



Tay Valley Township

December 16, 2025

The Honorable Doug Ford
Premier of Ontario
Legislative Building, Queen's Park
Toronto ON M7A 1A1

Sent by Email

Dear: Honorable Doug Ford,

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

The Council of the Corporation of Tay Valley Township at its meeting held on December 9th, 2025, adopted the following resolution:

RESOLUTION #C-2025-12-14

MOVED BY: Wayne Baker

SECONDED BY: Angela Pierman

"WHEREAS, water resources and water availability is the defining issue of this century due to the impacts of climate change which Tay Valley Township has already experienced (through dry wells and below normal river levels this summer and floods in 2017 and 2019),

AND WHEREAS, Ontario's Conservation Authorities play a critical role in watershed management, flood mitigation, drought mitigation, and public safety;

AND WHEREAS, Tay Valley Township has already experienced negative consequences of centralized management of water resources from afar (the Ministry of Natural Resources staff in Toronto have previously directed the depth of water at the Pike Lake Dam be lowered during a pickerel spawn event resulting in the death of the pickerel);

AND WHEREAS, municipalities must retain a strong, meaningful voice to ensure that local knowledge, local priorities and local risks are fully considered;

AND 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;

AND WHEREAS, local municipalities established the Rideau Valley Conservation Authority in 1966 and the Mississippi Valley Conservation Authority in 1968 and currently provide over 50% of total conservation authority funding, while the Province of Ontario provides less than 5%;

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

AND WHEREAS, Bill 68 (Schedule 3) and ERO posting 025-1257 propose to consolidate Ontario's 36 conservation authorities into seven regional authorities and create the Ontario Provincial Conservation Agency, a Crown agency that would assume oversight over conservation authorities and have the ability to levy authorities to cover its costs;

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

NOW THEREFORE BE IT RESOLVED THAT, Tay Valley Township strongly urges the Provincial Government of Ontario to withdraw all sections of Bill 68 related to Amendments to the Conservation Authorities Act;

BE IT FURTHER RESOLVED THAT, Tay Valley Township 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;

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

BE IT FURTHER RESOLVED THAT, while Tay Valley Township 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;

BE IT FURTHER RESOLVED THAT, Tay Valley Township 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;

BE IT FURTHER RESOLVED THAT, Tay Valley Township calls on the province to consider any potential amalgamation of Conservation Authorities on the basis of their abiotic, biologic and cultural characteristics (i.e. remove the Cataraqui Region and all lands not draining to the Ottawa River);

BE IT FURTHER RESOLVED THAT, the province maintains the local knowledge of the unique natural resources, weather and climactic features of the RVCA and MVCA watersheds through local staffing;

BE IT FURTHER RESOLVED THAT, the current assets (including financial reserves and land trusts) of the RVCA and MVCA remain with them to recognize their fiscal prudence and are not used to subsidize conservation authorities with fewer assets or developed upon;

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 watershed and mitigating risks;

AND BE IT FINALLY RESOLVED THAT, a copy of this resolution be sent to the Premier of Ontario, Ontario Minister of Environment, Conservation and Parks, Ontario Minister of Finance, to the local MPP, the Association of Municipalities of Ontario, the Rural Ontario Municipal Association, the local conservation authority(s), and all municipalities in Ontario."

ADOPTED

If you require any further information, please do not hesitate to contact the undersigned at (613) 267-5353 ext. 130 or deputyclerk@tayvalleytwp.ca

Sincerely,



Aaron Watt, Deputy Clerk

cc: Hon. Todd J. McCarthy Ontario Minister of Environment, Conservation and Parks,
Hon. Peter Bethlenfalvy Ontario Minister of Finance,
John Jordan, MPP Lanark-Frontenac-Kingston,
Rural Ontario Municipal Association (ROMA) Association of Municipalities of Ontario (AMO), RVCA, MVCA and all Ontario Municipalities
Sally McIntyre, General Manager, Mississippi Valley Conservation Authority
Sommer Casgrain-Robertson, General Manager, Rideau Valley Conservation Authority

/Enclosure



COMMITTEE OF THE WHOLE

December 2nd, 2025

Report #PD-2025-21
Noelle Reeve, Planner

PROPOSED BOUNDARIES FOR THE REGIONAL CONSOLIDATION OF ONTARIO'S CONSERVATION AUTHORITIES

STAFF RECOMMENDATION

It is recommended:

"THAT, staff submit comments to the Environmental Registry of Ontario posting <https://ero.ontario.ca/notice/025-1257> Proposed boundaries for the regional consolidation of Ontario's conservation authorities;

AND THAT, this report be circulated to the Honourable Todd J. McCarthy, Minister of Environment, Conservation and Parks; the Honourable Peter Bethlenfalvy, Minister of Finance; local MPP the Honourable John Jordan; Mayor Christa Lowry, the Chair of the Rural Ontario Municipal Association; and Sommer Casgrain Robertson, Rideau Valley Conservation Authority; Sally McIntyre, Mississippi Valley Conservation Authority."

