



201-159 King St
Peterborough, ON
K9J 2R8

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Ministry of Natural Resources and Forestry Policy Division
Natural Resources Conservation Policy Branch
Water Resources Section
300 Water Street
Peterborough Ontario
K9J 8M5

Attention: Julia Holder, Policy Analyst

Response of the Federation of Ontario Cottagers' Associations (FOCA) with respect to the review of the Conservation Authorities Act (EBR Posting 012 - 4509)

FOCA appreciates the opportunity to provide our comments on the Conservation Authorities Act, and specifically to the priority issues of resource management and environmental protection.

FOCA is an incorporated non-profit organization that represents over 500 waterfront property owners' groups, with over 50,000 member families. For over 50 years, FOCA has spoken on behalf of, and supported, Ontario's 250,000 waterfront property owners. Over half of FOCA's member associations are in the watersheds managed by CA's.

FOCA's Province-wide interests include land use planning, management of water quantity and quality, flood and drought response, natural heritage, and citizen engagement in resource management.

Worth noting are our many collaborations and interactions with local Conservation Authorities (on local or regional programs, events, publications), and with Conservation Ontario staff on everything from Source Water Protection, landowner stewardship, rural land use planning, and biodiversity conservation.

The subject of GOVERNANCE must consider the context and responsibilities inherent in floodplain mapping, water quantity monitoring, and flood/drought response. The "Governance" of resource management should include elements of equity across regions of the Province

(regardless of whether there is a large, small or no Conservation Authority in place), appropriately delineated and communicated standards and guidelines, and transparency about policy objectives sought and achieved.

FOCA notes that the extensive work undertaken by (some) CA's is done on behalf of, or are delegated to do so, by the Ministry of Natural Resources and Forestry, who have ultimate authority and responsibility for most of the pertinent issues. The model whereby authority is simultaneously retained by (or delegated from) MNR and delivery of these services is locally determined, can result in a highly variable and confusing situation, with widely varying resources and approaches being applied to resource management.

As it stands, there are jurisdictional overlaps and gaps – possibly a result of the Province's passive or unclear role, and the resulting emergence of other parties to fill the void in a local context.

To the question about FUNDING, Provincial obligations, as established at law and in related policies duly approved by the Legislature, must be fulfilled by the Province across the whole of Ontario's jurisdiction by providing adequate internal government capacity and resources, and/or by providing sufficient resources to third parties (including municipal government, or possibly Conservation Authorities).

While about 50% of FOCA's formal membership is within a municipality with CA jurisdiction, and 50% are outside the bounds of a CA, 100% of our members are subject to Provincial authority and oversight related to water quantity management, and related Provincial jurisdictional matters. Simply put, FOCA expects efficient and effective water management in ALL of the Province's watersheds.

In closing, any review of the Conservation Authorities Act should firstly define the obligations of the Province, how and who will fulfill them, followed by robust consideration of the resources required to deliver, and lastly to ensure that the resources are effectively allocated and are having the desired effect.

Thank you for the opportunity to provide our input to this important review and we look forward to continuing to contribute to robust resource management in Ontario, in partnership with our government and non-government partners.

Respectfully,



Ken Grant, President



Terry Rees, Executive Director