CONSERVATION SUDBURY

A REGULAR MEETING OF THE

NICKEL DISTRICT CONSERVATION AUTHORITY

PROPOSED AGENDA

Thursday December 11, 2025 **4:30 PM**

Audio and visual through Teams

1.	Chair opens meeting	
2.	Declarations of Conflict of Interest	
3.	Adoption of Agenda/Addition to Agenda (resolution)	1
4.	Adoption of Minutes of Previous Meeting a) Adoption of Minutes of November 13, 2025 (resolution) b) Business arising from the minutes not addressed otherwise below (information and updates)	3
5.	General Business a) Permissions under Section 28/29 Report (Melanie Venne, report, resolution) b) Response to ERO posting #025-1257 (Carl Jorgensen, report, resolution)	8 10
6.	New Business / Upcoming dates a) Next meeting – January 8, 2026	
7.	In-Camera Session for any legal, property or human resources matters (resolution), **In-Camera session will take place in a Teams Breakout Room*	31
8.	Adjournment (resolution)	32

Moved by:_____ Resolution: 2025-_____

Seconded by: _____

That the agenda of the December 11, 2025 Meeting is adopted as circulated.

Resolution Carried
November 13, 2025

_____
Chair

Moved by:_____ Resolution: 2025-_____

Seconded by: _____

That the minutes of the November 13, 2025 General Meeting as circulated and reviewed, are approved.

Resolution Carried
November 13, 2025

_____
Chair

NICKEL DISTRICT CONSERVATION AUTHORITY

MINUTES OF A REGULAR MEETING OF THE GENERAL BOARD

Thursday, November 13, 2025 Held vis MS Teams Commenced: 4:32 PM
Adjourned: 6:02 PM

MEMBERS PRESENT: Steve Kaufman, Chair
Eric Benoit
Michel Brabant
Jennifer Davidson, Vice-chair
Pauline Fortin
Joscelyne Landry-Altmann

ALSO PRESENT: Carl Jorgensen, GM, Secretary-Treasurer
Phillipa Cryderman, Director, Natural Hazards Program
Melanie Venne, Office and Communications Coordinator

REGRETS: Bill Leduc

1. Chair Kaufman called the meeting to order and welcomed everyone.

2. No declarations of conflict were made.

3. Adoption of Agenda/Addition to Agenda

Resolution 2025-65 **Benoit - Davidson**

That the agenda of the November 13, 2025, General Meeting is adopted as circulated.

Carried.

4. Previous Meeting Minutes

a) Adoption of Minutes of October 9, 2025

Resolution 2025-66 **Brabant – Landry-Altmann**

That the minutes of the October 9, 2025, General Board Meeting, as circulated and reviewed, are approved.

Carried.

5. General Business

a) Recent Announcement by MECP Minister McCarthy

GM Carl provided an update regarding recent announcements by the Ministry of the Environment, Conservation and Parks. On October 31 it was proposed that Conservation Authorities in Ontario would be consolidated into larger Regional Conservation Authorities.

There is currently an Environmental Registry of Ontario (ERO) posting open for comment regarding the geographic amalgamation of the conservation authorities. As per the posting, Conservation Sudbury would be grouped with the Sault Ste Marie Conservation Authority, North Bay-Mattawa Conservation Authority and Mattagami Region Conservation Authority (Timmins).

In addition to the ERO, the legislation to create the new Ontario Provincial Conservation Agency was also released as a schedule within Bill 68, the Ontario Budget Bill.

There was a lengthy conversation with board members about the impact of this amalgamation on land holdings, reserves and new board composition.

Comments on the ERO are open until December 22. Carl will distribute draft comments via email and the Board will decide upon the ERO response at the December meeting.

b) Section 28/29 Report

Resolution 2025-67 **Fortin - Benoit**

That the report for permits issued under Sections 28 and 29 of the Conservation Authorities Act during the month of October 2025 is received.

Carried.

c) 2026 Budget Approval

The 2026 Budget was presented to the Audit and Finance Committee in early October who then recommended its adoption to the Members at the October 9 meeting. After some minor adjustments it was presented to the City of Greater Sudbury's Finance and Administration Committee on November 12. GM Carl reiterated the uncertainty related to the 2027 forecast given the current ERO posting by the Province.

The Members had no further questions or comments at this time.

Resolution 2025-68 **Landry-Altmann – Davidson**

Given that, the 2026 Budget and Levy was approved on October 9, 2025, for consultation purposes with the City of Greater Sudbury, and given,

That, on October 10, 2025, the Secretary-Treasurer provided the 2026 Budget and Levy, as so approved, to the City of Greater Sudbury's Chief Financial Officer, and posted said budget to the website, and given,

That, on November 12, 2025, the Secretary – Treasurer presented the 2026 Budget and Levy to the City of Greater Sudbury's Finance and Administration Committee, therefore,

Be it resolved, that the 2026 Budget in the total amount of $2 431 433 is approved as presented, and

That the Authority's member municipality, the City of Greater Sudbury, is notified that the 2026 Operating Levy shall be $1 040 297 and the Capital Levy shall be $400 000.

Carried.

d) Approval of Algonquin Road Floodplain Study

Carl summarized the work for the Algonquin Road Watershed floodplain and the public engagement that has been ongoing since September. All requirements for engagement as per Ontario Regulation 41/24 have been met and the final step is adoption of the new floodplain mapping by the Members. The new floodplain mapping will be in use as of the day following the adoption.

Resolution 2025-69 **Brabant - Benoit**

That the newly updated regulatory floodplain mapping for the Algonquin Road Watershed is adopted for use beginning November 14, 2025.

Carried.

e) Regulation Review Hearing Guidelines Update

Melanie Venne briefly introduced the changes in the updated Section 28 Hearing Procedures. The Hearing Procedures are updated from time to time to keep up to date with changing regulations. This amendment makes small adjustments and incorporates the inclusion of additional circumstances when a hearing may be requested, including the issuance of a stop work order, the cancellation of a permit and the refusal to issue a permit extension.