BACKGROUND

On November 7, 2025, the province of Ontario introduced <https://ero.ontario.ca/notice/025-1257> "Proposed boundaries for the regional consolidation of Ontario's conservation authorities" for public comment by December 22, 2025.

The province states that, "Ontario's 36 conservation authorities play a vital role in watershed management and protecting communities from natural hazards like floods. Conservation authorities deliver programs and services that further the conservation, restoration, and management of natural resources. Conservation authorities review permit applications and issue permits to builders, municipalities and property owners for development activities such as housing developments, installation of sewage systems in areas affected by risks of natural hazards such as floodplains, shorelines, river and stream valleys, and wetlands. Permitting administered by conservation authorities helps to ensure that development does not happen in unsafe areas and that it does not worsen the impacts of flooding or erosion in surrounding areas."

However, the province believes, "The current system of 36 separate conservation authorities is fragmented, with each conservation authority following different policies, standards, fees and levels of staffing and technical capabilities. This has led to unpredictable and inconsistent

turnaround times for approvals across all conservation authorities, creating uncertainty and delays for builders, landowners and farmers seeking permits, and undermining conservation authorities' ability to protect communities from floods and natural hazards."

Therefore, the province intends to "consolidate the province's 36 conservation authorities into seven regional conservation authorities" (see Attachment 1 Map). Tay Valley Township would be included in the proposed St. Lawrence Regional Conservation Authority (see Attachment 2 Map).

The proposed St. Lawrence Regional Conservation Authority would include 5 conservation authorities (the Rideau Valley, Mississippi Valley, Cataraqui, Raisin Region, and South Nation Conservation Authorities) containing 46 municipalities ranging in population from large (Ottawa, Kingston, Cornwall) to small (Front of Yonge, Westport) and in geographical size from Greater Madawaska to the Town of Merrickville-Wolford (see Attachment 3 for a list).

On November 6, 2025 the province introduced Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2). Schedule 3 of Bill 68 proposes to amend the Conservation Authorities Act to establish the Ontario Provincial Conservation Agency – a provincial board-governed agency – "to provide centralized leadership, efficient governance, strategic direction, and oversight of Ontario's conservation authorities".

"Where the Minister considers it to be in the public interest to do so, the Minister may issue directions to the Agency. The Agency may issue directions to one or more conservation authorities but must first provide the Minister with a copy of the proposed direction, allowing the Minister the opportunity to take specified actions."

"The Agency is authorized to establish and require the payment of fees and to take steps to recover its costs and expenses. Other provisions include limitations on personal liability for specified persons and the barring of specified proceedings. Regulation-making authorities for both the Lieutenant Governor in Council and the Minister are also added to the Act."

DISCUSSION

Since Ontario municipalities are the primary funders of conservation authorities, they should decide the structure of these organizations moving forward. Local municipalities currently provide between 25 per cent and 50 per cent of total conservation authority funding, while the province of Ontario provides approximately three (3) per cent.

There will be 47 municipalities included in our proposed region, going all the way from Deseronto to the Quebec border, Ottawa and close to the Bancroft area. These watersheds vary widely from clay plains to granite bedrock making uniform application of province-wide standards complex. Ensuring that regional authorities can adapt provincial standards to local hydrological and ecological conditions will be critical.

We really appreciate the local connection we have with our conservation authorities and are concerned about what affect the change will have on the local presence of conservation authority staff. Amalgamation of Health Units in our area has seen the closure of 4 local

offices. We would not want to see a similar reduction in service from Conservation Authorities.

It is not clear how the proposed Ontario Provincial Conservation Agency will interact with the new Regional Conservation Authority Boards. It seems like an additional layer of bureaucracy that municipalities will have to pay for.

Turnaround time on permitting through local conservation authorities in Eastern Ontario is currently fast, and according to Peter Young, Planning and Economic Development Director, United Counties of Stormont, Dundas & Glengarry, permitting costs are between 33 and 50 per cent of the costs seen in other conservation authorities across the province.

Will we be saddled with extra costs for the extra layer of bureaucracy the Ontario Provincial Conservation Agency represents? Tay Valley Township has experience with the amalgamation of Police Services Boards into one Lanark County Board and the extra costs that brought.

