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Bradie Debes
GIS/Planning Technician
Town of Gravenhurst
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Gravenhurst, ON P1P 1Z3
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Dear Ms Debes,

**Re: Application No. SPA 81-2020 by Renaissance Leisure Group (2004) Inc.
for an Amendment to the Commercial Site Plan Agreement
for 1209 Muskoka Beach Road
(the “Application”)**

Thank you for providing the Muskoka Lakes Association (MLA) with an opportunity to comment on this Application. The MLA is a not-for-profit organization that represents more than 2500 families, extending from Seguin Township in the north to Gravenhurst in the south, as well as Bracebridge and the Township of Muskoka Lakes. Our association includes residents on the three big lakes and the numerous small lakes within Muskoka.

The Draft Site Plan Agreement

The draft Site Plan Agreement (SPA) you provided in your Memo to Agencies dated October 9, 2020 concerns docking to be built by Renaissance Leisure Group on what many know as the Taboo site on Muskoka Beach Road. We understand this is part of a process that began at least 4-years ago, and some aspects of development at the site are presently before the Local Planning Appeal Tribunal. The waterfront is part of a bay adjacent to a public beach at the mouth of the Hoc Roc River.

MLA Concerns

The MLA is concerned that the draft SPA as written is inadequate. Our concerns are based on the long-standing mission of the MLA of protecting the unique Muskoka environment and promoting conservation and responsible use of the waterfront.

Three aspirational phrases routinely describe residents’ vision of Muskoka:

Safe, environmentally sensitive, preserving Muskoka for future generations

Quoting section A2.6 of the Gravenhurst Official Plan, “A2.6 This Plan recognizes that the economy of the Town has historically been based on the surrounding natural resources, lakes, tourism and the high quality of the environment. *Protection of the environment is critical to the maintenance and enhancement of a healthy economy.*” (Our emphasis added)

The MLA is concerned that, if approved as written, the draft SPA will allow inappropriate and unintended over-use of the waterfront and will be unenforceable by the Town.

The reason for our concern is the lack of clarity in the meaning of the term ‘boat slips’ throughout the SPA. The restriction ‘98 boat slips’ is uncertain for many reasons, including:

- Does it mean that there is a maximum number of vessel-mooring sites?
- How large is a slip?
- Could a slip accommodate more than 1 vessel?
- Does ‘98 slips’ include boat lifts?
- Does ‘98 slips’ include jet-ski ramps?
- Are vessels able to be moored at the ends of the dock fingers?

The MLA does not object to the amendments to sections 9 and 10 of the draft SPA being proposed by the Applicant. However, the MLA believes that, as a condition of agreeing to these amendments, the Town should add a definition of ‘boat slip’ so there is clarity and certainty about its meaning. Without this definition, the restriction of 98 boat slips is unenforceable by the Town and many more vessels will be able to be moored at these docks than the Town intends.

The Town now has an opportunity to clarify the SPA in a manner that will help to protect the waterfront from unintended over-use, and we urge you to take this opportunity.

Thank you for the opportunity to provide these comments. We would appreciate being notified of the decision of the Town on the Application.

Respectfully submitted,



Susan Eplett
Chair, Government and Land Use Committee

Cc: Planning and Economic Development
Deborah Martin-Downs, President MLA
Stephen Sims, Director MLA