Resolution 2025-70 **Benoit - Landry-Altmann**

That that changes to the Section 28 Hearing Procedures are adopted as described in the staff report dated November 3, 2025.

Carried.

6. In-Camera

Resolution 2025-71 **Davidson – Landry-Altmann**

That we go in-camera at 5:39 p.m.

Carried.

Chair Kaufman confirmed that each Member was present, that all could hear and be heard and that each was participating from a private setting where no other person is present or able to hear any discussion or view any contents of the meeting.

Direction to staff was provided on one property matter and there were no forthcoming resolutions.

7. Adjournment

Resolution 2025-72 **Benoit – Brabant**

That we do now adjourn at 6:02 PM

Carried.

Moved by:_____ Resolution: 2025-_____

Seconded by: _____

That the report for permits issued under Sections 28 and 29 of the *Conservation Authorities Act* during the month of November 2025 is received.

Resolution Carried
November 13, 2025

_____
Chair

1973 — 2023
CONSERVATION SUDBURY

Permits Issued under Section 28 and Section 29 Regulations
November 2025

Name of Applicant	Project Location	File no.	Permit no.
Dave and Maureen Luoma	41 Nickel Street, Copper Cliff	25532	2025-77
Nature of Project			
Construction of SFD with addition.			
Regulated Feature	Date Permit Issued	Ward	Project Size/Fee
Copper Cliff Creek	November 12, 2025	2	Large/$800
			Meet Conservation Ontario Target Timelines?
			Yes

Name of Applicant	Project Location	File no.	Permit no.
Lyndale Holdings	Lot 4 National Street, Garson	65367 65368	2025-78
Nature of Project			
Lot grading for site development.			
Regulated Feature	Date Permit Issued	Ward	Project Size/Fee
Wetland, Junction Creek trib.	November 17, 2025	7	Large/$800
			Meet Conservation Ontario Target Timelines?
			Yes

Name of Applicant	Project Location	File no.	Permit no.
Jacques Lavergne	266 Montee Genereux, Chelmsford	31989	2025-79
Nature of Project			
Construction of SFD, detached garage, and new septic system.			
Regulated Feature	Date Permit Issued	Ward	Project Size/Fee
Wetlands	November 18, 2025	3	Large/$800
			Meet Conservation Ontario Target Timelines?
			Yes

Moved by:_____ Resolution: 2025-_____

Seconded by: _____

WHEREAS municipalities have historically established and governed their conservation authorities under the *Conservation Authorities Act*;

AND WHEREAS municipalities provide approximately 54% of conservation authority funding, while the Province of Ontario provides approximately 5%. (2023 MECP data);

AND WHEREAS for decades Conservation Sudbury and its predecessors have established programs and services to local watershed needs, maintained accountable service standards, and ensured fair and predictable costs for ratepayers.

AND WHEREAS the Authority operates the Lake Laurentian Conservation Area providing access to all visitors at no cost, maintains and operates flood control infrastructure across Greater Sudbury including dams in Copper Cliff and New Sudbury, weirs in Coniston, berms in Dowling and Capreol, and the box culvert under downtown Sudbury;

AND WHEREAS Conservation Sudbury owns and manages extensive lands for conservation, public protection, and recreational purposes, many of which are leased to private operators and to the City of Greater Sudbury for recreational purposes, including Timberwolf Golf Course, Adanac Ski Hill, Rotary Park, Garson Park, Carmichael Park, and portions of Fielding Park;

AND WHEREAS the Provincial Government has proposed the consolidation of Ontario's 36 conservation authorities into 7 large regional conservation authorities (RCAs) overseen by an new layer of bureaucracy named the Ontario Provincial Conservation Agency (OPCA), a move that would dilute local governance and put municipal cost distribution in question;

AND WHEREAS in time, the OPCA will levy participating municipalities for some of its operating costs and will collect fees from the authorities, and Conservation Sudbury, as proposed, would be merged with authorities operating from offices located in Sault Ste-Marie (SSMRCA), Timmins (MRCA), and North Bay (NBMCA);

AND WHEREAS assets of the existing authorities would be pooled under any new regional authority, that would include all lands, buildings, chattels, bank accounts and reserves as well as all loans and other liabilities;

AND WHEREAS the imposition of a new oversight agency, lacking local or public accountability, risks creating unnecessary costs for municipalities and authorities alike, adding "red tape" and unnecessary bureaucracy, and undermines an authority's efficiency and responsiveness to local community needs;

THEREFORE, BE IT RESOLVED THAT the Government of Ontario:

1. Maintains local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation that allow appropriate levy decisions, community-focused services, proper management of conservation lands and allocation of reserves to projects and infrastructure in the communities where the funds were raised;
2. Avoids imposing a centralized agency that will introduce additional costs, red tape, and bureaucracy, reducing efficiency and responsiveness to local needs;
3. Collaborates with municipalities and conservation authorities to improve consistency, capacity, and program delivery across Ontario without compromising local accountability;
4. Rejects the proposed "Northeastern Ontario Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257.
5. Requires the Minister to directly engage affected municipalities before finalizing any consolidation boundaries or any other legislative amendments impacting their conservation authorities.

AND BE IT FURTHER RESOLVED that a copy of this resolution be sent to:

- The City of Greater Sudbury
- The Environmental Registry of Ontario Consultations prior to the deadline of December 22, 2025
- The Honourable Todd J. McCarthy, Minister of the Environment, Conservation and Parks
- MPP Peter Tabuns, Official Opposition Critic
- Frances Gélinas, MPP for Nickel Belt
- Jamie West, MPP for Sudbury
- The Association of Municipalities of Ontario
- Conservation Ontario

- All municipalities within the proposed Northeastern Regional Conservation Authority boundary that includes the Cities of Timmins, Sault Ste-Marie and North Bay, as well as Prince Township, the Municipalities of Callander, Calvin, East Ferris, Mattawan and Powassan, the Town of Mattawa and the Townships of Bonfield, Chisholm and Papineau-Cameron.

