

My name is Laurie Thomson and I am a long term committed resident of Muskoka. My extended family has been spending summers here for the past 50 years, with connections to Muskoka that go back to the late 1930's.

With my long, deeply vested history in the area, and my experience as past Chair of the Nature Conservancy of Canada, my main concern is the long term sustainable evolution of Muskoka, which at its heart must always start from a position of protecting our natural environment and the health of our lakes => otherwise Muskoka no longer remains special...Muskoka is no longer Muskoka and the long term prospects for the region suffer.

I'm very concerned that we are heading in a direction with our District Official Plan that could have irreversible negative consequences for the health of our lakes

We are saying one thing, but proposing to do something very different.

What we SAY in our district OP, one of it's guiding principles is that "the natural environment, especially water, is Muskoka's key asset and it will be protected for the values it provides including support for diverse ecosystems and a vibrant economy" (pt 2, s. A2, Guiding Principles)

Policy Direction B demonstrates our District's commitment to achieving long term sustainability in Muskoka:

"A clean and healthy environment and a strong economy are inextricably linked in Muskoka. The environment is made up of more than 6000 lakes with a vast rural area made up of large forested areas. These elements combine to create the sense of place that is unique to Muskoka and is known around the world. On the economic side, Muskoka is a premier destination for vacationers that generates millions of dollars annually and it is one of the choice locations in Ontario for permanent and seasonal residents that are attracted to the natural environment. With this in mind, the MOP shall establish as a first principle, that development activity be undertaken in a manner that conserves and enhances the features, functions, and interconnections of the natural environment that sustains what is Muskoka for future generations". (Pt2, s. A3, Policy Direction B)

Given that commitment, we went to experts to get their view as to how the policies in the proposed OP mesh with this.

First: Mirek Sharp, a leading natural heritage expert and principal with North-South Environmental, has advised many municipalities in their official planning processes. He reviewed the second draft of the MOP and found that "Collectively, these high-level guidance directions at the beginning of the MOP provide a foundation for providing strong operational policies that will place a

priority on the protection of the natural features that characterize Muskoka, make it unique, and on which its long term economic well-being depends. However.. the operational policies do not reflect this emphasis and leave doubt as to when the Vision and Guiding Principles are being met.”

In other words, the stated objectives are there, but the chosen policy does not reflect those statements. We are saying one thing and proposing to do something different.

Mr Sharp goes on to say , “The argument could be raised that in order to achieve the balance that is referred to in several guiding policies in the MOP, that there should not be a priority given to the environmental policies. However, in considering this, it is critical to understand that in many cases the valued natural features that comprise the Muskoka environment cannot be replaced or restored once they are degraded. Some habitats may be re-created, and it is possible to restore the quality of lakes, but only at great expense, and only if the root cause of the degradation is removed. If that root cause is over-development, then it will be virtually impossible to reverse. A much sounder approach is to protect Muskoka’s valued natural resources from the outset. For this reason, they should be accorded priority when seeking a balance among competing interests. This is reflected in the wording of Policy Direction B, but is not consistent with some of the other policy directions in the MOP.” (p3., M Sharp)

And it is for this reason that Mr. Sharp recommends the District go beyond the minimum protection provided through the PPS and he offers some suggestions as to how the OP can be strengthened in this regard. Overbuilding on the Toronto shoreline is inadvisable, but won’t stop tourists from flocking to the city. Overbuilding in Muskoka on the other hand, will destroy the reason people come to Muskoka.

Second, we went to Dr. Dewey, who is a leading dynamic lake modeller. His view is that the lake capacity model used by Hutcheson has a margin of error so wide that it cannot be applied to help us understand whether too much shore line development is being permitted. Even the Hutcheson report acknowledges that. **Dr. Dewey advises caution in waterfront development** particularly given there may be delays of up to decades between the addition of phosphorus sources to a watershed (i.e., septic systems), its movement from the source to surface water (Robertson 1995\*) and its expression as a change in trophic status. (i.e. measurable effects on water quality).

Third, we approached Dr Nurnberg, a preeminent water chemist. She remarked that scientists are predicting that the changing climate will exacerbate the lake effects of phosphorous, resulting in an increased tendency toward algal blooms and eutrophication – in her words, “A critical and real threat to Muskoka waters

is the increased potential of toxic cyanobacteria and their blooms". Dr. Nurnberg cites studies confirming repeated toxic cyanobacteria blooms in several Muskoka lakes and cautions that: "especially in view of limnological changes in lakes due to climatic change, the current monitoring program lacks comprehensiveness". In other words, our lakes will be stressed even without additional development. She recommends additional, non phosphorous, indicators be added and more rigorous, and more frequent testing be conducted.

The Provincial MOE report on lakeshore capacity assessment concurs: "The incremental nature of watershed development results in a slow and gradual increase in trophic status. The high degree of seasonal and annual variance in lake phosphorus levels (Clark and Hutchinson 1992) means that changes may not be detectable without an intensive monitoring program that requires the collection of many samples and uses a precise and replicable analytical method."

This is not the type of program that is proposed through OPA 45 and the Draft OP. It cannot be used as the ultimate arbiter of development decisions. By the time phosphorous concentrations reach our chosen limit, our shores will already be overdeveloped. **You can't unbuild. But you can choose to build wisely.**

Fourth, Elizabeth Howson, a land use planner with a long history of working for municipalities says: "The direction to prop up a vulnerable sector of the tourism industry . . . does not seem to reflect the policies of the Provincial Policy Statement" (issued under the Planning Act). The District Plan must be consistent with the PPS. She goes on to say that: (and that ) "the focus on economic development does not reflect an appropriate balance with the need to give consideration to environmental or other planning considerations." And recommends, among other suggestions, a policy approach for new resorts and the redevelopment of existing resorts which requires a comprehensive development plan to determined the best use of these lands.

So what does all this mean?

The experts are saying that the proposed actions allowed through the OP are not consistent with the stated objectives of environmental protection.

The experts are saying our water testing model is inaccurate and can not be used to determine if additional shoreline development is advisable; the environmental effects of development will not be immediately evident. The tipping point can not be clearly determined. Once you get over the tipping point, you've destroyed Muskoka. It's hard and expensive to recover. Our experts recommend we adopt a cautious approach to development and redevelopment. The experts are saying that with the ongoing and already

emerging impact of climate change, stresses will worsen even without further development.

There is only one conclusion:

Let's not rush our OP planning process. I only became aware of these changes at the beginning of September. I think most people in the room would say the same. Let's allow more time for public and expert input. The intention of our planners is to protect our lakes. It's clear in the OP's objective. But the policy directions to do this are absent or inconsistent. Let's get the right environmental clauses into our OP. Let's make sure they are operationally specific. Let's do the cost-benefit study to determine the best use of our resort commercial lands. Let's study how to promote tourism in Muskoka, not just resorts that aren't resorts. Let's consider land use in a long term context with up to date and forward looking environmental assessments. Let's use the precautionary principle that our scientists recommend and not go headlong into waterfront development.

Why on Earth, especially when you will hear from others that the economic benefit of the resorts strategy has not been fully studied and at best the result is unclear, would you take this risk with one of our greatest assets, our lakes.