



February 27, 2023

Sent by Email

Town of Gravenhurst
3-5 Pineridge Gate
Gravenhurst, Ontario
P1P 1Z3

Attention: Melissa Halford, Director of Development Services

Dear Ms. Halford:

Re: Proposed Starboard/Cherokee Lane Development, OPA 01-2022 and ZA 11-2022 (the "Project")

We are writing to you on behalf of the Muskoka Lakes Association (the "MLA") and the Muskoka Bay Property Owners' Association (the "MBPOA"). The MLA represents over 2,000 families (over 11,000 people). The MBPOA has several hundred members located in Muskoka Bay.

Our respective members care deeply about the natural environment and water quality. In particular, built form should not dominate over the natural environment. Shoreline development should occur in a sustainable manner to protect, maintain and enhance the health of the watershed.

The attachments referred to below form part of our submission:

1. Exhibit "1" - Chart setting out the Matter/Issue, Allowed/Required, Ask and Increase/Change. Please note the original version of this chart was confirmed as accurate by Town staff. The updated version attached reflects the revised proposal.
2. Exhibit "2" - Slide deck of drawings illustrating the proposal.
3. Exhibit "3" - Pages 1 and 3 of the applicant's updated planning report, showing the currently proposed configuration of the boathouse complex.
4. Exhibit "4" - Page 2 of the Town's "Gravenhurst Parking Study" prepared by IBI Group in 2019, showing the location of the Gravenhurst Wharf municipal parking lots.

Unfortunately, we are having great difficulty analyzing the proposal due to discrepancies and inconsistencies between the applicant's planning report, the applicant's drawings and the proposed official plan amendments and zoning by-law amendments. By way of examples, the applicant's updated planning report refers to a maximum of 151 residential units, whereas the ZBA specifies 165 and the ZBA specifies a maximum boathouse complex length of 130 m (428 ft.), whereas one of the updated drawings indicates 101 m (332 ft.).

The following are our comments on what we see as key issues for consideration:

Executive Summary

Boathouse Complex Height of 30 m (52.5 ft.) is excessive and is 4.1 times greater than what is permitted. Even a revised drawing which appears to indicate a restaurant roof height of 13.5 m (45 ft.) is akin to a 4 storey building in the lake.

Boathouse Complex Length is now proposed at 130 m (427 ft.) or 30% longer than the Steamships wharf and 8.7 times greater than what is permitted. Again there is a revised drawing which appears to indicate a boathouse complex length of 101 m (331 ft.) or the length of the Steamships wharf and which may still cut off access to Lookout Park, especially for swimming. We suggest the length should be further reduced.

Height of the Principal Building is proposed to be 30 m (98 ft.) to the top of the last occupied floor, more than 2.9 times the 10.5 m (34.5 ft.) permitted. The actual height to the top of the building is 34 m (112 ft.), when the mechanical floor, lookout floor and peak of the roof are included. When taking into account that the property will be raised/infilled 3 m (10 ft.) at the water's edge, the building will actually be 37 m (121 ft.) higher than the existing grade on the waterfront side.

The proposal is for a maximum seven storey building. However, there are seven storeys of residential/retail, plus a mechanical floor and a lookout floor, for a total of nine storeys.

We recommend that maximum building height be limited to the height of the existing 6 storey blue and yellow condo buildings at 110 and 130 Steamship Bay Road.

Parking

- (a) **Residential Parking Requirements** appear to have a shortfall of 14 parking spaces. We submit that the 25 boat slips should not be considered the equivalent of parking spaces for residential parking requirements, since they are unavailable for use when the lake is frozen between December and March and a boat slip owned or rented by a residential unit owner would be in addition to, and not in lieu of, a regular parking space (as they will need a parking space for a vehicle they use to travel on land for errands or commuting).
- (b) **Commercial Parking Requirements** are assessed to be at least 168 parking spaces and the applicant is proposing **Nil**. Use of the Steamships lot (Lot 10), being the municipal lot closest to the Project, is extremely problematic. Per the Town's independent parking study prepared by IBI Group in 2019, the four closest lots (Lots 10, 11, 17 and 18) are at full capacity and a reasonable walking distance between a parking space and the user's final destination ranges between 300 to 400 metres. The only lot within a reasonable walking distance of the subject property and these full capacity lots

is Lot 12, which we calculate would only provide an additional 50 spaces, still leaving a shortfall of 118 commercial parking spaces.

