

December 18, 2025

**ERO Submission: Lakehead Region Conservation Authority Response to Posting #025-1257
Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities**

The Lakehead Region Conservation Authority (LRCA) appreciates the opportunity to comment on Ontario's proposal to consolidate 36 Conservation Authorities (CA) into seven Regional Conservation Authorities.

The LRCA supports modernization, consistency, and improved capacity across Ontario's conservation sector and are willing to work with the Province to achieve these goals. The LRCA acknowledges the Province's goals in the consolidation of CAs; however, considers that the LRCA is unique in both its location and region that it serves and are recommending that under the Ontario Provincial Conservation Agency (OPCA) during the transition to a regional-watershed based framework that the LRCA not be consolidated with the Huron-Superior Regional Conservation Authority and instead form the "**Northwestern Ontario Regional Conservation Authority**". If the LRCA is consolidated within the Huron-Superior Regional Conservation Authority, it is anticipated that LRCAs service delivery of all programs will be significantly impaired and will in fact be counter-productive to the Province's overarching goals related to consolidation due to distance, geographical differences and logistics of consolidating watersheds with no meaningful connection.

Rationale to support this recommendation include the following:

- The LRCA has over 70 years of experience in managing the Lakehead Watershed.
- The proposed northwestern region would align with LRCA's Source Protection Region, LRCA's watershed, existing Ministry regions and will maintain our relationship with our member municipalities.
- LRCA has the capacity to operate as a region and continue to provide all the mandatory programs to provincial standards.
- Hazard mapping is a priority at the LRCA. Riverine floodplain mapping has been updated; wetland boundaries have been delineated; and hazard mapping on the Lake Superior Shoreline is currently being undertaken.
- LRCA has the financial resources, including adequate reserves and deferred funds. Financial policies are in place for procurement, reserve principles, investment, etc. Staff

continually source external funding for programming, with over \$1,600,000 acquired for stewardship projects in the last five years. All non-mandatory category 3 programs are funded externally with no levy funds.

- The LRCA has a transparent and open budgeting process that aligns with the Inventory of Programs.
- The LRCA maintains an Asset Management Plan, including using cost forecasting to apply steady annual levies to maintain and fund minor and major maintenance of owned assets, the Neebing-McIntyre Floodway, erosion prone areas and floodplain mapping.
- The LRCA has a meaningful Strategic Plan (2023-2027) that directs the Authority's priorities and initiatives.
- Many modernization measures have been undertaken to reduce administration costs that have streamlined operations allowing the LRCA, through attrition, to reallocate staff to the front line such as the recent hiring of a Planning and Regulations Technician as a new position.
- The LRCA has consistently issued permits in less than five days and our largest member municipality being the City of Thunder Bay has exceeded their housing targets of 183 units by building 262 units, which represents them achieving 143% of their target.
- LRCA consistently provides services in the region beyond our area of jurisdiction and are willing to expand services, potentially as category 2 programming to other municipalities in the northwest region, which could facilitate the future expansion of the region. Current projects that benefit the region include:
 - Category 2 – GIS/Mapping service to member municipalities and the Lakehead Rural Planning Board (includes un-incorporated townships)
 - Presentations at regional conferences (i.e., hazard mapping at regional planning conference, municipal league, etc.)
 - Riparian habitat restoration along Lake Superior and inland lake shorelines
 - Invasive species management (phragmites, narrowleaf cattail, sea lamprey etc.)
 - Administer the Regional Phragmites Collaborative
 - Grow and sell northern native plants for regional projects
 - Blue-Green Algae monitoring and research on Lake Superior
 - Boundary Waters Voyageur Waterway – Canadian Heritage River System (proposed eastern section River Steward)
 - Collaboration and support of First Nations (i.e., Fort William First Nation, Red Rock Indian Band).
 - Sharing of hazard mapping on overlapping jurisdictions with Fort William First Nation and Lakehead Rural Planning Board.

The LRCA Board of Directors has passed resolution #130/25 (attached) opposing the proposed "Huron-Superior Regional Conservation Authority" boundary configuration and further recommended that the LRCA form the 8th Regional Conservation Authority. Supporting

resolutions/letters of support have been passed advocating for the LRCA recommendation to become a region representing Northwestern Ontario by:

- All eight LRCA Member Municipalities
 - City of Thunder Bay
 - Municipality of Shuniah
 - Municipality of Neebing
 - Municipality of Oliver Paipoonge
 - Township of Dorion
 - Township O'Connor
 - Township of Conmee
 - Township of Gillies (pending)
- Northwestern Ontario Municipal Association (NOMA)
- Northern Ontario Large Urban Mayors (NOLUM)
- Thunder Bay Chamber of Commerce.

The Board of Directors looks forward to further engagement with the Ministry on this matter. If further information is required, please contact the undersigned or Tammy Cook, Chief Administrative Officer at tammy@lakeheadca.com.

