Rural Action Plan

January 2020
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The Lakehead Rural Municipal Coalition (“LRMC”) was formed several years ago by six municipalities that surround Thunder Bay. Although Statistics Canada refers to our municipalities as “Metropolitan Thunder Bay”, we all strongly oppose that title and its implications. We consult with one another on matters of mutual concern and raise them with one voice. We share best practices and information. Our member municipalities are: The Corporation of the Township of Conmee, The Corporation of the Township of Gillies, The Corporation of the Municipality of Neebing, The Corporation of the Township of O’Connor, The Corporation of the Municipality of Oliver Paipoonge and The Corporation of the Municipality of Shuniah.

The LRMC has compiled this brief of matters of mutual concern for presentation to Ministers and opposition party officials to inform them in preparation for the upcoming conference of the Rural Ontario Municipal Association. It is a revised and updated version of compendia originally presented to Ministers and members of the opposition parties at the Rural Ontario Municipal Association (“ROMA”) conference in February 2017, and revised, updated and delivered at multiple conferences and meetings across the province since then.

Our member municipalities wish to express our gratitude to the Province for listening to the concerns that we have raised through our rural action plan in the past. The Ministry of Transportation recognized the need for our roads crews to be able to continue to communicate with hand-held radios, and permanently removed the “cut off date” for the legislative exemption. The Ministry of the Solicitor General recognized the significant challenges for volunteer fire teams to have mandatory training requiring travel to Southern Ontario, and agreed with us that the mandatory training needed further study and consultation. The Ministry of Municipal Affairs and Housing, recognizing the need for small municipalities to examine processes for efficiencies and recognizing the lack of resources to enable us to do so, made some grant funding available for these purposes. We move forward with this version of the plan with confidence that our concerns are being listened to, and addressed.

Our matters are presented in this compendium alphabetically by Ministry. The order in which they appear is not a reflection of priority. All issues outlined in this document are of equal importance to all members of the LRMC.

Please note that there are some issues that cross Ministry jurisdictional silos, and those issues are cross-referenced, rather than repeated for each involved Ministry.

There are three recurring themes throughout the various issues outlined in this Action Plan.

The first is that Ontario is made up of three distinct types of municipalities. There are large urban municipalities, small urban municipalities and rural municipalities. Often, the Province categorizes what the LRMC refers to as “small urban” municipalities as “rural” municipalities. This results in financial inequity. That is demonstrated in Chapter 8.1. Municipalities that are truly rural in nature require separate consideration and individual attention. The concerns, issues, priorities and financial circumstances of rural Ontario are very different from those of...
even small urban municipalities. Canada’s first Minister of Rural Economic Development stated that “We cannot have a prosperous country without successful, competitive and thriving rural communities” (MP Bernadette Jordan, as posted on the internet in 2018). The leadership in the LRMC member municipalities demands that attention be given to the concerns our communities share in order to maintain and strengthen our “successful, competitive and “thriving” natures.

The second theme is that policies that work for Southern Ontario municipalities often cause significant issues for Northern Ontario municipalities. To coin a phrase – "one size does NOT fit all". It isn’t just that the policies do not work – it is more than that – they can actually hurt. This needs to be addressed before the damage becomes irreversible.

Finally, the LRMC is convinced that the cost for "people-related" services and programs need to be removed from the property tax bill. This would create a much more equitable taxation system in Ontario – the way it was originally conceived in 1849. The “income gap” between the very rich and those who are struggling financially can be eased through taxation equity.

As you progress through this plan, you will see these themes woven throughout the concerns we are bringing to the Province’s attention.

At each conference that LRMC members attend, we extend an invitation to the staff and elected officials with each Ministry that we see, to allow some time in their busy schedules to have tours of our communities the “next time” they are up in the Thunder Bay area (for business or pleasure). That remains an open invitation. There is nothing like “seeing” to aid in “believing”.

Thank you for your attention to the various issues discussed in the LRMC Rural Action Plan for January, 2020.
When LRMC members met with Ministers at the AMO Conference in August of 2019, we requested a meeting with relevant ministers (Finance, OMAFRA, MMAH and MNDEM) and staff to address the complex issues set out in Chapter 8.1 of this Action Plan. While we were told a meeting in Toronto would be arranged, it has yet to occur. We have written twice now, to respectfully request that this meeting be set up without response. Our members are taking this opportunity to again request that this meeting take place as soon as possible. Chapter 8.1 contains analyses to demonstrate how patently unfair current financial policies are to rural municipalities. It will take more than a 15-minute delegation meeting at the ROMA or OGRA conferences to properly explain the information and to demonstrate the logical conclusions.

**Recommendation:** Honour our request for a meeting, in Toronto, as soon as possible, to fully explore the information set out in Chapter 8.1.

### 1.1 Reducing Red Tape / Duplication

This has been an item in the LRMC Rural Action Plan since January 2019. As small, rural municipalities, our members are well versed in stretching dollars and working with "shoestring" budgets.

Please refer to Chapter 16.1 of this Action Plan.

We acknowledge having received a letter from the Honourable Minister Steve Clark of the Ministry of Municipal Affairs and Housing in early December 2018. In this letter, he states that his ministry will be “convening a cross-government working group” amongst the ministries to which municipalities report. Since that time, there has been no communication on the status of that working group to reduce duplication and red tape.

**Recommendation:** We request that the Minister remain responsive to our concerns and review this Rural Action Plan, in its entirety, and consult with us on these and other issues associated with rural affairs that cross your desk. We can provide practical, cost-saving solutions and advice.
Further Recommendation: We respectfully request a status report on the cross-government working group amongst the ministries to which municipalities report, and we respectfully request consultation with small, northern, truly rural municipalities on the benefits (or lack thereof) associated with many of the required reports.

1.2 Municipal Property Taxes on Agricultural Land

This has been an item in the LRMC Rural Action Plan since January 2019. As the result of a Provincial initiative, Agricultural land in Ontario is taxed at one quarter of the tax rate which is applied to the land associated with residential properties. As rural municipalities with Agricultural land, we support the Provincial philosophy of encouraging the farming of Ontario land in this manner.

The Provincial program includes rebating to Ontario municipalities the amount of property tax that the municipality in question would otherwise have collected, but only in circumstances where the farmland assessment is at least three (3%) per cent of the municipality’s overall assessment. Rural municipalities such as those that make up the LRMC do not receive this financial compensation. This creates a situation that, we respectfully submit, is unfair.

Although a threshold of three (3%) per cent seems reasonable, it impacts small and rural municipalities the most, particularly in the north, where there is not an abundance of rich agricultural soil, and growing seasons are short. Further, when you combine the impact of this lost revenue with the lost revenue associated with managed forest land and conservation land, the impact on small, rural, northern municipalities is significant. Most of us rely heavily on assessment for our revenue – with very little opportunity to raise revenue in alternate measures, such as user fees, that are available to urban municipalities.

All Ontarians understand the importance of the agricultural industry to the Province and its residents. Investment in the agricultural sector should continue. This is particularly true in circumstances where the Federal government has created additional financial concerns in the dairy farming industry through its free trade negotiations.

Unfortunately, the current property tax system treats Ontario residents unfairly. If a person lives in a municipality with farmland assessment comprising less than three (3%) per cent of the municipal assessment, that person supports the agriculture industry indirectly, by having to absorb the additional tax payments to the municipality to make up for the loss of revenue caused by the reduction in the tax rate for the agricultural lands. A person living in an urban municipality without any farmland assessment, or one living in a municipality with more than three (3%) per cent farmland assessment does not have this additional burden on his or her
property tax bill. For example, the Municipality of Oliver Paipoonge lost $366,118 and $399,954 in tax revenue based on this agricultural program, in 2018 and 2019 respectively. These losses equate to 5.1% and 5.3% of total tax revenue in that municipality for 2018 and 2019 respectively.

There are three types of municipalities in Ontario. There are “purely” rural municipalities, with low populations spread over large geographic areas. There are “small urban” municipalities – whose populations are low, but who operate municipal services and serve residents within a relatively “compact” municipal boundary. Then, there are the large urban centers.

Rural municipalities are the ones least able to absorb the cost of this program – yet our constituents are the ones who end up “footing” this bill.

**Recommendation:** The farmland tax rebate should be returned to the income tax system. There should be no property tax reduction at all. Rather, the financial incentives for farming should be undertaken through credits or rebates of income tax. Such a system would ensure that all Ontarians are supporting the agricultural system – not just those who are ratepayers in the municipalities where farmland is located.

**Recommendation:** Rural municipalities should receive compensation for the tax revenue given up under this Provincial program – not just municipalities with more than three (3%) per cent of their lands in agricultural production. When a municipality is geographically large, and where much of the land cannot support agriculture, the program is an unfair tax burden to non-farm ratepayers.
This is a new item in the LRMC Rural Action Plan in this edition. LRMC member municipalities had been pleased with the historic decision to restore truly local planning decision-making to municipal councils, reducing the jurisdiction and power of the (former) Ontario Municipal Board. As such, we were disappointed when the Local Planning Appeals Tribunal (“LPAT”) was re-invested with these powers last fall.

What is happening at present is that cases and/or the issuing of decisions are delayed at the LPAT, causing significant problems for development in our communities. There is also confusion about the new rules associated with the tribunal, and conflicting messages being sent to parties and participants in ongoing cases.

At present, we see no accountability on the LPAT in terms of the timeliness of decision-making.

**First Recommendation:** Restore truly local planning decision-making by removing the ability of the LPAT to over-turn council/committee of adjustment decisions unless the decision-maker’s reasons clearly demonstrate error.

**Alternate Recommendation:** Impose deadlines on board members for issuing decisions and introduce accountability measures for the tribunal.
This has been an item in the LRMC Rural Action Plan since January 2017. The LRMC has been working on this issue now for over a decade, long before the birth of the Rural Action Plan.

The LRMC is fighting to achieve equity for our communities in terms of the funding and operation of the Thunder Bay District Social Services Administration Board (“TBDSSAB”). To that end, our members welcomed the Province-wide review of Social Services Administration Boards that was undertaken in 2017. We brought to the review the issues that we had set out in all previous versions of this action plan. Unfortunately, the results fell far short of our expectations, as the process did not adequately provide for a comprehensive review by the consultant, John Fleming.

Rural constituents cannot afford the ever-increasing Social Service costs that we subsidize for urban residents. Our residents use mere fractions of the services that our municipalities pay for. The funding formula makes our levies (and thus our subsidies) grow, proportionately, annually and exponentially.

**Recommendation:** Meet with the LRMC so that we can demonstrate to you with actual facts and figures how crippling the funding formula for TBDSSAB is to our member municipalities. This is a real issue that gets worse on an annual basis.

**Recommendation:** Remove the requirement that, in order to change the funding formula for “Area One” District Social Services Administration Board, a “triple majority” vote of our member municipalities is required. This requirement gives the City of Thunder Bay a free pass to continue to have its residents’ services subsidized by rural municipalities.

**Alternate Recommendation:** Allow the TBDSSAB to separate into two entities – one urban, and one rural – so that funding is more appropriately allocated and rural subsidies to urban residents can cease.
This item was introduced to the LRMC Rural Action Plan in January 2019. The LRMC supports private sector development, and does not wish to see the Province (or municipalities) competing with the private sector in the provision of services, including child care services. This is more broadly addressed in Chapter 4.1. If the public sector stepped out of this playing field, the private sector would be able to step up. As it is, however, the public sector pays higher wages to its child care center staff than the private sector can afford, and, not being subject to taxation, competes unfairly. This leads to the private sector “training up” staff, only to see them quit for employment in the public sector.

This is not a sustainable business model.

Privatizing business operations makes sense. Publicly run facilities do not pay taxes – whereas privately run facilities do. Not only does the Province save the operational costs and capital investments required, it gains the tax revenue stream. Money could be designated to subsidize the cost of day care for low income Canadians, resulting in an increase to the work force, which also increases provincial revenue.

There is no question that child care is required in order to allow parents to fully participate in the workforce in Ontario. There is also no question that more child care spaces are needed, however it is not a matter of space, but having adequate staff to accommodate the need. As long as the public service is running childcare services subsidized by tax dollars, no more private sector spaces will be created. This leads to the “vicious circle” of having the government provide (and subsidize) the additional spaces needed – and the cycle just continues.

Simply (and suddenly) closing a day care facility is not recommended. A transition time should be provided to allow those currently working in the facility to determine whether or not they wish to operate it as part of the private sector (or, alternatively, exercise “bumping rights” to obtain alternate Provincial employment). If the current employees do not plan to continue, new operators would need to be found. Whether the facility continues with existing staff, new operators, or a mix of both, the Province should provide support to the facility during the transition phase.

Successor employer rules in the Labour Relations Act may require review and attention to make this transition feasible.

**Recommendation:** Undertake a feasibility study, including a cost-benefit analysis, for the privatizing of publicly run and publicly funded day care facilities.
This item was introduced to the LRMC Rural Action Plan in January 2019. As referenced in Chapter 3.2, the LRMC supports private sector development, and does not wish to see the Province (or municipalities) competing with the private sector in the provision of services. It is true that competition with the private sector is seen more at the municipal government level than at the Provincial level, but there do remain a few areas of concern.

It is a different consideration in some locations where, for whatever reason, the private sector does not step forward to offer necessary services. In those cases, the Province stepping in is justifiable. The circumstances should be monitored, however, to be able to “retreat” when and if a viable private sector response occurs.

As noted, competition with the private sector is observed more frequently in the municipal sector than provincial. Exercise/fitness classes, golf courses, marinas, day care centers, and similar facilities can be provided by the private sector. Again, as they continue to be run by municipalities, and subsidized by the taxpayer, there is less and less incentive for the private sector to step in. On the other hand, there are recreational facilities that will never sustain a private sector business model – and as such – should be provided publicly. The primary example is a swimming pool. Stand-alone, private sector swimming pools cannot make a profit – and as such – there are none. The benefits of swimming for all ages are proven – yet when municipalities look at closing facilities to “save money” – the pools are often the first to go.

**Recommendation:** While the Province should not dictate to municipalities what services they can or should offer, the LRMC suggests that the operations of municipalities that “cry poor” when seeking grants from senior orders of government should be examined in terms of their eligibility for the grants. Are they “wasting” money by subsidizing services that could be more effectively handled by the private sector? If so, perhaps an organizational review (with or without provincial assistance) might be a pre-requisite to grant eligibility.

How wisely a municipality uses the tax dollars at its disposal is an issue that should be of concern to the higher orders of government when providing funding opportunities.
**Alternative Recommendation:** Consider developing practices to discourage unfair private sector competition; such as grant reductions where tax dollars are being used to unfairly fund private sector competition.