Boating Safety is a concern since Area A, being the area closest to the Project, exceeds available boating capacity according to the study prepared by the applicant's consultant, Riverstone. We agree with Riverstone's recommendation that a no-wake speed limit of 9 km/hr be instituted in Area A if this application is approved.

We recommend that **No residential use in the Boathouse Complex** be permitted.

We do not recommend a **Micro brewery on the Lake** as an additional permitted use, due to concerns about the serious problems that such use can cause to District wastewater systems, based on examples in Baysville and Gravenhurst.

Analysis of the Issues

1. Boathouse Complex Height

The maximum permitted height of the boathouse complex is 3.9 m (13 ft.) per the Town of Gravenhurst Zoning By-law 2010-04 (the "ZBL") Sections 20.2 and 5.2.4.2(iii). The applicant is requesting a height of 16 m (52.5 ft.), being 12.1 m (40 ft.) or 4.1x greater than what is permitted. We further note that only a one storey boathouse is permitted (per ZBL Section 5.2.4.2(iii)) and two storeys are being requested.

It is unclear where this height is measured from. For example, if it is measured from the top of the dock, the actual height may be closer to 55 feet or more (5 storeys) above the water level. According to ZBL Section 5.2.4.2(iii), height is to be measured from the optimal summer water level to the peak of the roof, and we recommend that the applicant clarify that their proposed height is measured in accordance with this requirement. For example, we note that the dock may be 1.7 m above water level.

We also recommend that the applicant explain to the Town why an excessive height of 52.5 feet is needed for a proposed two-storey boathouse complex.

That said, one of the applicant's revised drawings does indicate a boathouse roof height of 10.7 m (35 ft.) and a restaurant roof height of 13.45 m (45 ft.). Please see slides 11 and 12 of our Slide Deck.

How can one provide relevant comments on this application, and on a matter as significant as the size of these boathouses, when the materials do not consistently reflect what is proposed?

2. Boathouse Complex Length

The maximum permitted length of the boathouse complex is 15 m. (49 ft.) per ZBL Sections 5.2.4.2(i) and (ii). The original proposal was for 192 m. (630 ft.). The revised proposal is for 130 m. (427 ft.), which is still 115 m. (378 ft.) or 8.7x greater than what is permitted.

That said, the applicant appears to have submitted a revised drawing indicating a boathouse complex length of 101 m. (331 ft.). This will still be 86 m. (282 ft.) or 6.7x greater than what is permitted.

The original proposal effectively cut off several cottages, docks and boathouses from the lake. The revised proposal, while better, is still extraordinarily long and, we contend, is not in keeping with the character of the Gravenhurst Wharf, in particular, having a regard to the length of the Steamships wharf and other public docks and, as noted below in Section 12, it may still cut off access to Lookout Park, especially for swimming.

We also fail to see why the boathouse complex needs to be divided into two two storey structures, separated by an open deck on the upper level with two boathouses below. We suggest that this open area be eliminated, such that the overall boathouse complex length is reduced.

3. Height of the Principal Building

The maximum permitted height of the principal building is 10.5 m. (34.5 ft.) per ZBL Section 20.2. The revised proposal is for a height of 30 m. (98 ft.) and seven storeys, being a difference of 19.5 m. (64 ft.) or 2.9x what is permitted.

However, the application does not measure height to the top of the building, including the peak of the roof, but rather to the top of the last occupied floor. The height to the top of the building is 34 m (112 ft.). It should also be noted that the property will be raised/infilled 3 m (10 ft.) at the water's edge, with the result that the building will actually be 37 m (121 ft.) higher than the existing grade on the waterfront side.

