

Tuesday, January 12, 2021

Attention: Megan Williams, Deputy Clerk
City of Orillia

Via email: mwilliams@orillia.ca

Mayor and Councillors,

RE: Ramara's MZO application on Lake Couchiching

The undersigned is writing to you today with grave concerns about a MZO application recently submitted to the province by the Township of Ramara and supported the County of Simcoe. We strongly believe that this development is not in the best interest of Lake Couchiching, the environment writ large or the City of Orillia and its residents.

As you can see from the graphic below, a large portion of this development resides within a provincially significant wetland (PSW) and infringes on others. Currently, development within a PSW is prohibited under Ontario's planning laws. A MZO would remove these prohibitions.

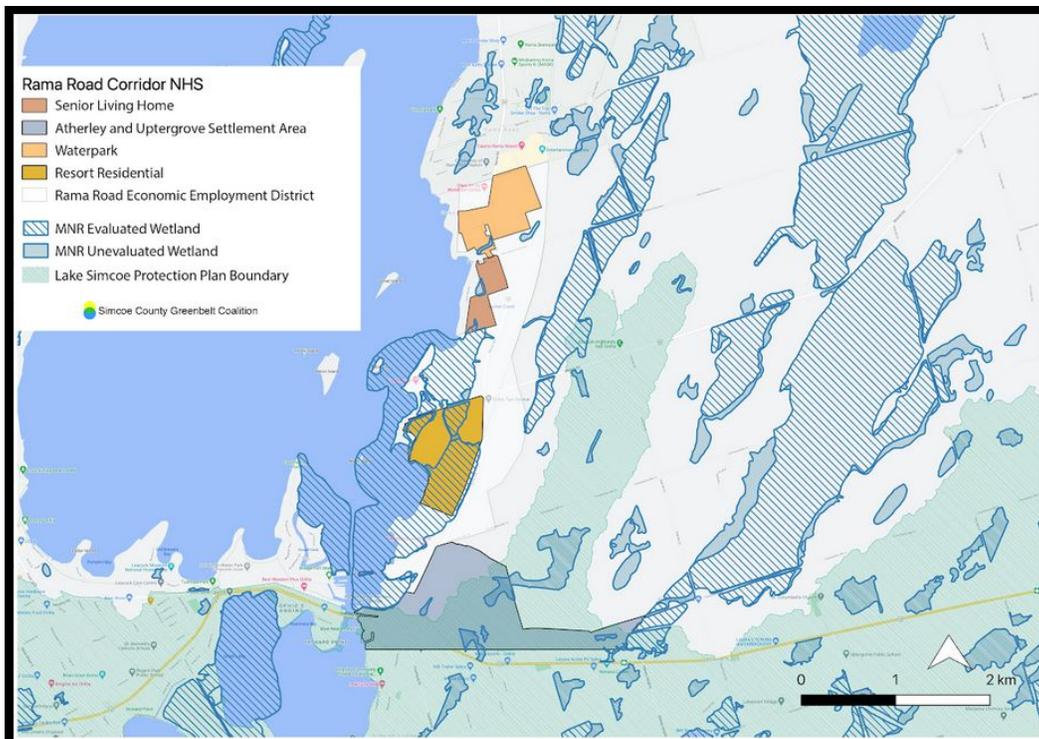


Figure 1: MNRF PSW mapping overlaid on Ramara's zoning mapping for the project. Sources: MNRF, Rama Road Corridor MZO application

In Figure 2, it is clear to see how the developments will also infringe on water intake protection zones as well as significant forests.