**Additional Recommendation:** Recommend that all municipalities who are conducting operational reviews include an examination of this issue.
Distance Learning (Mandatory Internet Courses)

This is a new item in the LRMC Rural Action Plan in this edition. The Province recently announced mandatory courses for high school students that will be offered via the internet.

As noted in Chapter 11.1, there are large areas of Rural Ontario without access to high speed (or any) internet. While LRMC member municipalities have no issues, in general, with courses being offered on line, there simply isn't infrastructure in place yet to make this mandatory.

It isn’t practical, nor is it fair, to require rural students to travel to urban centers for access to broadband.

Recommendation: Delay mandatory web-based education until such time as all Ontarians have access to high speed internet.
When LRMC members met with Ministers at the AMO Conference in August of 2019, we requested a meeting with relevant ministers (Finance, OMAFRA, MMAH and MNDEM) and staff to address the complex issues set out in Chapter 8.1 of this Action Plan. While we were told a meeting in Toronto would be arranged, it has yet to occur. We have written twice now, to respectfully request that this meeting be set up without response. Our members are taking this opportunity to again request that this meeting take place as soon as possible. Chapter 8.1 contains analyses to demonstrate how patently unfair current financial policies are to rural municipalities. It will take more than a 15-minute delegation meeting at the ROMA or OGRA conferences to properly explain the information and to demonstrate the logical conclusions.

**Recommendation:** Honour our request for a meeting, in Toronto, as soon as possible, to fully explore the information set out in Chapter 8.1.

**Part One: Northern Development Portfolio**

6.1 Reducing Red Tape

This issue, which has been an item in the LRMC Rural Action Plan from its inception, is addressed in Chapter 16.1 of this Rural Action Plan. From this Ministry’s perspective, however, Northern Development is indeed hindered by the red tape. We continue to look forward to working with the Province in reducing duplication, inefficiencies and over-regulation, to our mutual benefit.

**Recommendation:** Work with Minister Clark’s task force on reduction of red tape for Municipalities. Consult with small, northern, rural municipalities regarding this task force’s work.

**Part Two: Energy Portfolio**

6.2 Hydro Pole Replacement Cost Equity

The LRMC acknowledges with thanks, a recent meeting between representatives of the Ministry and the Township of Conmee to discuss this issue, which has been in the Rural Action Plan since August 2017.
Hydro One is responsible for the electricity distribution system in rural Ontario, including the jurisdictions of LRMC members. The LRMC was advised by Hydro One that a component of every Hydro bill involves charges for eventual replacement of the distribution system infrastructure. This includes Hydro poles and wires, transformers, fencing, any underground assets, etc.

As the Minister is aware, Hydro poles may be shared with other utility service providers, including telecommunication providers, lighting providers, etc.

It is Hydro One’s policy that, when another utility provider seeks to share a pole, Hydro One will assess the pole, and, if it determines that the pole must be replaced or significantly repaired, the entity seeking to use the pole must bear 100% of that cost, plus all future costs associated with the pole. Not only is this unfair, it is also “double dipping”, since, as pointed out, Hydro One already collects money for infrastructure maintenance and replacement.

It is in the best interests of Hydro One to require the pole to be replaced in every instance, whether or not it is truly required. There is a conflict of interest inherent in the position that Hydro One has taken. There should, at a minimum, be an independent third party to whom the potential service provider can turn for a final determination of the issue.

The federal government has placed significant importance on rural internet availability. Internet service providers need to share Hydro poles in order to expand or enhance telecommunications service to rural Ontarians. Hydro One’s policy of making these agencies pay for pole replacement, which can cost between $2,000 and $5,000 dollars per pole, is a significant barrier to the provision of broadband through fibre-optic cables to rural municipalities. High speed infrastructure in our rural communities is not adequate to meet the needs of our residents. The Province is moving quickly towards stronger reliance on internet, as is evidenced by the new requirements for mandatory online courses for high school students. This move is too fast. Rural students will not be able to access their courses. Even the municipal governments themselves face significant difficulties without fibre-optic capability, due to the Province’s move to completely online submissions for grant applications and reporting requirements. (Please refer to Chapter 11.1 of this Action Plan for more information on telecommunication barriers faced by Rural Ontarians.)

Internet providers must try to recoup these additional, and, we submit, unnecessary costs through the transfer of those expenses to the users. In rural Ontario, the lack of concentrated population means that the service becomes unaffordable for the agency – and thus unavailable to rural residents.

The LRMC is of the opinion that Hydro One is unfairly “double-dipping” in this regard. It already collects infrastructure repair funding from consumers, yet also wishes to force other utility service providers to pay 100% of the costs when the need is established (or alleged). This has created a barrier to growth for our communities, as it proves too costly for private telecom companies to adequately service small rural communities with broadband internet.
**Recommendation:** The Minister should use his influence to require that Hydro One alter its policy in this regard, and that Hydro One fully fund the cost, or, at a minimum fund a significant portion of the cost, of Hydro pole replacement when another service provider requests permission to use the infrastructure.

**Alternate Recommendation:** A regulation could be passed to establish an appeal process for utility companies to access in the event that Hydro One is unfairly requiring them to pay 100% of a pole replacement upgrade.
An extremely important juggling act in our modern day and age is the balance between development and the preservation of the environment. As northern, rural communities, our members value both. We look forward to working with the Province to balance these interests to our mutual benefit by looking at alternative technologies tailored to local community needs, and setting realistic and achievable policies for development.

7.1 Diversion of Waste from Landfill

This has been an item addressed in the LRMC Rural Action Plan since its inception in January 2017. Municipal and provincial authorities are very much aware that our landfills are filling up quickly, and that space for waste is a growing concern. The authorities are also aware that much of the material going into landfills should not be going there, and recyclables make up a large portion of that material.

It is clear that while well-intentioned, provincial recycling programs set up in the last 10 to 15 years have failed. They proved to be administratively unworkable, financially unsustainable and not effective enough to keep recyclables out of landfills. Even now, as Ontario struggles to transition recycling to a “producer pay” model, there are serious delays as consultations bog down and markets for “source material” recyclables shut down. China, for example, announced in January 2018, that it would no longer import recyclable materials – and it has historically been a significant purchaser. We are learning that some countries that purchase our alleged recyclable materials are burning them or landfilling them, defeating the purpose.

Distance to market in Northwestern Ontario is also a considerable barrier. The remoteness of the location, coupled with the relatively smaller volume of material, means that it is uneconomical to recycle most of the products and/or packaging that can be recycled in Southern Ontario.

New recycling solutions are quickly needed. Landfill opening and closing costs are huge burdens for any municipality, particularly the small, so recyclables need to stay out of landfills to extend landfill lifespans.

One definite solution is increasing our utilization of paper, cardboard and wood for packaging and moving away from plastics. Paper, cardboard and wood are all either recyclable or biodegradable, while plastics take lifetimes to breakdown, and many release toxins as they decay. Discarded plastics are polluting waterways and fields, and prove hazardous to wildlife.
First Recommendation: Increase investment in recycling science and technology to expand the types of products and packaging that can be recycled, and to make it economical to do so. Create jobs in Ontario for this research, development, and ultimately, for recycling industries.

Second Recommendation: Support the development of recycling businesses in Northwestern Ontario so that the “distance to market” issue is erased.

Third Recommendation: Incentivize the use of paper, wood and cardboard for commercial packaging and discourage the continued use of plastics.

Fourth Recommendation: Assist the “circular” economy by providing a resource where businesses that require an “input” product that is a “waste” product from another business, can find one another and realistically close the circle.

7.2 Landfill Closure/Post Closure Costs

As briefly referenced above, small rural townships with low population bases cannot fund landfill closure costs. These costs form a significant part of the “infrastructure gap” in Ontario.

Changing engineering practices over the years, together with the consumer-driven “throw-away” economy, mean that landfill life spans have become considerably shorter, which exacerbates the issue.

Recommendation: Make the process to expand an existing landfill site (where there is appropriate space to do so) more affordable for municipalities.

Further Recommendation: Provide leadership and financial resources to assist in landfill management and closure/post-closure costs.

7.3 Technology: Alternatives to Landfill

While the previous government may have had good intentions when it passed the Resource Recovery and Circular Economy Act, 2016 (also known as the “Waste-Free Ontario Act”, S.O. 2016, c. 12, Sched. 1, as amended), even when the legislation is fully implemented (which will take significant time), it will not solve Ontario’s waste management problems. Meanwhile, proven technologies exist that are in use in Europe which create far more diversion from landfill than recycling programs will ever achieve. LRMC member municipalities cannot
understand why the Province will not allow such technologies to be used in Ontario. Compared to the cost of continued, expanding landfilling, these technologies are very affordable. Why do we continue to spend money “chasing after” solutions when they already exist?

**Recommendation:** Explore evidence-based best practices to look at alternative technologies being utilized in other countries.

### 7.4 Conservation Land Tax Incentive Program

Although this program falls under the jurisdiction of the Ministry of Finance (as it arises through the Assessment Act, and is administered by the Ministry of Natural Resources and Forestry, the LRMC member municipalities felt that the Ministry of Environment, Conservation and Parks may be involved due to the “conservation” element of the jurisdiction.

Please refer to Chapter 8.2 of this Action Plan for full details of LRMC concerns regarding this program.

### 7.5 Excess Soil Regulations

The Province received input from LRMC member municipalities when the excess soil regulations (O.Reg. 406/19 under the Environmental Protection Act) were being considered. As passed, however, our concerns do not appear to have been heeded.

We requested that rural municipal ditching operations be exempt from the regulation – and they do not appear to have been exempted.

With respect, our municipalities have neither the in-house resources, nor the financial ability to hire consultants, to monitor soil. If a demonstrated problem had been illustrated to us that this regulation solves – that would be another story – however – municipal ditching operations are not known to cause environmental concerns, yet they appear to be captured. The fact that this relatively short regulation requires a 200+ page rule book demonstrates its complexity for small, northern, rural municipalities.

**Recommendation:** Exempt the ditching operations of small, northern, rural municipalities from the new regulatory requirements.

**Alternate Recommendation:** Provide to small, northern, rural municipalities, at no cost, the tools and (local) training they will require to comply with this new regulation.
When LRMC members met with Ministers at the AMO Conference in August of 2019, we requested a meeting with relevant ministers and staff to address the complex issues set out in Chapter 8.1 below. While we were told a meeting in Toronto would be arranged, it has yet to occur. We have written twice now, to respectfully request that this meeting be set up without response. Our members are taking this opportunity to again request that this meeting take place as soon as possible. Chapter 8.1 contains analyses to demonstrate how patently unfair current financial policies are to rural municipalities. It will take more than a 15-minute delegation meeting at the ROMA or OGRA conferences to properly explain the information and to demonstrate the logical conclusions.

**Recommendation:** Honour our request for a meeting, in Toronto, as soon as possible, to fully explore the information set out in Chapter 8.1.

### 8.1 OMPF & Downloaded Service Costs: Drastic Change is Required Now

For many years the LRMC has been highlighting in this Rural Action Plan the inadequacy of the Ontario Municipal Partnership Fund (“OMPF”) when compared to the levies from third party service provider agencies. While the Provincial Government continues to review the OMPF Program, rural municipalities like those in the LRMC, year after year continue to see third party service provider agency levies exceed OMPF funding. The gap is widening exponentially now that OMPF is reduced annually yet agency levies are increased annually. This trend is not financially sustainable for the LRMC municipalities. Our member municipalities propose that the Province take drastic action now to remedy the situation.

Back in 1998, the (then) Provincial government realigned service responsibility between it and Ontario’s municipalities through an initiative titled “Local Services Realignment” (“LSR”). The Province took $2.5 billion in education tax off of property tax bills and put $3.0 billion onto property tax bills to fund services including OPP policing and certain health and social services. In order to make the transfer “revenue neutral” to all municipalities, a $0.5 billion funding program, called the Community Reinvestment Fund (“CRF”), was established and provided to municipalities.

The CRF was re-titled the OMPF several years ago.

Now, over twenty years later, the entire picture has changed. The purported objective of the OMPF, the CRF’s replacement, is to support municipalities with the greatest need. Responsibilities downloaded in the LSR initiative are now detached from the OMPF. Rather
than being revenue neutral for all, under the current arrangements some municipalities are “revenue positive” while other are “revenue negative,” and the “gap,” the difference between OMPF and the cost of downloaded services, between the winners and losers is widening.

For the fifteen (15) Thunder Bay District municipalities there are schedules included in this chapter which outline the situation with OMPF, third party agency levies, and related aspects, and demonstrate the inequities. The small, urban municipalities on the north shore of Lake Superior are getting far more money from OMPF than they pay in levies, while most of the rural municipalities pay more money in levies than they get from OMPF. This OMPF windfall enables these small urban municipalities to deliver services like golf courses and indoor swimming pools that rural municipalities cannot afford, while at the same time keep their tax rates lower than that of rural municipalities.

We are proposing two options for your consideration to fix this unfair, unsustainable system.

The first calls for the Province to re-assume responsibility for the health and social services downloaded to municipalities in 1998. These provincially-mandated services have nothing to do with the local services provided by municipalities with property tax revenue. Coincidental with this change would be slimming down the OMPF to only the northern and the rural components. These changes would ultimately save both the municipalities and Ontario money since the governments would be responsible for the services they can effectively manage and thereby better control the costs of those services.

The second assumes the Province may want to continue using the OMPF program to provide assistance to municipalities it thinks are needy, so there would be no major overhaul of the program. Under this option, the Province would bill rural municipalities using the same method it applies to Territories Without Municipal Organization (“TWOMOs”) to cover the costs of services including policing, health and social services. This involves a 0.25% tax levy. The third party agencies providing these services would stop billing rural municipalities, and the Province would pay the costs for the services provided to the rural municipalities. Since truly rural municipalities are unable to provide any more services to their constituents than the Province provides to TWOMOs, it stands to reason that the same billing model should be employed.

Demonstration of Inequity of the Current Regime to Rural Municipalities

For years the LRMC has been providing analyses of financial and statistical data clearly demonstrating that the current practices are grossly unfair to rural municipalities. The key factor is the use of weighted assessment and household income as determinants in setting OMPF allocations and third party service agency levies. This works against rural municipalities. The use of the same two determinants for infrastructure grants also penalizes the rural municipalities. On the other hand, the use of these determinants highly favours small urban municipalities.
Using information from the 15 municipalities in the District of Thunder Bay, three sets of data analyses are provided in this Chapter to illustrate the gross unfairness to rural municipalities. Following that is a critique of the use of weighted assessment and household income as the key determinants in setting OMPF allocations and third party service agency levies. Lastly there is a discussion on the lack of fairness for rural municipalities due to the absence of services in their communities although they pay more than the small urban municipalities for those services.

