



Date: 2026-09-22

To: District Municipality of Muskoka Joint Health Services and Community and Planning Services Committee, via Amy Back, Clerk

Re: **Joint CPS/HS meeting on September 24, 2026 - Item 13 a) - Adoption of Official Plan Amendment 61 - Protecting Water Quality**

The Lake of Bays Association's (LOBA) membership includes over 1,200 waterfront property owners who support a balanced approach to shoreline development that protects the natural shoreline. LOBA has actively participated in the entire District Official Plan (OP) process. We now generally support the adoption of the District OP, as set out in report CPS-10-2026-6, which will be presented to the District's Joint Health Services and Community and Planning Services Committee on September 24, 2026.

Strengthened OP policies now better care for the environment by providing enhanced protection for features, water quality, the natural shoreline and the watershed, including taking measures to address future impacts of growth and climate change. These stronger policies will be essential to the preservation of Muskoka's natural shoreline as climate stresses and property development increase. Amongst the positive new environmental protections are the increase of minimum water frontage to 90 metres, and increased support for stewardship and remedial action programs.

In particular, LOBA supports the District OP section C2.6.3 Protecting Water Quality provisions which establish a universal 30-metre general standard for vegetation buffer and building setbacks combined with improved language setting out the rights of non-complying property owners to redevelop their properties.

General Policies C2.6.3.2 b) states that 'all of the lakes in the District are considered to be sensitive surface water features' and they are all entitled to the same level of protection. We support this. Climate change is a threat to all lakes and is best addressed by a consistent District-wide approach. There is no good justification for any lake in Muskoka to have lesser protection than the others. Differential levels of protection would lead to erosion of the new general standard.

Standard Protection Policies C2.6.4.2 b) is a clear and direct statement of the critical role of natural vegetated shorelines:

The role of natural vegetated shorelines in buffering waterbodies from erosion, siltation and nutrient migration adjacent to the sensitive littoral zone is critical to the protection of water quality. Natural shorelines are also generally avoided by waterfowl like Canada Geese (Branta canadensis), which produce phosphorus rich excrement that degrades water quality.

Preservation and restoration, where appropriate, of shoreline vegetative buffers is therefore required.

Science supports that a 30-metre buffer and setback is the appropriate protection for responding to the threats of climate change and overdevelopment into the future.

At the same time, there are many waterfront property owners with non-complying properties. LOBA has continually advocated for OP language that better protects their rights to redevelop their properties. We appreciate that those provisions have been strengthened. The OP allows redevelopment at a non-complying setback where:

Redevelopment of an existing structure is proposed, provided the setback is not reduced further

and now also explicitly where:

Addition(s) to an existing structure in the setback area are proposed, provided the setback is not reduced further and a net improvement over the existing situation is achieved through the design of the development or implementation;

C2.6.4.2 Standard Protection Policies C2.6.4.2 j) iii) and iv).

Plus, the OP now addresses the interaction between construction and the vegetation buffer.

LOBA will be continuing to seek more clarity about the implementation of these provisions in the Township of Lake of Bays Community Planning Permit bylaw review. It is important to balance environmental protection with practicality.

LOBA welcomes the District OP's encouragement of Area Municipalities to develop limits on the amount and type of hard surfaces near the shoreline, which in turn will reduce the volume of pollutants that may enter a lake. LOBA will participate in this discussion at the Township.

There are two areas of continuing concern to raise at the District level. First, waterfront property owners need more guidance on how the Fire Smart Guidelines align with the enhanced vegetation buffer standard. We are glad to see the District intends to provide additional clarity. Second, there needs to be more enforcement of planning standards. We will continue to stress that the District should assist the Area Municipalities to strengthen enforcement and more effectively deter violators of waterfront property protections.

The OP consultation process has been lengthy and detailed. LOBA wishes to thank District Council and staff for your sustained attention to all the issues. We look forward to working with the District to protect Muskoka's beautiful natural environment into the future.

Thank you for your attention.

Tim Hadwen, Chair Planning, Development and Government Relations Committee

Copies: Paul Gleeson, President, Lake of Bays Association
LOBA Board of Directors
Township of Lake of Bays Mayor and Councillors