

WLCA Statement to the District Municipality of Muskoka
RE: Proposed Official Plan Amendment No. 45 to the Muskoka Official Plan
(Lake System Health Policy Update)
Dec 2016

This document serves as the Wood Lakes Cottagers' Association (WLCA) comment submission to the District Municipality of Muskoka (DMM) regarding proposed official plan amendments to update lake system health policies. The association appreciates the opportunity to comment and looks forward to continuing to be engaged on this matter.

The WLCA was established in 1950 with intent of protecting and the promoting the interests of residential shoreline property owners, with emphasis on the preservation of the lake environment and its surroundings. Since the 1990s, the WLCA has participated in the DMM's Lake Partner Program both as a means of gaining awareness of potential water quality issues that may affect the lake environment, and to promote awareness and best practices to residents. Wood Lake has been classified as an 'Over the Threshold' lake for phosphorus levels in recent years and has taken this designation as a serious indicator that the lake environment is becoming degraded. We feel that any alterations to lake system health policies through the DMM should strive to enact a higher standard of lake health in order to best protect Muskoka lakes for the long-term, for both the benefit and enjoyment of humans and for wildlife. To this end, the WLCA offers the following opinions related to the proposed changes:

- The WLCA feels that a higher minimum standard set of best management practices should be applied to all forms of recreational lake development. Requiring such measures as vegetative buffers, set back distances, limiting impervious surfaces, shoreline naturalization for all proposed site alteration proposals is supported and encouraged. The WLCA foresees a potential challenge with this change related implementation (e.g. standardized guidance/protocols), as well as enforcement/compliance and effectiveness monitoring (especially with a lens for cumulative impacts). The WLCA encourages the DMM to carefully consider how success will be measured for this program change.
- The WLCA also understands that basing planning policies on Total Phosphorus (TP) in lakes alone is not the best approach for deciding how and when to apply enhanced restrictions on recreational lake development and agrees that a more comprehensive consideration of factors (e.g. climate change, settlement density, habitat loss/fragmentation, and cumulative impacts) is warranted when undertaking planning decisions.
- Regarding the 20ug/L limit that is proposed for the 'enhanced management' category, the WLCA feels this threshold is not cautious enough to prevent adverse effects to the lake environment in lakes categorized as 'over the threshold' under the current model, given the myriad of threats that face lakes in Muskoka (e.g. cumulative effects of shoreline development, climate change). In our opinion, lakes already classified as 'over the threshold' indicate the presence of adverse effects from human activities. Under the

proposed new model, even though some of these lakes would not meet the criteria for the enhanced management category, the new model seems to overlooks the distinction that some lakes in Muskoka are experiencing a higher degree of environmental degradation than others. A three-tiered system of management categories might still be warranted. A review of the 1994 Provincial Water Quality Objectives document published by the Ministry of Environment indicates that 20ug/L is the threshold for 'nuisance algal blooms', but also goes on to recommended a threshold of 10ug/L to maintain recreational water quality. In addition, is stated that Provincial Water Quality Standards "...do not take into account analytical limits, treatability or removal potential, socio-economic factors, background concentrations, or potential transport of contaminants among air, water, and soil" (p.37). The WLCA recognizes that a threshold set at 10ug/L would trigger the enhanced management requirements for a great deal of lakes, which would subsequently be more costly to developers, cottagers, and to the townships for authorization and compliance, and could further restrict development. However, we feel a threshold limit of 20ug/L is likely too coarse for application in Muskoka, particularly considering the degree of land cover change since 1994 resulting from significant increases in recreational lake development and associated pollutants, habitat loss and invasive species. The WLCA would prefer to see the DMM set a more conservative threshold limit that takes into account the precautionary principle and cumulative impacts for lakes already experiencing degradation. Maybe 10ug/L is not feasible to implement as a threshold, but perhaps a threshold of 15ug/L would be more appropriate for ensuring lakes are healthy and enjoyed by all well into the future.