Thousands of acres of land have been donated as personal legacies for long-term protection and stewardship, entrusted specifically to local conservation authorities, and Bill 68 could negate that giving in the future because of the loss of local connection.

A one-size fits all approach does not always work. It is not clear how many seats local municipalities would have on a regional board. Local influence and representation could be impacted.

The province has asked five questions as part of its public consultation:

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

No reduction in levels of protection. Levels of environmental protect should be uniformly raised to the highest level in the same Region. No reduction in service levels to municipalities e.g., report cards on state of watersheds, catchments, etc., provision of permits to the public, etc.

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

Providing smaller conservation authorities with better modelling capacity for climate change impacts.

- 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?

For each municipality to have representation, a 47 member board would be needed which seems unwieldy.

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

Get the proposed budget into the hands of the municipal representative by August since most municipalities start work on their budgets in September.

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

Increase communication staff so that messages can be delivered in a timely manner.

STRATEGIC PLAN LINK

Strong Community and Thriving Economy – Water is life. Without clean water and safety from flooding and drought there is no economy.

Healthy Environment – Without local environmental knowledge, natural heritage will be lost.

CLIMATE CONSIDERATIONS

Information on microclimates and ecological niches may be lost due to management at a higher level.

CONCLUSION

The Planner concludes that the Township should comment on the Environmental Registry of Ontario posting so that the province hears which of the proposals the Township supports and hears our concerns about the specific potential negative impacts on our rural area.

ATTACHMENTS

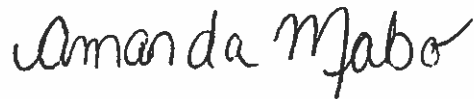
- 1) Map of Proposed 7 Regional Conservation Authorities
- 2) Map of Proposed St. Lawrence Regional Conservation Authority
- 3) List of Current Conservation Authorities and Municipalities that Would Fall Within the Proposed St. Lawrence Regional Conservation Authority

Prepared and Submitted By:



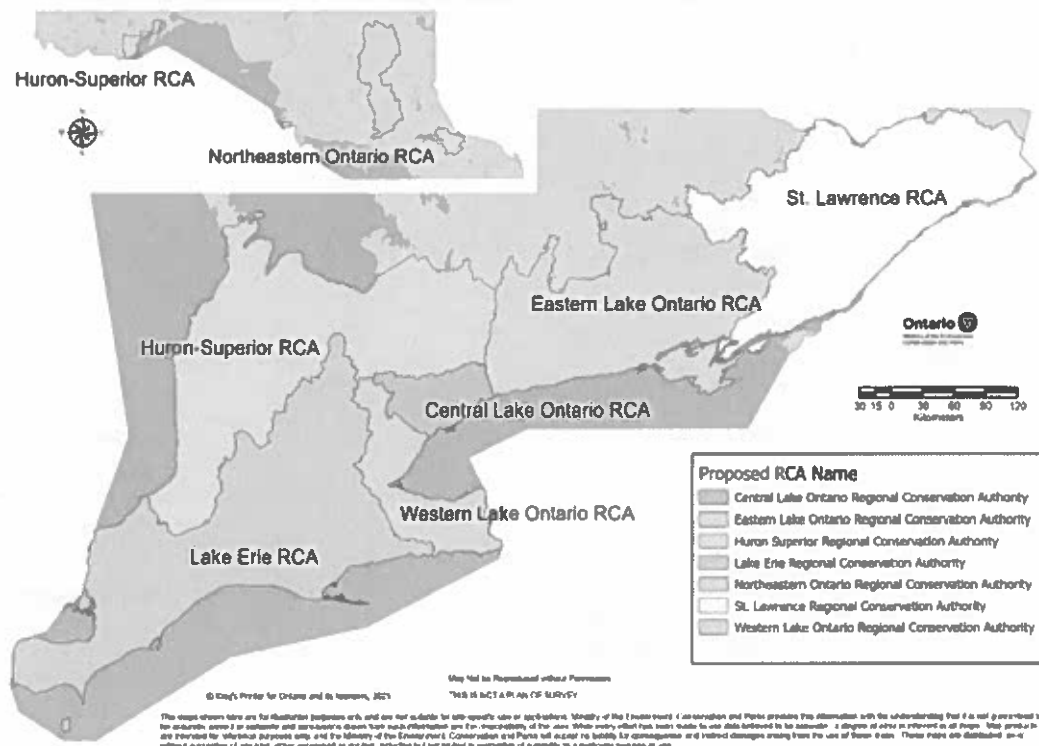
**Noelle Reeve,
Planner**

Approved for Submission By:

