



GEORGINA

December 22, 2025

Ministry of Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water Street North Tower, 5th floor
Peterborough, ON
K9J 3C7

Dear Minister McCarthy and Chief Conservation Officer Basit:

Environmental Registry Ontario Posting No. 025-1257

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

Thank you for the opportunity to provide comments on ERO No. 025-1257 regarding the proposed boundaries for the regional consolidation of Ontario's conservation authorities.

The Town of Georgina shares the Province of Ontario's vision for enhancing service delivery, increasing efficiencies and improving governance while committing to working collaboratively to achieve mutually desired outcomes. We recognize that achieving these outcomes requires careful planning, clear direction, and significant coordination to address the many operational, financial, and governance considerations involved.

Lake Simcoe is one of Ontario's most important freshwater ecosystems. It is vital to the ecological health, cultural identity and economic wellbeing of the community. Georgina residents, cottagers, and our close neighbours – the Chippewas of Georgina Island First Nation - all rely on Lake Simcoe for our drinking water, economic development, and quality of life, such as swimming, boating, and fishing. The health of the Lake is intrinsically linked to the economic success of Georgina and the region.

Lake Simcoe is the only watershed with its own legislation and policy document - the Lake Simcoe Protection Act and Plan – and the current governance structure of Lake Simcoe Region Conservation Authority ensures decisions remain tied to local needs.

The Town is concerned that under this mandated consolidation, local voices will be diluted, accountability diminished, and protection of the Lake Simcoe watershed weakened. For these reasons, the Town is strongly opposed to the proposed consolidation.

While not in support of the plan, the Town has responded to the questions posed in ERO No. 025-1257 with the following requests, should the Province decide to move forward:

1. Proposed Boundaries – The Town requests that Lake Simcoe Region Conservation Authority, Nottawasaga Valley Conservation Authority, and Grey Sauble Conservation Authority be removed from the proposed Huron-Superior Regional Conservation Authority, and that these three Conservation Authorities become the Lake Simcoe Georgian Bay Regional Conservation Authority.
2. Lakehead Region Conservation Authority - The Town requests that the Lakehead Region Conservation Authority be removed from the proposed Huron-Superior Regional Conservation Authority.
3. Further Consultation - The Town requests further consultation with all affected municipalities and conservation authorities before finalizing any boundary decisions or legislative amendments.
4. Preservation of the Lake Simcoe Protection Act - The Town requests the current implementation of the *Lake Simcoe Protection Act* and Plan by the Lake Simcoe Region Conservation Authority be transferred to the new regional Conservation Authority.
5. Guaranteed Local Representation at the Agency - The Town requests that there be representation from the Lake Simcoe watershed on the Ontario Provincial Conservation Agency’s board and transitional committees.
6. Decision-Making Power over Agency Funding - The Town requests that costs to operate the Agency not be imposed on municipalities without consultation and explicit municipal support. The Province has stated that the costs of running the Agency will be borne by municipalities after the first few years; therefore, the Town requests that municipalities be able to evaluate the value of the Agency and determine the appropriate level of funding at that time. The Town requests that there be consistent provincial funding of the Agency and that municipalities do not subsidize provincial responsibilities.
7. Transition Cost Funding - The Town requests that the Province provide significant funding for transition costs. These include professional services of lawyers, accountants and IT consultants, software and system upgrades, and rebranding costs.
8. Impact Assessment on Ongoing Revenue and Expenses - The Town requests that an assessment to understand the impact from consolidation on ongoing revenue and expenses (including payroll, permitting and planning fees, and local donations) be conducted as well as on efficiencies gained, and the Town requests that the Province's annual funding to Conservation Authorities be adjusted accordingly to compensate for any additional costs or lost revenue.
9. Service Level Commitments - The Town seeks a commitment that existing service levels (turnaround times, local inspections, and technical guidelines) be maintained during transition, and that the Province funds temporary "Change Management" positions within each regional Conservation Authority to support timely implementation. Clear transitional timelines are requested, with the expectation that they can be met with additional resource support.
10. Local Offices and Decision Making Maintained - The Town requests that front-line staffing, physical offices, and supports for local programs and technical guidelines be maintained in perpetuity, with explicit language in regulations ensuring this local focus. This includes local decision making such as permit approval, purchase orders, and land management decisions.
11. Financial Reporting by Local Office – The Town requests that accounting and financial reporting be conducted at the corporate and watershed levels in perpetuity so that municipalities can understand the level and proportionality of investment in their local watershed. In other words, the regional Conservation Authority would report by “Office”, and each “Office” would be one of the consolidated watersheds (ie. Lake Simcoe Office) as well as the Corporate Office.
12. Budget Equity Representation – The Town requests a clearly defined system for voting regarding budget that reflects the scale of the member municipalities, and that it is implemented similar in construct to what is currently prescribed for conservation authorities.

13. Governance Structure - The Town requests that the governance structure maintains all upper and lower tier municipalities as members, and that each existing watershed-based Conservation Authority becomes its own watershed-based Advisory Committee to the Board, consisting of their respective municipalities. The Board would then be made up of representatives from each watershed-based Advisory Committee. The Board chair and two Vice-Chairs would come from different primary watersheds within the region.
14. Increased Ongoing Funding for Watershed Protection – The Town requests that the Province increases its funding and federal coordination for on-the-ground watershed-based action to address priorities in the Lake Simcoe watershed (ie. phosphorus reduction, stormwater management, floodplain protection, etc.)

We look forward to further dialogue, and request that the province continue consultation in 2026 before finalizing any boundary decisions or legislative amendments as we expect to submit further comments in the new year.

Thank you,



Mayor Margaret Quirk
Town of Georgina