**Schedule A: OMPF for Thunder Bay District Municipalities**

<table>
<thead>
<tr>
<th>Municipality</th>
<th>OMPF for Municipalities in the District of Thunder Bay</th>
<th>$ Change from 2017</th>
<th>% Change from 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2020</td>
<td>2019</td>
<td>2018</td>
</tr>
<tr>
<td>Manitouwadge</td>
<td>1,716,400</td>
<td>1,718,100</td>
<td>1,718,100</td>
</tr>
<tr>
<td>Nipigon</td>
<td>1,049,000</td>
<td>1,049,000</td>
<td>1,049,000</td>
</tr>
<tr>
<td>Red Rock</td>
<td>637,500</td>
<td>639,400</td>
<td>640,600</td>
</tr>
<tr>
<td>Greenstone</td>
<td>2,144,400</td>
<td>2,199,300</td>
<td>2,252,200</td>
</tr>
<tr>
<td>Schreiber</td>
<td>807,300</td>
<td>820,400</td>
<td>833,700</td>
</tr>
<tr>
<td>Marathon</td>
<td>1,721,500</td>
<td>1,787,600</td>
<td>1,853,300</td>
</tr>
<tr>
<td>Terrace Bay</td>
<td>858,800</td>
<td>885,300</td>
<td>908,200</td>
</tr>
<tr>
<td>Gillies</td>
<td>173,800</td>
<td>181,600</td>
<td>190,600</td>
</tr>
<tr>
<td>Thunder Bay</td>
<td>18,811,300</td>
<td>19,321,500</td>
<td>20,478,500</td>
</tr>
<tr>
<td>Conmee</td>
<td>201,200</td>
<td>211,500</td>
<td>225,200</td>
</tr>
<tr>
<td>Shuniah</td>
<td>850,300</td>
<td>872,700</td>
<td>969,600</td>
</tr>
<tr>
<td>Dorion</td>
<td>103,100</td>
<td>112,100</td>
<td>121,500</td>
</tr>
<tr>
<td>Oliver</td>
<td>103,100</td>
<td>112,100</td>
<td>121,500</td>
</tr>
<tr>
<td>Paipoonge</td>
<td>894,900</td>
<td>986,100</td>
<td>1,095,600</td>
</tr>
<tr>
<td>O'Connor</td>
<td>158,900</td>
<td>176,500</td>
<td>196,100</td>
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<tr>
<td>Neebing</td>
<td>538,300</td>
<td>598,100</td>
<td>664,500</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>30,666,700</strong></td>
<td><strong>31,559,200</strong></td>
<td><strong>33,196,700</strong></td>
</tr>
</tbody>
</table>
Schedule A, showing OMPF over the 4-year period 2017 to 2020 has an easily recognizable pattern. Rural municipalities, five of the six LRMC members and Dorion, have experienced the greatest reductions. Thunder Bay, the large urban municipality, is in the middle. The small urban municipalities north of the Lake have seen the lowest reductions. Manitouwadge has even seen an increase while Nipigon has not seen a cut.

Schedule B: OMPF versus Levies & Policing for the Thunder Bay District Municipalities

<table>
<thead>
<tr>
<th></th>
<th>2018 OMPF</th>
<th>2018 Levy</th>
<th>Cops</th>
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<tbody>
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<td>A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>F</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>G</td>
<td></td>
<td></td>
<td>Net Benefit</td>
</tr>
<tr>
<td>(A-F)</td>
<td></td>
<td></td>
<td>minus OMPF</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Thunder Bay</th>
<th>2018 OMPF</th>
<th>2018 Levy</th>
<th>Cops</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nipigon</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marathon</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Terrace Bay</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Red Rock</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gillies</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conlin</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>O'Connor</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Defoe</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Terrace</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lively</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thunder Bay</td>
<td>2018 OMPF</td>
<td>2018 Levy</td>
<td>Cops</td>
</tr>
<tr>
<td>Nipigon</td>
<td>1,469,000</td>
<td>250,000</td>
<td></td>
</tr>
<tr>
<td>Marathon</td>
<td>1,100,000</td>
<td>175,000</td>
<td></td>
</tr>
<tr>
<td>Terrace Bay</td>
<td>782,250</td>
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<tr>
<td>Red Rock</td>
<td>377,000</td>
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<tr>
<td>Gillies</td>
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</tr>
<tr>
<td>Conlin</td>
<td>272,125</td>
<td>52,000</td>
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</tr>
<tr>
<td>O'Connor</td>
<td>340,300</td>
<td>62,000</td>
<td></td>
</tr>
<tr>
<td>Defoe</td>
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<tr>
<td>Terrace</td>
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<td>36,000</td>
<td></td>
</tr>
<tr>
<td>Lively</td>
<td>916,000</td>
<td>160,000</td>
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</table>

<table>
<thead>
<tr>
<th>Manitouwadge</th>
<th>2018 OMPF</th>
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<th>Cops</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
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<td>Terrace Bay</td>
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</tr>
<tr>
<td>Red Rock</td>
<td>377,000</td>
<td>65,000</td>
<td></td>
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<tr>
<td>Gillies</td>
<td>613,115</td>
<td>110,000</td>
<td></td>
</tr>
<tr>
<td>Conlin</td>
<td>272,125</td>
<td>52,000</td>
<td></td>
</tr>
<tr>
<td>O'Connor</td>
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<td>62,000</td>
<td></td>
</tr>
<tr>
<td>Defoe</td>
<td>388,700</td>
<td>71,000</td>
<td></td>
</tr>
<tr>
<td>Terrace</td>
<td>194,460</td>
<td>36,000</td>
<td></td>
</tr>
<tr>
<td>Lively</td>
<td>916,000</td>
<td>160,000</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Manitouwadge</th>
<th>2018 OMPF</th>
<th>2018 Levy</th>
<th>Cops</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nipigon</td>
<td>1,469,000</td>
<td>250,000</td>
<td></td>
</tr>
<tr>
<td>Marathon</td>
<td>1,100,000</td>
<td>175,000</td>
<td></td>
</tr>
<tr>
<td>Terrace Bay</td>
<td>782,250</td>
<td>145,000</td>
<td></td>
</tr>
<tr>
<td>Red Rock</td>
<td>377,000</td>
<td>65,000</td>
<td></td>
</tr>
<tr>
<td>Gillies</td>
<td>613,115</td>
<td>110,000</td>
<td></td>
</tr>
<tr>
<td>Conlin</td>
<td>272,125</td>
<td>52,000</td>
<td></td>
</tr>
<tr>
<td>O'Connor</td>
<td>340,300</td>
<td>62,000</td>
<td></td>
</tr>
<tr>
<td>Defoe</td>
<td>388,700</td>
<td>71,000</td>
<td></td>
</tr>
<tr>
<td>Terrace</td>
<td>194,460</td>
<td>36,000</td>
<td></td>
</tr>
<tr>
<td>Lively</td>
<td>916,000</td>
<td>160,000</td>
<td></td>
</tr>
</tbody>
</table>
Under the service realignment imposed by the Provincial Government in 1998 municipalities were given responsibility for policing and certain health and social services costs, but were given funding from the “Community Reinvestment Fund” to offset the costs. There was not to be any impact on municipal finances; the service realignment was to be “revenue neutral.”

Schedule B illustrates that the current situation is far from being “revenue neutral.” Other than Greenstone, all of the municipalities north of the Lake are enjoying surpluses. Meanwhile, other than Gillies, LRMC municipalities have deficits. The City of Thunder Bay is an anomaly; unlike the other 14 municipalities, the City has its own police force, which accounts for over 63% of its total cost per the Schedule.

There are three versions of Schedule C - Comparison of 2016 Census and 2017 FIR Information for Thunder Bay District Municipalities – shown on the following three pages. Schedule C contains a lot of information on the 15 Thunder Bay District municipalities that demonstrates that the rural municipalities are far worse off than their small urban and urban counterparts. The FIR data is from 2017 while the Census data is from 2016. The data has been sorted by different parameters to highlight certain aspects of the overall situation, thus there are three Versions of Schedule C.

Version A

The OMPF formula uses household income to rank municipalities. Using this statistic is flawed since it does not take into account the number of persons living off that household income. Version A is sorted by per capita income. The table shows small urban municipalities like Schreiber, Manitouwadge, Terrace Bay and Marathon that have high OMPF per household because they have moderate household income have per capita income over the median of the 15 municipalities. On the other hand, rural municipalities like Oliver Paipoonge, O’Connor and Conmee that have low OMPF per household because they have high household income have per capita income under the median of the 15 municipalities.

Version B

Residential and Multi-Residential Taxation per household is a better measure of impact on households than Total Taxation per household, since the latter takes into account taxes paid by businesses that can include taxes paid by large corporations. Rural municipalities like Conmee, Oliver Paipoonge and O’Connor have high rates of taxes per household.

Residential and Multi-Residential Taxation per household as a Percentage of Total Taxation is a telling statistic. The burden on residential taxpayers is higher if there are fewer other taxpayers. Greenstone gets nearly 50% of its tax from TransCanada Pipelines, so it has the lowest Residential and Multi-Residential Taxation per household. LRMC municipalities rely the most on residential taxpayers.
<table>
<thead>
<tr>
<th>OMPF</th>
<th>Sorted By</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Household per HH</td>
</tr>
<tr>
<td>Shuniah</td>
<td>506 2,798</td>
</tr>
<tr>
<td>Neebing</td>
<td>633 2,055</td>
</tr>
<tr>
<td>Schreiber</td>
<td>1,284 1,047</td>
</tr>
<tr>
<td>Manitouwadge</td>
<td>1,379 1,821</td>
</tr>
<tr>
<td>Dorion</td>
<td>769 316</td>
</tr>
<tr>
<td>Terrace Bay</td>
<td>1,056 1,611</td>
</tr>
<tr>
<td>Marathon</td>
<td>1,117 3,273</td>
</tr>
<tr>
<td>Greenstone</td>
<td>766 4,636</td>
</tr>
<tr>
<td>Oliver</td>
<td>512 5,922</td>
</tr>
<tr>
<td>Paipoonge</td>
<td>801 663</td>
</tr>
<tr>
<td>O'Conner</td>
<td>753 819</td>
</tr>
<tr>
<td>Connee</td>
<td>957 410</td>
</tr>
<tr>
<td>Gillies</td>
<td>1,448 885</td>
</tr>
<tr>
<td>Red Rock</td>
<td>442 107,909</td>
</tr>
<tr>
<td>Thunder Bay</td>
<td>1,305 1,642</td>
</tr>
</tbody>
</table>

**Total:**

<p>| 135,817 | 65,648 |</p>
<table>
<thead>
<tr>
<th>Community</th>
<th>Population</th>
<th>Households</th>
<th>Median Gross Income per Household</th>
<th>Median Gross Income per Person</th>
<th>Res &amp; Multi-R. Tax per Household</th>
<th>Taxation % of Total Tax per HH</th>
<th>Comp. Exp. Per HH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greenstone</td>
<td>766</td>
<td>2,930</td>
<td>1.58</td>
<td>63,488</td>
<td>40,182</td>
<td>4,771</td>
<td>1.332</td>
</tr>
<tr>
<td>Dorian</td>
<td>769</td>
<td>1,741</td>
<td>1.82</td>
<td>79,360</td>
<td>43,604</td>
<td>2,857</td>
<td>1.795</td>
</tr>
<tr>
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<td>1,117</td>
<td>1,643</td>
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<td>82,816</td>
<td>41,616</td>
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<td>1.802</td>
</tr>
<tr>
<td>Terrace Bay</td>
<td>1,056</td>
<td>1,893</td>
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<td>75,328</td>
<td>41,849</td>
<td>3,902</td>
<td>1.804</td>
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<tr>
<td>Gillies</td>
<td>957</td>
<td>214</td>
<td>1.92</td>
<td>66,944</td>
<td>34,867</td>
<td>1,875</td>
<td>1.813</td>
</tr>
<tr>
<td>Shuniah</td>
<td>506</td>
<td>2,136</td>
<td>1.31</td>
<td>96,989</td>
<td>79,999</td>
<td>2,017</td>
<td>1.867</td>
</tr>
<tr>
<td>Schreiber</td>
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<td>1,047</td>
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<td>70,528</td>
<td>45,210</td>
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<td>2.045</td>
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<td>Neebing</td>
<td>633</td>
<td>1,166</td>
<td>1.78</td>
<td>87,424</td>
<td>49,673</td>
<td>2,136</td>
<td>2.077</td>
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<tr>
<td>Naigon</td>
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<td>834</td>
<td>2.04</td>
<td>57,062</td>
<td>27,972</td>
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<tr>
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<td>2.281</td>
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<tr>
<td>ConnecI</td>
<td>753</td>
<td>327</td>
<td>2.50</td>
<td>89,856</td>
<td>35,942</td>
<td>2,369</td>
<td>2.316</td>
</tr>
<tr>
<td>Oliver Peipoine</td>
<td>512</td>
<td>2,379</td>
<td>2.49</td>
<td>96,981</td>
<td>38,948</td>
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<td>2.405</td>
</tr>
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<td>Red Rock</td>
<td>1,448</td>
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<td>3,351</td>
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</tr>
<tr>
<td>O'Connor</td>
<td>801</td>
<td>272</td>
<td>2.44</td>
<td>89,856</td>
<td>36,826</td>
<td>2,571</td>
<td>2.512</td>
</tr>
<tr>
<td>Total</td>
<td>13,817</td>
<td>65,648</td>
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</table>
## Schedule C: Comparison of 2016 Census and 2017 FIR Information for Thunder Bay District Municipalities