Resolution Carried
November 13, 2025

_____
Chair

CONSERVATION SUDBURY

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STAFF REPORT

TITLE:	**Submission to ERO # 025-1257, Proposed boundaries for the regional consolidation of Ontario's conservation authorities**
TO:	All Members of the Nickel District Conservation Authority
FROM:	Carl Jorgensen, General Manager
DATE:	December 5, 2025

Background

Municipalities have historically established and governed their conservation authorities under the *Conservation Authorities Act* (CA Act). In 1957, the Junction Creek Conservation Authority (JCCA) was established; it was then enlarged in 1969. Similarly, the Whitson Valley Conservation Authority (WVCA) was established in 1959. Then, in 1973 the two were combined to become the Nickel District Conservation Authority (NDCA). The new authority's jurisdiction was enlarged, and it continues to operate today under the brand of Conservation Sudbury. It is governed by seven Members appointed by the Council of the City of Greater Sudbury.

For decades Conservation Sudbury and its predecessors have established programs and services to local watershed needs, maintained accountable service standards, and ensured fair and predictable costs for ratepayers. The Authority operates the Lake Laurentian Conservation Area providing access to all visitors at no cost. It also maintains and operates flood control infrastructure across Greater Sudbury. This includes dams in Copper Cliff and New Sudbury, weirs in Coniston, berms in Dowling and Capreol, and the box culvert under downtown Sudbury.

Conservation Sudbury owns and manages extensive lands for conservation, public protection, and recreational purposes. Many of these properties are leased to private operators and to the City of Greater Sudbury for recreational purposes. These include Timberwolf Golf Course, Adanac Ski Hill, Rotary Park, Garson Park, Carmichael Park, and portions of Fielding Park.

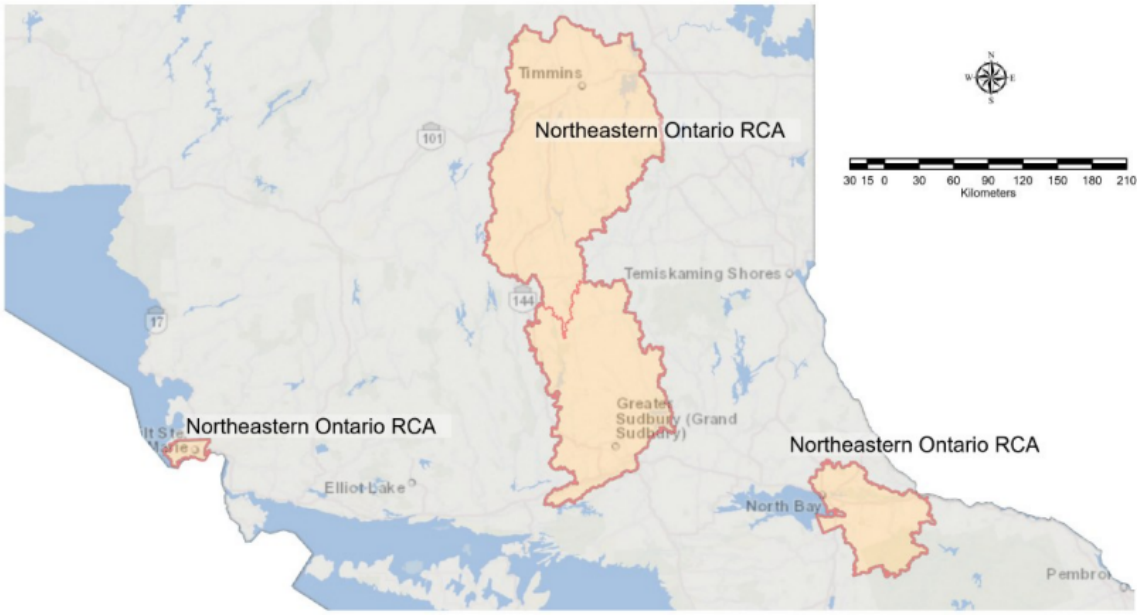
Provincially, municipalities provide approximately 54% of conservation authority funding, while the Province of Ontario provides approximately 5% (2023 data from MECP).

Discussion

The Provincial Government has proposed the consolidation of Ontario's 36 conservation authorities into 7 large regional conservation authorities (RCAs) overseen by a new layer of government, the Ontario Provincial Conservation Agency (OPCA). This move would dilute local governance and puts municipal cost distribution in question. In time, the OPCA will levy municipalities for some of its operating costs and would collect fees from RCAs.

As proposed in the ERO, Conservation Sudbury would be merged with the authorities operating from offices located in Sault Ste-Marie (SSMRCA), Timmins (MRCA), and North Bay (NBMCA).

The map shown below is taken from the ERO posting and in error excludes parts of the Wanapitei River watershed leaving out the communities of Coniston, Wahnapitae, and Falconbridge. The map also omits the Whitefish River watershed, leaving out numerous lakes and neighbourhoods including Richard Lake, McFarlane Lake, Long Lake, etc.



Ministry staff acknowledge these and other mapping errors. The ERO posting proposes that these four would become part of the Northeastern Ontario Regional Conservation Authority (NORCA) and describes the move as bringing "*together the conservation authorities in the northeast, maintaining coordination across large watershed areas and shared northern infrastructure and ecosystems. Its work focuses on maintaining healthy waterways, protecting natural habitats, and promoting sustainable land and water use across major watershed areas that span parts of Northern Lake Huron, the Abitibi, Missinaibi, Mattagami, Wanipitai (sic), French, and Upper Ottawa River systems*."

To be clear, the Abitibi, Missinaibi, and French Rivers are not located within any existing conservation authority jurisdiction nor is any of the shoreline of northern Lake Huron. Furthermore, the work of conservation authorities has been modified by recent changes to the CA Act. No longer does Conservation Sudbury govern sustainable land use as the *conservation of land* was removed from the legislation. The inclusion of *sustainable water use* is also questionable as the Authority has no legislative role in the permitting of water takings or discharges of sewage systems. Similarly, the implication of maintaining healthy waterways is dubious as the control of *pollution* was also removed from the CA Act.

