

August 5, 2021

Dear Chair Bridgeman and Planning Committee Members,

Re: Official Plan Amendment 56, Resort Village of Minett

Friends of Muskoka and the Muskoka Lakes Association have reviewed the Meridian Planning Memorandum dated July 29, 2021 and offer the following comments on behalf of our supporters and members who represent a significant portion of the waterfront residents in the Township of Muskoka Lakes.

1. **Number of units:** We are pleased with the reduction of 299 units from 1,999 to 1,700 on the main proponent's lands, however the entire reduction is in the lands off the waterfront, west of Juddhaven Road. As we presented to Committee on May 28th, our community is particularly concerned about development on the waterfront and **we respectfully ask Committee and the proponent to consider if a commensurate reduction might also be possible in the VC, RC1 and RC2 waterfront areas. Barring that, perhaps the 299 unit reduction could be split between the waterfront and non-waterfront areas, ie 149 in RC1 and RC2 and 150 in R1 and R2.**

2. **Non-Red Leaves Lands:** **We support the removal of significant Non-Red Leaves lands from OPA 56.** Neither studies commissioned by the District and Township nor the District growth plan provide evidence of a need for either another resort village in Muskoka or significant additional residential housing capacity in the next 25 years. In our opinion, removal of these lands from the resort village represents good planning and is aligned with the desires of the broader community.

3. **Servicing:** We support the three recommendations concerning servicing, particularly the inclusion of both the JW Marriott and Legacy Cottages lands in the full-service area, **which we believe should be mandatory and not subject to discussions with the proponents.**

4. **Setbacks and Buffers:** **We cannot support flexibility in setbacks and buffers along the water's edge.** While arguably applicable for urban and community areas, Minett is neither, and we believe it should be subject to setbacks and buffers applicable to other waterfront resorts in the Township. These are vital for both environmental and aesthetic reasons, particularly in RC1 and RC2, where shoreline vegetation should be retained or enhanced as much as possible. There are many existing buildings such as the Marina, Yoga Boathouse, Church, several resort units and the on-water restaurant that will presumably be grandfathered, mitigating the need for additional flexibility.

5. Building Height: We cannot support 5 storey buildings in Minett. Building height is one of the issues of great importance to our community. Most of our supporters agree that the height of the JW Marriott was a mistake and detracts significantly from the natural feel and character of the Minett area. 90% of respondents to our Minett survey requested heights below the natural treeline and limited to 4 storeys. **At a minimum, we request that the OPA mandate building heights below the natural treeline, as required in the existing Official Plan.** Our goal is to **not** be able to see buildings protruding above the trees from anywhere on the lake.

6. Implementation: We support the recommendations concerning development phasing and the addition of a traffic impact study. We also support the developer having sole responsibility for the cost of improvements to the road network to accommodate the development. **We request that the municipality consider adding a fiscal impact study to determine the short and longer term costs to the community of this development and who will bear them.**

7. Docking: We support the recommended cap on the number of docks be **limited to the existing legally constructed and approved slips.** **We request that the municipality also consider ways to limit the launching of boats in Minett during the busy summer period.**

8. Staff housing: We support the recommendation that staff housing be located in Minett to support any new resort-related development and **request that it be required to be located on-site at the resort.**

9. Clarity of Language: We support more clear, strong, unambiguous language in the OPA and look forward to the next draft.

10. Building on a Floodplain: The PPS (2020) directs that:

"Development shall generally be directed, in accordance with guidance developed by the Province (as amended from time to time), to areas outside of:

- a) hazardous lands adjacent to the shorelines of the Great Lakes - St. Lawrence River System and large inland lakes which are impacted by flooding hazards, erosion hazards and/or dynamic beach hazards;
- b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards"

The District of Muskoka has just completed floodplain mapping for the shoreline of Lake Rosseau which delineates the high-water level. In redevelopment there is an opportunity to 'build back better' and we would encourage Council to consider flood prone areas to be restricted from development and existing structures removed or flood proofed. Intensification of the shoreline in a floodprone area is not in keeping with provincial guidance (MNR 2003) for natural hazards which states that "Municipalities and planning boards will direct new development to areas outside of the flood and erosion hazard areas."

As per District comments on the Minett OPA, flood prone areas in Minett should be subject to a restrictive designation with detailed policies and development should be appropriately set back from these areas.

11. Second Public Meeting: **We support the recommendation that Non-Red Leaves landowners be consulted directly and asked to make submissions by a certain date rather than holding a second public meeting.** It is more efficient and just as effective for the Township to consult the Non-Red Leaves property owners directly to get their feedback on the proposed change in development rights for their property. There was strong turnout at the first public meeting on May 28th and ample opportunity for public comment. Direct consultation will avoid the time and consultants' fees involved in holding another public meeting.

Both Altus and Riverstone studies make clear it would be detrimental to the viability of both the proposed development and the existing resort properties, the character of the area, and safe boating on that part of the lake to provide development rights beyond what is currently contemplated.

Finally, further delay would be unfair to Mr. Goldhar who has been patient throughout this process.

12. Additional items: **Friends of Muskoka and the MLA made several additional recommendations for changes to OPA 56 in our May 28th submission which we trust were received and will be considered in the next draft.** Examples include:
- a. A requirement for a tree protection plan to minimize tree canopy removal to the extent possible.
 - b. The addition of commercial criteria recommended by the Minett Joint Policy Review Steering Committee.
 - c. A minimum of 25% of waterfront gross floor area be required to be commercial amenity space .. i.e. non-accommodation.

Minett represents an opportunity to build back better, address climate change and give thorough consideration to physical and social impacts of this development concept. Policies need to be forward thinking, strong and climate ready.

Thank you for this opportunity to provide our comments, and for your continued hard work and commitment to the Minett policy review.

Sincerely,



Laurie Thomson
President, Friends of Muskoka



Susan Eplett
Vice-President, Muskoka Lakes Association

cc: David Pink, Director of Development Services and Environmental Sustainability