

Re: ERO #025-1257

Proposed boundaries for the regional consolidation of Ontario's conservation authorities

I am submitting this comment as **Manish Kushwaha, operator of Gaia Organics**, a small-scale ecological seed and farm enterprise based in Ottawa. My work depends directly on healthy watersheds, reliable water access, flood protection, and locally informed environmental governance.

I am opposed to the **scope and scale** of the proposed consolidation of Ontario's Conservation Authorities from 36 locally governed watershed bodies into 7 large regional entities. While I support improving consistency, service standards, and efficiency, I am deeply concerned that this proposal would **weaken local decision-making, dilute municipal accountability, and distance farmers and communities from watershed-level governance** at a time of increasing climate and water risk.

The value of local Conservation Authorities

Conservation Authorities are a valued local presence. They provide flood protection, watercourse regulation, land stewardship, education, parks, and applied environmental expertise that keeps communities safe and landscapes resilient. As a farmer, I rely on **local CA staff who understand the specific soils, hydrology, and seasonal behaviour of my watershed** — knowledge that cannot be effectively centralized without loss of nuance and responsiveness.

Local governance matters especially in **rural and agriculturally based watersheds**, where farming operations, drainage, seasonal flows, and land use pressures are highly site-specific. I value having local environmental expertise available to my farm and my community, and I believe rural voices must remain central to democratic watershed governance.

A practical example from my farm: small-scale water retention

My operation depends on seed isolation distances to maintain genetically pure varieties. This often requires farming on sites where drilling a well is not feasible, yet **water access remains essential** for seed production and climate resilience.

On my site, I have been developing a proposal for a **very small, low-hazard water-retention structure** on a seasonal creek — a dam under 4 feet in height, creating a modest irrigation pond with minimal storage volume. The design explicitly avoids downstream flood risk and incorporates erosion control, spillway capacity, seasonal drawdown, and fish and wildlife considerations. It is intended to support irrigation while also enhancing wetland habitat.

Importantly, this proposal **fully respects Ontario's regulatory framework**. It anticipates Conservation Authority review, compliance with the Lakes and Rivers Improvement Act and the Ontario Water Resources Act, fisheries protection, and professional engineering oversight. This is not an attempt to bypass regulation — it is an example of how **responsible, small-scale**

agricultural water projects can be assessed safely and efficiently when reviewed locally and case-by-case.

My concern is that under a large regionalized CA model, projects like this may become subject to more distant, less context-specific review, increasing complexity, timelines, and uncertainty for farmers attempting to implement climate-adaptive solutions. Streamlining should focus on **clear timelines and proportional review**, not on removing local expertise or consolidating decision-making away from the watershed.

Risks of large-scale consolidation

A regional CA model risks:

- Diminishing the partnership between municipalities and the Province
- Reducing meaningful municipal representation in watershed decisions
- Downloading costs to municipalities without providing new provincial funding
- Weakening environmental safeguards and local stewardship relationships
- Creating uncertainty about whether **municipal levy dollars will continue to be invested in their local watersheds**

I am concerned that assets and lands secured and stewarded locally over decades could be managed at a distance, undermining public trust and local accountability.

What the province should do instead

I respectfully urge the Province to reconsider this approach and to pursue reform that strengthens — rather than dismantles — Ontario’s watershed governance model. In particular, the Province should:

1. **Maintain local, watershed-based decision-making boards** with real authority
2. **Ensure municipal funds are allocated to and retained within their local watersheds**
3. **Protect environmental safeguards** and science-based decision-making
4. **Ensure conservation lands and assets remain with the local Conservation Authority** that has invested decades in securing and managing them
5. **Work collaboratively with Conservation Authorities** to build capacity, improve service standards, and support local solutions
6. **Increase stable provincial funding** so CAs can deliver the responsibilities the Province requires of them without downloading costs to municipalities

Closing

Ontario’s Conservation Authorities are internationally respected precisely because they are **local, watershed-based, and accountable**. Modernization is possible without sacrificing these strengths. As a farmer, land steward, and community member, I want to continue working with a local Conservation Authority that understands my watershed and supports responsible, climate-resilient solutions.

Thank you for the opportunity to provide comments on this important matter.

Sincerely,
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Ottawa, Ontario

