



March 12, 2020

The Honourable Doug Ford, Premier
Room 281 Legislative Building,
Queen's Park Toronto, ON M7A 1A1

Dear Premier, and Ministers Yurek, Yakabuski, and Clark,

Please see below the comments from the Federation of Ontario Cottagers' Associations (FOCA), with respect to the 2020 consultations on the Conservation Authorities Act. FOCA is a province-wide not-for-profit organization, representing the 250,000 families who own waterfront property in Ontario.

FOCA believes that planning at the watershed level is a must, in the face of looming and increasing threats from changing precipitation patterns, threatened natural heritage and biodiversity, and the ongoing need for safe drinking water for all.

The Province, and most municipal governments, does not have the wherewithal to adequately plan, manage, administer and deliver the kind of technical oversight and programming required to keep our communities and our waters protected.

The Conservation Authority (CA) model has been recognized as a progressive approach to ensuring that flood risks are reduced, and important natural heritage is protected for the multiple benefits it provides.

With better regulatory clarity within the governing provincial policy, CA's can continue to provide an outstanding level of service delivery, including their important role in natural hazards management, land use planning, permitting and oversight, and the overall management of water quantity and quality.

The recent Flood Advisor's report showed strong support for the CA watershed model in protecting Ontario from the risks of climate change. This model only works if CA's retain regulatory power in land use planning decisions to ensure watershed resilience to climate change and flooding.

Watershed-wide monitoring and planning supports the CA's programs of flood mitigation, natural hazards, drinking water source protection, as well as the Lake Simcoe Protection Plan. Monitoring programs are necessary for delivery of these "core" programs, and greatly assist broader environmental goals of land conservation, improving overall water quality, and ecological health.

CA's partner with local conservation groups, including lake associations, to develop and deliver regionally significant projects including rehabilitating natural heritage, implementing best practices, and restoring or creating wetlands. They often can provide matching funding, in addition to the on-the-ground expertise and relationships with the local community. The bulk of the funding comes from local levies collected by and for the local level of government, to deliver services deemed important in their respective communities.

FOCA urges the Province of Ontario to further cultivate the success of the CA's who, since the 1940's, have delivered valued programs and services that "conserve, restore, develop and manage" our natural resources.

Our communities, and our watersheds are facing increasing pressure from population growth, expanding development and climate change. Recent and unprecedented flooding in many parts of Ontario, including in Muskoka, along the Great Lakes, and the Ottawa River in 2019 make it clear that local expertise and hands-on management through CA programs are more important than ever.

FOCA has members in over 100 municipalities who are part of a CA; we are certain that the overwhelming majority of our members, and the municipal representatives they have elected, support the involvement of their local CA to deliver important community services. Having said that, it is fair to say that clarifying and streamlining the services the CA's deliver (especially as it pertains to land use development/permitting) would help further integrate their role to better fulfill the overall mandate of safe, sustainable communities.

It will be important to consider any revisions to the roles and responsibilities of CA's with the adequate input of municipal governments, and the Province's key agencies (notably Ministry of the Environment, Conservation and Parks, the Ministry of Natural Resources and Forestry, and the Ministry of Municipal Affairs and Housing partners) to ensure that true improvements are achieved through well-thought out reforms.

In terms of Source Water Protection, FOCA believes the watershed is the right scale for managing the quality of our waters, and strongly encourages the Province to consider how this approach could be applied beyond just the current municipal systems to extend to clusters or other rural water sources/systems – for more robust drinking water protection for Ontarians.

Stable provincial funding is critical to ensure a minimum level of capacity across all conservation authorities, especially smaller ones, to ensure a level of consistency in the delivery of mandatory programs.

In closing, FOCA supports a strong and well-supported Conservation Authority network in Ontario and looks forward to continued good work together on behalf of Ontario's 250,000 waterfront residents, many of whom benefit from their services and programs.

Sincerely,



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