The four criteria applied by the Minister for determining the proposed boundaries for regional conservation authorities are provided below:

1. Maintaining watershed-based jurisdictions – Aligning with natural hydrological boundaries to support effective flood and water management, consistent with drinking water Source Protection Areas and Regions.

2. Relationships between conservation authorities and municipalities – Reducing administrative duplication and overlap for municipalities and conservation authorities to simplify accountability and strengthen local partnerships.

3. Balancing expertise and capacity across conservation authorities – Enhancing technical skills and resources across conservation authorities to improve service and program delivery.

4. Service Continuity – Ensuring uninterrupted delivery of local conservation authority programs – including flood forecasting and warning, permitting, and source water protection – through and after consolidation.

None of the four criteria has any context for northeastern Ontario's authorities.

1. Merging the four authorities will not maintain watershed-based jurisdictions. Conservation Sudbury's three watersheds ultimately flow into the North Channel of Lake Huron. The Mattagami Region's watersheds flow north to James Bay. The watersheds of North Bay – Mattawa are divided and flow into Lake Nipissing to the southwest and into the upper Ottawa River to the east. The Sault Ste-Marie Region's watershed discharge primarily to the St. Mary's River, between Lakes Superior and Huron. Furthermore, all four Source Protection Areas are discrete with no watershed linkages leaving no efficiency to be found.

2. None of the municipalities in northeastern Ontario currently have more than one conservation authority. There is no duplication or administrative overlap. In Timmins and Greater Sudbury, there are currently one-to-one relationships. Consolidation will increase the complexity of relationships between municipalities and authorities. Locally the City of Greater Sudbury would find itself appointing Members to a board with representation from up to fourteen other municipalities.

3. No northeastern authority can boast an abundance of in-house professionals. On average, there are fewer than one staff with a professional designation per authority, allowing no opportunity for balancing expertise or capacity.

   Combined, the four authorities have 2 professional engineers (P.Eng.), 1 engineer in training (EIT), 1 professional planner (RPP) and 1.5 GIS specialists.

Note: Some of these staff are partially allocated to the source protection program that is funded by the Province. The 4.5 FTEs funded typically include Project Managers who ensure local municipal drinking water protection remains current and appropriate.

This situation should not be surprising given the failure of the Province to properly fund authorities for several decades, downloading the cost of doing business onto smaller municipalities. Outside of source protection funding, the provincial support for mandatory operations has been eroded significantly. Roughly 75% of funding was cut in the late 1990s and another 12% in 2019. This remaining 13% has not been adjusted for inflation, meaning the value of the transfer payment provided under the CA Act's Section 39 is in 1997 dollars. Therefore, each authority operates on lean budgets for administering its mandatory programs and services that focus on keeping people and property safe from natural hazards. Northeastern authorities and their municipal partners are forced to rely on outside consultants to advance many of the mandatory programs such as dam safety inspections, floodplain mapping, and erosion hazard assessments.

4. Including the continuity of mandatory programs and services as one of the consolidation criteria is misleading. All authorities are required to deliver the examples listed, along with others defined as mandatory by O.Reg. 686/21.

Board composition of the proposed Northeastern RCA would presumably include representation from the following municipal bodies: City of Greater Sudbury, City of Timmins, City of Sault Ste-Marie, Prince Township, City of North Bay, Municipality of Callander, Municipality of Calvin, Municipality of East Ferris, Municipality of Mattawan, Municipality of Powassan, Town of Mattawa, Township of Bonfield, Township of Chisholm, and the Township of Papineau-Cameron.

The ERO posting includes statements that the Minister will improve conservation authorities in several ways. Firstly, the creation of a new agency the Ontario Provincial Conservation Agency (OPCA) to "provide centralized leadership, efficient governance, strategic direction, and oversight of Ontario's conservation authorities."

The initial assumption, that centralized leadership is required or desired, is antithetical to the very nature of conservation authorities that came into being by cooperation of local municipalities. In Greater Sudbury, the governance of the conservation authority is as highly efficient as one could hope. Since there exists a one-to-one ratio, City Council appoints all seven of the Members to the Conservation Sudbury board; five from within its ranks and two from residents who apply to be considered, typically following each municipal election.

An authority's strategic direction, again, is not a matter for centralization. The Minister, through regulation, has recently provided clear guideposts that authorities must operate

within. All authorities acknowledge and deliver on mandatory programs (Category 1) and undertake other programs deemed locally important through municipal agreements (Category 2 / 3). How the delivery of programs and services are prioritized must be a localized decision that considers capacity, funding and demand. Where “have not” municipalities are unable to fund authority functions adequately, introducing equalization grants would lift capacity and expertise serving those communities.

Provincial oversight is already in place through two ministries. The Ministry of Natural Resources (MNR) oversees the transfer payment agreements related to natural hazards including flood management and water and erosion control infrastructure. Conservation authorities also are heavily integrated into the provincial surface water monitoring network alongside their provincial and federal counterparts. Recent changes have the MECP overseeing the conservation authority portfolio, building upon its significant role related to drinking water source protection. Investing in these two ministries would have a direct and positive effect on conservation authority operations by providing contemporary policy direction, and technical guidance.

To address perceived challenges that have not been elaborated upon, the Minister has proposed a list of solutions and advancements that can be of benefit to existing conservation authorities. These would be brought forth by the OPCA and include:

- Development and implementation of a standardized and centralized system for processing applications for permits issued by authorities
- Development and implementation of digital strategies and shared services to support the operations… programs and services
- Support strategic investment in programs and services provided by authorities
- Oversee and evaluate the financial performance of authorities to ensure long-term operational and capital financial sustainability
- Guide and evaluate the strategic planning by authorities to ensure alignment with provincial objectives
- Promote consistent policies, standards and fees for programs and services provided by authorities
- Oversee the governance of authorities and other aspects of authorities such as their operations, including the programs and services they provide, to further the purposes of the Act.
- Assess and report on the effectiveness of authorities in furthering the conservation, restoration, development and management of natural resources

Without exception, the initiatives listed above can be effectively implemented at existing conservation authorities without any amalgamation. The Government of Ontario, through the Ministry of Environment Conservation and Parks (MECP) is enabled, through the CA Act, to establish legislation, regulations, and standards without the consolidation of authorities, i.e. without restructuring the existing governance model.

