Considerations for when making comments on the ERO (BASED ON MY EXPERIENCE):***

- Keep it professional/not too emotional (possibility of the comment being deemed as "attacking" or "not productive")
- No names/titles/specific government – Don't mention Doug Ford, Ford's Government, Ministry of Environment, the "current administration", etc., just avoid because word on the street is they could flag it and remove it.
    - Maybe only "local Conservation Authority" too, not specific ones? Again, not sure about this, but keeping it broad might be best.
- Answer what they're asking – they want comments on boundaries, see questions below.
    - Make your answers as unique as you can. I list my thoughts below, but it is important we're not sharing the same thing over and over to hit the point home. But if you're burnt out (hello!), it's okay :)
- Provide links if you have some specific research, information, or examples.
- Don't forget to call your MPPs; this is still vital, too, especially our rural MPPs
- Here are the specific questions they are asking comments/feedback on, and where we should encourage others to comment on:

"We welcome your feedback in response to the proposed boundaries and criteria applied to inform the boundaries for the regional consolidation of Ontario's conservation authorities. Comments may be submitted through this posting or by email to ca.office@ontario.ca.

We welcome your feedback to the following discussion questions which are especially relevant to the planning for the future state:

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

scroll for my thoughts - but please add your own/subtract what you don't agree with - this is YOUR comment after all

Other links/releases I've found so far:

https://www.nation.on.ca/snc-responds-provincial-proposal-restructure-conservation-authorities

https://thamesriver.on.ca/massive-changes-proposed-on-the-eve-of-the-conservation-authorities-acts-80th-anniversary/

https://www.essexregionconservation.ca/post/erca-board-expresses-concerns-over-provincial-plan-to-consolidate-conservation-authorities

https://cknxnewstoday.ca/sarnia/news/2025/11/26/county-council-wants-province-to-delay-conservation-authorities-merger

social media posts with good points

https://www.facebook.com/share/p/1AkGBi7D3E/?mibextid=wwXIfr

ERO QUESTIONS & COMMENTS

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

1. Maintain strong local representation and accountability.

- There needs to be a minimum municipal representation from every sub-watershed in each new regional authority.
- Rural, northern, and smaller municipalities must retain meaningful decision-making power, especially since municipal levies fund the majority of CA operations (due to cuts in 1996 and 2019).

2. Protect local expertise and continuity of technical knowledge.

- Current CA staff possess decades of specialized, place-based understanding of flooding, erosion hazards, hydrology, soils, species, agricultural needs, and development pressures. These staff must remain central in technical review, permitting, and field operations.
- Transition plans should include: clear role protection, retention strategies, and regionally distributed local offices.

3. Provide adequate transition funding.

- Consolidation will require significant investment in administrative integration, HR alignment, IT migration, policy harmonization, legal restructuring, governance redesign, and communication.
- Without provincially dedicated transition funding, money will inevitably be drawn away from front-line conservation, restoration, flood forecasting, and education programs. Funding must support continuity of local services throughout the change process.

4. Engage Indigenous Nations early and meaningfully.

- A successful transition requires sustained co-development with Indigenous governments and rights holders.

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

1. Potential administrative efficiencies and shared expertise — if key protections are in place.

- These benefits depend entirely on ensuring no loss of skilled staff, no reduction in local representation, and retention of local operational capacity.

2. Limited opportunities in community programs, restoration, and education.

- Many CA programs are highly place-based and shaped by local species, landscapes, hydrology, agricultural needs, and municipal priorities. While administrative services may benefit from consolidation, local environmental programming is unlikely to gain efficiencies and risks losing quality if centralized.

3. Opportunity to strengthen Indigenous involvement.

- A regional framework could create space for more consistent Indigenous representation in governance and land-use planning, if co-developed with Indigenous partners and resourced appropriately.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level, including board size, make-up, and the municipal representative appointment process?

1. Balanced board structure reflecting both population and watershed geography.

- Boards should be large enough to ensure representation from each sub-watershed, but not so large that they become ineffective.

- Therefore, representation must reflect: municipal levy contributions, watershed geography, and the need to maintain local accountability.

2. Hybrid governance model including municipal, Indigenous, technical, and community sector representation.

- To ensure strong, science-based decision-making, boards should include a range of stakeholders (municipal reps, technical experts, and sector stakeholders)
- This model protects diverse perspectives and supports scientific and evidence-driven land-use planning.

3. Transparent and accountable appointment processes.

- Appointment processes should include:
    - clear qualification criteria for non-municipal members,
    - public transparency,
    - term limits and performance expectations, and
    - strong limits on political appointments to prevent undue centralization of power.

4. Watershed-based governance model.

- The following approach ensures decisions remain grounded in the unique risks and characteristics of each watershed. To maintain legitimacy and effectiveness, governance should:
    - guarantee municipal seats for each sub-watershed,
    - ensure community representation, and
    - embed Indigenous participation at the governance level.

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

1. Budgets should be structured and reported by sub-watershed, not only at the regional level. This is essential for maintaining municipal accountability and ensuring that communities can track where levy dollars are being spent.

2. Municipalities must retain approval powers proportional to their financial contributions. Consolidation must not weaken the ability of municipalities to influence budgets, especially when they continue to fund the vast majority of CA operations.

3. Continue mandatory public access and local consultation. Budget drafts must remain publicly available, with local consultation periods, opportunities for municipal feedback, and transparent reporting requirements.

4. Fully fund transition costs to avoid impacts on service delivery.

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

Existing Conservation Authorities have been building trust within their communities for decades, as it's been foundational to effective conservation and communication. Large regional bodies will struggle to replicate this, especially across the proposed geographic areas.

Stakeholders have already expressed fears that consolidation will replace "local permitting offices and staff familiar with site conditions" with distant administrators, delaying rather than speeding approvals.

Therefore, you must:

- Maintain a strong local presence through field offices and distributed staff, as centralized offices would slow service and weaken community trust.
- Preserve and strengthen local outreach and education (including agricultural stewardship, youth education programming, citizen science programming, and many, many more programs that CAs provide).
- Strengthen partnerships with Indigenous Nations.
- Commitment to local engagement across the entire region. This will be vital in new boundaries.