



Date: 2026-02-13

To: Lisa Marden, Director of Planning, District Municipality of Muskoka
Christy Doyle, Director of Environmental and Watershed Programs, District
Municipality of Muskoka

Re: **Comments on the Muskoka Official Plan Amendment 61 esp. Component 4
(Lake System Health Policy)**

The Lake of Bays Association (LOBA) represents over 1,200 property owners on the shores of Lake of Bays who support a balanced approach to shoreline development that protects the natural shoreline. LOBA has reviewed the various documents associated with the policy changes proposed through the Districts' Muskoka Official Plan Amendment 61 and attended the public information meeting held in December. We have the following comments on the District Reports CPS-10-2025-5 Component 3 and CPS-10-2025-6 Component 4.

Overall we are pleased to see policies being strengthened to better care for the environment, with enhanced protection for features, water quality, the natural shoreline and the watershed, including looking forward to future impacts of growth and climate change. These strengthened policies will be essential to the preservation of Muskoka's natural shoreline as climate stresses and property development increase.

We have had an opportunity to review the detailed and thoughtful recent submission of the Muskoka Lakes Association (MLA). We support that submission and urge you to adopt it.

Concerning **Component 3 – Environmental Resiliency, Climate Change**, we would like to stress the value of more guidance on how to align the Fire Smart tools with vegetation buffers. The "made in Muskoka" solution advocated by the MLA would be very helpful given the ever-increasing threat of wildfires.

Concerning **Component 4 - Lake System Health Policy**, LOBA has several areas of particular interest and concern to highlight.

Section C2.6.2 Key Program Activities

C2.6.2 c) stresses the importance of stewardship in caring for lakes and mitigating emissions that negatively impact water quality. In Muskoka, waterfront property owners have the main responsibility for these efforts. We will certainly support education programs that promote responsible stewardship

around Lake of Bays. But, in other parts of Ontario, organizations like Conservation Authorities provide technical expertise and financial support to landowners. We encourage the District to engage in active programming that will motivate and assist property owners in being better stewards of their lake frontage.

C2.6.2 f) sets out support for the development and implementation of septic re-inspection programs. LOBA clearly sees the need for this program, and we urge that particular priority be given to the inspection of high-risk systems. We have urged the Township of Lake of Bays to do the same. Leaking and malfunctioning legacy septic systems are a pollution risk that should be addressed now.

Relevant to C2.2.6h) and the development of remedial action programs, LOBA has a long running water quality sampling program with now over 50 years of data. We would welcome the opportunity to coordinate monitoring efforts among all the different government and volunteer agencies to ensure compatible data sets. HESL 2024 notes that there are challenges in having the appropriate data on which to evaluate the issues fully. It would be beneficial if the District developed revised sampling guidelines that would outline how, where and the frequency of water testing for a lake and/or review and endorse a lake's sampling program such that the data results can be used to help identify cause and effect in addition to long-term water quality trends where required.

C2.6.3 Protecting Water Quality

C2.6.3.2 General Policies b) states that *'all of the lakes in the District are considered to be sensitive surface water features'*. We are very supportive of this recognition that climate change is a threat to all lakes and is best addressed by a consistent District wide approach.

C2.6.4.2 Standard Protection Policies

C2.6.4.2 a) proposes that the minimum water frontage be increased to 90 m or 295 ft for new lot creation and a minimum lot size. We support larger new lots, as it will reduce the numbers of new buildings, structures and docks and thereby increase the retention of natural shoreline. C2.6.4.2 is a clear and direct statement of the critical role of natural vegetated shorelines in buffering waterbodies from erosion, siltation and nutrient migration.

C2.6.4.2 c) proposes to continue the requirement of 75% of the linear shoreline frontage of a lot to be maintained in a natural state and introduces an increase to the buffer depth of 10 m to a total depth of 30 m (98 ft) from the shoreline for new or vacant lot development. HESL 2024 provides some scientific support for this number. Expanding the shoreline buffer is an effective way of increasing shoreline protection.

Re C2.6.4.2 j), LOBA requests further discussion of how this policy will apply to existing non-conforming properties. It is proposed that *"A minimum 30 m (98 ft) setback from any shoreline shall be required for all development, excluding shoreline structures, open decks and minor accessory structures."* It is not clear how this applies to redevelopment.

C2.6.4.2 e) speaks to best efforts where existing buildings are being reconstructed which seems to conflict with j).

The section does contemplate circumstances where “iii) *Redevelopment on an existing lot is proposed where the setback is not further reduced*”, but the standards governing such redevelopment are not clear. Those standards must be clarified. There will be many non-conforming properties which owners will understandably want to redevelop, and the District OP needs to provide balanced policy direction on the topic. In general, it is our position that redevelopment at the existing setback should be permitted with minor additions, and not major additions, but we look forward to discussing the issue in more detail. Clarity is also needed about the interaction between the District OP and the local municipality OPs on this issue.

C2.6.4.4 Enhanced Protection Policies

C2.6.4.4 d) proposes monitoring and reporting to the District by the property owner to confirm compliance with planning permits. Based on the observations we have made on the lakes, compliance with permit conditions is not always being adhered to as buffers are reduced to mulch and manicured trees. If self-monitoring is allowed, then there must be inspection or verification by the District and/or local municipality.

Thank you for the opportunity to provide these comments, and for your attention to our submission. We request a meeting to review the issues we have presented in more detail. Also, we look forward to taking part in future consultations.

Respectfully,

Tim Hadwen
Chair, Planning, Development and Government Relations Committee

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