Secondly, the Minister proposes to improve conservation authorities to "reduce duplicative administrative costs, free-up resources for frontline conservation, and better align conservation authorities' services with provincial priorities on housing, the economy, infrastructure and climate resilience." Given that northern authorities operate on lean budgets, becoming highly efficient has not been an option. There are no administrative-only positions at any of the authorities and all positions are "front line" to varying extents.

With respect to the provincial housing and economy priorities, Conservation Sudbury's performance, achieved through its working relationship with the City of Greater Sudbury, speaks for itself. In a typical year, staff screen about 1000 building permit applications referred by the City's building services division. Staff have access to the back end of the City's online permitting portal built on the Accela platform that is in use in several jurisdictions across the province. Most (>85%) of these permit reviews are cleared quickly and rarely exceed the City's 5-day and 10-day turnaround benchmarks. Approximately 5% of the applications screened will receive a streamlined letter of permission with a map of the regulated area and natural hazards on the parcel where work is proposed. The remaining applications, between 7 and 8%, will require a permit under Section 28 of the CA Act. Over 90% of those will be issued within 15 working days following the receipt of a complete application. Staff have recommended not issuing a permit less than once annually in the past five years. This is testament to their ability to work with proponents and the city to find solutions and the results speak for themselves. In July of this year the Province awarded the City of Greater Sudbury with $1.52 million for achieving 80% or more of their provincial housing target; in fact the City saw work on 840 residential units breaking ground, achieving 265% of its target and the trend continues.

Turnaround times and permit fees are not the challenge in Greater Sudbury, where a shortage of skilled labour and higher materials and construction costs are challenging. The unemployment rate in Greater Sudbury is lower than provincial and national rates, the housing market is one of the hottest in the country, and the economic outlook is bright.

With respect to infrastructure needs, investment in flood control infrastructure continues annually by leveraging locally derived reserves to maximize provincial and federal funding opportunities. Since 2015 over $5 Million in grants were invested into local dams and flood channels, increasing the value of the authority's fixed assets by over $4 Million.

Climate change resilience in a community can be highly related to flood control infrastructure but Conservation Sudbury's efforts in this respect go beyond fixed assets. As part of the city's regreening efforts, over 1 million trees have been planted on conservation lands out of the more than 10 million in the region. In addition, ~ 600 000 more have been planted on private lands in partnership with Trees Ontario / Trees Canada as part of the 50 Million Trees program. Furthermore, floodplain mapping has been advanced in Greater Sudbury's watersheds. Currently three floodplain studies covering more than 200 square kilometres are in the final year of completion, and a small watershed in the City's south end recently had new mapping adopted. The province's

assistance in providing updated technical guidance related natural hazards would be highly appreciated by all authorities for future efforts and in complex scenarios where 2-D and spill modelling are prudent.

The ERO posting solicits feedback via five questions that presume consolidation to be the only possible outcome. Addressing these questions, as phrased, by default contemplates consolidation of northeastern Ontario's conservation authorities.

This proposed move has been criticized by the five Northern Ontario Large Urban Mayors (NOLUM) in their joint letter issued December 4, 2025 (attached as Appendix A). In it, the mayors state that "the solution proposed … will create real and significant harm to a system that is functioning well in Northern Ontario." They go on to say northern "conservation authorities are lean organizations that are accountable, transparent, and provide efficient permit approvals and community services. The proposed regional model for Northern Ontario will not eliminate red tape and has the distinct potential to result in the opposite outcome of increased bureaucracy."

The mayors reference the willingness to work with the government, and demonstrate optimism for access to new tools, stating "We are confident our conservation authorities will be happy to work collaboratively with the (OPCA) and utilize the shared digital platforms, common standards, and technical resources envisioned."
In closing they look " forward to collaborative discussions that enable our conservation authorities to continue in their current form, recognize the geographic realities of Northern Ontario, and establish protocols that will enable them to meaningfully engage with the (OPCA)."

On December 9, 2025, Member Landry-Altmann will ask her colleagues on City Council to waive notice and bring a motion (Appendix B) that will ask the Minister to:

- Maintain local independent conservation authorities
- Avoid imposing a centralized agency that reduces efficiency and local input
- Collaborate with municipalities and authorities to achieve improvements
- Reject the boundary as proposed for a northeastern Ontario regional authority
- Require the Ministry to engage directly with municipalities before consolidation or legislative amendments.

On December 11, 2025, from 2 – 4 PM, two representatives from Conservation Sudbury will attend a virtual engagement session with the OPCA and the MECP. This meeting will also be attended by the municipalities listed above and attendees from the other three northeastern authorities. This is the only opportunity for direct interaction with the MECP and OPCA prior to the comment deadline of December 22, 2025.

Half an hour later, Members of the General Board will be meeting where a similar resolution will be presented, along with draft submission in response to the ERO posting (see Appendix C).

Financial Implications

The Minister has suggested that no layoffs would result and that any surplus staff would be reassigned, therefore there are likely no significant savings to be found through staffing. Consolidation may find minimal savings in administrative costs such as audit and banking fees however all other costs would remain. Currently all northeastern Ontario authorities achieve a high degree of cost-effectiveness through participating in large, pooled plans for expenses such as benefits and insurance that are based not on a per entity basis but per employee or asset. All authorities are included in the province's Vendor of Record program *Doing Business* where preferred pricing is available through standing offers on expenses including cleaning products, cellular communications, vehicles, etc.

