



## **Bruce Peninsula Biosphere Association**

P.O. Box #3, 16 Brock Street, Tobermory, ON N0H 2R0

### **Honorable Mayor and Councilors and Members of Our Community**

My name is Elizabeth Thorn and I am the volunteer Chair of the Bruce Peninsula Biosphere Association, a registered charity. We promote conservation and sustainable economic development to maintain a healthy environment. We do not own land. We focus our efforts on restoration and stewardship.

We recognize that the proposed zoning by law changes have created a great deal of concern and we hope this process of consultation which allows people to express their views, have questions answered and changes made, will ease people's minds. We believe better overall planning will improve everyone's quality of life.

The Northern Bruce Peninsula's natural beauty is regarded as the jewel of the Niagara Escarpment World Biosphere Reserve. The Bruce's beauty however is NOT skin deep. The Northern Bruce Peninsula has one of the highest concentrations of rare species in all of Canada and it is important to protect because of this spectacular biodiversity. It is not just a treasure for us who live here, or for residents of Ontario, **it is a treasure for all Canadians.**

Residents, cottagers, and visitors have a role to play in protecting this special place which is the foundation for our economy and our quality of life. Indeed, one might argue **it is our responsibility as citizens** to make ourselves aware of environmentally responsible practices, and to adopt these practices.

Government too has a role and the proposed update of our Comprehensive Zoning By-Law, the first in fifteen years, provides an opportunity to help ensure we, our children and grandchildren will swim in unpolluted, algae-free waters, enjoy a freshly caught fish dinner and benefit from a prosperous and sustainable recreational-based economy. How much will our properties be worth if the lakes become polluted, the shoreline fouled with algae or our wells contaminated or dried up. This will certainly decrease property values.

Here are our comments on the Northern Bruce Peninsula Comprehensive Draft By-law.

### **Septic Systems**

The Bruce Peninsula Biosphere Association is committed to helping community members fix their failing septic systems. Over \$100,000 has been given directly to property owners so far with another \$50,000 available in 2018. We have seen and fixed unbelievable septic system problems. We support zoning provisions that protect surface water and groundwater quality, and zoning that prevents overdevelopment of sites causing poor water quality.

The current proposal is that **if** a septic system has to be replaced on the smallest lots it will be required to use advanced technology. Our extensive bedrock geology (i.e. karst topography) has limited soil cover and many fissures and openings which means water can quickly move from the surface into the ground water. When water moves quickly, it cannot be completely filtered before reaching the groundwater. This may cause contamination of well water. We support the objective of reducing the cumulative, negative impact of clustered development on small lots with septic systems.

Fixing a septic system is a “one-time” cost. Perhaps the Municipality can contribute funding to bridge the gap between the cost of a regular system replacement and the proposed advanced systems to be required when upgrading systems on the smallest lots. Yes, it will be expensive but it is a one-time cost. Alternately, we should proceed with the even more expensive proposal contained in the Municipality’s new economic development strategy - install municipal sewage treatment in Lion’s Head and expand existing facilities in Tobermory. This of course has the added benefit of allowing more intensive development.

### **Wetland Buffers**

Over two-thirds of the fish species living in the Great Lakes depend on coastal wetlands for feeding, cover, spawning and nursery habitat. Nearshore fish like Northern Pike and Walleye also use the coastal wetlands for habitat. Wetlands are also important to people. Wetlands filter water contributing to clean beaches and clean water for cattle and support the fish and wildlife for recreational fishing and tourism. The Biosphere Association is working with nine community groups to fight phragmites which is destroying our wetlands and can block shoreline access.

Wetlands are so important to ecosystem functioning that the Province has classified some wetlands as Provincially Significant Wetlands. Wetlands, both those Provincially Significant and Locally Significant, are mapped as natural hazards within Bruce County.

Adjacent lands are areas that extend 120 metres from a PSW boundary. In many circumstances you can build on lands adjacent to a wetland. Understandably though, given the importance of provincially significant wetlands, any proposed development within the adjacent lands is carefully considered through a process of assessment to ensure ecosystem functions of that wetland are maintained. We note and support the fact that an assessment is not one-size-fits-all – it is tailored to the size and impact of the building requested.