### Version C

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<tr>
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<th></th>
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<tbody>
<tr>
<td>Shuniah</td>
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<td>2,798</td>
<td>2,130</td>
<td>1.31</td>
<td>96,939</td>
<td>73,999</td>
<td>2,017</td>
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<td>92.55%</td>
</tr>
<tr>
<td>Gillies</td>
<td>957</td>
<td>410</td>
<td>214</td>
<td>1.92</td>
<td>66,944</td>
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<td>1,875</td>
<td>1,813</td>
<td>96.67%</td>
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<td>2,055</td>
<td>1,166</td>
<td>1.76</td>
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<td>49,673</td>
<td>2,116</td>
<td>2,077</td>
<td>98.15%</td>
</tr>
<tr>
<td>Comme</td>
<td>753</td>
<td>819</td>
<td>327</td>
<td>2.50</td>
<td>85,856</td>
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<td>2,369</td>
<td>2,326</td>
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<td>96,981</td>
<td>38,948</td>
<td>2,827</td>
<td>2,405</td>
<td>85.08%</td>
</tr>
<tr>
<td>O'Connor</td>
<td>801</td>
<td>663</td>
<td>272</td>
<td>2.44</td>
<td>85,856</td>
<td>36,836</td>
<td>2,571</td>
<td>2,512</td>
<td>97.74%</td>
</tr>
<tr>
<td>Dorion</td>
<td>769</td>
<td>316</td>
<td>174</td>
<td>1.82</td>
<td>79,360</td>
<td>43,604</td>
<td>2,857</td>
<td>1,795</td>
<td>62.84%</td>
</tr>
<tr>
<td>Manitouwadge</td>
<td>1,379</td>
<td>1,821</td>
<td>1,214</td>
<td>1.50</td>
<td>66,048</td>
<td>44,032</td>
<td>2,974</td>
<td>2,211</td>
<td>74.33%</td>
</tr>
<tr>
<td>Nipigon</td>
<td>1,305</td>
<td>1,642</td>
<td>804</td>
<td>2.04</td>
<td>57,062</td>
<td>27,972</td>
<td>2,888</td>
<td>2,132</td>
<td>73.82%</td>
</tr>
<tr>
<td>Marathon</td>
<td>1,117</td>
<td>3,273</td>
<td>1,643</td>
<td>1.99</td>
<td>82,816</td>
<td>41,616</td>
<td>2,917</td>
<td>1,802</td>
<td>61.55%</td>
</tr>
<tr>
<td>Schreiber</td>
<td>1,264</td>
<td>1,047</td>
<td>670</td>
<td>1.56</td>
<td>70,528</td>
<td>45,110</td>
<td>2,664</td>
<td>2,045</td>
<td>76.19%</td>
</tr>
<tr>
<td>Red Rock</td>
<td>1,448</td>
<td>895</td>
<td>444</td>
<td>2.02</td>
<td>69,376</td>
<td>34,345</td>
<td>3,351</td>
<td>2,465</td>
<td>73.55%</td>
</tr>
<tr>
<td>Terrace Bay</td>
<td>1,056</td>
<td>1,611</td>
<td>893</td>
<td>1.80</td>
<td>75,328</td>
<td>41,849</td>
<td>3,502</td>
<td>1,804</td>
<td>51.51%</td>
</tr>
<tr>
<td>Grenstone</td>
<td>766</td>
<td>4,636</td>
<td>2,930</td>
<td>1.58</td>
<td>63,488</td>
<td>40,182</td>
<td>4,771</td>
<td>1,332</td>
<td>27.92%</td>
</tr>
<tr>
<td>Thunder Bay</td>
<td>442</td>
<td>107,909</td>
<td>50,388</td>
<td>2.14</td>
<td>66,163</td>
<td>30,917</td>
<td>3,106</td>
<td>2,281</td>
<td>73.44%</td>
</tr>
</tbody>
</table>

| Total          | 135,817                 | 65,648                      |                         |                       |                           |                        |             |             |             |
Total Expenses per household simply means how much a municipality spends. LRMC municipalities are the lowest spenders, whereas municipalities north of the Lake, amongst the highest OMPF recipients, are bigger spenders. The City of Thunder Bay is an anomaly – as a large urban municipality, it is mandated to provide additional services, such as long-term care homes, that increase its spending.

Compensation Expenses per household correlates fairly well with Total Expenses per household. LRMC municipalities are the lowest spenders. The small urban municipalities have more financial resources than LRMC municipalities to utilize, since they receive more OMPF funding, yet pay lower levies to third party service providers. Manitouwadge operates a golf course and Marathon has an indoor swimming pool. Spending more on employees can generate advantages. Terrace Bay employs community service personnel who have been very successful getting large government grants to do various community redevelopment projects over the years.

Weighted assessment and household income are poor determinants of financial capacity. The use of weighted assessment as a determinant is, in our respectful submission, a major flaw of the current system. In the OMPF formula high assessment is viewed as an advantage to a municipality, since it supposedly indicates more tax revenue potential. We need to point out that high assessment does not mean property owners are able to pay more municipal tax. It does not distinguish between residential and other, e.g., commercial, industrial, etc., assessment. Taxes generated by the latter assessment types do not come out of the after-tax incomes of municipal residents, but out of the pre-tax incomes of businesses and organizations. Again, truly rural municipalities rely primarily on the residential tax base.

We also wish to highlight the significant negative consequences of high assessment. One is the higher cost of housing to residents. LRMC residents pay higher mortgage payments, residential accommodation rents and property insurance, resulting in less available cash flow to fund other household costs, like municipal taxes. Another significant disadvantage to high assessment for a municipality is increased levies from third party service providers, who calculate levy allocations based on assessment. Two organizations using assessment to calculate levies charged to LRMC municipalities are the Thunder Bay District Social Services Board and Superior North Emergency Management Services. In both of these examples, services are provided to people, not to properties. LRMC taxpayers pay far more for social services and ambulance services than their counterparts in the small urban municipalities due to the weighted assessment factor.

Household income is not as meaningful as per capita income for measuring the financial capacity of municipal residents. Household income is an inferior measure since it does not take into account the number of people in a household dependent on that income. As shown on Schedule C, three LRMC municipalities, Oliver Paipoonge, Conmee and O’Connor, have the highest numbers of persons per household. People, not the properties, live on the
household income. The more people there are in the house, the less money the residential household has, overall, for living expenses such as property taxes.

An important factor to consider is the presence of service offices and/or bases in the municipalities. There are three major benefits to having services facilities in a municipality. The first is easy access for residents. The second is property taxes, water and sewer charges and other revenues for the host municipality. The third is employment and business activity in the host community.

The small urban municipalities in the Thunder Bay District have some offices and facilities. The City of Thunder Bay has significantly more offices and facilities. Truly rural municipalities, like the LRMC member municipalities and TWOMOs “next door”, have virtually none of these. Unlike the other municipalities in the Thunder Bay District, LRMC municipalities pay high levies without any of the benefits generated by local presence of services. It’s easy to get a flu shot at the health unit when the clinic is in the neighborhood and wait time for an ambulance is reasonable when the base is nearby. Just like residents of neighboring TWOMOs, residents of LRMC municipalities have to drive to Thunder Bay to get a flu shot at the health unit and wait longer for an ambulance to arrive. If an individual living in an LRMC municipality or a nearby TWOMO needs social housing, it’s only available in Thunder Bay. The difference is the residents in the LRMC member municipalities pay far more to the service provider for the housing it operates in the City. TWOMO residents do not.

Two Options to Generate Financial Sustainability for Rural Municipalities

As noted above, we are suggesting two alternative options to deal with the situation now in order to avoid a deep financial crisis in the future. The first is preferable since it addresses the root causes of the problem. The second is less complicated to achieve but will nonetheless provide much needed relief.

Option 1: Service Realignment and OMPF Reform

It has been over 20 years now since the drastic service realignment was implemented by the Province. The LRMC respectfully submits that the realignment has proven to be a huge mistake. The realignment was ostensibly undertaken to provide better management and control of the downloaded services, e.g., policing, housing, child care, welfare, ambulance services and public health, but that has clearly not happened. Provincial legislation and regulation dictates the delivery of these services; local governments have no meaningful role in service delivery. The only tangible results of the realignment have been municipal funding for these services and preoccupation and frustration of municipalities with the rising costs of these services, both to the detriment of traditional core local services, e.g., roads, waste disposal, recreation, fire protection and prevention, planning, water and sewer, etc.

The downloaded services, specifically health and social services, are primarily human services. Per the Canadian Constitution they are the responsibilities of provincial and territorial
governments and are supposed to be available and accessible to Canadians regardless of where they live. Ontarians are eligible for these services because they live in Ontario and not because they live in a particular municipality. Ontario should have responsibility for the management and costs of these services that are not local in nature. There is no good reason to have municipal responsibility for ambulance services while there is none for hospital services or to have municipal responsibility for child care services while there is none for child welfare services.

It would be very sensible to return to the time when municipal councils dealt with the traditional local areas they can manage and control. Local governments are best positioned to understand things like local road networks or waste disposal systems, and have authority to make good decisions to manage them properly, using property taxpayer money wisely. Council members on social and health service boards are essentially powerless. These services are highly legislated and regulated by Ontario, and the boards have little discretion in managing the services. It is important to retain member municipality Council members on these boards because of the required accountability associated with the municipal financial contributions to the services. Having locals on these service boards is important since it adds a local perspective that the service managers can consider and try to take into account in delivering the services within the provincial service parameters. If it were the Province, rather than the municipalities funding the agency, the importance of having council members on the boards disappears. Local voices can be provided by community members interested in the services, in the same way that occurs for the boards of service entities like hospitals, child welfare agencies, developmental service agencies, etc. People like them could take the seats of municipal council members that currently sit on the boards of ambulance, welfare, child care and other services.

Returning the downloaded health and social service costs to Ontario would also improve overall tax fairness. A widely accepted objective of tax policy is to have wealthier people pay more and poorer people pay less. The objective works as an income redistribution measure to counteract income and wealth inequality. It is widely accepted that income tax, the Province’s main revenue tool, is far better at meeting the objective than is property tax, the main revenue tool for municipalities. The gap between the highest incomes and the lowest incomes is far greater than the gap between the highest residential assessments and the lowest residential assessments. Higher income tax rates are applied to higher levels of income whereas the same tax rate is applied to a property regardless of its assessment. Because of these factors a greater portion of income tax is paid by wealthier people than the portion of property tax paid by wealthier people. While some poor people do not pay any income tax, it is highly likely they are paying property tax since most people own or rent a dwelling.

Seniors with only CPP and OAS income, living in owned dwellings illustrate the matter. While these people pay little to no income tax, they must pay property tax. Although they are eligible for the Ontario Energy and Property Tax Credits, they are still out of pocket. These situations exist because property tax is a blunt instrument that affects wealthy and poor people alike,
while income tax does not. The LRMC submits that minimizing the property tax burden in terms of “people services” is good overall tax policy.

These changes would ultimately save both the municipalities and Ontario money since the governments would be responsible for the services they can effectively manage and thereby better control the costs of those services. Recent developments with the cost sharing formula for public health illustrate this point. Ontario decided to decrease its costs by reducing its contribution from 75% to 70% rather than making system changes to reduce costs. On the other hand, Ontario joined other provinces recently imploring the Federal Government to increase its annual health transfers from 3% to 5%. Restructuring and reforming the health care system to make it financially sustainable is the task at hand – downloading costs to municipal property taxpayers is no solution.

While under this option municipalities would retain responsibility for police services, we submit that the Province should reinstitute a policing grant. The traditional role of police, primarily crime prevention with law enforcement as required, has changed dramatically in recent times, especially in Northwestern Ontario. Police officers now find themselves frequently acting as social and health workers. Problems like mental health illness and addictions, homelessness, income inequality, and the breakdown of the family unit are generating a large portion of the police workload. Lack of efficient and effective health and social services to address these matters means emergency response workers are filling in the gaps. Police deal with crime undertaken by perpetrators looking for resources to feed addictions. Due to the legacy of the Indian Act and residential schools, police in Northwestern Ontario are dealing with a multitude of serious issues affecting certain portions of the Indigenous population. The Federal Government needs to acknowledge its responsibility for the situation and provide resources to deal with it. Given these responsibilities of modern policing, a police grant is warranted. How much police grants should be, i.e., what percentage of total policing costs, would need to be determined.

Under this Option we are proposing that only the northern and the rural components of the OMPF should be retained. The northern grant is justifiable given the higher cost environment and other conditions in the north. With regard to the rural grant, the definition of a rural and small community in the OMPF guidelines is inappropriate. On top of Statistics Canada’s definition of a rural community you add any municipality with a population under 10,000 to come up with your Rural and Small Community Measure (“RSCM”). While small, some municipalities with under 10,000 are more urban rather than rural. True rural communities, like the six LRMC municipalities, have distinct disadvantages, e.g., large road networks, little commercial or industrial tax base, lack of communal water and sewer services, high fire insurance rates, poor access to hi-speed (or any) Internet, lack of natural gas service, no public transit, high electricity delivery rates, no home mail delivery, etc. These disadvantages are not present in many communities under 10,000 if they are urban, and these urban small communities should not be entitled to a rural community grant.
Option 2: Alternative Billing for Rural Municipalities

Currently, the Provincial Government applies a 0.25% tax levy to properties in TWOMOs, which is intended to cover the costs of services including policing, health and social services. We respectfully submit that truly rural municipalities are able to offer very little to their constituents beyond what residents of TWOMOs receive, and should be dealt with in the same manner. Under this model, the Province would pay the costs for police, ambulance, public health, housing, Ontario Works and child care services, by providing the money directly to the service providers, such as the Thunder Bay District Social Service Administration Board, and would apply the 0.25% tax to properties in the LRMC municipalities.

LRMC municipalities as rural municipalities would therefore pay the same amounts as TWOMOs for these services. This is justifiable. We note the following similarities between rural municipalities and TWOMOs:

**Communal Water and Sewer**: There are no services. Residents have to pay themselves for well for water and a septic system for sewage, which typically cost $10,000 to $15,000 each. Unlike urban municipalities with communal systems, there are no grants from senior governments for private water and sewer systems.

**Natural Gas**: This fuel is generally lacking. Residents have to rely on high cost alternatives such as oil, propane, wood and electricity.

**High Speed Internet**: This critical component of modern life is usually unavailable, while it is widespread in even small urban municipalities.

**Health and Social Services**: They are generally absent. Residents need to travel to urban centres for these services.

**Public Transit**: There is none. Unless you have a private vehicle, you have no transportation.

**Commercial/Industrial Tax Base**: This is very limited. Residents bear the brunt of property taxes.

**Road Network**: They are extensive in these low density areas. Residents carry the costs.

Rural municipalities and TWOMOs share these disadvantages. A major item they do not share is charges from service provider organizations for police, ambulance, public health, housing, Ontario Works and childcare services. Rural municipalities pay for these services while TWOMOs do not. It follows that rural municipalities are subsidizing the services provided in the urban municipalities for both urban residents and TWOMO residents. Rural municipalities
are ready to pay their fair share, and the 0.25% tax, which is considered fair for TWOMOs, should be equally a fair share for truly rural municipalities.

Under this Option the Province would continue with the current OMPF system, which is supposed to support those with the greatest needs.

Conclusion

The current regime for allocating OMPF and levies is grossly unfair for rural municipalities like those in the LRMC. The trend of diminishing OMPF grants and increasing downloaded service costs is unsustainable. The LRMC municipalities are requesting drastic change to correct the imbalance.

**First Recommendation:** Reform the OMPF and re-align service provision as outlined in “Option One” of this Chapter.

**Alternate Recommendation:** Institute a new billing model for “people” services provided by third party agencies, as outlined in “Option Two” of this Chapter.

