



Federation of Ontario Cottagers' Associations  
201-159 King St.  
Peterborough ON  
K9J 2R8

October 17, 2023

To: Joe Salemi  
Landscape Ontario

Dear Joe,  
Thanks for your leadership thus far on the salt file.

***The increasing chloride levels in Ontario's freshwater systems continues to concern our members across Ontario.***

As a reminder, FOCA is a not for profit organization representing Ontario's 250,000 waterfront property owners through over 540 local associations – from Kenora to Cornwall. Our mission is to support these groups through education, communication and advocacy.

We work with our members on environmental stewardship, community engagement, rural affordability and we do this through partners at the municipal, provincial and federal level towards sustainable and affordable rural waterfront communities.

Our members are the backbone of the largest and longest standing lake water quality monitoring program in Ontario – the Lake Partner Program, monitoring the nutrient status, and chloride content of Ontario lakes at over 800 locations with over 600 volunteers each year for over 30 years.

Our members have an enduring (almost 60 year) legacy of commitment to protecting water quality and biodiversity on our waterways. Waterfront property owners collectively own and steward 50,000 hectares of nearshore property and over 15,000 kms of important shorelands.

Through the Lake Partner program, and through regular consultations with Dr. Shelley Arnott at Queen's University, Dr. Hilary Dugan at University of Wisconsin-Madison, Muskoka Watershed Council, Lake Simcoe Conservation Authority, and through our work as members of the Ontario Biodiversity Council we have seen an alarming upward trend in the salinity of our freshwater lakes, and are gravely concerned about the impacts to our sensitive aquatic habitats, and our fish and wildlife.

On the immediate, homeowner level, FOCA represents over 200 rural resident groups who provide or support private road access to their members – by volunteering to do road maintenance for access to remote properties, and by contracting hundreds of road maintenance contractors – large and many small – to perform winter snow maintenance. They do this at their own expense, affording access to thousands of rural Ontarians to their homes.

Increasingly, these groups are unable to find contractors who are willing or able to do this fundamental work. The lack of service providers means a lack of crucial winter road maintenance, hampering basic access to our homes, for medical and other emergencies, and the ability to travel for work.

The growing lack of maintenance services is linked directly to the number of these service providers who have abandoned their businesses due to the unaffordable liability exposure. This impacts Ontarians who collectively own close to \$100 billion in residential real estate, much of it serviced by non-municipal roadways.

Road salt reduction has also been identified as a key priority in the Canada-Ontario Agreement respecting the Great Lakes.

FOCA believes the oversalting of our environment, and all the related causes and effects, should be addressed through the Provincial government, which should include:

1. Establishing a Provincial Water Quality Objective (PWQO) to help identify and address the specific environmental needs of Ontario's aquatic species at risk that are more susceptible to chloride levels as set out by the Canadian Council of Ministers for the Environment (CCME) and place Ontario as the environmental stewards of Canada's Great Lakes. A PWQO seeks to protect the natural environment and water.
2. Regulating the activity of road salt application, including implementing a training, certification and reporting program for medium to large-scale road salt applicators. Completion of certification in approved application techniques and technologies should be a minimum for an industry applying a known environmental toxic substance at medium to large-scale for the protection of water.
3. Developing liability benefits in the province of Ontario for public and private holders of an audited training and certification in which proper winter conditions, snow and ice removal techniques, and substance quantities are tracked and recorded as evidence for maintaining public safety and environmental health. The New Hampshire Green SnowPro model has demonstrable benefits that could be emulated here in Ontario.

In conclusion, FOCA believes that policy changes within the scope of the Ontario government are a significant part of the solution to rising salt levels, and we look forward to working with you, the Province and others to reduce the overuse of salt while keeping our communities and roadways safe.

Regards,

A handwritten signature in black ink, appearing to read "Terry Rees". The signature is fluid and cursive, with the first name "Terry" being larger and more prominent than the last name "Rees".

Terry Rees  
Executive Director, FOCA