We recognize that some people are concerned about wetland mapping inaccuracies and they believe the scale of the mapping is not sufficient for individual lots so we support a review by MNRF of the mapping as good mapping is absolutely fundamental.

The Biosphere Association also strongly supports and believes it is critical that proposed development within 120 metres of a PSW be identified and that proposed development on these adjacent lands be formally evaluated to ensure it is respectful of the wetland's features and functions.

If you like to fish, you need to ensure we protect our wetlands - both coastal and interior.

### **Water Quality Provisions**

The Biosphere Association supports measures to protect water quality. As many of you are aware, we have several initiatives underway to improve water quality. Working closely with our farming community, we have provided alternate watering sources for over 4,500 cattle and installed over 12.5 km of fencing reducing phosphorus loading into Georgian Bay and Lake Huron by one tonne each year. We have created demonstration sites to illustrate how to prevent phosphorus and sediment loading from soil erosion and have held several workshops for owners of shoreline properties to promote use of best practices for shoreline management.

We believe our small Inland lakes are particularly sensitive to water quality impairments. In several instances, old cottages are being torn down and much larger ones built as people decide to live here for most of the year. We support the creation of guidelines to establish the carrying capacity of a given inland lake.

While underperforming septic systems pose the greatest threat to water quality, residential storm water run-off from a property into the lake can also damage water quality. The cumulative effect from several properties of oils & car washing soaps from the driveway, salts from the roadways, and fertilizers and pesticides from gardens and lawns and hardening of shorelines impairs water quality. Setbacks and maintaining natural shorelines can allow the storm and household waste water to be absorbed into the ground and filtered before it enters the lakes, reducing the likelihood that chemical or nutrient-laden waters enter the lake from the cottages and homes that ring these lakes.

A large percentage of cottages on inland lakes in the Northern Bruce were built many years ago, before cell phones even. Today, many citizens have told us they are worried that water quality has deteriorated and that fishing is not as good as it once was.

In recent years, there have been many scientific advances and increased understanding of what impairs water quality and what can be done to minimize the impacts of residential development. The proposed setbacks of 15 metres or 49 feet on inland lakes for new builds grew from this deeper, scientific based understanding. South Bruce has enacted the 49 feet level of protection and it is less than is required in Muskoka. With what we know now and the intensification of development, a 25 feet setback is no longer enough.

As a community, the Biosphere Association believes we have to make the change to create better protection of our lakes and the quality of our water. Surely, given we have one of the highest concentration of rare species in all of Canada we need to work toward a good level of protection. We believe the setback proposal for inland lakes in the by-law strives to balance existing landowner needs and the need to transition to better protection. We note in particular that the increased setbacks from the lake are not a requirement for existing structures or re-builds that maintain the existing dwelling's footprint. This means if a cottage or home burns down the owner would be allowed to re-build in the same place. A further compromise is that if a new owner wishes to tear down an older cottage and build a new one they can do it, provided they maintain the existing or a smaller footprint. They can even add an addition if there is a 10 metre setback for the portion being added.

However, if they wish to build a larger building (not an addition) they would be required to adhere to the updated 15 metre setback to be consistent with other new builds that provide a greater level of environmental protection.

Over 80% of dwellings on inland lakes already meet this setback and there are no requirements for existing properties to make changes to meet the new standard. For these reasons, we support the concept of setbacks on inland lakes of 15 metres for new builds and 10 metres for additions.

### **Natural Heritage System**

We strongly support the creation of a Natural Heritage System for the Northern Bruce as it is a foundational document required to inform conservation efforts. We will actively work on the creation of a such a system and have already collected much of the required information through the development of the Community Conservation and Stewardship Plan and sub-watershed documents.

## **Dark Sky Community**

The Municipality of Northern Bruce Peninsula declared itself a Dark Sky Community in 2004.

The Biosphere Association promotes understanding of why and how to protect our natural night sky during our Bayside Astronomy program which attracts 2,500 people a year during July and August. With the unprecedented number of building permits issued, we believe that it is now time to enshrine as a general provision in the by-law the requirement to use dark sky friendly lighting fixtures on new residential buildings.

Elizabeth Thorn  
Chair  
Bruce Peninsula Biosphere Association  
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