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Ministry of Natural Resources and Forestry
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April 25, 2016

Attention: Hon. Bill Mauro, Minister

Dear Minister Mauro,

We are writing to follow up on a stalled policy reform process for water quantity management at MNRF. Despite an acknowledged need to adapt to climate change, and problems with high water levels and flooding from annual spring freshets, MNRF has been silent on a modern approach to Water Management Planning.

Action on Water Management Planning in the province of Ontario is long-overdue. We have had no indication of a new plan, timelines or any sense of guiding principles for a modernized approach to water quantity management, since our letter to ADM Rosalyn Lawrence last summer. In the letter (a follow-up to a meeting we had on this topic with Ms. Lawrence in July 2015), we specifically asked for a response about the status of the 2012 legislative amendments to the Lakes and Rivers Improvement Act. This reform was intended to create a 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, over two years ago.

In the intervening years, 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, no such opportunity has been possible.

Our request today, as it was in mid-2015, is for some assurance from MNRF 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.

Some further points from our 2015 letter are restated here:

- 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 Water Management Plans was seen as too cumbersome and not flexible enough. As it stands, there is NO review, no opportunity for input, discussion, problem solving or consensus building in Ontario.

On behalf of our member organizations, The Federation of Ontario Cottagers' Associations (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 program in Ontario.

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.

On behalf of these families, FOCA has worked on many shared and important issues with the Federal and Provincial government in the past: as long-standing partners in delivering water quality monitoring, as members of your Ontario Biodiversity Council, as supporters of strong and measureable Great Lakes protection in Ontario, and as partners with MNRF on many resource management files (wildland fires, fisheries, invasive species, natural heritage, and stewardship).

We hope to continue this collective commitment to the Province's natural heritage and resources, and believe this requires on-going dialogue. We are anxious to move the water management file to an active phase and would like to meet to discuss your plans on this issue.

Sincerely,



Terry Kennedy, President, FOCA



Terry Rees, Executive Director, FOCA

cc Rosalyn Lawrence, Assistant Deputy Minister rosalyn.lawrence@ontario.ca
Chris Walsh, Director, Crown Forests and Lands Policy Branch, chris.m.walsh@ontario.ca