



January 17, 2019

FOCA provides the following Comments related to the proposed Bill 66, EBR Registry Number 013-4293, and proposed open-for-business planning tool, EBR 013-4125

FOCA is the Federation of Ontario Cottagers' Associations, a member-based organization representing over 500 local community groups across rural Ontario. Waterfront property owners represent one of the single largest rural constituencies – over 250,000 families, located in hundreds of Ontario municipalities and who collectively own and steward 15,000 kilometers of the Provinces shorelines, and over 50,000 hectares of economically and environmentally important lands.

FOCA's mission is *To protect thriving and sustainable waterfronts across Ontario.*

FOCA has province-wide interests founded on thriving communities and healthy natural environments that sustain them. We help to achieve this through our education and promotion of best practices, informed individual actions, and by providing leadership on sound public policy.

A number of fundamental strategies to deliver affordability and sustainability include land use planning that considers the myriad community needs along with consideration for impacts that will degrade our ability to thrive and prosper in the future. Protecting vital resources and especially our water is non-negotiable; reducing the threats to drinking water has been a necessary and positive step in the right direction, currently secured through the provisions of the Clean Water Act (CWA) and other provincial statutes.

As a primarily rural constituency, we appreciate the challenges confronting smaller communities, the economic pressures they face, and also the stretched resources they have available to provide the information upon which to make decisions. As creatures of the Province, they benefit from clear and principled policy direction. The proposed open for business planning bylaw could precipitate a "race to the bottom" and will put significant pressure on competing municipal councils to attract jobs and allow development in areas that would normally be protected by provincial legislation.

Protecting all of our water sources (lake, river, ground) is essential to healthy communities and families. Strongly affirming that Ontario's health is not for sale and therefore our water cannot be compromised for the sake of other interests, is appropriate and a long-term strategy for success.

Federation of Ontario Cottagers' Associations

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Key to achieving this is a shared and common knowledge that we have both individual and collective responsibilities to the stewardship of these resources. The CWA has been a step forward to systematically identify risks to our primary drinking water sources and employed a robust and very public process to reduce these threats.

FOCA has long held the belief that the types of risk mitigation delivered through the CWA and Source Protection Plans was a solid first step, and has the potential to further protect all of our waters if applied more broadly.

Bill 66 seeks to undermine the primacy of the protection in these CWA policies, and we feel this is an unacceptable breach of both science-based policy protocols, and the public trust.

We implore the Province to reconsider the language and intent of this Bill and especially the provisions in Schedule 10 that specify the open-for-business planning bylaws do not have to comply with established and important environmental protections and land use controls.

We are concerned that the proposed Open for Business approach exempts lands from the Provincial Policy Statement, The Great Lakes Protection Act, the Growth Plan, Greenbelt Act, Oak Ridges Moraine protections, the Lake Simcoe Protection Act, and similar initiatives.

Collectively, these Acts and initiatives are vital to how the planning framework identifies and protects natural heritage and therefore our air, water, and biodiversity; community resilience from erosion and flooding, and ultimately, human health.

Exemptions from the provisions in the Provincial Policy Statement and similar protective measures is a threat to public health and safety, could degrade terrestrial and aquatic natural heritage, biodiversity, and ultimately, both Ontario's social wellbeing and its economic vitality.

Our planning system will be compromised by allowing the passing of bylaws that do not conform with Provincial policy, and circumvent the normal process of good planning which would include proper public scrutiny.

We hope that these comments are useful and will help you to amend your proposed Bill so we don't repeat the mistakes that lead to the Walkerton tragedy in 2000, and so as not to further degrade our natural heritage and vital biodiversity.



Terry Rees
Executive Director