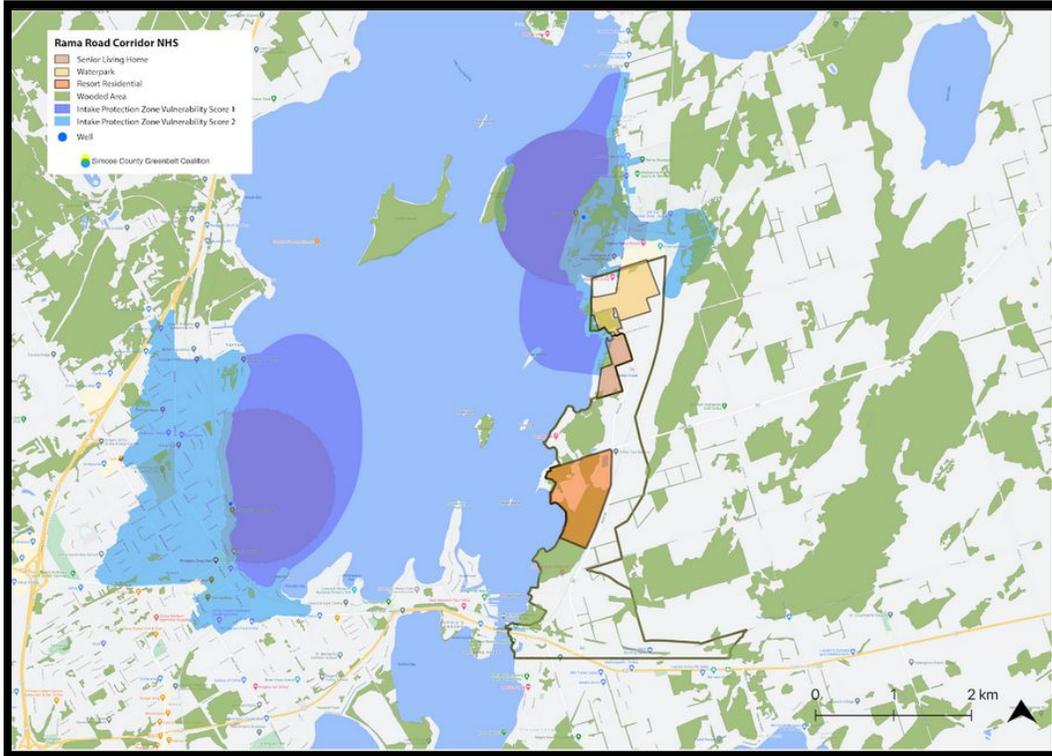


Figure 2: Rama Road Corridor zoning overlaid on significant woodlots and wellhead protection zones. Sources: MNRF, Source Water Protection Maps, Rama Road Corridor MZO application

For clarity, the development proposal would include 3 separate developments. The MZO is asking for all three of the development applications to be approved including:

- **Harbour Village at the Narrows (listed as “Resort Residential” on Fig. 1&2)**
 - 258 room hotel, an additional 1,678 mixed units proposed
 - Creating 6,414 additional feet of frontage (through harbours and canals) mostly in the midst of a provincially significant wetland which is also one of the last, large intact wetlands on Lake Couchiching



Figure 3: Rendering of aerial view of Harbour Village at the Narrows. Source: Rama Road Corridor MZO package, Ramara Township

- **Ramara Waterpark Resort (listed as “Waterpark” on Figures 1&2)**
 - Includes a 58,500 sq ft water park, 7 hotels ranging from 6-10 storeys in height (totalling 700 hotel rooms), 8 restaurants, 152 condominium units (6-10 storeys), 252 stacked townhouse units; 8 storey, 34,000 sq ft retirement residence (40 units), commercial and retail space

