



LOWER TRENT CONSERVATION

714 Murray Street, R.R. 1, Trenton, Ontario K8V 0N1

■ Tel: 613-394-4829 ■ Fax: 613-394-5226 ■ Website: www.ltc.on.ca ■ Email: information@ltc.on.ca

Registered Charitable Organization No. 107646598RR0001

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON
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December 17, 2025

RE: ERO number 025-1257

This letter is from the Board of Directors of the Lower Trent Region Conservation Authority (LTC) in response to ERO number 025-1257 "Proposed boundaries for the regional consolidation of Ontario's conservation authorities".

The Board of Directors is against the proposed consolidation of 36 conservation authorities into seven large regional conservation authorities. As outlined in the posting the purpose for the creation of the Ontario Provincial Conservation Agency (OPCA) and the proposed consolidation of conservation authorities is to modernize, streamline and standardize processes and applications for operations.

The Lower Trent Conservation Board of Directors are in favour of modernization, streamlining and standardization of processes and operations. We welcome the opportunity to be provided with e-permitting software, standardized financial and human resources management software and other applications that would create efficiencies across all 36 authorities. We do not believe that a consolidation is required to achieve these goals.

The development of Key Performance Indicators is also welcomed by Lower Trent Conservation. We are confident that staff can meet targets put forward by the OPCA. Last year alone, Lower Trent Conservation met mandated targets under O. Reg. 41/24 for issuing permits upon receipt of complete permit applications with an overall average of 7.32 days, which includes an average of 7.45 days for major permits and 6.88 days for minor permits.

To summarize, the process for consolidation is not necessary for improvements to be delivered by conservation authorities. The provision of common software applications would increase the operational efficiencies of conservation authorities and allow fair comparisons to be illustrated.

The haste at which the consolidation is being proposed appears rushed and does not provide a framework for the processes to occur by January 2027. We believe that more information is required and widely consulted upon before any consolidation is finalized.



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In addition, if the proposed consolidation, is completed prior to the delivery of standardized software will create a disruption in service delivery and regular operations whilst staff are learning the new operational processes. These processes are required to be implemented prior to any consolidation to allow for a smoother transition.

The Lower Trent Region Conservation Authority requests that the consolidation be paused until the current configuration of 36 conservation authorities be given the opportunity to establish operations utilizing the modernization tools and new standards as proposed.

And further, that a longer timeline be considered to address governance, financial, guidelines and directives before the proposed consolidation is considered. And the development of a clear transition plan be prepared collaboratively with a representative working group to outline expectations and timelines.

One of the primary concerns with the proposed consolidation is the loss of local representation at the Board of Director/municipal level. The area represented by the Eastern Lake Ontario Region Conservation Authority would amalgamate seven conservation authorities into one region and includes 48 municipalities. There is no model for governance outlined in the ERO posting. The request to provide feedback on a proposed regional governance model would necessitate a regional representational model based on existing county and/or regional governments. Having regional representation in our watershed area would have to include upper tier municipalities not participating in regional government. The voice of local municipalities will be lost under a proposed consolidation model including their ability to pay.

The representation of municipal board members leads directly into the question of how to maintain a transparent and consultative budgeting process across member municipalities. Municipalities fund more than 50% of local budgets and their input is invaluable in determining, maintaining and enhancing local programs to meet the needs of the local communities. The proposed consolidation will not be truly consultative nor conducive for transparency as there will be less exposure to budget planning and participation from the local level.

The proposed consolidation has been presented in a manner that will amalgamate financial and capital assets of each individual conservation authority into the regional conservation authority. Property assets are owned by the local conservation authorities and were either donated by local families and organizations or acquired through the assistance of local municipal governments. Other assets include buildings, equipment, vehicles, etc. Our municipal partners fund ongoing maintenance and replacement of these capital assets. The financial stability of each conservation authority varies across the region, and their priorities differ based on local input.



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The Lower Trent Region Conservation Authority requests that all capital asset management plans, as approved by the Board of Directors, are considered as priority in any regional budgeting process for continuity of local operations.

And further, that all costs associated with the modernization and any transition to the proposed consolidation be paid for by the province and not downloaded to the municipalities.

Access to staff and programs at a local level is necessary to fulfill the mandate of conservation authorities. Local knowledge, experience and expertise are required to meet requirements of planning and regulations. Local expertise is also required to meet the conditions of local memorandums of understanding with our municipal partners. Under the proposed consolidation there exists the potential to lose local expertise and watershed knowledge with the loss of staff due to the uncertainties brought about by this proposed consolidation and the loss of local Boards of Directors.

The Lower Trent Region Conservation Authority requests that all local conservation authority offices remain open for access by municipal partners and the public to promote local delivery of all required services.

And further, that the province provides a letter to each conservation authority for distribution to staff reinforcing the importance of staff members to deliver programs and services which could assist with slumping staff morale, maintain service levels, and counteract the lack of direct messaging to date.

Conservation authorities have been present in local communities for decades and have built strong and binding relationships with municipalities, community groups, First Nations and residents. These relationships remain strong because of the presence of the local conservation authority in neighbourhoods and participation in local programs and activities. Maintenance of these relationships are imperative to the success of watershed programs and services. Comments received by municipal partners indicate that working under a regional model will likely slow down approvals and affect municipal timelines for planning and regulations.

The Lower Trent Region Conservation Authority recommends maintaining the current local offices as stated earlier and further that local naming and brand identity remain intact.



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The mapping as depicted for the proposed Eastern Lake Ontario Region Conservation Authority is incorrect. The northern limit of the Lower Trent Region Conservation Authority requires correction to reflect the legal and operational boundary.

Sincerely,

Gene Brahaney, Chair
Lower Trent Region
Conservation Authority

Sherry Hamilton, Vice-Chair
Lower Trent Region
Conservation Authority