



A Shared Passion for Lake Life

Lake of the Woods District Stewardship Association

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October 20, 2019

Ministry of Municipal Affairs and Housing Provincial Planning Policy Branch
777 Bay St., 13th Floor
Toronto, ON M5G 2E5
planningconsultation@ontario.ca

Re: Provincial Policy Statement Review ERO Posting #019-0279

The **Lake of the Woods District Stewardship Association (LOWDSA)** is a vibrant membership-driven organization focused on the sustainability of lake life in our region for over 57 years. It is a not-for-profit association with more than 2,800 individual and family memberships representing cottagers, waterfront property owners, year-round residents, seasonal vacationers and concerned citizens. LOWDSA's members include singles, couples and extended family groups living in the Lake of the Woods watershed area, both in municipal and unincorporated areas, extending from Morson at the south end of Lake of the Woods to the Minaki area on the Winnipeg River and from the Manitoba border east to the Longbow Lake/Dogtooth Lake area (covering an area of approximately 5,500 square kilometers).

We are writing today on behalf of our members, particularly the majority who reside in the unincorporated/unorganized areas and are not represented by any municipal body. Our comments pertain first to consultation/engagement with organizations and stakeholders in the unincorporated/unorganized areas and, secondly, to changes proposed in the Provincial Policy Statement Review, ERO Posting #019-0279.

Consultation/engagement with organizations and stakeholders in the unincorporated/unorganized areas

We only recently became aware of the Provincial Policy Statement (PPS) Review (ERO #019-0279) and the October 21st deadline for comments and submissions. Given the potential of these changes to have a significant impact on future development and the environment in the unincorporated/unorganized areas, just as elsewhere in the province, notice of this review would have been welcomed. In fact, we would respectfully suggest that it should have been expected and would be interested in knowing what efforts were made to contact organizations in the unincorporated/unorganized areas.

It is our expectation that all municipalities would have been made aware of this review through normal channels of communication between the Ministry of Municipal Affairs and Housing, giving municipal residents a voice. However, this left the unincorporated/unorganized areas largely offside and without a voice. Respectfully, the Lake of the Woods District Stewardship Association recommends that going forward, on matters having the potential to impact the unincorporated areas, the Ministry make a real effort to reach out to organizations and stakeholders in the unincorporated/unorganized areas. This would of course include the Lake of the Woods District Stewardship Association, Local Service Boards (at least 3 in the area), DoKURA and a number of other 'community' organizations that are spread across the area – many of them well known to local ministry offices and the Honourable Greg Rickford, Minister of Energy, Northern Development and Mines/Minister of Indigenous Affairs.

The absence of effective consultation/engagement with organizations and stakeholders in the unincorporated/unorganized areas on changes to the Provincial Policy Statement leaves thousands of residents and taxpayers without an opportunity to provide input - with decisions on their behalf falling to the minister. There is no planning authority in the unincorporated/unorganized areas, so the only planning policy that applies is the Provincial Policy Statement, and the only planning controls that apply are provincial approval of land division. This is of particular concern with respect to proposed and significant changes noted below relating to permitting private communal septic systems in the unincorporated/ unorganized areas.

Case in point - we would refer to the Minaki on the River development that was approved by two provincial ministries, opposed by a significant number of area residents and subsequently taken before the Ontario Municipal Board, the subject of 11 days of hearings in 2017. The ministerial approval to proceed was overturned by the OMB, with reference in the board's ruling to the proposed water and sewage services and private communal services factoring into the decision.

Proposed changes to the Provincial Policy Statement

At this point, given the imminent October 21st deadline, we will be unable to conduct a detailed review of the changes to the policy. With advance notice, we would have conducted such a review and would have done so drawing on the expertise and knowledge of our board and individual members. We would have also reached out to those other community organizations mentioned above to make sure they were aware and had the opportunity to engage in the process with emphasis on the potential impact to the unincorporated areas within the Lake of the Woods watershed.

We do, however, have two comments to make:

1. As per the ERO posting (#019-0279) the government of Ontario is proposing policy changes to:
 - encourage the development of an increased mix and supply of housing
 - protect the environment and public safety
 - reduce barriers and costs for development and provide greater predictability
 - support rural, northern and Indigenous communities
 - support the economy and jobs

It is the second goal, to protect the environment and public safety, that we would ask receives careful attention and consideration specific to rural, northern and Indigenous communities. Changes to policy affecting environmental protection will not necessarily play out and impact rural/northern areas in the same way as they will in the dense, urban areas of southern Ontario. Further, those changes will not necessarily play out and impact unincorporated/ unorganized areas in the same way as they will in rural municipalities or townships. Unincorporated/ unorganized areas – clearly without municipal structure or planning authority – do warrant some separate consideration in this respect. One example of many would be changes proposed to policy changes regarding private communal septic systems.

2. As per the ERO posting (#019-0279) the government of Ontario wants feedback on proposed PPS changes to support Ontario communities that provide housing choices for all residents, are investment-ready, and protect the environment and important resources such as water and farmland. In response to questions posed in this posting we would note the following:
 - As above in #1, we would again ask for assurance that consideration of whether or not - *the proposed policies effectively support goals related to increasing housing supply, creating and maintaining jobs, and red tape reduction while continuing to protect the environment, farmland, and public health and safety* - receives careful attention and consideration specific to rural, northern and Indigenous communities. Changes to policy affecting environmental protection and important resources such as water and farmland will not necessarily play out and impact

rural/northern areas in the same way as they will in the dense, urban areas of southern Ontario. As noted above, we again suggest that unincorporated/ unorganized areas – clearly without municipal structure or planning authority – do warrant some separate consideration in this respect.

- As to - *how these policies take into consideration the views of Ontario communities* – although communities in the unincorporated/unorganized areas may be without structure, they are communities in every other way that counts and there were a number of ways they could have been reached to be notified of this review process. Given the lack of outreach to communities in the unincorporated/unorganized areas, we feel that these policies do not take into consideration Ontario communities which fall outside municipal structure.

For future consideration, we ask you to call on us to assist in notifying our members on matters such as this and anytime you are looking for real public consultation. As representatives from the Ministry of Natural Resources and Forestry and the Ministry of Indigenous Affairs recognize and appreciate, we do have the ability to get the word out to our members quite quickly and on short notice. In addition, depending on timelines, it is possible to include such notices in our *Lake of the Woods Area News* magazine.

We appreciate the opportunity to comment on the notice and process on behalf of our association and its 2800 member families. The Lake of the Woods District Stewardship Association is mindful of the importance of the consultation process regarding *any* matter that may have an environmental impact, one which should provide those potentially impacted with a real opportunity to participate.

Respectfully,



Hardy Bock, President



Diane Schwartz-Williams, Executive Director

c.c. Honourable Steve Clark, Minister of Municipal Affairs and Housing minister.mah@ontario.ca

c.c. Honourable Jeff Yurek, Minister of Environment, Conservation and Parks minister.mecp@ontario.ca

c.c. Honourable Greg Rickford, Minister of Energy, Northern Development and Mines/Minister of Indigenous Affairs

c.c. Don Parfitt, Director, LOWDSA

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