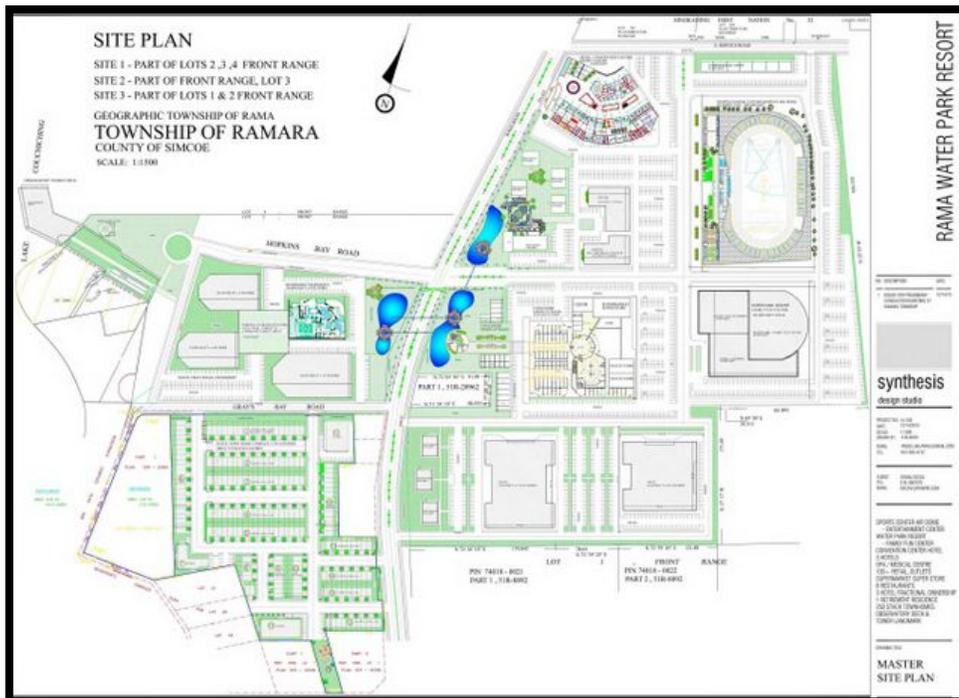


Figure 4: Site plan of Ramara Waterpark Resort. Source: Rama Road Corridor MZO package, Ramara Township.

- **Ramara Landing (listed as “Senior Living Homes” on Figures 1&2)**
 - 172 townhouse units, 300 resident independent living building, 300 resident long term care home, Two 6 storey condominium towers (150 units total), community centre, water and wastewater treatment plant



Figure 5: Ramara Landing Site Plans overlaid on existing mapping. Source: Rama Road Corridor MZO package, Ramara Township

This application is problematic for the City of Orillia for several reasons.

- **The health of Lake Couchiching is vital to the health of the City of Orillia.** Whether it be for drinking water for residents, recreation or supporting Orillia’s economy via its downtown and tourism, Orillia is highly dependent upon the wellbeing of Lake Couchiching. A MZO application does not currently require environmental assessments to be completed as per Section 47 of the Planning Act.

Although Ramara Township references a 1,400 page Environmental Assessment that has been done, it is our understanding that this EA only applies to a portion of the development that is proposed and was completed in the early 2000s. A lot has changed since then. What we know about the necessity of shoreline wetlands to the health of a lake has also increased. There is a reason why there aren't policies within Ontario's planning regime that guide how development should be done within a provincially significant wetland - because it isn't allowed.

Since there are no statutory requirements within the Planning Act to complete environmental assessments as part of a MZO and there aren't policies to guide how building on top of a PSW should be done, it is hard to understand how these wetlands will be protected through a MZO or through this development application at all. And in the case of these particular shoreline wetlands, they play a significant role in flood mitigation and water filtration of Lake Couchiching. Impairing these wetlands by building in the heart of them and directly infringing on other parts, squarely puts the health of the lake at risk.

- **A MZO application is not an appropriate tool for a large development such as this.** MZOs cut out several key pieces of the Planning Act process, but most importantly, it removes the statutory consultation and appeal process. Not only is this process for the public, but also for other stakeholders such as neighbouring municipalities to weigh in on shared assets and key issues.

Considering the significant impact this development could have on Orillia's shoreline, water quality and recreation opportunities, the City of Orillia should be able to have meaningful opportunities to engage in the process and protect its interests. With a MZO, the approvals are already given and Ramara Township would only be able to handle issues via site plan controls and permitting. What meaningful process will the City of Orillia have under that system? If issues do arise, what mechanisms will the City of Orillia have to outline its interests if approvals have already been given?

A large development such as this should have sober second thought, especially within a changing climate and biodiversity loss, but the idea of truncating the process by cutting out consultation through a MZO is unacceptable.

Of course, there are other issues that may be meaningful to members of council such as climate action. Removal of forests and wetlands is directly incompatible with these goals. The increased boat traffic could also impact shoreline residents on the west side of the lake and historical sites such as the fishing weirs. Again, there are many impacts that need to be fully considered which underscores why a truncated MZO process, which removes meaningful community consultation, is not in the best interest of area residents or other stakeholders.

The City of Orillia has prided itself on its port and Couchiching shorelines. Consequently, council should consider itself a steward of the Lake and deem applications such as this as problematic - especially under a MZO application. We hope that the City of Orillia will take a stand for the interests of its residents and the lake and officially oppose the MZO application request..

Sincerely,

Margaret Prophet
Executive Director, Simcoe County Greenbelt Coalition

Claire Malcolmson
Executive Director, Rescue Lake Simcoe Coalition

Mike Douglas
Chair, Concerned Citizens of Ramara