

North Frontenac Lake Association Alliance

December 6, 2018

Mayor Ron Higgins
Township of North Frontenac
Plevna, Ontario

Subject: MPP Hillier's expressed difficulties with Conservation Authorities

Dear Mayor Higgins,

I am writing to you on behalf of the North Frontenac Lake Association Alliance. We hope to add information and insights we have investigated into Council's due diligence when deciding on the request from MPP Hillier for a supporting motion for his proposed reforms to Conservation Authorities.

Accuracy and evidence, we appreciate, is the basis of decisions by North Frontenac Council. We trust that Council is using these two metrics in determining how it should respond to MPP Hillier's request for support.

With this as the basis for our letter, the NFLAA wishes to bring to the attention of the full council that:

1. The MVCA and RVCA are accountable to the municipalities which appoint the members of their Boards of Directors. The CAs actions are determined by and accountable to these Boards. Through the municipalities (Townships) to whom they are accountable, CAs are accountable to and serve the taxpayer.
2. Local CAs, with the mandate of their Boards, have had to grapple with the withdrawal / offloading of services from higher levels of government, namely MNR, MOE and Fisheries and Oceans. The CAs were mandated by their Boards to set up agreements (MOUs) with the appropriate local authorities to support some but not all of these areas but in particular programs related to Watershed Management. These were in line with their original mandates related to natural hazard erosion, flood control, overall water quality and recently added effects of climate change on watersheds as approved by municipalities.
3. CAs successfully undertook their work since 1996 when provincial funding (some 70% of their funding) was cut by the province.
4. In 2006 CAs were required / mandated by the province to manage all wetlands, which in some cases had to be delayed due to a lack of mapping. Consequently they focused on the mapped areas, being provincially significant wetlands (a term within their mandate). However, their mandate for all wetlands set by the province in 2006 was finally actioned in 2017 as approved by the Boards of the two CAs being questioned. Terms such as "insignificant wetlands" and "unevaluated wetlands" neither appear in the CA mandates nor do they alter their responsibility and mandate to apply the provincial regulations to all wetlands. By regulation this requires that CAs have a regulatory responsibility to monitor

development proposed for any and all wetlands, which they are doing. This is neither an expansion of “their scope of services” nor “broadening their jurisdiction”. They are doing what is required, expected and mandated by the province and their Boards and accountable to municipalities.

Further to this effort to provide contextual, clarifying and corrective information, we also note that the Federation of Ontario Cottager Associations is not aware of any similar concerns in the province. While the role of CAs is much wider than the views of cottagers, it would be known if this matter had a basis across the province. From the perspective of NFLAA, the support being requested from Council needs to be carefully considered.

Within our membership there would be a shared view about mission creep, but while being described as such by MPP Hillier, in our considered opinion CAs are working with rigour to implement their mandates as directed and monitored by their Boards and through which they serve taxpayer interests accountably.

Thank you for your consideration of this set of NFLAA views and implicit concern that council take a fully informed view of the request it is considering.

Sincerely

Bruce Moore

Chair

North Frontenac Lake Association Alliance