



March 10, 2016

Debbie Crowder
Clerk, District Municipality of Muskoka
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BY EMAIL: dcrowder@muskoka.on.ca

RE: LAKE OF BAYS OFFICIAL PLAN

The recently adopted Lake of Bays Township Official Plan is presently before the District of Muskoka for approval. The Lake of Bays Association (LOBA), which represents approximately 1300 family property owners / stakeholders around the Lake of Bays, is grateful for the efforts involved in the Official Plan Review by the local staff, their consultants, the local elected representatives and now the District staff and the District elected representatives.

LOBA is fully supportive of the new Official Plan as amended with the exception of two material issues. Provided these two matters are resolved or held for further study by the District (and possibly the Township as appropriate), LOBA has no objections to the remainder of the document being approved at an early date by the District of Muskoka.

The two remaining issues of concern to LOBA are the following:

- 1. A proposed reduction in the area requirement of waterfront backlots from 10 to 7 acres.**
- 2. A proposed reduction in the shoreline setback requirement for a large number of small lakes in the Township from 30 metres to 20 metres.**

LOBA objects to the approval of both of these proposed amendments.

Proposed Backlot Area Reduction

This proposal came as a motion from the Lake of Bays Council floor and was not generated by professional consultants or planning staff engaged in the Official Plan Review. There has been no planning or environmental study or analysis of any kind on the eventual impact of the proposal. Nor has there been a clear rationale or supportive documentation provided for the introduction of the proposal aside from casual remarks that it may generate more economic development and affordable housing. In fact, this proposal is contrary to the advice of the planning consultant, Tunnock Consulting, who was retained by the Township of Lake of Bays to conduct the Official Plan Review (please see attached **Discussion Paper 2 – Lot Sizes and Housing Affordability** prepared by Tunnock Consulting Ltd). Economic development and affordable housing are noble objectives and the initiative is well intended, but the concern is that the costs will severely outweigh any questionable benefits that may ensue.

LOBA is concerned with the potential negative unmeasured impacts of this proposal on individual property owners and stakeholders and the aggregate tax base, the fragmentation of the forested areas and wildlife habitat of the area, the potential for negative ambient visual impacts around the lake along with a decline in the desirability of the natural environment in the eastern part of the District of Muskoka and the consequential adverse impacts on tourism for the area which is and has always been the backbone of the local economy for the entire Township and District.

In addition, LOBA is of the view that this proposal is not in keeping with the major thrusts of the 2014 Provincial Policy Statement as it will tend to encourage linear development around the approximately 120 km shoreline of Lake of Bays and elsewhere in the Township, with attendant hard and soft local and District servicing implications and result in undermining the efforts to create and maintain complete self-sustaining communities in the area.

On balance, LOBA and its membership is of the view that any signal that increased backlot development is being encouraged is contrary to the main thrusts of all local, District and Provincial policies that apply to the area.

As per the District's letter to the Township of Lake of Bays dated January 8, 2016 (attached) on a related matter of widespread rural lot reductions, the District is now required to be engaged in a process of refining its growth strategies to implement the 2014 Provincial Policy Statement.

LOBA would respectfully submit that this backlot reduction initiative be denied. Failing that, no reduction in backlot standards should be entertained prior to the completion of the necessary District growth strategy reviews and studies.

PROPOSED REDUCTION IN SHORELINE SETBACK STANDARDS

This proposal similarly emanated from the floor of the Lake of Bays Council and was not generated by the professional consultants or planning staff engaged in the Official Plan Review. **Discussion Paper 1 – 20 vs 30 Metre Setbacks** (attached), prepared by Tunnock Consulting Ltd., recommended against any changes to the setback requirements and provides, by way of reference, numerous studies which support the maintenance of greater front yard setbacks for small, remote and environmentally sensitive lakes.

Currently six of the larger lakes in the Township of Lake of Bays have a 20 metre setback requirement and over 100 of the remaining smaller lakes in the Township have a 30 metre setback. It is not clear, but it is LOBA's understanding that the rationale behind the proposal to reduce the setback to 20 metres for all lakes was to simplify setback standards for administrative purposes. This would not appear to be a sound planning rationale to justify this proposal.

As per the District's letter to the Township of Lake of Bays dated January 8, 2016 (attached), the reduction of this setback for lakes identified as "Sensitive Lake Trout lakes" is contrary to District and Provincial policy and will not be approved. LOBA supports this position, however there are only 15 lakes in the Township of Lake of Bays that are classified as Sensitive Lake Trout Lakes, which means that 87 lakes that are not classified by the District as Sensitive Lake Trout Lakes that would be subject to a reduction of shoreline setback from 30 to 20 metres. LOBA is very concerned about what the impact of this lesser setback would be on these 87 lakes because the environmental impacts of this change on the individual lakes as well as broader Muskoka Watershed are presently unmeasured and unstudied.

LOBA would respectfully request that this proposal be denied, or failing that, that the appropriate studies be carried out by the District, the Township or perhaps the Muskoka Watershed Council, as appropriate, to properly determine the potential cumulative impacts and consequences of reduced shoreline setbacks.

We trust that these comments will be received in the spirit in which they are intended. As you have no doubt heard before, LOBA strongly believes that in the Township of Lake of Bays and the District of Muskoka, the environment is the economy and the economy is the environment.

Respectfully Submitted,



Ian Beverley
President
Lake of Bays Association

C.C.

Samantha Hastings, Commissioner of Planning and Economic Development,
District Municipality of Muskoka
Mark Christie, Manager, Community Planning and Development
Ministry of Municipal Affairs
Lake of Bays Association Board of Directors

ATTACHMENTS:

1. LOBA COMMENTS re OP Draft Amendments April 7, 2015
2. Discussion Paper 1 – Shoreline Setbacks 20 Metre vs 30 Metre (Tunnock Consulting Inc)
3. Discussion Paper 2 – Lot Size and Housing Affordability (Tunnock Consulting Inc.)
4. Statutory Public Meeting Letter of Input re: Backlots #6 (c) 08-26-15
5. Statutory Public Meeting Letters of Input re: Backlots #6 (d) 08-26-15
6. Township of Lake of Bays Staff Recommendation re OPA #16 11/10/2015
7. OP Review LOBA SUBMISSION – January 2016 – Rural Lot Sizes
8. District of Muskoka Comment Letter - OP Review – January 2016