The application refers to a maximum of 7 storeys. However, we count 7 storeys of residential/retail (main floor of mixed residential/retail, then six floors of residential), a mechanical floor and a lookout floor, for a total of 9 storeys. The infill to raise the grade for the first parking level results in a 10th floor when viewing the Project/principal building from the lake. Please see slide 7 of our Slide Deck.

The blue and yellow condominium buildings further along the Gravenhurst Wharf at 110 and 130 Steamship Bay Road are six storeys and are set back much further from the lake. Our understanding is that, at the time these buildings were approved, the initial proposal was for four storeys and this was later increased to six.

The proposed development is much closer to the lake and is proposed to be much higher (when measured from the water's edge to the top of the proposed building, including the mechanical floor, lookout floor and the peak of the roof). Please see slides 7 and 9 of our Slide Deck.

A guiding principle is that height may be increased as distance from the waterfront increases, not the other way around. See for example Official Plan Section C7.8.3.2d), regarding the Taboo Resort, which states that: "Building heights will be graduated to minimize visual impacts on the waterfront and surrounding community and will in no case exceed 15.0 metres."

We recommend that the maximum height of the proposed principal building be restricted to that of the blue and yellow condominium buildings.

We are also concerned that the drawings and renderings submitted by the applicant indicate the boardwalk will run continuously along the wharf at an elevation slightly above water level. In reality, the portion of the boardwalk on the applicant's property will be raised, as a result of infilling, such that it will be 2.2 m (7 ft.) or about 12 steps higher than the surrounding boardwalk. Please see slides 18 and 20 of our Slide Deck.

4. Parking

(a) Residential Parking Requirements

Per ZBL Section 6.1.3(i), definition of Multiple Dwelling, each residential unit is required to have 1.25 parking spaces. The applicant is proposing up to 165 residential units, so 206 parking spaces are required.

The applicant's original proposal indicated one level of underground parking with 125 parking spaces for residential purposes and an additional 28 parking spaces on the two lots owned by the applicant on the other side of Cherokee Lane.

Per the notice of public meeting, the applicant's revised proposal provides that "there are now two levels of underground parking proposed which will provide all the parking required for the residential component of the proposed development." Pursuant to the applicant's revised drawings and revised parking report, there will apparently be 118 parking spaces on basement level one (which is only partially below the existing grade and is not a full basement) and 74 parking spaces on basement level two, for a total of 192 parking spaces. As a result, there will still be 14 spaces fewer than the required 206.

(i) Boat Slips to be considered Parking Spaces?

The applicant is requesting in Section 2.(iii) d. of the proposed zoning by-law amendment that residential (**not commercial**) parking requirements may be satisfied by including proposed boat slips, where a boat slip is considered the same as a vehicle parking stall.

It appears from the revised application that there may be a total of 25 boat slips.

Of course, the difficulty with this is that the boat slips are unavailable for use when the lake is frozen between December and March. Boat slips should therefore not be included in satisfying the number of required residential parking spaces.

In addition, the proposed boat slips likely can only be used by three categories of users:

- A. Boat slips freely available to the public. There was an indication in the applicant's materials that some slips would be made available to the public, presumably for use by patrons of the proposed restaurant and retail space.
- B. Boat slips rented to the public. Much like some of the Town-owned boat slips on the wharf, slips could be rented to the general public for use by island residents, etc.
- C. Boat slips owned or rented by residential unit owners of the Project. It is hard to imagine a scenario where a unit owner would use a boat slip in lieu of a parking space, as opposed to in addition to a parking space for a vehicle they use to travel on land for errands or commuting.

In none of these scenarios can boat slips be considered the equivalent of parking spaces. In discussions with Town planning staff, we understand that District Public Works agrees with this analysis and shares the same concerns.

(b) Commercial Parking Requirements

Per ZBL Section 6.1.3(i), definitions of Restaurant, Retail and Commercial Entertainment, respectively, restaurants require one parking space for each 9 m² of gross floor area ("GFA"), retail requires one parking space for each 20 m² of GFA and commercial entertainment (amenity space) requires one parking space for each 23 m² of GFA.