It has been suggested that the assets of the existing authorities would be pooled under any new RCA. This would include all lands, buildings, chattels, bank accounts and reserves as well as all loans and other liabilities although this is unclear. At the end of 2024, the reserves at each of the four northeastern authorities stood as follows:

Conservation Sudbury	*$2.48 million*
Mattagami (Timmins)	*$0.36 million*
Sault Ste-Marie Region	*$0.36 million*
North Bay – Mattawa	*-- $0.39 million*

The consolidation of the four northeastern authorities would increase costs in Greater Sudbury. This would come in many forms, generally because Conservation Sudbury has the lowest rates by several measures.

The Minister has suggested that all authorities will use the same permitting platform and that all development review fees would be the same across the province. The following is a sample of fees in place local and at two other authorities.

AUTHORITY	STANDARD PERMIT	CONSENT TO SEVER	LEGAL INQUIRY - SIMPLE
SUDBURY	$450	$320	$180
LAKE SIMCOE	$765	$536	$536
MAITLAND VALLEY	$975	$275	$190
SAUGEEN VALLEY	$850	$390	$116

Given that the per capita levy in Sudbury is the lowest in Ontario ($7.06) it stands to reason that the levy would be equalized for all municipalities across the region where the average is nearly double, at $13.62.

In addition to these necessary adjustments, the OPCA itself will have the ability to recoup

certain costs from the proposed regional conservation authorities and, in future, will be able to levy the municipalities.

With reference to the proposed equalization of expertise across the proposed RCAs, there will be a need for a regional authority in the northeast to increase in-house expertise by hiring staff with certain skillsets, especially those directly related to natural hazards including, for example, wetland hydrology, fluvial geomorphology, hydraulic engineering, and geoscience. This injection of expertise would increase the capacity of authorities and reduce project review and approval times but would also significantly increase human resources budgets and the costs directly related to their tools and technology.

Recommendation

That, the response to ERO 025-1257, attached as Appendix C is submitted to the registry prior to the December 22, 2025 deadline.

Northern Ontario Large Urban Mayors
NOLUM

4 December 2025

The Honourable Todd McCarthy
Minister of the Environment, Conservation and Parks
5th Floor
777 Bay St.
Toronto, ON M7A 2J3

Subject: Bill 68, Schedule 3 - Conservation Authority Amalgamations and Regional Boundaries

Dear Minister McCarthy,

We, the Northern Ontario Large Urban Mayors (NOLUM), are writing to provide feedback on the proposed consolidation of the northeastern Ontario conservation authorities and the regional boundaries envisioned.

As the Ministry-provided material correctly states, Conservation Authorities are organized based on watersheds. The proposed regional conservation authority boundaries for northeastern and northwestern Ontario do not align with this principle. The two proposed regional conservation authorities involving Northern Ontario are the only non-contiguous agglomerations of watersheds. This does not create the same efficiencies for the other regional conservation authorities.

We recognize that there are significant concerns regarding conservation authorities in Southern Ontario. Unfortunately, the solution proposed to address this Southern Ontario issue will create real and significant harm to a system that is functioning well in Northern Ontario.

The proposed regional boundaries cover vast, disconnected territories and include many small communities, leading to significant governance challenges. There are also huge financial considerations, as substantial reserves are set aside in our conservation authorities, paid for by residents, for future community infrastructure.

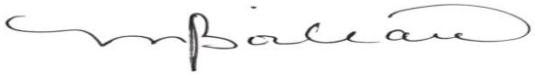
We are confident our conservation authorities will be happy to work collaboratively with the new Ontario Provincial Conservation Agency and utilize the shared digital platforms, common standards, and technical resources envisioned.

Our conservation authorities are lean organizations that are accountable, transparent, and provide efficient permit approvals and community services. The proposed regional model for Northern Ontario will not eliminate red tape and has the distinct potential to result in the opposite outcome of increased bureaucracy. For Northern Ontario, this is a situation of, "if it ain't broke, don't fix it."

NOLUM looks forward to collaborative discussions that enable our conservation authorities to continue in their current form, recognize the geographic realities of Northern Ontario, and establish protocols that will enable them to meaningfully engage with the new Ontario Provincial Conservation Agency.

We thank you for the opportunity to provide this feedback and look forward to working with your Ministry on this matter in the future.

Sincerely,



Michelle Boileau, Mayor of Timmins

Ken Boshcoff, Mayor of Thunder Bay

Peter Chirico, Mayor of North Bay

Paul Lefebvre, Mayor of Greater Sudbury

Matthew Shoemaker, Mayor of Sault Ste Marie

As presented by Councillor Landry-Altmann:

WHEREAS municipalities have historically established and governed their conservation authorities under the Conservation Authorities Act;

AND WHEREAS municipalities provide approximately 54% of conservation authority funding, while the Province of Ontario provides approximately 5%. (2023 data);

AND WHEREAS for decades Conservation Sudbury and its predecessors have established programs and services to local watershed needs, maintained accountable service standards, and ensured fair and predictable costs for ratepayers.

AND WHEREAS the Authority operates the Lake Laurentian Conservation Area providing access to all visitors at no cost, maintains and operates flood control infrastructure across Greater Sudbury including dams in Copper Cliff and New Sudbury, weirs in Coniston, berms in Dowling and Capreol, and the box culvert under downtown Sudbury;

AND WHEREAS Conservation Sudbury owns and manages extensive lands for conservation, public protection, and recreational purposes, many of which are leased to private operators and to the City of Greater Sudbury for recreational purposes, including Timberwolf Golf Course, Adanac Ski Hill, Rotary Park, Garson Park, Carmichael Park, and portions of Fielding Park;

AND WHEREAS the Provincial Government has proposed the consolidation of Ontario's 36 conservation authorities into 7 large regional conservation authorities (RCAs) overseen by an additional layer of government named the Ontario Provincial Conservation Agency (OPCA), a move that would dilute local governance and put municipal cost distribution in question;

