Coalition for Equitable Water Flow

April 25, 2022

Trent-Severn Waterway
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RE: TSW Management Plan 2022

The Executive Committee of the Coalition for Equitable Water Flow, (CEWF), is pleased to provide their comments on the Draft 2022 Management Plan for the Trent Severn Waterway.

The Coalition exists to represent the interests of the reservoir and flow-through lake communities in the Upper Trent watershed. We have 32 member Lake Associations whose lakes account for 91% of the Trent Severn Waterway's reservoir lake storage capacity. We anticipate that some Member Lake Associations may choose to provide additional input and have encouraged them to do so.

We look forward to meeting to discuss the attached comments in May.

Regards,

Edward (Ted) Spence, Chair

c.c. CEWF Member Lake Association representatives
Members of the Upper Trent Water Management Partnership Council
David Britton, Director, Ontario Waterways, Parks Canada

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CEWF Response to TSW Management Plan
April 25, 2022

The Coalition for Equitable Water Flow, (CEWF), exists to represent the interests of the reservoir and flow-through lake communities in the Upper Trent watershed. We have 32 member Lake Associations accounting for 91% of the Trent Severn Waterway's (TSW's) reservoir lake storage capacity.

We appreciate the opportunity to comment on the Draft 2022 Management Plan for the Trent Severn Waterway. During the Consultations held in 2019 the Coalition's input focussed on Water Management as we do not have a mandate to express opinions on 'canal operations'.

Our position was that Parks Canada needs to formally recognize the 'dual mandate' of the TSW with regard to: (1) the operation of the "waterway" (canal system); and (2) "integrated water management at the watershed level", recognizing that these separate but overlapping mandates are sometimes in conflict.

Our overarching theme was that the Plan recognize the need to adapt integrated water management at the watershed level in light of climate change.

Overall we are pleased to see that the Draft Plan reflects these concerns to a considerable extent and incorporates them into the "Key Strategies". In particular we are pleased to note the following inclusions *(all emphases in **bold** added by CEWF):*

- *…. over the past 10 years, **a broader, integrated water management approach has been undertaken using a watershed-wide approach,** that includes the management of water levels in the reservoir lakes that provide a critical buffer capacity for the entire Waterway* (page 8);
- *The challenges for contemporary canal operations are to **balance the requirements of effective, integrated water management, safe navigation and a working canal system**, which include updating and maintaining critical infrastructure, such as dams, locks and bridges, to meet modern standards, while protecting and celebrating the Waterway's heritage of evolving engineering technology* (page 8);
- A vision statement to the effect that *"Parks Canada is recognized for its leadership in delivering a complex, adaptive **integrated water management system across an entire watershed that is responsive to climatic change*** (page 10); and
- By 2024, an evaluation is undertaken of how current predictions for **regional climate change may impact operations, construction and asset management, environmental management and water management on the Trent-Severn Waterway**, in order to inform future adaptive approaches (page 13).

We are also especially supportive of the following inclusions:

- Noting that the creation of the Trent-Severn Waterway affected the **natural, cultural and economic landscape**, facilitating the creation and growth of towns, villages and cities, industry, and a recreational economy that today is worth billions of dollars annually (Pages 4-5);
- Reference to the 2008 **Report of the Panel on the Future of the TSW** (page 8);

- Identification of the need for sufficient and stable **capital investments** in the TSW engineering works and buildings required for ongoing corrective and preventative maintenance, and adequate resources to manage them effectively (Page 9);
- Identification that the complexities of the Waterway's operations require a strong **legislative and policy framework** to ensure effective management given that the Historic Canals Regulations under the Department of Transport Act are antiquated and do not fully address the complexities of operating a large, evolved waterway and its vital watershed, in the 21st century (Pages 9 & 13); and
- Including targets in Objective 3.3 to the effect that the **system-wide water monitoring network** needs to continue to be modernized through the ongoing exploration and development of new tools and methodologies, such as **hydrological modelling**, and their integration into decision-making with **reviews on an annual basis**; and that a **formal communications protocol for communicating Parks Canada water management information to the public and stakeholders** is to be in place by 2024 (Pages 13-14).

We have the following comments for consideration as part of the consultation on the Draft Plan:

- Expand the reference to the economic impact of the "Waterway" to **specifically reference the economic benefit of sound water management to the communities within the Upper Trent watershed**, where it is estimated that over 80% of the municipal tax base comes from waterfront properties on reservoir and flow-through lakes of the Haliburton sector;
- Expand the reference to the need for an updated legislative framework in light of the 2008 Panel noting that 'no federal legislation ascribes a mandate for the canals' yet the TSW is nonetheless required to conform to a number of regulations such as Transport Canada's Canal Regulations (which specifies draught limits but is not mentioned in the Plan) and the separate Historic Canal Regulations and the Navigable Waters Act. **The reference to simply analysing gaps in current legislation by 2024 and noting needed improvements should be strengthened to be more explicit in terms of planned action**;
- Expand the phrase (at the end of the first paragraph on page 4 of the Draft Plan) from "Beyond the waters of the historic site itself, over thirty reservoir lakes, located primarily in Haliburton County, …" to read **"Beyond the waters of the historic site itself, over thirty-five reservoir lakes, located in Haliburton and northern Peterborough counties,** …"; and
- Include the specific phrase "integrated water management at the watershed level" in the above noted reference for a **'balanced'** approach (second bullet and page 8 of the Draft Plan) to read "*The challenges for contemporary canal operations are to balance the requirements of effective, integrated water management* ***at the watershed level****, safe navigation and a working canal system" etc.*

Finally, the Coalition looks forward to continuing to liaise closely with TSW management on a number of 'operational matters' related to the strategies outlined in the Management Plan during its implementation. These include: the ongoing review of issues raised in the Preferred Water Levels Summary Report filed with the TSW by CEWF in May 2017; and discussion of the annual implementation update of the Management Plan and related public communications.