

Messrs. Seiling and Fenn
Regional Governance Advisors

Dear Messrs. Seiling and Fenn:

Re: Comments for the Regional Governance Review

The Muskoka Lakes Association (MLA) has a 125 year history in Muskoka and represents over 2500 waterfront families. The following comments are made to contribute to your review on Regional Governance in Muskoka.

The MLA has an excellent working relationship with both the District of Muskoka and the individual towns and townships in our area. We value the ability to be able to interact with councillors as well as the Mayors and Chair of the District.

The MLA is in favour of maintaining the existing two-tier structure for the following reasons:

1. **Potential impact on taxation:** Our members for the most part are second home owners, for which we shoulder an ever-increasing proportion of the tax burden in Muskoka. Of the taxes paid by seasonal residents in the Township of Muskoka Lakes, about 83% or \$22.5 million are contributed to the District. Further the seasonal residents paid 83% of the taxes in the Township of Muskoka Lakes.

Decisions taken by the Province need to consider the potential impact on taxation where so many cottage owners find themselves having to sell or rent to be able to continue to maintain ownership. Ever increasing property taxes have the potential to put downward pressure on property values, eroding the tax base, and particularly the seasonal tax base, that contributes the vast majority of tax revenue to the District and local municipalities. We are aware of studies ([Municipal Amalgamation in Ontario Review](#) and [Toronto Ten Years after Amalgamation](#)) that concluded there were no cost savings as a result of amalgamation and instead resulted in increased levels of taxation.

2. **Importance of the Local Voice:** The MLA has been a voice of responsible taxation and appropriate development with our local and District governments. The MLA are involved in many planning files holding our local and regional governments to account for development decisions.

We value the ability to have a local voice where our municipal boundaries are so large, and the area is so geographically, demographically and economically diverse (the Township of Muskoka Lakes (TML) is 781 km² with the District of Muskoka at 3900 km², compared with Regions of Peel 1250 km², Durham 2500 km² and Halton 964 km²). In large areas physical access to government services is important which fundamentally does not reduce expenses. While less councillors may not necessarily mean less access, it may mean delayed access, as each councillor than must take on a greater workload and potentially is less available to their constituents.

3. **Regional Environmental Monitoring and Management:** Perhaps the most important reason to maintain a District government is the **environment** of Muskoka. *In Muskoka, the environment is the economy.* Unlike municipalities, the environment does not follow boundaries of roads or other straight lines. There are watershed boundaries within which the water flows towards a drainage point (like the Muskoka River). There are forests that form a continuum of habitats allowing animals and seeds to move freely between areas for various life purposes or to escape conditions that may no longer be suitable for survival. To protect and manage the environment, it must be seen for what it is – a system and not a series of discrete pieces. Municipalities are also part of a system – part of the regional, provincial and federal governments. They benefit from the bigger view.

In recent decades, the Province has pulled back on much of its local involvement, particularly in environmental oversight, protection and management, pushing much of the responsibility down to the municipalities. This trend appears poised to continue. The District of Muskoka through their environmental programs and policies and support for the Muskoka Watershed Council, provide the larger view for the environment in Muskoka – their size alone capturing a significant area of the watershed. Their monitoring programs allow us to see the trends in water quality and the impact of larger policy and infrastructure decisions that have been made over the years. Without the Districts' programs, overarching policies and resources to be efficient, we would not be able to track and manage the environment in Muskoka. In other jurisdictions in Ontario, Conservation Authorities ([Conservation Ontario](#)) have been set up to manage natural resources on a watershed basis. Muskoka does not have a conservation authority to provide that larger oversight. The District is essential to provide that service in the absence of another environmental management organization.

Nevertheless, there are always improvements that can be made to every government and their processes. The MLA would note the following improvements that can be made:

1. **Number of Councillors:** While we appreciate the local representation, in the Township of Muskoka Lakes each ward has 3 councillors and we would suggest that a reduction by one could be contemplated.

2. **Representation:** Representation of the seasonal population at the District of Muskoka should be weighted at 100%. Currently our representation is based on 50%. There may have been a time when that was appropriate but no longer. Seasonal residents contribute significantly as outlined above to Muskoka 's community through their taxes, their membership on boards, such as Muskoka watershed council, the Muskoka health board, and Muskoka Steamship and Heritage Society, similar to the permanent population. Seasonal residents view themselves as much of the community as permanent residents and should have full rights to be represented at 100%.
3. **Planning:** The division of planning responsibilities is confusing and at times in conflict on applications. For example, subdivision approvals are undertaken by the District but zoning amendments – both of which may be required on the same file - are administered by the Township. The MLA would suggest that all planning be undertaken by the local level with the District responsible for the review and final approval of more complex files around subdivisions. We value the 'sober second thought' review by another body to ensure sound planning decisions.

In summary the MLA recommends:

1. Maintain the Regional governance of the District of Muskoka to ensure that there is sufficient protection, monitoring and management of the environment. If the recommendation is to abolish this level of government then require the formation of a Conservation Authority for Muskoka to provide watershed governance and management in the absence of a District government model.
2. Ensure potential impacts on taxation are considered as part of the review with the effect that the seasonal population is not disproportionately impacted;
3. Ensure local representation is maintained to give voice to the local residents;
4. Count seasonal residents in the District of Muskoka as full (100%) residents for the purposes of representation.
5. Streamline the land use planning responsibilities by consolidating with the local municipality with District oversight.

We trust that these brief comments are helpful.

Yours truly,



Lawton Osler
President, Muskoka Lakes Association

c.c. Katie Edwards, General Manager, Muskoka Lakes Association