



September 17, 2026

Ms. Jennifer McKay
Manager, Crown Land Policy Section
MNR Crown Forests and Lands Policy Branch
300 Water Street, 5th Floor, North Tower
Peterborough, ON
K9J 3C7

SUBJECT: Changes to Streamline Natural Resource Permits: Allow Dry Hydrants on Public Lands (ERO Policy Proposal 026-0692)

Dear Ms. McKay:

On behalf of the Northern Ontario Tourist Outfitters Association (NOTO), thank you for the opportunity to provide comments on the Ministry's proposal to amend regulations under the *Public Lands Act* to modernize certain approvals to allow for the placement of dry hydrants on public lands without site-specific authorization, as detailed in [ERO policy posting 026-0692](#).

Founded in 1929, NOTO is dedicated to proactive planning, development and promotion of a strong nature and outdoor tourism industry in Ontario. NOTO supports the resource-based tourism (RBT) industry through advocacy, information services and business support. We work with Government on policies that will support a strong and vibrant outdoor tourism industry in Ontario.

NOTO members and the broader RBT sector rely heavily upon access to Ontario Crown land and waters to deliver important economic benefits to the economy of northern Ontario. In doing so, the RBT sector works closely with MNR and other ministries to help manage and sustain the lands, waters, fisheries and wildlife on Crown lands. For these reasons, we have a keen interest in all matters related to the management of Ontario's Crown lands.

We have reviewed this proposal and wish to advise that we are in full support of the proposal. This past summer's forest fires have seen widespread damage and losses to many northern communities, with significant negative financial and operational impacts to many operators across the resource-based tourism sector.

There is an opportunity to learn from this summer's experiences with fire suppression, emergency management and evacuations, and NOTO welcomes the opportunity to work collaboratively with government, communities and other stakeholders to identify lessons learned and explore ways to strengthen our collective preparedness moving forward.



NOTO supports anything that can be done to better enable rapid and effective fire suppression to protect people and values across northern Ontario, including the proposal to allow dry hydrants on public lands as laid out in this policy proposal.

NOTO will continue to encourage the Government to enhance funding opportunities that would allow for the following:

- Increase the AFFES Branch budget for the staffing, equipment, operations, education and infrastructure needed to support immediate, effective wildfire response as seasons become longer, more unpredictable and increasingly challenging for Northern Ontario communities, businesses and emergency responders.
- Explore a cost-sharing program that would enable operators to install protective equipment such as sprinklers, water lines, hoses, and standpipes leading to faster response.
- Establish a new Recovery Assistance Funding Program to support operators who have lost structures and provide support for them to build back better.

In closing, NOTO appreciates the opportunity to provide comments on this policy proposal. If your office has any questions regarding our submission or requires any other additional information, please do not hesitate to contact myself.

We look forward to continuing to work with MNR as the policy and permitting review process continues.

Take care,

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c.c. Chris Cuthbertson Director, MNR Aviation, Forest Fire and Emergency Services Branch
Spooner Collins, Director, MNR Crown Forests and Lands Policy Branch