8.2 Conservation Land Tax Incentive Program

This has been an item in the LRMC Rural Action Plan since January 2017. The conservation land tax incentive program (“CLTIP”) falls under the authority of the Ministry of Finance, as it arises through the Assessment Act (R.S.O. 1990, c. A.31, as amended). It is administered by the Ministry of Natural Resources and Forestry, in that the MNRF decides whether or not a particular property meets the eligibility requirements to become property tax exempt under the program.

Both the Ministry of Finance and the Ministry of Natural Resources and Forestry have been approached in the past by the LRMC, and by other Ontario municipalities who are impacted by this program, to voice our concerns. No resolution has to date been offered, and no explanation provided as to why these real issues are falling on deaf ears. Municipalities across Ontario are struggling with the requirement to absorb 100% of the cost of this provincial program which is based on Federally-made promises.

With Canada coming closer and closer to its international treaty deadline to convert 17% of Canadian land into conservation reserves, and not being near that target yet, our members fear that they will be required to fund the rest of Canada’s obligations – or at least a significant part of them. Recently, the issues associated with ecosystem conservation have been in the
news again. There is talk that 17% is not sufficient, and that Canada needs to conserve 50% of its land for ecosystems.

The residential tax rate in our municipalities exceeds the rates in urban centres by a significant margin. While we recognize that many things factor into this, the Province needs to understand that it is becoming unaffordable for people to live in Rural Ontario. Urban-centric policies and programs like the CLTIP, are being implemented at the expense of the rural residents of Ontario. Our ratepayers simply cannot afford to keep bearing the burden. Rural Ontario is an essential part of Ontario’s life blood.

Our member municipalities are not “anti-conservation”. We enjoy breathtaking natural scenery in our communities, and it is appreciated by everyone. Our point is that municipalities are absorbing all of the costs associated with these conservation programs – which are driven by higher orders of government – and that is not fair.

Municipalities are not permitted to participate in the process through which landowners apply to have their property accepted into the CLTIP. LRMC member municipalities have seen some questionable (from a “conservation” perspective) properties qualify.

**Recommendation:** Set aside some of the vast acreages owned by the Province as Conservation reserve in order to assist Canada in meeting its treaty objectives without placing the financial burden for doing so on municipalities.

**Additional Recommendation:** Allow Municipalities to place a limit on the percentage of their total acreage that can be placed into the CLTIP program – and focus the program on the “best” possible conservation land.

8.3 **Funding for Rural Volunteer Fire and First Response Programs**

All six LRMC member municipalities depend on volunteers to provide fire and first response services to our residents and businesses. As the Minister is aware, these services are becoming increasingly costly to provide due to the significant training, equipment and facilities required. Given their unique and challenging circumstances, northern rural municipalities in particular are finding it extremely difficult to provide adequate fire and first response services.

A considerable operational issue for fire and first response services in rural municipalities is the low density of population over large geographical (and often rugged) areas. Provincial standards require properly resourced responses to emergencies within short time periods. Property insurers also require reasonably prompt and adequately-resourced responses as a pre-requisite to offering affordable fire insurance to private property owners. In order to provide such services in their vast territories, rural municipalities need to have more fire stations, more
firefighting equipment (including pumps, tankers and rescue vehicles), and more firefighters and first responders than urban municipalities with comparable populations. Data from the rural LRMC municipalities demonstrates this reality. Although it has a population of only 5,922 people, since its area is 351 square kilometers, the Municipality of Oliver Paipoonge has six fire stations with six pumpers, four tankers, eight rescue vehicles and nearly sixty volunteer firefighters and first responders. Likewise, the Municipality of Neebing, with a population of 2050, covers 877 square kilometers, and has five fire stations, three pumpers, two tankers, two rescue vehicles, and struggles to maintain a 30-person volunteer team. A more compact urban municipality with a small population will have one fire station with far fewer vehicles and personnel.

Training firefighters and first responders is costly, and there are three major reasons why the cost issue is greater for rural municipalities, like the six LRMC members, than it is for urban municipalities. As noted above, rural municipalities relying on volunteers need more personnel to provide adequate coverage, so training costs are correspondingly magnified. The second issue is the lack of availability of basic training for new recruits to volunteer fire and first responder services. In 2001, Ontario established the “Pre-Service Education and Firefighter Training Program,” which is the basic training any firefighter requires. Community colleges like the Confederation College in Thunder Bay offer this program and tuition is approximately $10,000. In larger municipalities, job candidates compete to get hired into permanent, full time, well-compensated positions, and urban fire departments won’t even consider applicants who have not completed the Pre-Service Education and Firefighter Training Program. Understandably, no one is competing to get hired as a casual fire or first responder on a volunteer fire department where an individual may earn a few hundred honoraria dollars in a year, and no one is going to pay $10,000 in tuition for basic fire training to join a volunteer service. It is up to the rural municipalities to invest the time and money to get raw recruits the training they need to provide the service. (When college-trained individuals do join the volunteer forces in their communities, the combination of the training and volunteer experience make them prime candidates to be “hired away” by neighbouring urban municipalities with full time, professional forces.) The third major cost factor is lack of training options in the north for rural municipalities. The Ontario Fire College at one time had a training program facility in Thunder Bay that LRMC municipalities could access. Unfortunately, it was closed many years ago. To fill the training vacuum, LRMC municipalities have had to resort to spending the money to set up their own training programs and facilities. For example, the Municipality of Oliver Paipoonge, with its own resources, built a training facility at one of its fire stations and built a live fire training prop using sea cans at one of its landfills. Other LRMC member municipalities have made similar investments.

Fire fighting / prevention infrastructure is also costly. A new fire pumper truck cannot be purchased for less than $500,000. Pricey equipment like that is beyond the capacity of most rural municipalities. Even used pumpers, tankers and rescue vehicles can be prohibitively expensive. Again, needing several units to provide prompt and adequate responses is a further burden for low-population density, rural municipalities. Despite the fact that these vehicles see relatively low annual mileage, insurers require fire-fighting equipment to remain “new” in order
to provide affordable coverage (or any coverage) for constituents of the municipality. This forces municipalities to replace equipment sooner than is necessary, impacting optimum asset management policies.

Fire stations are other significant assets needed to provide service, and rural municipalities require more of them than their urban counterparts. Several fire stations of LRMC municipalities are well past their expiration dates. They are also under-sized, minimally heated, and provide few comforts for tired fire-fighters after battling a winter fire in sub-zero temperatures. Basically “glorified garages”, they function to house equipment, and very little else.

Under mutual aid agreements, our volunteers serve not only their “home” communities, but their neighbours’ as well. If an emergency occurs, it is “all hands-on deck”. Personnel and equipment leave their jurisdictions to travel, sometimes significant distances, to assist another municipality. While they are away, their “home” communities are disadvantaged by a reduction in service. Should another emergency occur “at home”, the community would be hard-pressed to respond.

Funding for fire vehicles, equipment or stations have not, to date, been eligible projects for the infrastructure fund grant programs of provincial and federal governments. This leaves rural municipalities on their own trying to rehabilitate or replace their fire protection and prevention assets.

Given the importance of fire prevention and protection to our communities, and the continued denial of funding assistance for the necessary infrastructure, imagine the frustration of seeing a neighbouring territory without municipal organization receive brand new trucks, protective gear and other necessities at 100% Provincial expense.

It goes without saying that a volunteer fire and first responder service is critical for the health and safety of a rural Ontario municipality. With significant weather events becoming more frequent due to climate change, first responders are being called out more and more often, and wildfire activity across the country is increasing.

**First Recommendation:** Provide financial assistance and/or programs and facilities in the north to help rural municipalities meet their training requirements.

**Second Recommendation:** Recognize municipal fire services as critical infrastructure for the purposes of qualifying for infrastructure grant programs.

**Third Recommendation:** Encourage the Federal government to re-instate the JEPP (Joint Emergency Preparedness Program) grant program that was cancelled several years ago. It provided much-needed financial assistance for fire infrastructure.
**Fourth Recommendation:** Include funding for Fire Department infrastructure in the Provincial government’s “infrastructure strategy”, recognizing all of: equipment and buildings (construction, renovation and maintenance), training and operating requirements.

### 8.4 Provincial Gas Tax

This has been an item in the LRMC Rural Action plan since January 2017. At present, rural municipalities are ineligible to receive any portion of provincial gas tax, because they do not operate municipal transit systems. It is clearly not possible to efficiently and effectively run a transit system in a rural municipality. Rural drivers of private vehicles must pay the provincial gas tax, which is then used to subsidize urban transit systems. This is patently unfair.

The rationale for this requirement is that gas tax dollars are directed to programs that reduce greenhouse gas (“GHG”) emissions, such as mass transit. There are many rural programs that serve to reduce greenhouse gas emissions; however, those programs are not recognized. A share of the provincial gas tax could be used for even more GHG reduction projects. It is inequitable that rural taxpayers cannot benefit from the provincial gas tax the way that urban taxpayers do.

Rural municipalities must keep their roads and bridges in operational order, and a stream of reliable funding is critical for that purpose. In essence, the roads and bridges of rural municipalities are their "transit systems”.

Excluding rural municipalities from the benefits of Provincial Gas Tax funding is inequitable. These funds are required for transportation infrastructure and associated maintenance equipment.

**Recommendation:** Expand the Provincial Gas Tax program beyond municipalities who operate transit systems. Provide Provincial Gas Tax money to rural municipalities.

### 8.5 Asset Management Planning

This has been an item in the LRMC Rural Action plan since January 2017. Since 2012, the Province has made it a requirement for municipalities in Ontario to have “asset management plans”. Every year sees more changes and more requirements relating to asset management plans, referred to as “AMP”s. The ever-increasing obligation on municipalities in this regard is a huge workload burden, particularly for small, rural communities such as the LRMC members.
The Ministry of Infrastructure posted a draft regulation in June of 2018, imposing more requirements on municipalities relating to their AMPs. The Regulation was passed that December, with very few changes. While the LRMC municipalities appreciate that some of the timelines were extended, and some reporting and preparation obligations removed (including the expensive requirement to have an AMP reviewed by a professional engineer), the fact remains that the regulation creates obligations that are significant “overkill” for small, rural municipalities.

All of the LRMC municipalities recognize the value of an AMP. These plans assist with important financial decision-making and help the Council, the staff and the public to understand and plan to reduce any “infrastructure gap” that may exist. Unfortunately, as more and more obligations are imposed, the costs to comply are adding up. Meanwhile, OMPF payments to LRMC members have decreased in both 2018 and 2019, and eligibility for a large number of other available grant funding programs remains elusive. (See Chapter 8.1 of this Action Plan for further information in that regard.)

The AMP plan, strategy and program requirements have become a set of handcuffs rather than an important financial planning tool.

Many of the activities being mandated have relevance for large, urban municipalities, but are not relevant or applicable, in many cases, for small, northern and rural municipalities like LRMC members.

Further, the obligations imposed under Asset Management regulations duplicate responsibilities under Public Sector Accounting Board obligations, but the duplication is just different enough to require two separate processes and two separate reports, both of which are onerous and time consuming to complete. The two areas of financial management conflict in other regards as well. For example, Ontario Regulation 284/09 allows municipalities to exclude amortization costs from annual budgeting, yet the Asset Management regulations require budgets to conform to Asset Management Plans and indicate how depreciating capital assets will be replaced.

While funding provided by the Province can be used to fund consultants, studies and software purchases, the LRMC respectfully submits that these dollars would have a far better value to the public if they were spent on infrastructure needs directly. Professional consultants and complex software solutions should not be necessary for small, rural municipalities to understand and implement basic asset management.

A basic set of standards for asset management planning is appropriate, however, the rules need to be flexible enough to recognize the reality of rural municipal government and to reduce the costs associated with over-planning and over-studying.

Urban municipalities have whole departments staffed with people who work on nothing but asset management. Rural municipalities cannot afford to do that.
It is the understanding of the LRMC members that Provincial Ministry requirements for AMPs and programs are far less onerous and allow for much more flexibility than those for municipalities. It is unfair to force small rural municipalities to undertake more work than is undertaken in Provincial ministries.

Another issue is that the former Ontario government had begun to tie grant eligibility to the progress of one’s (over-complex and over-detailed) asset management plan. Well-deserving small, rural and northern municipalities are excluded from consideration for infrastructure grant funding in this regard. This is patently unfair. The status of one’s paperwork does not correlate to the need for asset maintenance and replenishment.

**First Recommendation:** Reduce the number of mandatory requirements associated with creation and ongoing maintenance of asset management plans and programs for small, rural and northern municipalities. The plan needs to be a tool for the local council to utilize, without requiring expensive consulting for every decision that needs to be made through the tool.

**Second Recommendation:** Provide templates, tools, guidelines, formulae and formats for use in asset management plans and programs to avoid the necessity for municipalities to waste significant dollars on new software products and/or consulting fees.

**Third Recommendation:** Cease the practice of eliminating eligibility for infrastructure grant funding on the basis of the status of a municipal asset management plan.
This has been an item in the LRMC Rural Action plan since January 2019. This issue involves an overlap of jurisdictions between the Ministry of the Solicitor General, and the Ministry of Health. As Ministers of Health, you are charged with, among other things, efficient and effective land ambulance and health care facility operations for Ontarians.

This issue is fleshed out under Chapter 14.3.

9.1 Care for Intoxicated Persons

9.2 Consultations on Emergency Medical Services

The LRMC member municipalities were pleased to have been able to participate in a consultation session on emergency medical services, held in Thunder Bay on November 28, 2019. Holding consultation sessions in Northwestern Ontario for these types of issues is essential, and members are grateful the Province is recognizing this.

Once managed and operated by the Province, emergency medical services were historically downloaded to municipalities, with a cost-sharing arrangement entered between the municipal and provincial orders of government. Costs to operate emergency medical services have been increasing based on a variety of factors, many of which are outside of governmental control. The population is aging, and medical issues/accidents are occurring with greater frequency. At the same time, there are mental health and addiction issues throughout the Province that involve more and more responses from EMS providers. Responding to these calls often means a lengthy wait at an emergency room, tying up these services even more, and, basically, paying paramedics (and sometimes police officers) to “wait around” for the transported patient to be seen by an attending physician. There are problems with the dispatch of responses to emergency calls. More often than not, more responders (in terms of both sheer numbers as well as the type of responding party) are called to a scene than are required to deal with the issue at hand. Further, many calls involve situations that do not turn out to be actual emergencies.

Bottleneck overcrowding at hospitals also causes “wait around” issues for paramedics delivering patients. It has been widely suggested that a large reason for the overcrowding is a
lack of long-term care facilities for patients taking up beds in hospitals while waiting for a bed in a long-term care facility.