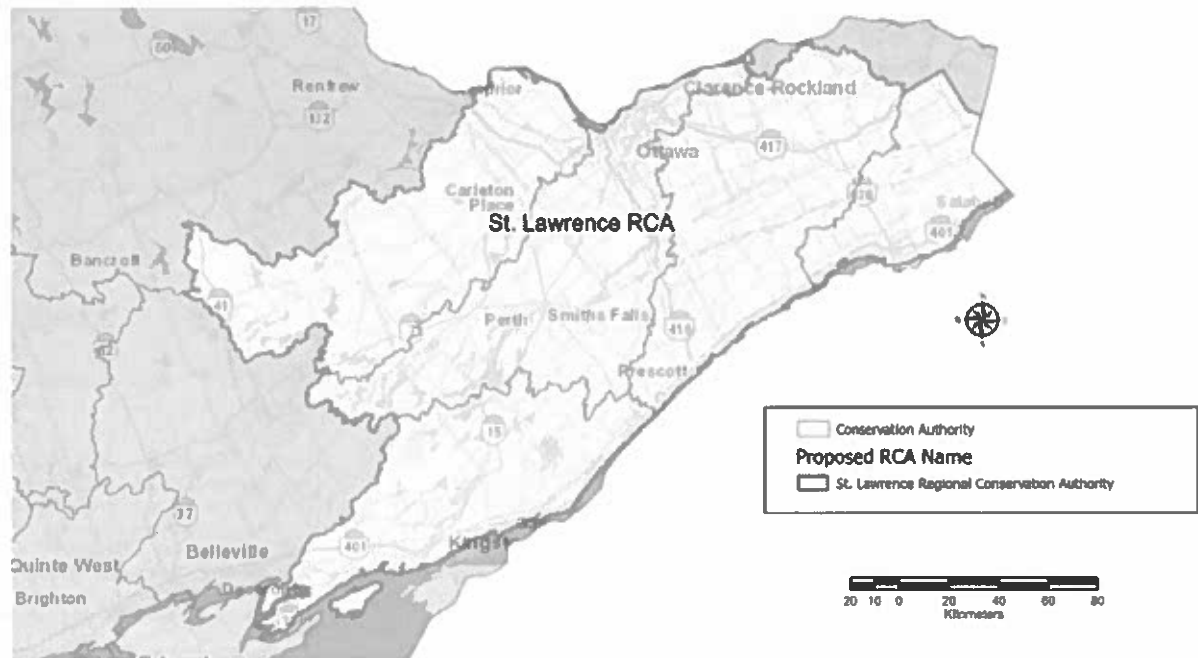


**Amanda Mabo,
Chief Administrative Officer/Clerk**

PROPOSED 7 REGIONAL CONSERVATION AUTHORITIES (RCA)



ST. LAWRENCE REGIONAL CONSERVATION AUTHORITY



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Attachment 3

Municipalities that would fall within the proposed St. Lawrence Regional Conservation Authority include:

- City of Brockville
- City of Clarence-Rockland
- City of Cornwall
- City of Kingston
- City of Ottawa
- Municipality of Mississippi Mills
- Municipality of North Grenville
- Municipality of South Dundas
- Municipality of The Nation
- Town of Carleton Place
- Town of Gananoque
- Town of Greater Napanee
- Town of Perth
- Town of Prescott
- Town of Smiths Falls
- Township of Addington Highlands
- Township of Alfred and Plantagenet
- Township of Athens
- Township of Augusta
- Township of Beckwith
- Township of Central Frontenac
- Township of Champlain
- Township of Drummond/North Elmsley
- Township of East Hawkesbury
- Township of Edwardsburgh/Cardinal
- Township of Elizabethtown-Kitley
- Township of Front of Yonge
- Township of Greater Madawaska
- Township of Lanark Highlands
- Township of Leeds and the Thousand Islands
- Township of Loyalist
- Township of Montague
- Township of North Dundas
- Township of North Frontenac
- Township of North Glengarry

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- Township of North Stormont
 - Township of Rideau Lakes
 - Township of Russell
 - Township of South Frontenac
 - Township of South Glengarry
 - Township of South Stormont
 - Township of Stone Mills
 - Township of Tay Valley
 - Village of Casselman
 - Village of Merrickville-Wolford
 - Village of Westport

Current conservation authorities that would make up the proposed St. Lawrence Regional Conservation Authority include:

- Cataraqui Region CA
- Rideau Valley CA
- Mississippi Valley CA
- South Nation River CA
- Raisin Region CA