Based on the applicant's revised submission, it would appear that commercial parking requirements are as follows:

<u>Commercial Use</u>	<u>GFA (sq.m.)</u>	<u>Parking Spaces</u>
Restaurant	646	72
Retail	890	45
Commercial Entertainment	1,164	<u>51</u>
Total		168

Notes:

-The initial Tatham report referred to a shortfall of 233 commercial parking spaces, which included commercial entertainment/amenity spaces; the revised Tatham report refers to a shortfall of 118 commercial parking spaces, but no longer refers to commercial

entertainment/amenity spaces, which would add an additional 51 parking spaces for a total shortfall of 168

-The retail space includes 601 m² for a brew pub. This would appear to fit within the definition of a “restaurant”, with a parking requirement of one space for each 9 m² of GFA, not 20, resulting in an additional 36 commercial parking spaces being required

-There is also 878 m² of outdoor commercial entertainment/amenity space. Pursuant to the definition of “commercial entertainment”, it would appear that this space should be included, resulting in an additional 38 commercial parking spaces required

The applicant is proposing to have **Nil** commercial parking spaces, representing a shortfall of 168 parking spaces.

We refer to the applicant’s parking report prepared by Tatham Engineering dated October 27, 2021, as revised December 2022 (collectively, the “Tatham Report”), which was peer reviewed by Paradigm in a report dated May 16, 2022 (the “Paradigm Report”). Both reports refer to the Town’s “Gravenhurst Parking Study” prepared by IBI Group dated September 16, 2019 (the “Gravenhurst Parking Study” or “GPS”). The Gravenhurst Parking Study states that:

- A. “For the purpose of this parking study, parking facilities will be considered effectively full when occupancy exceeds 85%.” (Page 3)
- B. “While some parking facilities are operating at or above capacity, there are surrounding facilities within a reasonable walking distance that can accommodate the excess demand. Based on industry research, the typical publicly accepted walking distance between a parking space and the **user’s final destination** (emphasis added) ranges between 300 to 400 metres, depending on land use.” (Page 6)
- C. “Lot 10, 11, 17, and 18 operated above 85% effective capacity. This high demand was likely associated with the Dockside Festival of the Arts, which was located on the field behind Lot 17. All excess parking demand can be accommodated by Lot 12, which is 150 metres west of Lot 11.” (Page 6)

The MLA’s representatives walked the Gravenhurst Wharf municipal parking lots and counted parking spaces and our findings are set out in the chart below. The Tatham Report also notes that incorrect numbers were included in the Gravenhurst Parking Study with regard to Lot 10- Steamships lot (80 parking spaces, not 147) and Lot 12 (202 parking spaces, not 381).

<u>Lot #</u>	<u>Description</u>	<u># of Spaces (GPS)</u>	<u># of Spaces(MLA)</u>
<u>Spaces within reasonable walking distance</u>			
10	Steamships	147	75
11	Boston Pizza	169	169
17	Park across from Boston Pizza	82	86
18	Lot across the highway from Steamships	<u>23</u>	<u>22</u>
Total within reasonable walking distance		421	352

Other spaces

12	Lot west of Boston Pizza lot	381	190
13	Near Residence Inn	87	89
14	Near Residence Inn	84	80
15	Across the park on James Street	20	30
16	Across the park on James Street	31	31
20/21	Near Residence Inn	78	78
22	Near Residence Inn	33	36

Notes:

- Lot 10 (Steamships lot) also has 6 designated bus parking spaces/lanes and Lot 12 also has 8 designated bus parking spaces/lanes
- Lots 10, 11, 17 and 18 are the only lots within reasonable walking distance of the subject property and are at full capacity at peak times
- Lot 12 is the only lot within a reasonable walking distance available to handle excess parking demand
- Lots 13, 14, 15, 16, 20/21 and 22 are not within reasonable walking distance of the subject property or the four full capacity lots (Lots 10, 11, 17 and 18)
- To access Lots 15 and 16 from the subject property, you must cross the park and take a trail through some woods. These lots are not visible from Muskoka Road 169 and are only accessible from James Street. These lots service a baseball diamond fronting onto James Street.
- Lot 20/21 is for boat trailer parking only and a permit is required

A copy of the map on page 2 the Gravenhurst Parking Study showing the location of the municipal lots is attached as Exhibit “4”.