Member municipalities feel strongly that EMS is a health service, and its cost should not form any part of a municipal property tax bill. Regardless, however, of which order of government funds the service, much needs to be done to bring costs to a sustainable level.

**First Recommendation:** Refer to the recommendation in Chapter 14.3 relating to care for intoxicated persons, as described in Chapter 9.1 above.

**Second Recommendation:** Address the province-wide issue associated with increases to mental health and addiction problems with greater supports. This has been done in other jurisdictions with some positive results. Consult with other jurisdictions for best practices and lessons learned. Money spent in this regard should result in savings in EMS and other emergency response costs.

**Third Recommendation:** Re-examine and refine emergency response dispatch services so that fewer responders are sent to calls unnecessarily.

**Fourth Recommendation:** Enable and encourage the creation of private-sector service providers to transport patients in non-emergency situations (such as transporting a dialysis patient from Geraldton to Thunder Bay, as one example). This could start with something as simple as a system to re-imburse friends or family members for mileage and associated expenses for undertaking the task on behalf of the patient.

### 9.3 Consultations on Public Health Modernization

The LRMC member municipalities were pleased to have been able to participate in a consultation session on public health modernization, held in Thunder Bay on November 28, 2019. As noted in chapter 7.2 above, holding consultation sessions in Northwestern Ontario for these types of issues is essential, and members are grateful the Province is recognizing this.

As our members understand it, the Province has put its originally-announced plan to decrease the number of local boards of health and to revamp or replace the local health integration network system “on hold” while these consultations take place, province-wide. As a general rule, the LRMC member municipalities support “doing more with less” by sharing/combining services. A problem occurs, however, when those who are mandated to pay for the service
become too far removed from any decision-making associated with it. There had been a suggestion, for example, that membership on a board of directors for a local health unit should be application-based (to attract needed skill sets) rather than based on appointment by municipal members. Such a move would erode accountability of the organization to its funding partners. As long as municipalities continue to be required to fund health care delivered by local health units, the ability to appoint representatives to the boards must be retained. Should the Province agree with the LRMC members that funding for health services should be undertaken through income tax rather than property tax, and agree to fund public health units at 100%, our member municipalities would not object to being removed from the board composition/selection process.

Rather than assuming more health program costs, however, the province is moving ahead to change the cost-sharing arrangement for boards of health and their programs to download more to municipalities. Currently, costs are shared either on a 25% (municipal) and 75% (provincial) basis, or, alternatively, on a 0% (municipal) and 100% (provincial) basis. The announced proposal is that all programs and costs will now be shared on a 30% (municipal) and 70% (provincial) basis. Because of the increase from zero to 30 percent for some programs, the bottom line for LRMC members is that – solely due to this change at the Thunder Bay District Health Unit – the levies we pay to the TBDHU are expected to increase by forty-seven (47%) per cent in 2021. This is neither initially possible nor sustainable, especially in light of other external agency cost increases over which our members have no control.

Not only are costs skyrocketing, but at the same time, revenues are decreasing. During the consultations, it was acknowledged that the Ontario Municipal Partnership Fund (“OMPF”) grants (provided by the Province to municipalities) were originally intended to reimburse municipalities for the costs of provincial services downloaded to them. OMPF funding, as noted earlier (see Chapter 8.1) is on the decline. What is happening here is a “double hit” to the municipal budget – where costs go up and funding goes down.

LRMC member municipalities are aware that some health promotion programs work well on a regional basis but, on the other hand, others work poorly regionally and especially provincially. There are too many differences amongst communities to use the same approach. Public health research also becomes suspect when done provincially. Local research is needed to capture the peculiarities of communities.

There is also a divide between public health service delivery (targeted to a broad public audience) and health care (between an individual and his or her doctor). These need to be less siloed and better aligned in order that communication about effective prevention of major health issues is delivered to those that need it.

What cannot be forgotten is that public health promotion is important and is intended to prevent health concerns, saving the Province money in the long term. All orders of government have a keen interest in keeping their constituents healthy. In the face of a deteriorating health
system, combined with an aging population and an increase in the numbers of persons presenting with mental health and addiction problems, this is becoming next to impossible.

**First Recommendation:** Continue consultation beyond the current deadline set for February 10th and use the initial phase of consultations to focus a second phase on working collaboratively to find solutions. **Delay planned increases in the proportion of public health funding required from municipalities at least until workable solutions are presented.**

**Second Recommendation:** Until such time as municipalities are not required to fund public health services, retain the right for municipalities to appoint members of council to local boards of health.

**Third Recommendation:** In the event that amalgamations of local boards of health are ultimately approved, retain localized studies, consultations and communications, **as well as local service delivery in areas where unique circumstances or other factors demand it.**
This has been an item in the LRMC Rural Action plan since January 2018.

It is important to note that the Province of Ontario is the legal entity which has a duty to consult with First Nations and Métis. *Municipalities do not have that obligation.*

The Province’s obligation to consult with First Nations has been known for many years. Municipalities cannot be expected to undertake this consultation on the Province’s behalf. Municipalities do not have the necessary knowledge or resources for this undertaking. The Ministry of Indigenous Affairs should be instructing other Ministries on their consultation obligations, and providing them with appropriate education as to when, how and with whom to consult. If the Province intends to download this obligation to municipalities, it must provide associated training and financial resources.

**Recommendation:** The Province, and not its municipalities, must recognize and step up to its obligation to consult with First Nations and Métis.

**Alternative Recommendation:** If the Province expects Municipalities to undertake consultation with First Nations and Métis, it must first provide training, tools and financial resources to enable municipalities to do this properly and respectfully.
11.1 Broadband for Rural Ontario

This has been an item in the LRMC Rural Action plan since January 2018. Member municipalities of the LRMC continue to be extremely frustrated with the level of provision of telecommunication services in our municipalities. This is a “number one” complaint from our constituents. Lack of reliable service is also impacting municipal operations. We cannot “download” the information sent to us by the Province, constituents or other agencies. We cannot participate in webinar training sessions (many of which we have to pay for, only to find out that they cannot be viewed).

In December of 2016, the CRTC made a huge policy announcement regarding Internet service for all Canadians. By the end of 2021, the CRTC expects that 90% of Canadian homes and businesses will have access to broadband speeds of at least 50 Mbps for downloads and 10 Mbps for uploads. A $750 million fund to help achieve this objective was announced. Three years have passed, the end of 2021 is now less than two years away, and our member municipalities have seen little to no progress toward the CRTC’s objectives.

Our world is becoming increasingly digital. Almost all businesses have an online presence. People now expect to be able to find information, shop and submit government forms online. Rural residents are excluded from this digital age through lack of reliable and sufficient broadband capacity.

The LRMC member municipalities either border on, or are within a ½ hour drive of, the City of Thunder Bay. It is a fully serviced urban community with broadband availability. Nevertheless, internet service providers advise that it would be far too expensive to provide our communities with reliable broadband. (Part of the unaffordable costs involve requirements to replace utility poles – refer to Chapter 6.2 of this Action Plan for more detail in that regard.) Our municipalities need to be able to attract businesses and residents. Without adequate connection speeds, it is unlikely that people will move to our communities. In fact, several member municipalities have been advised by residents who put their properties up for sale that the reason they are leaving is to obtain acceptable internet access in the urban center.

While fibre optic service is the best product for the provision of high-speed internet, it should be noted that satellite internet service has significantly improved over the past few years. The cost of satellite connections continues to be prohibitive for most rural residents, and significantly more than the cost of fibre optic connectivity, or even “DSL” line connectivity, that is available...
in urban areas. Even if the long-term goal is fibre optic installation for everyone in Canada, the Province should consider, in the interim, providing subsidies for satellite service so that rural residents can obtain them at affordable prices.

**First Recommendation:** Partner with the Federal government and/or private partners to provide funding for high speed internet and reliable cellular telephone services for rural Ontarians, including those in our member municipalities.

**Second Recommendation:** Use some of the money set aside for fibre optic cable expansion to off-set the high cost of satellite internet service for remote and rural Canadians.

**11.2 Asset Management Planning**

This has been an item in the LRMC Rural Action plan since January 2017. This topic, equally applicable to this Ministry as to the Ministry of Finance, is addressed in detail in Chapter 8.5. What is critically important is to cease tying grant funding to the progress of reporting or other paperwork, and to direct more of our rare tax dollars to infrastructure rather than further studies or reports.

**11.3 Recognizing Private Water and Septic Systems**

This has been an item in the LRMC Rural Action plan since January 2018. Most of the rural residents in our member municipalities have private well and septic systems installed. In recent years, a significant amount of provincial grant funding has been directed at communal water and wastewater systems, providing a financial benefit to those users that individual system owners do not have. Communal systems are not an option in rural areas due to the low housing density.

Our member municipalities feel that an option should be made available to private system owners to enable them to ensure that their wells and septic systems remain viable. The current grant system discriminates between those on communal systems and those with private systems.

**Recommendation:** Remove the inherent discrimination that exists between urban and rural municipalities in terms of the availability of infrastructure dollars for communal water and septic systems by undertaking one or more of the following actions:
(a) Studying the issue and developing an appropriate program to provide grant funding to private septic/well owners/operators; or

(b) Ceasing to provide infrastructure funding to urban municipalities for communal water and sewage treatment system upgrades; or

(c) Compensating for this inherent discrimination by providing funding at the same level as is provided to urban municipalities for communal water and sewage treatment system upgrades, to be used for rural road networks or other rural infrastructure systems.
When LRMC members met with Ministers at the AMO Conference in August of 2019, we requested a meeting with relevant ministers (Finance, OMAFRA, MMAH and MNDEM) and staff to address the complex issues set out in Chapter 8.1 of this Action Plan. While we were told a meeting in Toronto would be arranged, it has yet to occur. We have written twice now, to respectfully request that this meeting be set up without response. Our members are taking this opportunity to again request that this meeting take place as soon as possible. Chapter 8.1 contains analyses to demonstrate how patently unfair current financial policies are to rural municipalities. It will take more than a 15-minute delegation meeting at the ROMA or OGRA conferences to properly explain the information and to demonstrate the logical conclusions.

**Recommendation:** Honour our request for a meeting, in Toronto, as soon as possible, to fully explore the information set out in Chapter 8.1.

**Part One: Issues Relating to the Housing Portfolio**

**12.1 Affordable Housing/Senior Housing**

This has been an item in the LRMC Rural Action plan since January 2018. The need for affordable housing and senior housing in the Lakehead Rural Municipal Coalition municipalities is growing. The *Promoting Affordable Housing Act, 2016* (S.O. 2016, c. 25, as amended) passed in December of 2016, and (relatively) recent provincial budget provisions show that the former Ontario government planned to continue to commit to make progress on affordable housing and senior housing. Canada’s National Housing Strategy announced November, 2017 by the Federal Government, and the funding plans within in, indicate the Province will have strong support from the Federal Government to improve affordable housing and senior housing throughout Ontario. Recently distributed consultation surveys demonstrate that affordable housing is also an issue for this Provincial government.

Within the LRMC municipalities, there are very few affordable housing or senior housing options for our residents. Historically, affordable housing and senior housing development has been concentrated in the City of Thunder Bay. Rural residents have to leave the communities they care about and move to the City to access these facilities.

Approximately 20 years ago, provincial funding enabled the establishment of a housing facility in the hamlet of Kakabeka, which is located in the Municipality of Oliver Paipoonge. The facilities are owned and operated by the Kay Bee Seniors Non-Profit Housing Corporation.
Additional provincial help in recent years has allowed the addition of some more units. Currently, they have expanded to 40 apartments in 5 separate buildings, which primarily accommodate seniors.

The Kay Bee housing facilities give an excellent example of affordable housing and senior housing in a rural community. The member municipalities of the LRMC would like to see more such housing located rurally, and wish to point out why the Provincial Government should be interested in the same goal.

The primary reason to encourage rural affordable/senior housing is to allow people more freedom of choice in where they want or need to live. It is well known that seniors live and age better in their home communities. Being forced to leave communities, family members, social groups (churches, book clubs, volunteer opportunities, quilting bees, etc.) is not a happy moment for anyone involved. Lower income individuals also need and want accommodation in rural areas. The businesses within our communities employ local workers, and many can only afford wages on the lower end of a pay scale. Allowing for affordable housing near to where they work will provide these workers with additional support by removing the cost of the commute.

Another solid reason to support rural affordable/senior housing development is the lower cost of land in rural communities. More land is available, and there is less demand for it. Land can be a major cost in establishing new housing facilities, and this cost will be lower as one moves away from an urban center.

**Recommendation:** Ensure that rural communities are included in future provincial affordable housing and senior housing programs.

### 12.2 Asset Management Planning

This has been an item in the LRMC Rural Action plan since January 2017. This topic, equally as applicable to this Ministry as to the Ministry of Finance, is addressed in Chapter 8.5, of this Action Plan.

### Part Two: Municipal Affairs Portfolio

### 12.3 Provincial Policy Statement Review – Results?

The LRMC applauded this government’s decision to review the Provincial Policy Statement (“PPS”) and thanks the Minister for the Province-wide municipal consultations that took place
last fall on this topic. Our municipalities have been concerned with the development constraints imposed by the PPS for years, and our concerns have been included in the Rural Action Plan since its inception in January of 2017.

We are looking forward to the issue of a new, draft PPS, hoping that the Minister listened to our voices seeking to include policies that are directed to “truly” rural, northern municipalities. We look forward to the opportunity to provide input once the draft is available.

**Recommendation:** Allow for further input from municipalities once the new PPS has been drafted.

### 12.4 Crippling, Overwhelming Regulatory and Reporting Obligations

This has been an item in the LRMC Rural Action Plan since January 2017. This topic, equally as applicable to this Ministry – and perhaps moreso - as to the Office of Red Tape and Regulatory Burden Reduction, is addressed in Chapter 16.1 of this Action Plan.

We acknowledge having received a letter from the Honourable Minister Steve Clark in early December 2018. In this letter, he states that his ministry will be “convening a cross-government working group” amongst the ministries to which municipalities report. Since that time, there has been no communication on the status of that working group to reduce duplication and red tape.

**Recommendation:** We respectfully request a status report on the cross-government working group amongst the ministries to which municipalities report, and we respectfully request consultation with small, northern, truly rural municipalities on the benefits (or lack thereof) associated with many of the required reports.
This has been an item in the LRMC Rural Action Plan since January 2017.

The LRMC appreciated the opportunity to provide input into a limited review of the Aggregates Resources Act (R.S.O. 1990, c. A.8, as amended) last fall, and is awaiting the results of that consultation exercise. In the meantime, we find it necessary to repeat in this edition of the Rural Action Plan, our recommendations from the prior edition. They continue to be relevant and required.

