

December 11, 2025

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

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***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.