The Muskoka Steamships & Discovery Centre (“MSDC”) owns and operates the Steamships and the Discovery Centre. These are the bookends that draw tourists to the Gravenhurst Wharf. The Town provides ongoing financial support to the MSDC. Lot 10 provides municipal parking for the Steamships. We understand that when the steamships are operating, this lot is insufficient and patrons use Lots 11 and 18 for overflow parking. Lot 10 is the closest municipal parking lot to the subject site. It would be the first lot used for commercial parking by the Project and, in our view, its use would seriously negatively impact the Steamships operation. Patrons must be able to access the ships conveniently and in a timely way. The needs of the business operations of the MSDC must be considered carefully by the Town and Council in the review of this application. The economic viability of the Gravenhurst Wharf is highly dependent on the continued operation of the steamships.

In any event, the four closest lots (Lots 10, 11, 17 and 18) are at full capacity at peak times and do not support additional commercial use by the Project. We understand the Gravenhurst farmers’ market runs every Wednesday beginning in May and running through October and vendors and patrons fill Lot 17 (Park lot) and part of Lot 11 (Boston Pizza lot). A number of

times over the summer there are craft shows and other events where Lot 11 (Boston Pizza lot) is filled with booths. During Ribfest, Lots 17 and 11 tend to be full. Anecdotally, some evenings, especially weekend evenings, Lot 11 (Boston Pizza lot) is full, due to people attending the Boston Pizza and Dock of the Bay restaurants.

While the Tatham Report suggests that the commercial parking space shortfall can be accommodated by the parking supply available in the Muskoka Wharf area, we disagree. The Steamships lot (Lot 10) should not be used to satisfy the applicant's commercial parking requirements, since it is necessary for the Steamships' customers and operations. The four closest lots to the subject property (Lots 10, 11, 17 and 18) are at full capacity at peak times and are not available. The only lot available within a reasonable walking distance to handle the overflow is Lot 12 with 190 parking spaces. Using a 59% occupancy factor (per the Paradigm Report and the Gravenhurst Parking Study) and using 85% as the cutoff (85% of 190 - 59% of 190 = 50), this Lot 12 would provide only an additional 50 commercial parking spaces, still leaving a shortfall of 118 commercial parking spaces (168 - 50).

We submit that "reasonable walking distance" should take into account not only the distance from the nearest lot line on the subject property to any particular municipal parking lot, but also the distance from the applicable retail/commercial space (as noted above in the Gravenhurst Parking Study, reasonable walking distance is 300 to 400 metres from the parking space to the user's final destination) and the number of steps that must be climbed in order to access that space. For example, the proposed restaurant is approximately 200 metres from the Steamships lot (Lot 10) and requires climbing about 12 steps to get to the raised boardwalk from the Steamships property and as many as 40 steps to get to the walkway at the top of the boathouse complex. Please see slide 20 of the Slide Deck.

Lot 11 (Boston Pizza lot) and Lot 17 (Park lot) are already at full capacity and are at the extreme end of the range at 400 m (ignoring the steps that must be climbed at the end of the walk). The theory is that a Starboard customer parking in the Boston Pizza lot will "push" a Boston Pizza customer to another lot within reasonable walking distance. The only suitable lot is Lot 12. None of the other lots can be seen from Lots 10, 11, 17 and 18 and Lots 13, 14, 15, 16, 20/21 and 22 are approximately 600 m, 600 m, 500 m, 400 m, 600 m and 600 m from Lot 11, respectively, and are outside reasonable walking distance. Please see Slide Deck, slide 16.

We understand the applicant may have also purchased 170 Cherokee Lane (a residential property with a single-family dwelling across Cherokee Lane from the main property at 205 Cherokee Lane). Perhaps the applicant could use this property to satisfy residential and commercial parking requirements?

We further note that ZBL Section 6.1.1(vi) provides that: "no part of any parking area shall be located within 20 metres of the optimum summer water level." Based on the applicant's drawings, the proposed two underground parking levels do not comply with this requirement, as they are only 8 metres from the waterfront. Please see Slide Deck, slide 18.