Municipalities, particularly small rural municipalities, are faced with ever-increasing uncontrollable costs (such as mandatory payments to government agencies over whose budgets there is no municipal control), as well as ever-dwindling sources of revenue. In this climate, it is respectfully suggested that Municipal holders of aggregate permits or licenses should be exempt from royalty fees where the pits exist within their own municipal boundaries. Royalty fees are intended to compensate the municipality for road damage. The municipality should not have to pay these fees out, only to receive a portion of them back again. A waiver of the royalties would be an excellent demonstration of understanding of the partnership that needs to exist between municipalities and the Province. This is of even more importance now, given the recent rate increase.

In Southern Ontario, as we understand it, municipalities who operate gravel pits sell the gravel to the private sector. That may be the rationale for imposing the royalty fees. In Northern Ontario, however, this does not occur. Municipalities who operate gravel pits do so for their own infrastructure repair and/or replacement and/or enhancement needs.

**First Recommendation:** Waive royalty fees for Northwestern Ontario municipalities hauling their own material for their own roads.

The last increase in the proportion of the royalty fee being provided to the local municipality is appreciated, however, it is respectfully suggested that the Ministry should take this opportunity to increase the royalty fees overall. While it is true that "every little bit helps", the current level of income received by road authorities from royalties makes very little dent in the cost to them to repair the damage to roads that is caused by heavy aggregate hauling.
Second Recommendation: Increase the proportion of the royalty fees paid to municipalities, and/or increase the royalty fees paid by road users overall.

Municipalities are not compensated through royalty payments when the Province hauls aggregate from Pits within (or in unincorporated townships adjacent to) their geographic boundaries. This hauling has a direct impact to the road infrastructure. If the private sector has to contribute royalties for the purposes of assisting the Municipality in maintenance of its roads, then the Province should also do the same.

Third Recommendation: Royalty fees should be paid by the Province when it extracts aggregate within an incorporated municipality and/or hauls that aggregate over municipal roads.

Due to the dramatic increases in possible fine levels for legislative or regulatory violations, the LRMC municipalities recommend that there be a transparent, accountable and widely disseminated investigation process with strict requirements that alleged offenders receive notice of pending charges with an opportunity to comply prior to being formally charged with a violation.

Fourth Recommendation: Create and publicize enforcement procedures that include a requirement to provide notice of an alleged offence, together with an opportunity to voluntarily correct it, prior to taking enforcement action.

The LRMC municipalities strongly recommend that an obligation be imposed on all operators of licensed or permitted aggregate resource sites to require them to have and to use scales to accurately weigh the material in vehicles that are leaving or entering their sites. Vehicles should be required to carry with them the weight, recorded through these scales, and to provide the weight evidence to law enforcement officers upon request. This will prevent pit operators from under-estimating and/or under-reporting the tonnage of material that leaves their sites and/or short changing a customer. Without scales, there is no way to confirm whether or not this is the case. One of our members has investigated the cost of weigh scales, and they are not onerous. Portable scales can be purchased at a fraction of the cost that permanent scale installations impose. It behooves the regulators and the operators to ensure accurate and timely record of the aggregate tonnage in all circumstances.

Fifth Recommendation: Make weigh scales obligatory in all operating pits.

There is a proposal to increase record-keeping requirements on the pit operators. LRMC municipalities are opposed to this when it relates to the pits that we operate for our own purposes. Imposing more record-keeping requirements on our road department staff causes difficulties and inefficiencies which interfere with our ability to “get the job done”. Ontario’s
municipalities are, and have been for some time, under significant pressure to “do more with less”, yet increased record keeping, and reporting obligations keep interfering with our ability to do just that. Provided that proper weight measuring, and recording is undertaken, that should be sufficient for the Ministry’s requirements.

Sixth Recommendation: Do not require increased record-keeping for municipally operated pits and quarries.

13.2 Conservation Land Tax Incentive Program

This has been an item in the LRMC Rural Action Plan since January 2017. This topic, equally as applicable to this Ministry as to the Ministry of the Environment, Conservation and Parks, is addressed in Chapter 8.2 of this Action Plan.
14.1 Police Service Boards

In 2017, four of the member municipalities of the LRMC (Neebing, Gillies, O’Connor and Conmee) formed a Joint Police Service Board as permitted under the Police Services Act (R.S.O. 1990, c. P.15, as amended. (The Municipality of Shuniah has had its own Police Service Board for some time and is under a contract with the Ontario Provincial Police. The Municipality of Oliver Paipoonge purchases police services from the City of Thunder Bay.)

The Police Services Act, 2018, once it is proclaimed in effect, provides for only one police service board for each service detachment.

While one board per detachment makes sense in Southern Ontario for a variety of reasons, the vast distances between communities in the Northwest, together with the vast number of territories without municipal organization which are served by the Ontario Provincial Police, make this change problematic.

It is respectfully submitted that the Lakehead Police Service Board and the Shuniah Police Service Board operate effectively and efficiently and should be permitted to continue to do so.

**Recommendation:** “Grandfather” the existing Lakehead Police Service Board and Shuniah Police Service Board and allow them to continue to serve their communities and the Ontario Provincial Police in the Thunder Bay Detachment area.

14.2 Fire Department Training / Certification Regulations

This has been an item the LRMC Rural Action Plan since August 2018. The LRMC member municipalities applauded this government’s repeal of Regulation 379/18 passed under the Fire Protection and Prevention Act, 1997 (S.O. 1997, c. 4, as amended) by the prior government. This Regulation imposed inequitable training requirements on volunteer fire services.

The consulting team utilized by the previous Provincial government did not benefit from input from small, rural, northern volunteer fire team operators like those of the members of the Lakehead Rural Municipal Coalition. Despite its touting of its "technical table" input, the prior Ontario government did not benefit from appropriate input from purely volunteer fire services.
The technical table participants did not consult with volunteer forces. We commend the current government for recognizing this vital shortcoming, however after considerable time has passed, there has been no communication or follow up after requesting to be consulted on this issue. Our member municipalities’ volunteer fire departments are integral to the safety of our small rural communities.

This is another case where the significant differences between Ontario’s three (3) distinct types of municipalities (small rural, small urban, and urban) must be recognized. Small rural municipalities with volunteer forces would have experienced significant hardship under the previous government’s plan.

Small, northern, rural municipalities like the LRMC members cannot afford to have full-time, staffed, career professional fire departments. We rely on, and, thankfully, are well served by, volunteers. All of our member municipalities recognize, applaud and support training requirements. What we did NOT support was training that required our dedicated volunteers to make further personal sacrifice in order to continue in service.

Our member municipalities understand, and support, that the current government will replace the requirements of Regulation 379/18 with alternate requirements. We wish to see truly representative consultation that includes all municipalities who rely on volunteers for fire protection/prevention services. True rural municipalities with real volunteer services must be included in consultations.

**Recommendation:** Provide an update on this subject matter, and include the LRMC members, who represent small rural municipalities, in consultations related to any mandatory training requirements to be imposed by regulation under the Fire Protection and Prevention Act, 1997 (S.O. 1997, c. 4, as amended).

### 14.3 Care for Intoxicated Persons

This has been an item in the LRMC Rural Action Plan since January 2019. This issue involves an overlap of jurisdictions between the Ministry of Community Safety and Correctional Services, and the Ministry of Health and Long-Term Care. As Minister of Community Safety and Correctional Services, you are charged with, among other things, efficient and effective policing operations for Ontarians. As Minister of Health and Long-Term Care, the Honourable Minister Elliot is charges with, among other things, administration of the Ambulance Act (R.S.O. 1990, c. A.19, as amended) and the efficient and effective operations of the province’s many hospitals and care facilities.

Municipalities fund land ambulance services (either directly, or indirectly through a service provider such as a Social Services Administration Board). In the Thunder Bay District, the City of Thunder Bay provides land ambulance service through “Superior North Emergency Medical Services” (“SNEMS”). Our member municipalities must pay levies to fund the SNEMS.
Municipalities also have to pay for policing services, either directly, through creation of a municipal police force, or indirectly, by payment to the Ontario Provincial Police for its services. As noted above, five (5) of our six (6) member municipalities contract with the Ontario Provincial Police, and one contracts with the City of Thunder Bay, to provide policing for their communities.

In each of these two cases, the paying municipalities have absolutely no control over the budgets and/or management of the provision of these services. These two payments absorb significant fractions of our member municipalities’ operating budgets. Year after year, the costs increase, and there is no end in sight.

It goes without saying that the efficient and effective operation of both land ambulance and policing is of great concern to the municipalities that have to fund them.

Taxpayers in our municipalities also fund the operation and establishment of hospitals through their income taxes. Again, it is of extreme importance to our constituents, both as funders of, and as users of, these institutions, that they are operated effectively and efficiently, including a reduction of emergency room waiting time.

The Thunder Bay District is experiencing increased issues relating to addiction and substance abuse. These two problems are often closely linked to mental health issues.

Persons who are intoxicated, whether through alcohol or drugs, are often the subject matters of calls for emergency assistance. Whether it is because the person is causing a disturbance or danger, committing an offence, or because the person’s health (and perhaps life) is threatened, emergency response to intoxicated individuals is increasing at exponential levels.

This graph, provided by Superior North Emergency Medical Services, illustrates the trend in significantly increased calls for these types of cases over the past three (3) years:
These calls tie up our land ambulance and policing resources. Our members are not suggesting that a 9-1-1 call is not warranted in these circumstances. The problem is what happens after the first responders arrive. There is a systemic “bogging down” of the system, which, we submit, could be addressed by this government, to everyone’s benefit.

Unless a crime has been committed – and even then – only if the person’s state of health will allow it – intoxicated individuals should not be transported to, and held in, policing hold cells or jails. Most of the time, intoxicated persons are removed from the “scene” of the response and transported to a hospital emergency room.

Under the Ambulance Act (R.S.O. 1990, c. A.19, as amended), ambulance service providers are obligated to transport persons to a hospital. There is no alternative destination, even though appropriate alternative destinations exist. Many intoxicated persons do not require medical attention – rather – they require a quiet place to rest and sober up. Some may also require mental health diagnoses and/or counselling services.

When SNEMS paramedics take an intoxicated person to the Thunder Bay Regional Health Sciences Center’s emergency room, the law requires them to remain with the patient until he or she is transferred over to a medical doctor. The same is true, of course, across Ontario. This ties up a minimum of two paramedics and the ambulance vehicle (who could otherwise be responding to other medical emergencies.) In some circumstances, one or more police officers must also remain. Because of emergency room wait times, this process can take hours. Often, the intoxicated person sobers up during the wait time and, because there is no authority to detain them, they leave the emergency room without ever seeing a medical doctor.

It does not make sense to utilize hospital emergency room facilities in these incidents. It does not serve the patient, the emergency responders, or those that fund the institutions and agencies involved. While difficult to qualify the amount of money saved; creating a detoxification centre would provide a solution to hallway healthcare and emergency room wait times.

Your attention is, with respect, drawn to The Intoxicated Persons Detention Act (C.C.S.M. c. 190), a statute of the Province of Manitoba. Under this legislation, where a “peace officer” finds a person in a public place who is intoxicated, he or she may take that person into custody, and may, where facilities exist, deliver that person into the custody of someone in charge of a detoxification centre. Provisions in the statute ensure that the intoxicated person may leave when he or she is able to, or may be placed in care of a capable friend or family member, and in any event, cannot be forced to remain more than 24 hours.

Detoxification centers can be operated by nurses and/or paramedics, rather than medical doctors. The intoxicated person is cared for and protected, can be directed to counselling where appropriate, and is not taking up time at an emergency room. The paramedics, after handing the person into the care of the detoxification center, can return to their normal duties.
This improves:

- Quality of care for the intoxicated person;
- Efficiencies associated with the operation of the ambulance service;
- Efficiencies with respect to the operation of the policing service; and
- Efficiencies associated with the operation of emergency rooms in hospitals.

As the problem persists and continues to grow, it becomes more and more important to effectively and efficiently respond to substance abuse issues. Taking appropriate measures would help reduce hallway healthcare and reduce the impact felt on Municipal tax bill. Moreover, the scope of this issue extends beyond provincial borders, the LRMC encourages Federal collaboration on this issue to ensure all peoples health care needs and supports are met.

While some detoxification centers and similar facilities exist in Ontario, it is respectfully submitted that many more are necessary. There is one, 20-bed facility in operation in the City of Thunder Bay, but it is almost always at capacity. Hand in hand with the ability to take patients to facilities other than hospitals, is a requirement that those facilities exist, whether operated directly by the Province (connected with, or independent of, hospitals) or by not-for-profit nongovernment organizations or charitable institutions.

The previous government, through “Bill 160” (which became the Strengthening Quality and Accountability for Patients Act, 2017, S.O. 2017, c. 25, Schedule I) proposed some amendments to the Ambulance Act which would allow the Minister to issue operational or policy directives to a land ambulance operator which could, along with other things, provide for “conveyance of persons by ambulance to destinations other than hospitals”. This is one of the sections in that legislation which has not come into force. Because this legislation was passed by the previous provincial government (December 12, 2017), these provisions may never come into force. Enacting these provisions soon, and then issuing the required directives, would be of assistance, however, our preferred solution would be legislation similar to the Manitoba statute referenced above.

Should you be travelling to Thunder Bay at any time in the future, our members would be delighted to provide you with a tour of our municipalities – and – more importantly relating to this issue – the Thunder Bay Regional Health Sciences Center emergency room. We are confident that, on any given Friday or Saturday night, a clear demonstration of this problem would be observable.
First Recommendation: Enact and/or support the enactment of legislation similar to Manitoba’s “The Intoxicated Persons Detention Act” which would provide options for both police officer and ambulance operators to “deliver” intoxicated persons to appropriate alternative care centers rather than to hospital emergency rooms.

Alternative to First Recommendation: Bring into force and effect proposed sections 1(1), 2, 4, 5, 6, 7, 8(2), 11 and 12 of the Strengthening Quality and Accountability for Patients Act, 2017, S.O. 2017, c. 25, Schedule I.

Second Recommendation: Support the establishment of more detoxification centers (or similar facilities) throughout Ontario in partnership with the Federal Government.

Alternative to Second Recommendation: Support the placement of health care professionals, such as nurses or paramedics, at containment facilities other than medical centers. This would provide an appropriate level of care to intoxicated persons for the time period necessary to enable them to safely be released.

Community Safety and Well Being Plans

This is a new item for this edition of the LRMC Rural Action Plan. In 2018, the Police Services Act was amended to require all Ontario municipalities (regardless of size or current safety and well-being states) to undertake a very complex and time-consuming process ending up with a “Community Safety and Well-being Plan” which must then be reported upon and updated regularly.