AND WHEREAS in time, the OPCA will levy participating municipalities for some of its operating costs and will collect fees from the RCAs, and Conservation Sudbury, as proposed, would be merged with the authorities operating from offices located in Sault Ste-Marie (SSMRCA), Timmins (MRCA), and North Bay (NBMCA);

AND WHEREAS assets of the existing authorities would be pooled under any new RCA, which would include all lands, buildings, chattels, bank accounts and reserves as well as all loans and other liabilities;

AND WHEREAS the imposition of a new oversight agency lacking local accountability risks creating unnecessary costs for municipalities and authorities alike, adding “red tape” and unnecessary bureaucracy, and thereby undermines an authority’s efficiency and responsiveness to local community needs;

THEREFORE BE IT RESOLVED THAT Council for the City of Greater Sudbury requests that the Government of Ontario consider:

1. Maintaining local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation which would allow appropriate levy decisions, community-focused services, proper management of conservation lands and allocation of reserves to projects and infrastructure in the communities where the funds were raised;
2. Avoid imposing a centralized agency structure that could introduce additional costs, red tape, and bureaucracy, reducing efficiency and responsiveness to local needs;
3. Collaborating with municipalities and conservation authorities to improve consistency, capacity, and program delivery across Ontario without compromising local accountability;
4. Rejecting the proposed “Northeastern Ontario Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257.
5. Requiring the Ministry to directly engage affected municipalities before finalizing consolidation boundaries or legislative amendments.

AND BE IT FURTHER RESOLVED that a copy of this resolution be sent to:

- The Environmental Registry of Ontario Consultations prior to the deadline of December 22, 2025
- The Honourable Todd J. McCarthy, Minister of the Environment, Conservation and Parks
- MPP Peter Tabuns, Official Opposition Critic
- Frances Gélinas, MPP for Nickel Belt
- Jamie West, MPP for Sudbury
- The Association of Municipalities of Ontario
- Conservation Ontario
- All municipalities within the proposed Northeastern Regional Conservation Authority boundary which includes the Cities of Timmins, Sault Ste-Marie and North Bay, as well as Prince Township, the Municipalities of Callander, Calvin, East Ferris, Mattawan and Powassan, the Town of Mattawa and the Townships of Bonfield, Chisholm and Papineau-Cameron.
- Nickel District Conservation Authority

CONSERVATION SUDBURY

December 11, 2025

Response to ERO # 025-1257, Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Advancing Conservation Authorities AND Meeting the Goals of the Province of Ontario

The Nickel District Conservation Authority (NDCA, o/a Conservation Sudbury) appreciates the opportunity to provide comment on the above posting to the Environmental Registry. In response to the proposal of consolidating the four authorities in the northeast, this Authority agrees with the Northern Ontario Large Urban Mayors (NOLUM) whose letter is attached.

Distinct and Distant - The history of Conservation Sudbury includes the merger of two smaller adjacent authorities in 1973, a move that was voluntary and initiated by the municipalities of the day. The proposed consolidation of four authorities in distant watersheds is incomparable. The distances between the jurisdictions are vast and none of the watersheds are shared. This includes four discrete Source Protection Areas.

Simple Governance Model - None of the municipalities in northeastern Ontario currently have more than one conservation authority. There is no duplication or administrative overlap. In Timmins and Greater Sudbury, there are currently one-to-one relationships. Consolidation will therefore increase the complexity of relationships between municipalities and authorities. Any assumption that additional or centralized leadership by an agency is required or desired, is antithetical to the very nature of conservation authorities that came into being by cooperation of local municipalities. In Greater Sudbury, the governance of the conservation authority is as highly efficient as one could want. Since there exists a one-to-one ratio, City Council appoints all seven of the Members to the Conservation Sudbury board; five from within its ranks and two from residents who apply to be considered, typically following each municipal election.

Expertise Challenges – Being funded by smaller municipalities means no northeastern authority can boast an abundance of in-house professionals. On average, there are fewer than one staff with a professional designation per authority, allowing no opportunity for balancing expertise or capacity. Introducing equalization payments to allow northern authorities to attract and retain the needed experts is one approach. This would speed up plan reviews and permitting, bolster the study and mapping of natural hazards and support the local economy.

Lean and Effective – A desire to ensure that conservation authorities can "reduce duplicative administrative costs, free-up resources for frontline conservation, and better align conservation authorities' services with provincial priorities on housing, the economy, infrastructure and climate resilience" is reasonable. Given that northern authorities operate on lean budgets, becoming highly efficient has not been an option. There are no administrative-only positions at any of the authorities and all positions are "front line" to varying extents.

With respect to the provincial housing and economy priorities, Conservation Sudbury's performance, achieved through its working relationship with the City of Greater Sudbury, speaks for itself. In a typical year, staff screen ~ 1000 building permit applications referred by the City's building services division. Staff have access to the back end of the City's online permitting portal built on the Accela platform that is in use in several jurisdictions across the province. Most (>85%) of these permit reviews are cleared quickly and rarely exceed the City's 5-day and 10-day benchmarks. Approximately 5% of the applications screened will receive a streamlined letter of permission with a map of the regulated area and natural hazards on the parcel where work is proposed. The remaining applications, between 7 and 8%, are deemed to require a permit under Section 28 of the CA Act. Over 90% of those will be issued within 15 working days following the receipt of a complete application.

In the past five years staff have recommended not issuing a permit less than once annually on average. This is testament to an ability to work with proponents and the municipality to find solutions and the results are telling. In July of this year the Province awarded the City of Greater Sudbury with $1.52 million for achieving 80% or more of its provincial housing target; in fact the City saw work on 840 residential units breaking ground, achieving 265% of its target, and the trend continues.

Turnaround times and permit fees are not constraints to development in Greater Sudbury, where a shortage of skilled labour and higher material and construction costs are challenging. The unemployment rate in Greater Sudbury is lower than provincial and national rates, the housing market is one of the hottest in the country, and the economic outlook is bright.