5. Boating Safety

The applicant's Boating Traffic Impact Assessment by Riverstone Environmental Solutions Inc. ("Riverstone") dated October 27, 2021 notes that Area A (the area closest to the Project) exceeds available boating capacity at times and that the proposed development is expected to increase boating traffic and is also expected to exacerbate the situation.

To alleviate boating safety concerns, Riverstone's primary recommendation is to establish additional educational opportunities.

Riverstone also recommended that a no-wake speed limit of 9 km/hr be instituted in Area A. We concur. We submit that no new boat slips should be permitted in Area A until the 9 km/hr speed limit has been implemented. The Town could apply an additional Holding Zone (H) in this situation, providing that no buildings or structures be permitted in the zone until regulation is effected to reduce boating speed limits to 9 km/h, after which time a further by-law would be passed to remove the (H) or Holding Provision. We note that regulations related to navigation or shipping are within the exclusive jurisdiction of the federal government.

6. No residential use in the Boathouse Complex

The applicant is requesting in Section 2.(iii)k. of the proposed zoning by-law amendment that the boathouse complex will only permit commercial retail, studio or other similar uses on the second floor.

We believe that residential uses should not be permitted in the boathouse complex. We suggest the language be revised to read "only permit commercial or retail uses on the second floor and no residential uses." We are concerned that "studio" could later be interpreted to mean studio apartments or lofts. Similarly, "other similar uses" could refer to anything.

We are also concerned that the main floor of the boathouse complex could be used for habitable space. We suggest that additional language be included as follows:

"The bottom floor of a boathouse is intended to be used only for storage of boats and other marine-related equipment, with a minimum of 50% of the floor area open to the water below. No cooking facilities or areas for sleeping will be permitted."

This language is consistent with the wording in Section L15.3d) of the Township of Muskoka Lakes' recently adopted Official Plan.

7. Micro brewery on the Lake

A micro brewery is proposed to be included as part of the proposed boathouse complex.

In 2011, Lake of Bays Brewery overwhelmed Baysville’s municipal treatment plant and waste had to be hauled away by truck. Both yeast and sugar caused biochemical problems which recurred over several years. In 2017, in this District report <https://muskoka.civicweb.net/document/31278/>, there was an incident at the Gravenhurst sewage treatment plant that “occurred as a result of a plant upset that caused elevated ammonia levels of 9.2 mg/L that exceeded our ECA limit of 5.0 mg/L. It is assumed that SawDust City Brewing Co. effluent may have been a contributing factor.”

We urge Council to exercise extreme caution when considering whether to add micro brewery/micro distillery as a permitted use. Such effluent can clearly cause serious problems with District wastewater systems and it is difficult to imagine how offending effluent could be accessed to be trucked away, given the location of the Starboard facility in a boathouse over water. As a recognized champion of water quality protection and supporter of the District’s Lake System Health policy, the MLA requests that micro brewery/micro distillery not be added as a permitted use or that the applicant enter into a responsibility agreement with the District.

8. Unused portion of the water lot to be deeded to the Town

Section C7.7.7 of the Official Plan states:

“There are a number of privately owned water lots adjacent to the shoreline. As a condition of development for a use over water, including docks, the balance of the water lot that is not to be used should be deeded to the Town.”

It would be preferable not to have the boathouse complex length and height discussion again several years from now. We recommend that a condition of approval be included to address this requirement.

9. Maximum Permitted Residential Density

In the public notice, under Amendment No. 04 to the Gravenhurst Official Plan (the “Amendment”), Section 2.4 states that there will be “an increase to the maximum permitted density for multiple residential development to 165 units/hectare.” However, Section 5.2 states that “the maximum permitted residential density shall not exceed 193 units per hectare.” We submit that the reference to “193” should be changed to “165”.

