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Sent Via Email and Environmental Registry of Ontario

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Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 13th floor Toronto, ON M5G 2E5

Dear Mr. Helfinger and Mr. Petersen:

Re: Bill 66, Restoring Ontario's Competitiveness Act, 2018 ("Bill 66") – ERO 013-4293

The Muskoka Lakes Association has deep concerns about many aspects of Bill 66, Restoring Ontario's Competitiveness Act 2018 and more specifically with Schedule 10.

The Muskoka Lakes Association was formed in 1894 and is Canada's oldest cottage association. We represent over 2300 member families to carry out the MLA's mission - to promote the responsible use, enjoyment and conservation of the unique Muskoka environment, a value we all share. The MLA provides the following comments on the on behalf of our member families.

Bill 66 would allow municipalities to pass "open-for-business" planning by-laws (OFB-PBL) that would circumvent fundamental protections for drinking water, farmland, natural heritage and human health and safety as set out in Ontario's key planning laws and policies and in municipal official plans. Our provincial laws and policies establish a fair and coherent rule set and system of governance that uphold the provincial interest, with needed flexibility provided locally through municipal official plans. In contrast, the outcome of Bill 66 would be a piecemeal, directionless approach to land-use planning and decision-making, leaving communities vulnerable to the whims of changing councils and influential developers.

The mission of the Muskoka Lakes Association is to promote the responsible use, enjoyment and conservation of the unique Muskoka environment.

In Muskoka, the environment IS the economy since millions of people come to Muskoka and invest here because of its clean lakes, rivers, forests and natural character. To emphasize the obvious, 90% of the District's tax base is dependent on preserving Muskoka's delicate environment. Last summer your government acknowledged just that by announcing it was making \$5 million investment to ensure the protection of the Muskoka watershed. Schedule 10 is inconsistent with this action.

The MLA has worked with our local municipalities to ensure environmental protections for our recreational lake system are built into their official plans to protect them now and into the future. And yes we have held our local politicians to account when they have elected to favour economy over environment.

Public input on development proposals has been a key means of informing our governing councillors and planners about the impact of development proposals. We have witnessed this first-hand on numerous occasions where public input has informed Council in a manner that led them to make a different decision than initially recommended by their planning staff.

The vulnerability of Muskoka is heightened by the fact that "open-for-business" zoning by-laws could be passed without any prior public notice or meetings and could not be appealed to the Local Planning Appeal Tribunal. In other words, by-laws passed behind closed doors would trump laws, policies and municipal official plans developed through extensive and open public consultation. Compounding the problem, communities would have no recourse to influence or challenge them.

This bill purports to "*Introduce a new economic development tool and remove planning barriers to expedite major business investments and speed up approvals by about two years*" and thus create jobs, yet nowhere in the act is there a purpose described nor criteria to assess the use of such a by-law ["A municipality may pass an open-for-business planning by-law only if it has received approval to do so in writing by the Minister and ***if criteria as may be prescribed are satisfied.***" Bill 66].

By any objective standard, the provincial laws, policies or plans excluded by Schedule 10 are neither "red tape" nor "burdensome regulations." To the contrary, the legislative framework being ousted by Schedule 10 was carefully developed by the province under various governments with considerable input from Ontarians, non-government organizations and other stakeholders in order to safeguard public and private interests throughout Ontario. Safe drinking water, protection from natural hazards and preservation of the green infrastructure of our province is not "red tape". While short-term gains may be realized, long term costs may result for future generations to bear.

So it is time for a grown up conversation about what is working and what is not in the quest to bring employment, if that is the objective, to Ontario. What are the barriers and how can they be streamlined without abrogating laws and planning policies, impacting the environment and eliminating public rights in the process? What kind of employment are we streamlining for? Retail plazas or good long term jobs?

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We know that we can always improve processes if we all work together to determine a better way. That consultation should happen before heavy handed measures are taken. Such streamlining can occur immediately and should policies or laws be identified that need to be modified, they can be targeted rather than eliminated without cause.

We recommend that the government delay any further reading of this bill in favour of a thorough consultative process that involves the province, municipalities, stakeholders and the public providing an opportunity to identify stream lining solutions in support of provincial objectives.

Should the government continue to pursue reading of this bill, Schedule 10 must be deleted.

In summary, Schedule 10 of Bill 66 would turn back the clock on many years of good planning, community input and strong, progressive government leadership on both sides of the house. "Open-for-business" by-laws would sidestep laws and policies intended to protect the long-term health, safety and resilience of our communities by facilitating development that could ignore environmental safeguards which currently protect Muskoka's greatest asset - its lakes and shorelines. Ultimately, the result could be irreversible negative longer term implications for Muskoka's economy and jobs.

Yours truly,

A handwritten signature in black ink that reads "Lawton Osler". The signature is written in a cursive, slightly slanted style.

Lawton Osler, President

c.c. Township of Muskoka Lake Council
Town of Bracebridge Council
Town of Gravenhurst Council
Township of Sequin Council
District Chair John Klinck
Norm Miller, MPP