



January 20, 2021

Chair, Members and Staff
Bracebridge Town Council and Planning and Development Committee
1000 Taylor Ct
Bracebridge, ON
P1L 0A1

Ladies and Gentlemen,

**Re: Official Plan Amendment D09-08/18 and Rezoning Application D14-17/18
(Muskoka Royale Development Inc.)**

On behalf of Ontario Nature, I am writing to express our deep concern about the proposal to site the Muskoka Royale development on lands that include Henry Marsh and other wetlands which may be provincially significant.

Ontario Nature is a charitable conservation organization that protects wild species and wild spaces across the province through conservation, education and public engagement. Established in 1931, we represent more than 30,000 individual members and supporters and over 150 member groups, including the Muskoka Field Naturalists.

I understand the Muskoka Royale Development application proposes to build extensive facilities – including a primary and secondary school, recreation and medical facilities, accommodations and pavilions – on or near wetlands that have not yet been evaluated for their significance, and that are known among other things to harbour species at risk such as Blanding's turtle. I further understand that Council is considering approving the application, even though the project could be sited on other less sensitive lands available nearby. I believe that allowing this project to go forward under these circumstances, without first requiring completion of an Ontario Wetlands Evaluation System (OWES) study, would be a serious mistake and contrary to the interest of the community.

Wetlands provide significant benefits to local communities, helping to control flooding, purify drinking water, sequester carbon, mitigate erosion, and provide habitat for wildlife, including about 20 percent of Ontario's species at risk. They are valued by Indigenous communities as a source of food and medicines. They also provide important recreational opportunities, including birding, hunting, fishing and canoeing. In a study commissioned by the Ministry of Natural Resources and Forestry, it was conservatively estimated that wetlands in southern Ontario alone provide about \$14 billion in economic benefits for Ontarians each year (Troy and Bagstad, 2013).

It is widely recognized that wetlands play a critical role in enhancing resilience to climate change impacts, and that every effort should be made to retain them on the landscape.



This should be of particular interest to the Bracebridge community, given that your region has experienced three “once in a century” floods in the last nine years alone.

Ontario’s Provincial Policy Statement (PPS) directs municipalities to maintain the ecological function, diversity and connectivity of natural heritage features, and in recognition of the many benefits provided by wetlands, it prohibits development and site alteration on provincially significant wetlands and adjacent lands. In keeping with the spirit of this policy, I urge you to ensure that an OWES study is conducted before you make any decisions that will pave the way for the Muskoka Royale development. For the sake of current and future generations, Council should make every effort to understand, through an OWES study, the scale, scope, functions, boundaries and significance of the wetlands in question, as well as the measures required to ensure that they can continue to deliver, at no cost, important ecological, cultural and economic benefits to the Bracebridge community.

Thank you for your consideration.

Yours sincerely,

Dr. Anne Bell
Director of Conservation and Education
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