

Sent via email to: [Rosalyn.lawrence@ontario.ca](mailto:Rosalyn.lawrence@ontario.ca)



Federation of Ontario Cottagers' Associations  
201 – 159 King Street  
Peterborough, Ontario K9J 2R8  
Phone 705-749-3622

Learn more: [www.foca.on.ca](http://www.foca.on.ca)

July 28, 2015

Ministry of Natural Resources and Forestry, Policy Division  
Room 6540, 6<sup>th</sup> Floor Whitney Block  
99 Wellesley Street West  
Toronto, Ontario M7A 1W3

**Attention: Rosalyn Lawrence, Assistant Deputy Minister**

Dear Rosalyn,

I appreciated the opportunity to speak with you briefly earlier this month in Toronto about FOCA's concerns about the state of Water Management Planning in Ontario. This letter is intended to provide some further detail about our concerns and to seek your help in addressing the stalemate that has its grip on this important public policy.

The stated purpose of Bill 55 LRIA legislative amendments (2012) was to create a more modern, streamlined and financially sustainable planning and review process that effectively balances social, environmental and economic objectives associated with the construction and operation of dams in the province.

The comment period on proposed changes, as posted on the Environmental Bill of Rights (EBR#012-0562) ended in January, 2014, almost a year and a half ago.

For several years now, many concerned stakeholders have anxiously been awaiting the revised process so they can again contribute their input on the social, economic and environmental aspects of their local Water Management Plans. Unfortunately, since the review began, any such opportunity has effectively been denied.

Our request today is for some assurance from MNR that this review/reform process has a reasonable end date, and to secure from you a timeframe when stakeholder input will once again be part of Water Management Planning in Ontario.

In an era of adaptive management and "evergreen plans," it seems unreasonable that the role of stakeholders and other interests, and the introduction of new information and science have been eliminated from the process. This is particularly surprising and frankly unacceptable, given that the Water Management Planning Guidelines for Waterpower, 2002 explicitly state (in S. 4.2.8) that "... *public participation is required to ensure accountability and transparency in the planning, that the public should be involved in identifying issues and resource values related to the management of water, and for ongoing oversight of plan implementation.*"

It is of course impossible for the MNRF to fulfill any of these functions in an environment where the process is completely closed and - by all appearances - happening either behind closed doors, or possibly not at all?

A ten-year automatic review requirement for WMP was seen as too cumbersome and not flexible enough; as it stands there is NO review, no opportunity for input, discussion, problem solving and consensus building around WMP in Ontario.

On behalf of our member organizations, FOCA respectfully requests your response to our concerns outlined above, and looks forward to a commitment from the MNRF to restart the water management planning regime in Ontario.

Sincerely,



Ken Grant, President, FOCA



Terry Rees, Executive Director, FOCA

cc Chris Walsh, Director, Crown Forests and Lands Policy Branch, [chris.m.walsh@ontario.ca](mailto:chris.m.walsh@ontario.ca)  
Paul Norris, Ontario Waterpower Association, [pnorris@owa.ca](mailto:pnorris@owa.ca)