This is another example of an urban “need” being pushed out to Rural Municipalities who have no such need. It is also another example of additional red tape and reporting obligations heaped upon municipalities by provincial ministries operating in silos (see Chapter 16.1 of this Action Plan).

The LRMC member municipalities understand – and, further, respect – the importance and utility of Community Safety and Well Being Plans for urban municipalities. We simply do not see the relevance – particularly now as we have commenced the work required to produce the plan – for our communities. The requirement to undertake the work to create a plan that we
neither need nor want detracts from our ability to provide the services that our constituents do need and want.

There is a requirement in the legislation to consult with a group of professionals. For our rural municipalities, these professionals live and/or work in the City of Thunder Bay – and have been approached already by the City to work on its consulting team. Further, many of their professional skills and abilities are not applicable to work in truly rural communities. Asking them to do “double duty” as volunteers is a lot to ask – and we have no finances to pay them as professionals. No funding accompanied this new legislative requirement so as to ease the burden to small, rural municipalities.

If there was a demonstrated need for this plan – it would not be such a bitter pill to swallow. However, the relevance and utility of a “Community Safety and Well Being Plan” for small, rural municipalities eludes us.

**First Recommendation:** Exempt small, rural municipalities from this onerous requirement unless/until a demonstrated need arises.

**Alternative Recommendation:** Provide small, rural municipalities with funding to allow this obligation to be met without detriment to other services, and extend the deadline for compliance with the legislation to allow the funding to be used to hire consultants to undertake the required work.
Introduction & Summary

This has been an item in the LRMC Rural Action Plan since January 2019. Over the last several years, at various times, the City of Thunder Bay has launched initiatives to pass a by-law to divert heavy truck traffic off two major arterial roads, Arthur Street and Dawson Road, to Highway 11/17. Arthur Street and Dawson Road were, historically, provincial highways. Arthur Street connects to Highway 130, which in turn connects to Highway 11/17. Dawson Road connects to Highway 102, which in turn connects to Highway 11/17. Highway 11/17 runs through LRMC member municipalities Oliver Paipoonge and Conmee. Please see the map below. Although an initial Designated Truck Route (DTR) By-Law was defeated by City Council in June, 2019, a revised by-law is expected to be passed by City Council on January 27, 2020.

When the by-law is passed, all heavy truck traffic will be forced onto Highway 11/17. Traffic counts done by the Municipality of Oliver Paipoonge show the number of heavy trucks would double. Highway 11/17 runs through the Village of Kakabeka Falls, where traffic congestion is already a problem. It is unreasonable to think that twice as many heavy trucks rumbling through this normally peaceful village is not going to have serious safety consequences.

Recently, the Municipality of Oliver Paipoonge and the Township of Conmee, with the support of the other LRMC municipalities, established a working group to look at measures to improve Highway 11/17 safety. The three measures being considered are: (1) imposing a Community Safety Zone (“CSZ”), (2) erecting radar speed display signs, and (3) implementing traffic control measures (i.e. traffic lights). Implementing these measures is now urgent, given that the DTR By-Law is anticipated to be put in place prior to month’s end. Our member municipalities will need support, cooperation and approval from the Ministry of the Solicitor General and your Ministry to improve safety on Highway 11/17. Other measures to ensure safety on this route should also be examined and implemented.
Safety Implications of City Truck Diversion

The City of Thunder Bay says it needs to get heavy trucks off Arthur Street and Dawson Road to improve safety. Of course, removing truck traffic from Arthur Street and Dawson Road and putting all of it on Highway 11/17 just re-locates these safety issues to the City’s rural neighbours.

In April 2018 the Municipality of Oliver Paipoonge engaged an engineering consultant to count the number of heavy trucks using Highway 102. According to the consultant’s report, the average daily number of trucks at that time was 869, which was slightly higher than the Ministry of Transportation’s (“MTO’s”) figure of 765 published several years ago. In May 2019 the Municipality had the consultant count all traffic on Highway 11/17 in Kakabeka Falls. With respect to heavy trucks, the count was 758 per day. This demonstrates that the City’s diversion of truck traffic will double the number of heavy trucks travelling on Highway 11/17 through Kakabeka Falls.

The full traffic studies can be viewed online: https://www.oliverpaipoonge.ca/explore/latest-news/designated-truck-route.

Residents of Conmee, Oliver Paipoonge, and neighboring communities are well aware of the current difficulties driving on Highway 11/17 in Kakabeka Falls. Getting into and out of side roads, businesses and other properties is challenging due to the existing heavy truck traffic. Due to hills and curves on either end of the settled area, sightlines are poor. Pedestrians,
including seniors and wheelchair users, struggle to safely cross the Highway. School buses labour to get on and off the road while recreational vehicles and vehicles with trailers visiting Kakabeka Falls Provincial Park toil to get on and off the Highway. Having two, rather than one, trucks coming through, on average, every minute will undoubtedly exacerbate the current difficulties.

In addition to generating unsafe conditions in Kakabeka Falls, the truck diversion will increase risks at the intersections with the numerous side roads along Highway 11/17 in the Municipality of Oliver Paipoonge and Township of Conmee. It is already difficult to enter or exit Highway 11/17 at these intersections due to poor sightlines and the absence of merge or turning lanes. Doubling the number of heavy trucks will make the situation worse.

**Request for Action by the MTO**

Several times in the last few years municipal representatives have met with regional MTO officials about the City’s truck diversion initiative. Most recently, Oliver Paipoonge representatives met with the Regional Director on September 16, 2019 to express their grave concerns. MTO officials continue to say that there is nothing they can do about the City’s plans, and that they will “monitor impacts” if the City truck diversion plan is implemented.

To LRMC member municipalities, these dismissive responses are completely unsatisfactory. They and you, the leaders of MTO, need to realize that currently all TransCanada traffic, particularly heavy truck traffic, goes on either Highway 11/17 or Dawson Road/Highway 102; there are no other options. In the 1970s the Province realigned and upgraded Hwy 102 to serve as a by-pass for TransCanada traffic not wanting to travel through the City, and to reduce the congestion TransCanada traffic caused on Highway 11/17 and other roads. Highway 102 was also the designated route for dangerous goods transportation. The current City plan to take Dawson Road/Highway 102 out of the picture is completely unrealistic. Rather than sit back to see what happens, MTO should be undertaking immediate action.

**Recommendations for Immediate Safety Actions:**

1) Promptly review and approve requests from Oliver Paipoonge to MTO for traffic control measures such as traffic lights, speed limit reductions and a community safety zone in the Village of Kakabeka Falls; and,

2) Look at the other measures outlined below along Highway 11/17:
   a. Merge and Turning Lanes
      There is a lack of merge and turning lanes on Highway 11/17 throughout the Municipality of Oliver Paipoonge and the Township of Conmee. These features need to be added.
b. Truck Rest Stops
There are no rest stops along Highway 11/17 where trucks can pull over and get off the Highway. Rest stops improve safety.

c. Warning Lights at Thunder Bay Expressway Intersections
Currently there are no warning lights on the Expressway. They would be a useful addition to warn trucks there are lights ahead.

d. Roundabout at Thunder Bay Expressway/Highway 11/17 Intersection
Currently only two trucks, emerging from a dead stop, will have the time to turn left at the traffic lights. Doubling the number of trucks at the intersection will cause congestion and frustration will influence some drivers to take chances. There is enough room at this intersection to construct a large roundabout to manage traffic flows more safely.

15.2 Highway 130, Arthur Street and Twin City Crossroad Intersection
Concerns – Municipality of Oliver Paipoonge

This has been an item in the LRMC Rural Action Plan since January 2017. For several years there have been serious safety concerns about the intersection of Highway 130, Twin City Crossroad and Arthur Street. Persons who drive through this intersection on a regular basis understand why it is a dangerous place. The combination of high speeds, commercial heavy trucks, business entrances, extensive signage and light passenger traffic, particularly at peak times, creates conditions for calamities. Near misses are common, and collision statistics show the number of incidents is rising.

Although this intersection is physically located in Oliver Paipoonge, this issue impacts all of our member municipalities, as their constituents frequent the route.

The untimely deaths of two persons at the intersection in August 2017 caused the Municipality of Oliver Paipoonge to launch an initiative to get safety improvements. Two meetings with regional MTO officials in September and November 2017 generated significant progress. An MTO internal study that fall determined that some form of traffic control, either lights or a roundabout, was warranted. Growth projections for the areas affecting the intersection indicate that even more vehicles are anticipated to be added to the already high existing traffic volumes. As a result, MTO decided to undertake a traffic impact study in 2018. Oliver Paipoonge was received the draft study in December 2018.

After talking with you about this matter at the 2019 AMO Conference, representatives from Oliver Paipoonge had an opportunity to bring it up in a meeting with the Regional MTO Director on September 16th, 2019. At that time, Oliver Paipoonge was advised that MTO has a 5-year window to complete projects. The LRMC understands, however, that MTO updates its
Northern Highway Program on an annual basis. Our members hope a construction project to establish traffic control to improve safety at this intersection will be a priority in the Program. The LRMC wants to see action from MTO sooner rather than later, i.e., a construction project for safety improvements in 2020.

**Recommendation:** Expedite a construction project to establish traffic control to improve safety at the intersection of Provincial Highway 130, Arthur Street and Twin City Crossroad in the Municipality of Oliver Paipoonge.

**Highway 588 Bridge over the Kaministiquia River at Stanley**

This is a new issue in this edition of the Rural Action Plan. Last year, weight restrictions were imposed over the Province’s bridge on Highway 588, in the hamlet of Stanley, in the Municipality of Oliver Paipoonge. We have been advised that significant work must be undertaken on the bridge before the weight restrictions can be removed.

The weight restrictions impact the Municipalities of Oliver Paipoonge and Neebing with respect to access to aggregates (both have gravel pits adjacent to the bridge) and impact Oliver Paipoonge in terms of its road maintenance, as its heavy vehicles need to cross this bridge to access the road network.

Another concern that LRMC municipalities have with respect to the pending bridge work is the manner in which it will be conducted. This river crossing sees considerable traffic, and is relied upon by residents in Neebing, Gillies, O’Connor and Oliver Paipoonge. Our member municipalities wish to see the bridgework conducted in a manner that preserves access to the river crossing during construction.

**Recommendation:** Continue to keep LRMC informed of the intentions for remediation of this important transportation link, and undertake the work in a manner that preserves river crossing for passenger vehicles.
LRMC member municipalities continue to look forward to working with the Province in reducing duplication, inefficiencies and over-regulation, to our mutual benefit. We are earnest in our plea to be consulted directly in this regard. We have much to contribute.

We acknowledge having received a letter from the Honourable Minister Steve Clark of the Ministry of Municipal Affairs and Housing in early December of 2018. In this letter, he stated that his ministry will be “convening a cross-government working group” amongst the ministries to which municipalities report. Unfortunately, we have heard nothing since, nor have we had any opportunity to provide input.

The plethora of reporting requirements with which municipalities must comply is an ongoing issue and continues to be a significant and worsening problem. Accordingly, the LRMC members are looking forward to Minister Clark’s review and/or the work of the Red Tape and Regulatory Burden Reduction office.

The Provincial government ministries operate independently and their rules and structures often cause wasteful and time-consuming duplications of issues and reports for municipalities, particularly small, rural municipalities with few members of staff and limited financial resources. In addition, each ministry imposes upon municipalities its own reporting processes on various matters under municipal jurisdiction, and all of these reports involve different web-based (or otherwise) software, different forms, different information and significant workload. There is a great deal of duplication in these reporting requirements – some that involves direct duplication, and some that involves providing information which is “slightly” different from that sought by another agency or Ministry.

The Association of Municipal Managers, Clerks and Treasurers of Ontario (“AMCTO”) released a study – some time ago now - on the reporting burden upon Ontario’s municipalities. The LRMC adopts the following conclusions of AMCTO in that report:

1. Reporting negatively impacts service delivery and prevents municipalities from innovating and preparing for the future;
2. Reporting is excessive and onerous;
3. The purpose of reporting is often unclear;
4. Municipal-provincial reporting is highly fragmented; and
5. Municipalities think reporting is important.
The LRMC recommends that the Province centralize data collection to a “one-window” function with a consistent software and format for any and all reports required by the Province. Municipalities can post information to this single window, and the various Provincial Ministries or agencies that require the information can download it and use it for their own purposes. This will save time and cost for the municipal reporters, as well as for the Provincial ministries which seek the reports.

Without listing all of the reports that our members are forced to provide to the Province on a regular basis, a read-through of this Action Plan highlights only some of these problematic requirements, such as:

- Asset management reporting requirements
- Indigenous consultation requirements
- Aggregate Resources Act proposed new reporting requirements
- Community Safety and Well-Being Plans

Readers are referred to the AMCTO study, which identified close to 100 reports sought by various arms of the Province. Since that report is now dated, and since no reporting requirements have been deleted, and many more have been layered on, the number has surely climbed since then.

As this Action Plan demonstrates, rural municipalities are seeing more and more red tape and reporting obligations, with less and less revenue (decreased OMPF grant funding, removal of land from assessment under the Conservation Land Tax Incentive Program, development constraints restricting assessment growth, etc. etc.). Some of the reports we are mandated to submit involve reporting to the province that “nothing happened” - which seems ridiculous. For example, we have to annually report to the Office of the Information and Privacy Commissioner as to the number of requests received for information under the Municipal Freedom of Information and Protection of Privacy Act (and further information related to them). Many small, rural municipalities do not receive any - but must still so advise the Province.

Our member municipalities wonder how many of these hundreds of reports, from hundreds of municipalities, are actually reviewed, considered or utilized for any productive purpose.

As the Province piles on more reporting requirements, this hurts small rural municipalities most, because they do not have the financial resources to hire the staff necessary to undertake the work. Our small, hard working employee groups cannot take on any more of this burden. Think of all the valuable work that could be undertaken, and services provided, if this bureaucratic red tape could be reduced or eliminated.

**Recommendation:** Work with Minister Clark to expedite the review of crippling and overwhelming reporting obligations currently imposed on small, rural municipalities.
**Recommendation:** Create a one-window reporting system for all municipal data that is required, in order to ease the reporting burden and provide greater operating efficiencies for both the Municipalities and the Province. Entering our data once in a format that any/all ministries can access if and when needed would be far more efficient for all involved.

**Recommendation:** Undertake a provincial audit of reports prepared and filed by municipalities to see whether there are reports that are never read, utilized or considered for any meaningful purpose – and eliminate those reporting requirements.
APPENDIX: Contact information

All telephone/facsimile numbers have area code 807.

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