



Hon. Minister Yurek
Minister of the Environment, Conservation and Parks
Ministry of the Environment, Conservation and Parks
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Dear Minister Yurek,

Thank you for committing to protecting Lake Simcoe in your Ten Year Report dated July 17, 2020. We are pleased that the province has allocated some money to Lake Simcoe, and sincerely hope that the results of the newly funded monitoring initiatives will be used to make future management decisions. We also appreciate that your government is committed to adaptive management and to resourcing the implementation of the Lake Simcoe Protection Plan (LSPP).

The Rescue Lake Simcoe Coalition, our 26 member groups, and the experts we work with and consult are concerned about the integrity of your report, however. A more critical look at the Ten Year Report reveals questions that concern us, and we are skeptical that the information has been presented without bias. This is precisely why the comprehensive science monitoring report should have been separate from the Minister's report. Overall, the report paints a positive picture of the lake, leaving any casual reader with the message that all is well. We do not agree this is an accurate portrayal of the lake's health.

Targets and Objectives

We find the claim that *“This consolidated report, which addresses both five-year and annual reporting requirements under the Lake Simcoe Protection Act, 2008, describes the collaborative efforts taken to implement the Lake Simcoe Protection Plan, as well as results of monitoring programs and progress towards the plan's objectives,”* is an overstatement of the Ten Year Report's contents. LSPP targets and objectives are not laid out in an easy-to-understand way and are reported on inconsistently or not at all. For instance, the LSPP has a 40% high quality natural cover target. Why not say that we currently have 28% high quality natural cover and need to do more to achieve that target? This Ten Year Report does not provide the monitoring results required to inform the review of the Lake Simcoe Protection Plan.

We are also saddened by the repeated obfuscations of the harder truths affecting Lake Simcoe in the Ten Year Report. For instance, your report says: *“The Lake Simcoe Region Conservation Authority's most recent Watershed Report Card (2018) indicates that the overall quality of groundwater is fairly consistent and good throughout all of Lake Simcoe's subwatersheds. While the quality of surface water has remained relatively stable since the last Report Card in 2013, there are key stressors in extensively urbanized areas and some agricultural areas.”* It would have been far more informative and accurate to say, “Surface water quality is poor to fair in 9 / 15 subwatersheds, which are characterized by agricultural and development land uses.” That is the reality. We would prefer that you not obfuscate the hard truths.

Phosphorus Loads

Your report says, *“Phosphorus loads from sewage treatment plants in the watershed have been reduced by approximately 50 percent since 2009,”* but does not go into the tricky problem of how to achieve overall reductions in phosphorus loading. We are going the wrong way on Phosphorus (P) loads. The annual target is 44 T/yr. P loading hit its highest in 2017 at 117 T/yr. This should have been a much more prominent point.

The impact of allowing so much more development via recent changes to the Growth Plan, even encouraging more than real population statistics suggest is probable, will undoubtedly lead to more P loading from new development. Growth Plan changes also provide the rationale for municipalities asking for increases to their Certificates of Approval for sewage treatment plants (STPs). If we don't keep the caps on STPs, how will we bring down P loads? This is the most important question facing Lake Simcoe. We hope to see much more analysis on this topic in the lead up to the review of the LSPP, and we hope that the STP caps remain.

Questions arising from the Ten Year Report

The Rescue Lake Simcoe Coalition and its allies would very much appreciate hearing a response from your Ministry regarding the questions below, in order to contextualize the Ten Year Report, and for us to understand its relationship to the fall review of the Lake Simcoe Protection Plan.

1. How was the LS Science committee engaged in the development of and / or providing comments on the Minister's report?
2. Why are there almost no citations, references or background documents?
3. Why was a science report not prepared independent of the Minister's Ten Year Report, as was done by your predecessor in 2014?
4. Is there another science report coming that will do a better job of presenting targets and results towards those targets?
5. Should we anticipate that the province will produce a white paper to outline proposals for changing the LSPP in advance of the review or at the launch of the review?
6. We would like to know how well all municipalities are adopting the policies of the LSPP in their Official Plans. This was analyzed by the province before this provincial administration came to power, following years of requests by the Lake Simcoe Coordinating Committee, and remains confidential.
7. What actions listed in this report were undertaken by this government?

Additional Information Required Ahead of the Fall 2020 LSPP Review

Below is a list of the information we believe is required for people to be able to comment intelligently in the LSPP review:

- A. List objectives and targets by chapter. Summarize and source results, outstanding questions and concerns, and future threats. Identify possible actions to achieve targets.
- B. How can we achieve lower P levels in the development scenario your government has created? What are the options?
- C. How are we going to lower P levels from development? What real policy are you going to develop other than offsets?
- D. What will you do to ensure farmland is not reduced further in the watershed?
- E. What policy options are you going to use to stop the loss of natural heritage and wetlands?
- F. Share an analysis of how the P load target can reasonably be met if Certificates of Approval are eased on Lake Simcoe's sewage treatment plants.

- G. Report on the current breakdown of P load sources as was done in the Phosphorus Reduction Strategy (PRS), 2010, from 2009 - present.

- H. Indicate how a renewed PRS fits in with the LSPP review. We would suggest that at this stage, public consultations should encompass both. But statistical information and funding scenarios are needed to inform this topic.

Finally, Lake Simcoe is supposed to be the model for how other lakes will be managed; the fact that the government missed the 2019 statutory deadline for the LSPP review, and is not delivering in Lake Simcoe in a transparent and robust way, sends a signal that this is a low priority for this government. We urge you to take a long term view and do the hard work today, to protect Lake Simcoe forever.

We would appreciate a response to our questions a month before the review begins so that we can advise the many people who are interested in the Plan what the province is expected to produce. We want to be prepared to provide the best advice possible to the province in the LSPP review.

Sincerely,



Claire Malcolmson

Executive Director
Rescue Lake Simcoe Coalition

The Rescue Lake Simcoe Coalition represents 26 groups around the Lake Simcoe watershed, and spearheaded the campaign to get the Lake Simcoe Protection Act in 2008.

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