

The Honorable Kathryn McGarry
Minister of Natural Resources and Forestry
Whitney Block, Room 6630
99 Queens Park Circle
Toronto, ON
M7A 1W3

February 15, 2017

Dear Minister:

Re: Muskoka Lakes Association (Ref: MNR6446MC-2016-124)

Thank you for your above referenced letter of November 29th, 2016 to the President of the Muskoka Lakes Association. We appreciate the information you shared and your sympathy for the issues that waterfront residents in Muskoka have faced in recent years with unprecedented flooding. We have met with MNR staff of the Parry Sound office and found the discussion helpful. However, we are disappointed in the response of your Ministry to the concerns we have expressed with the Muskoka River Water Management Plan (MRWMP).

Your letter references that there is no term on Water Management Plans (WMP). The MRWMP had an expiry date of 2016. We were advised in early 2016 that it would be renewed for a further 5 years. We only recently became aware of the "Maintaining Water Management Plans Technical Bulletin". Stakeholders of the Muskoka Plan were not made aware of the document nor of the implications for the future maintenance and updates to our plan. **The MLA is concerned with the effective "shutdown" of the obligatory WMP reviews** and with the current undefined internal review period whereby there is no official policy review process to trigger public or stakeholder input into future plans.

When this government is investing so much political capital in addressing climate change, the opportunity to revise the Muskoka River Water Management Plan to reflect new climate realities must be a priority. Hydrologic models are commonly used to predict the flows and water elevations that may be experienced under a variety of rainfall/runoff or water management conditions, particularly for those that may not be normally experienced – such as extreme rain or modification of dam operations.

The models use a number of sets of data including topography, precipitation, routing of flows through dams, lakes and rivers, discharge rating curves for existing dams and weirs, evaporation losses, minimum and maximum flow constraints for various channel or river sections. The base model for the Muskoka River plan was set up to simulate the period 1970-2000. Much of the data used in the model was current as of late 1990s.

The data in the model are over 20 years old. Climate conditions have changed according to many sources, including the Ministry of Natural Resources and Forestry (Climate change projections for

Ontario: An updated synthesis for policymakers and planners, 2015). Their results show significant changes are expected when future years (2011-2040, 2041-2070 and 2071- 2100) are compared with the baseline period 1971-2000 (coincidentally the same baseline period as in the MRWMP). They predict that air temperatures will be from two to seven degrees warmer in summer. Winter temperatures are projected to increase, on average by 2.5 to 2.8° in the 2020s. Another new report focused on the Muskoka Region about the impact of climate change is well documented in the Planning for Climate Change in Muskoka report, published by the Muskoka Watershed Council, 2016 (www.muskokawatershed.org).

This means the potential for:

- a) Earlier ice out (observations and predictions are suggesting 3 weeks earlier)
- b) Increased precipitation, with seasonality shifted towards late winter/spring, potentially altering the timing of spring freshet
- c) Increased extreme weather, both in quantity and extent.

For this coming spring 2017, the MLA remains very concerned for the potential of damaging spring flood conditions with warmer winter temperatures and global warming (2016 was the warmest year on record) that have contributed to record fall temperatures in the Great Lakes and record low extent of ice cover. This sets the stage for increased lake-effect snow and/or winter rain in the Muskoka River basin.

WMP's need to have up-to-date management scenarios to be able to address the risk from extreme events that are becoming more common. MNRF needs the weather forecasting tools and models to provide for increased lead times for heavy rains. It is our understanding that MNRF staff does not even have the model used to develop the MRWMP to assist them in managing this complex basin.

All this means that there is a need to update the MRWMP sooner than later and to determine if changes in system operations are warranted as a result.

We agree with your suggestion to identify new planning standards, but without the ability to model future water management scenarios, no one will be in a position to determine what those standards should be. New planning standards will not assist the existing dock or boathouse structures. The District of Muskoka estimates there are over 10,000 boathouses, mostly on wood crib or steel docks, built at elevations based on the Normal Operating Zone of the MRWMP. Many of these waterfront property owners contribute a significant amount of property taxes to the District and Townships.

The MLA would like the MNRF to undertake some new model runs that would use observed and actual spring conditions of 2013 and 2016. These analyses would determine if different operations would have altered the flooding outcomes. Alternatively, the MLA would like to be able to have a copy of the model or access to the consultants who undertook to use the model for the Plan and have the consultants run some scenarios. The complicated nature of the various control structures and the size of the watershed means that objective modelling based on updated and current data must be viewed as the most effective way to assess options.

While we appreciate that there are many Water Management Plans in Ontario, there are only 20 complex plans. Of these, only a few may have experienced the issues and significant structural, property and financial damages as found in Muskoka, such that updates to provincial WMPs can be prioritized.

The MLA urges you to support the renewal and updating of these plans to reflect climate change, and to ensure that property values, tourism and infrastructure are protected in Muskoka. We will continue to pursue the update by also making a formal amendment request through MNRF and the Standing Advisory Committee for the MRWMP.

Both the Township of Muskoka Lakes and the District Municipality of Muskoka have passed resolutions requesting the province to conduct an impact study of the high and low water zones contained in the MRWMP and to initiate a full review of the MRWMP before 2021 to address Ontario's changing climate in Muskoka, along with mitigating associated impacts on municipal and personal property.

In summary the MLA continues to ask that MNRF:

1. Develop short term measures with MNRF staff to reduce flood risks until such time as a revised and acceptable Muskoka River Water Management Plan (MRWMP) can be implemented
2. Initiate a process to revise the MRWMP as soon as possible, and
3. Allow MLA to be one of the participating parties in the creation of the new MRWMP.

The MLA and elected officials of our Municipalities still seek a meeting with you to discuss how MNRF can assist us in protecting our assets from further avoidable harm and in advance of this spring freshet. We look forward to your timely response.

Yours very truly,



Robert Ensor

President

Muskoka Lakes Association

Representing over 2,250 member families, 600 lake association members and over 35 local associations in the Muskoka Region

c.c. John Klinck, Chair, District of Muskoka
Don Furniss, Mayor, Township of Muskoka Lakes
Graydon Smith, Mayor, Town of Bracebridge
Paisley Donaldson, Mayor, Town of Gravenhurst
Jamie McGarvey, Mayor, Town of Parry Sound
Bruce Gibbon, Mayor, Sequin Township
Scott Aitchison, Mayor, Town of Huntsville
Michael Hart, Past President, MLA
Terry Rees, Executive Director, Federation of Ontario Cottagers Association
Norm Miller, MPP Parry Sound-Muskoka