Yours truly,



Donna Blunt
Chair, LRCA Board of Directors

Enclosure: LRCA Resolution #130/25

**RE: Lakehead Region Conservation Authority Response to Posting #025-1257
Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities**

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

Key considerations for success include:

- Funding is provided to cover all costs associated with consolidation.
- Adequate time is allocated to deal with all legal, banking, human resources, etc. requirements.
- Preservation of local decision-making.
- Conservation Authority owned lands remain owned by the municipalities that acquired them.
- Existing reserve and deferred funds are allocated to the existing Conservation Authority that generated the funds, not merged into one collective regional fund.
- Satellite offices are maintained for each existing Conservation Authority.

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

Opportunities and benefits from a regional conservation authority framework include:

- Potential for sharing expertise within a region.
- A municipality will only have to deal with one Conservation Authority (in most cases).
- One fee schedule and permit process applicable to a region.
- Standardized policies.
- Sharing of resources.
- Bulk purchasing.

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?

- Preference should be that each member municipality have at least one member on each regional Board; however, in regions with 80 municipalities this will not be possible.
- If each member municipality will not have a member on the Board, then municipalities within a region should be grouped and have a rotation, where every municipal term each municipality has a year (or other time period) on the Board, and then they rotate out to the next municipality in their grouping. This model is undertaken with the Thunder Bay District Health Unit.

- Alternatively, each region has a Board and advisory committees, where every municipality has a seat on either the Board or a committee.
- Board appointments should remain with the municipality.
- Municipalities should continue to have the ability to appoint citizens, if so desired.

Regions with many municipalities will result in a loss of “pay for say”, which will in turn result in a disconnect between Conservation Authorities and municipalities.

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

- Budgeting should be developed annually at each individual satellite office (i.e., existing Conservation Authority) as part of an overall regional budget, allowing for local prioritization of issues and allocation of resources within each locality.
- Overall administrative costs will require apportionment that is fairly applied to each satellite office.

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

- Satellite offices (i.e., each current Conservation Authority) will need the ability to connect via social media, newsletters, annual reports on programs and work in their local area. Regional only messaging will not resonate at the local level for large regions.
- Maintaining local leadership at each satellite office that remains engaged and accessible to the local municipalities, community and stakeholders will be key in maintaining support and trust from the local community.
- The ability for each satellite office to continue to provide programming at the local level in each watershed within a region will maintain connections.

LRCA Resolution #130/25

Moved by: Sheelagh Hendrick

Seconded by: Brian Kurikka

With Respect to the posting by the Ministry of the Environment, Conservation and Parks Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities”), proposing to reduce Ontario’s 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the Conservation Authorities Act;

AND THAT *under this proposal, the Lakehead Region Conservation Authority (LRCA) would be merged into a new “Huron-Superior Regional Conservation Authority” together with:*

- *Grey Sauble Conservation*
- *the Saugeen Valley Conservation Authority*
- *the Maitland Valley Conservation Authority*
- *the Ausable Bayfield Conservation Authority*
- *the Nottawasaga Valley Conservation Authority*
- *the Lake Simcoe Region Conservation Authority*

forming a single organization encompassing the eastern shores of Lake Huron, the southern shores of Georgian Bay, Lake Simcoe, and the western shores of Lake Superior in Northwestern Ontario;

AND THAT *the LRCA Board acknowledges and supports the Province’s goals of improved efficiency, consistency and fiscal prudence in conservation delivery,*

AND THAT *the Lakehead Region Conservation Authority is a self-sufficient entity that is; accountable to its member municipalities;*

- *financially resilient;*
- *consistently processes permits in less than 7 days;*
- *operates in the City of Thunder Bay that has exceeded their housing target by 143%;*
- *has modern financial and IT processes that prioritize security and redundancy; and*
- *is a locally recognized leader in the conservation and protection of the Lakehead Watershed;*
and
- *all staff are front line workers,*

AND THAT *the Board further recognizes that the Lakehead Region Conservation Authority is unique as it does not abut any other Conservation Authority and solely serves Northwestern Ontario communities that face vastly different climatic, hydrological, geographic and infrastructure realities, and would be disconnected to the proposed larger overarching administrative structure that is physically based 1,500 kilometres from the north with 72 other municipalities;*

The Board finds that the proposed “Huron-Superior Region” configuration would :

- *Create a geographically vast and administratively complex entity, joining Northwestern Ontario with fast-growing Southern Ontario municipalities that are 1,300-1,500 kilometres apart with no shared watershed connection or economic alignment;*
- *dilute local accountability and municipal partnership, contrary to the principle that decisions are best made at the local level;*

- *generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization, rebranding — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's business-planning principles of value for money, cost containment and service continuity; and*
- *risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with local conditions are replaced by distant regional structures, making it harder for applicants to obtain timely local advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda;*

THEREFORE BE IT RESOLVED THAT:

The Board of Directors is opposed to the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257;

AND THAT *the Board recommends that the Lakehead Region Conservation Authority form the 8th Regional Conservation Authority as the "Northwestern Ontario Regional Conservation Authority";*

AND THAT *further provincial evaluation is conducted with a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely housing delivery;*

AND THAT *the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;*

AND THAT *this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:*

- *the Minister of the Environment, Conservation and Parks and his Opposition critics;*
- *local Members of Provincial Parliament;*
- *local Members of Parliament;*
- *the Association of Municipalities of Ontario;*
- *Conservation Ontario;*
- *All local municipalities; and*
- *All Conservation Authorities in Ontario.*

Carried