

John W. Klinck, District Chair,
Scot Weeres, Interim Commissioner,
Planning & Economic Development
District Municipality of Muskoka
70 Pine Street
Bracebridge, ON P1L 1N3

November 16, 2017

Dear Messrs. Klinck and Weeres,

We are cottagers on Lakes Joseph, Muskoka and Rosseau and are strongly committed to the preservation of Muskoka's traditions and environment. We write to express our profound opposition to the proposed changes to the Muskoka Official Plan (MOP) that create a more permissive environment for condominium development on resort land. We support the MLA's position against these changes and applaud their advocacy.

The PKF consulting report, "Muskoka Resort and Tourism Official Plan Policy Review Recommendations Report" (2013) was commissioned to advise on policies that would benefit the resort sector in Muskoka and concluded the best thing for the resorts would be to create a more permissive and flexible environment for developers to turn them into high density condominium cottage projects with a weak and largely un-enforceable proviso that to maintain resort designation 50% of the units must be available to the travelling public through some form of time-share, rental or fractional ownership. As resort operation becomes less profitable, operators quite logically seek to develop their lands in the most profitable way, and while this may be to their benefit we do not feel it benefits the region or its residents as a whole. While the proposed changes to the MOP may be good for resort owners and developers we believe they are contrary to the wider public interest.

In particular we object to provisions that while requiring 50% of residential units to show tenant turnover, allow the other 50% to be single owner private condominium cottages. The environment Muskoka seeks to foster is one of unspoiled nature, not clusters of cookie cutter condos. Authorizing private residential condominium cottage construction at resort density is a game changer. People who want real homes in Muskoka hesitate to buy condos in a time share rental fractional ownership contract. However, when you authorize the sale of condominium cottage units at resort density that are fully private residences, expect many more people to be interested. It will result in more boats, more damage to both land and aquatic environments and loss of property values for neighbouring cottagers.

The assertion that the MLA is confusing official plan revisions and zoning revisions, and that, the density of development is a zoning issue and is not part of the MOP do not stand scrutiny. The Official Plan is created under the Planning Act, and it is intended to set the limits on land use. Section L.4 of the draft MOP states that Municipal Zoning By-Laws must conform to it as a minimum. The MLA is therefore right to insist that the MOP should not endorse the creation of special rules to allow high density waterfront cottage/condominium projects as part of resort zoning rules.

Furthermore the assertion that the density (10% lot coverage) of recent and proposed residential condominium cottage projects is the same as for cottagers is disingenuous because it ignores all the other zoning by-law restrictions such as minimum lake frontage, setbacks, back lot restrictions which are very different for private cottages as compared to resorts. A lot more resort units can be built on a piece of commercially zoned waterfront land than on the same land zoned for private cottages as is the case at Legacy Cottages in Minett, the former Lakeside lodge, where 43 individual residences are planned on 471' of shoreline.

The rationale behind the proposed changes seems to be that resorts in Muskoka are no longer financially viable, so we need to let developers build lots of condos next to the "resorts" so they can make lots of money which they will reinvest in the resorts. This proposition can be challenged on quite a few grounds:

It is far from clear that Muskoka needs more resorts. The PKF study shows that there are now fewer resorts in Muskoka than before, and their average annual occupancy rates are 43 to 47%, and only 67% in summer high season. The reason that resorts are financially unsuccessful is that relatively few people want to stay in them. It is therefore being suggested that they need subsidies, such as lower taxes, and condo developer profits to prop them up. However, a more rational approach would be to let the number of resorts decline to a level that matches demand. Resorts that fail could be down-zoned and developed according to the same strict rules as apply to regular cottage development.

One of the reasons that resorts are struggling is that many people prefer to rent a cottage instead. (Indeed, the PKF study suggests that new licensing rules be introduced to restrict the private renting of cottages in order to force people back into resorts !). Creating an environment that supports private cottages (that their owners are free to rent out) being built under the restrictive, low-impact building rules for cottages might be a much more desirable way to accommodate would-be holiday makers.

Providing profits to developers by allowing them to develop condominium/cottages on resorts does not guarantee that the profits will be used to support the resorts. The PKF report states that resort developers are more interested in cashing their profits than investing in resort operations on a continuing basis. And, if the resorts continue to lose money on their own, they will simply be allowed to fail, and we will be left with the high-density condominiums, and some rich developers.

The suggested reason for building new resorts is that they provide employment for local residents and contribute significantly to the local economy. This is questionable. In the construction phase a significant resort project will probably be built by a major builder who will come up from the GTA, complete with their own workforce, because local builders don't have the capacity. Building trades are very scarce in Muskoka due to the continuing boom in cottage construction and town building projects. Major builders (e.g. Mattamy Homes) already are bringing construction workers up from Toronto as they cannot be hired locally. As for the broader employment impacts of new resorts, they are unlikely to find employees locally because many resort jobs are low paying/long hours and therefore unattractive to locals so that the employees will have to be brought in from other places (as the J W Marriott and Sherwood now do). Far more employment opportunities will be created by the continuing boom in cottage upgrades and new-builds, and the cottagers provide much more economic benefits to the local community due to their expenditures at marinas, restaurants, shops, etc than transient guests at resorts.

The overriding goals of the Muskoka Official Plan are stated to be "to protect the natural environment, especially water", and to preserve "the small town, waterfront and cultural heritage" of Muskoka. The idea of permitting new waterfront condominium / cottage projects with high unit densities is completely inconsistent with these goals.

We fully support those who believe that, "cottage country" should remain just that. It is a concept, and a way of life, that has worked brilliantly here for over a hundred years. Let's do our best to ensure a few profit hungry developers don't screw it up. Don't kill the goose that laid the golden egg !

Yours sincerely,