If a single permitting platform is desired, then adopting the *Conservation Authority Content Management System* (CACMS) developed by Central Lake Ontario Conservation Authority (CLOCA) is recommended. This system is already in place and has proven to be effective. Procuring this system and providing it to all authorities would be most cost-effective, have fewer challenges, and could be up and running

quickly. This system was purpose built for conservation authorities and includes many desirable features including:

- CA Regulation Workflow
- Timeline Tracking
- KPI Tracking
- Robust search functionality
- Document classification
- Data retention policies
- Cloud deployment
- Plan Review Workflow
- Online permit integration
- Reports and status dashboards
- Violations Section
- Task Management
- Site Inspection
- MS Outlook Integration
- Forms and Reports customization
- Integration with Web GIS

With respect to infrastructure needs, investment in flood control infrastructure continues annually by leveraging locally derived reserves to maximize provincial and federal funding opportunities. Since 2015 over $5 million in grants were invested into local dams and flood channels, increasing the value of the authority's fixed assets by over $4 million.

Climate change resilience in a community can be highly related to flood control infrastructure but Conservation Sudbury's efforts in this respect go beyond fixed assets. As part of the city's regreening efforts, over 1 million trees have been planted on conservation lands out of the more than 10 million in the region. In addition, nearly 600 000 more have been planted by the Authority on private lands in partnership with Trees Ontario / Trees Canada as part of the 50 Million Trees program.

Furthermore, floodplain mapping has been advanced in Greater Sudbury's watersheds. Updating natural hazard mapping is the most important work that an authority can do to complement municipal adaptation efforts. Currently three floodplain studies covering more than 200 square kilometres are in the final year of completion, and a small watershed in the Greater Sudbury's south end recently saw new mapping adopted. On this front, the MNR's assistance in providing updated technical guidance would be highly appreciated by all authorities and especially so in complex scenarios where 2-D and spill modelling are required.

Supporting Local is Best - An authority's strategic direction is not a matter for centralization. The Minister, through regulation, has recently provided clear guideposts that authorities must operate within. All authorities acknowledge and deliver on mandatory programs (Category 1) and undertake other programs deemed locally important through municipal agreements (Category 2 / 3). How the delivery of

programs and services are prioritized must be a localized decision that considers capacity, funding and demand. Where “have not” municipalities are unable to fund authority functions adequately, introducing equalization grants would lift capacity and expertise serving those communities. This could easily be administered by enhancing the units that the province already has. Provincial oversight is already in place through two ministries. The Ministry of Natural Resources (MNR) oversees the transfer payment agreements related to natural hazards including flood management and water and erosion control infrastructure. Conservation authorities are heavily integrated into the provincial surface water monitoring network alongside their provincial and federal counterparts. Recent changes have the MECP overseeing the conservation authority portfolio, building upon its significant role related to drinking water source protection. Investing in these two ministries would have a direct and positive effect on conservation authority operations by providing contemporary policy direction, and technical guidance.

The Minister has proposed a list of solutions and advancements that can be of benefit to existing conservation authorities. Some have these have been touched upon above and could be actioned by the OPCA as proposed. These include:

- Development and implementation of a standardized and centralized system for processing applications for permits issued by authorities
- Development and implementation of digital strategies and shared services to support the operations… programs and services
- Support strategic investment in programs and services provided by authorities
- Oversee and evaluate the financial performance of authorities to ensure long-term operational and capital financial sustainability
- Guide and evaluate the strategic planning by authorities to ensure alignment with provincial objectives
- Promote consistent policies, standards and fees for programs and services provided by authorities
- Assess and report on the effectiveness of authorities in furthering the conservation, restoration, development and management of natural resources

Without exception, the initiatives listed above can be effectively implemented at existing conservation authorities without any consolidation. The Government of Ontario, through the Ministry of Environment Conservation and Parks (MECP) is enabled, through the CA Act, to establish legislation, regulations, and standards without the consolidation of authorities, i.e. without restructuring the existing governance model.

Fiscally Responsible? - Consolidation may find minimal savings in administrative costs such as audit and banking fees however all other costs would remain. The process of amalgamating several legal entities will not be without costs that small northern municipalities will not bear. Currently all northeastern Ontario authorities achieve a high degree of cost-effectiveness through participating in large, pooled plans for expenses such as benefits and insurance that are based not on a per entity basis but per employee or per asset. All authorities can participate in the province's Vendor of Record program *Doing Business* where preferred pricing is available through standing offers on expenses including cleaning products, cellular communications, vehicles, etc. In short, the efficiencies that may be found through economies of scale in a larger organization are already in place through arrangements made via Conservation Ontario, member municipalities or the Province itself.

With reference to the proposed equalization of expertise across the proposed RCAs, there will be a need for a regional authority in the northeast to increase in-house expertise by hiring staff with certain skillsets, especially those directly related to natural hazards including, for example, wetland hydrology, fluvial geomorphology, hydraulic engineering, and geoscience. This injection of expertise would increase the capacity of authorities and reduce project review and approval times but would also significantly increase human resources budgets and the costs directly related to their tools and technology. As an alternative, investments into MNR / MECP or Conservation Ontario could support a shared-service model for existing conservation authorities with expertise deficits. This approach would allow localised services to persist and enhance the ability to support the management of the risks of natural hazards.

Let's Work Together - In closing, Ontario can reach its housing and infrastructure goals faster and more effectively by building upon, and not dismantling, the proven strength of local conservation authorities.

A collaborative model that respects northern Ontario realities, meets provincial expectations, and safeguards proven long-standing public safety standards, can deliver without sacrificing local identity or trust. By supporting existing governance instead of starting from scratch, let's work toward an approach that accelerates approvals, strengthens community confidence, and ensures growth without compromising the safety of people and property nor the natural spaces we all enjoy.

Moved by:_____ Resolution: 2025-_____

Seconded by: _____

That we go in-camera at _____ p.m.

Resolution Carried
November 13, 2025

_____
Chair

Moved by:_____ Resolution: 2025-_____

Seconded by: _____

That we do now adjourn.

Resolution Carried
November 13, 2025

_____
Chair