Similarly, the Amendment, Section 5.2 states that “the maximum permitted residential density shall... not exceed a gross floor area of 16,585 m².” and the proposed zoning by-law amendment in Section 2(iii).i. states that “The maximum number of residential units shall... not exceed a gross floor area of 16,585 square metres.” However, the applicant’s updated planning report states that Residential (GFA) in the original submission was 13,471 m² and in the revised submission is 15,650 m². We submit that both the above references to “16,585 m²” should be changed to “15,650 m²”. The amount should not include Non-Residential GFA.

10. Restore Policy C7.7.14.5 to the Amendment

Appendix “A” provided with the Notice of Complete Applications dated April 22, 2022 contained policy C7.7.14.5 that stated “Prior to any further development or site alteration of the property, the owners shall be required to enter into a Site Plan Agreement with the Town of Gravenhurst.”

Given the number of residential units (more than 10) as well as the commercial uses, we imagine that the omission of the requirement for a Site Plan Agreement was an oversight.

11. Environmental Impacts and Support for Holding Provision 22

This proposal has the potential for many environmental impacts, including removal of a stream along the north side of the property, substantial alteration of the shoreline to fill the floodplain, loss of all vegetative cover on land and impacts to fish and fish habitat. With 25 boat slips proposed, boats are being introduced into an area of sensitive fish habitat (Type 1). Boat operations in areas of submergent vegetation can damage the vegetation and stir up sediment from the bottom of the lake, as the whole area is relatively shallow. At certain times of the year, this will impact spawning fish, spawned young and sight feeding. The studies done to date leave many questions unanswered, including the ability to gain approvals for this work by relevant agencies.

We are very supportive of Holding Provision 22. Specifically, we are encouraged to see that all applicable Ministry of Natural Resources and Forestry, Ministry of the Environment, Conservation and Parks and Department of Fisheries and Oceans approvals must first be obtained before the Holding Provision will be removed. We appreciate the specific comments and conclusions outlined in the Peer Review by Hutchinson Environmental Sciences Ltd. We are especially concerned about protection of Type 1 aquatic habitat, Species at Risk, salt management plans, sediment and erosion controls during construction and application of LID techniques to control stormwater runoff and prevent water quality impacts, such as the proliferation of algae blooms. We trust that the issues raised in the peer review will be satisfactorily addressed before lifting of the Holding Provision.

12. Continued access to Lake Muskoka from Lookout Park

We are concerned that the proposed boathouse complex still cuts off Lookout Park (and the Town’s road allowance at the end of George Street) from the lake. Numerous members of the public swim or wade off the rocks from Lookout Park. This is one of the few Town-owned public access points to the lake. This is another reason why the boathouse complex length should be further reduced.

13. Phasing Plan

If the Project proceeds in phases and the boathouse complex/restaurant is in the first phase, we recommend that an appropriate amount of the residential component in the principal building be required to be constructed during that phase. We expect this will not be problematic for the applicant, since the materials indicate that it will all be built in one phase.

Please accept this letter as a written request that the Muskoka Lakes Association and the Muskoka Bay Property Owners' Association be notified of the decision of the Town of Gravenhurst in respect of the proposed Official Plan Amendment OPA 01-2022 and Zoning By-law ZA 11-2022.

As a final comment, we are very disappointed that the Town decided in January to only hold in-person meetings, after two years of virtual meetings during the pandemic. As you can appreciate, it is often difficult, if not impossible, for our members and supporters to attend in-person, especially during the winter months. The public's ability to make verbal presentations to Council is a key part of the democratic process. We note that other Muskoka municipalities continue to hold hybrid meetings.

We appreciate the opportunity to provide you with our comments.

Yours very truly,



Ken Pearce
Vice-President and Director,
Muskoka Lakes Association



Keith Duncan
Director,
Muskoka Bay Property Owners'
Association

cc. Mayor and Councilors, Town of Gravenhurst
Bob Chant, President, Sunset Bay Cottagers' Association
Anne Stanway, President, South Muskoka Lake Cottagers' Association
Susan Eplett, President, Muskoka Lakes Association
Laurie Thomson, President, Friends of Muskoka
Liz Lundell, Chair, Government and Land Use Committee, Muskoka Lakes Association
Stephen Fahner, Northern Vision Planning Ltd.

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