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June 23, 2021

Liz Mikel  
Conservation and Source Protection Branch  
40 St. Clair Avenue West  
14<sup>th</sup> Floor  
Toronto, ON  
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Dear Ms. Mikel:

Re: ERO Posting: 019-2986  
Comments from the Lakehead Region Conservation Authority

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The Board of Directors of the Lakehead Region Conservation Authority have reviewed Environmental Registry of Ontario posting ERO number 019-2986: *Regulatory proposal (Phase 1) under the Conservation Authorities Act* and provide the following comments for consideration:

- The Province is encouraged to provide on-going adequate funding to Conservation Authorities to continue to administer provincially mandated natural hazard programming; complete the provincially mandated strategies and plans that will be required; and administer the mandatory Public Advisory Boards. At the very minimum, the province should restore Section 39 funding to 2018 levels. In 2019, provincial funding provided to conservation authorities was cut by 50%. This reduction in funding makes it very difficult for many conservation authorities to deliver mandatory natural hazard programs across the province.
- The province is encouraged to provide adequate technical guidelines and training related to natural hazards that will enable conservation authorities to administer the mandatory programs related to natural hazards.
- It is recommended to allow conservation authorities the ability to cover multiple conservation authority lands under one management plan where the properties are similar in nature. This flexible and practical approach supports the efficient use of taxpayer dollars.

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- It is recommended that recreation be categorized as a mandatory program; or at a minimum, that passive recreation such as walking trails and boat launches be considered mandatory. Conservation Areas provide outdoor passive recreation to the public, which have become even more important during COVID-19 in providing a safe space for people to maintain their mental and physical well-being. Open accessible natural spaces fundamentally are in the public interest and the greater good of a community.
  - It is essential that the province continue to fully fund the Drinking Water Source Protection program as long as conservation authorities are required to exercise and perform the powers and duties of a source protection authority and implement mandatory programs and services related to those responsibilities. Municipalities do not have the capacity to absorb these program costs.
  - It is recommended that reasonable and flexible timelines are established for all mandatory deliverables, which preferably are set by the Board of Directors. Smaller conservation authorities do not have the capacity to undertake all tasks in a short timeframe. The Province is encouraged to enact the Phase one and two regulations in a timely manner; a substantial delay in their finalization may make the timelines unachievable.
  - The inclusion of on-going organizational costs under mandatory programs and services is supported, as these costs are necessary to deliver all other programs and services and should therefore be apportioned to municipalities as part of the conservation authority's municipal levy.
  - It is recommended that it not be mandatory for conservation authorities to form a community advisory board; alternatively, it is recommended that the Minister be able to grant an exception from this requirement. As a small conservation authority, it will be challenging to recruit interested members of the public to sit on the Public Advisory Board; additionally, the requirement to provide administrative support to the additional board will be challenging with limited staff capacity.

Yours truly,



Donna Blunt  
Chair