

Palmerston Lake Association

Ompah, Ontario

January 26, 2023

Dear Ms. Mieske:

re: Official Plan Amendment Application #OP 02/22 and Zoning By-law Amendment Application #Z08/22

We are writing on behalf of the Palmerston Lake Association (PLA) and the North Frontenac Lake Association Alliance (NFLAA) concerning the above application. The PLA represents property owners with shoreline on the lake and others who share our interest in responsible stewardship of the lake. The primary objective of our Association is to "promote the preservation of the quality and character of the lake and the surrounding environment". The NFLAA represents the interests of 16 lake associations in North Frontenac and wishes to assess the potential impact of this proposed change in the Official Plan on all lakes in the Township. We attended with interest the Public Meeting on January 13, 2023. Our interest in this application concerns solely the health of our lake, a designated Lake Trout Lake. We understand that the County Planner has requested that questions regarding the application be submitted before February 3. We have received answers to a number of our questions to date and have the following additional questions:

1. We would like to understand why the applicants have chosen to seek this change in zoning versus seeking severances using the Waterfront Area designation (4.10) in the Official Plan? Is it because the minimum lot size restriction in the Limited Service Waterfront (LSW) area would not be satisfied for the five cottages on the peninsula portion of the property? Are there specific uses the applicants intend for the property that are not permitted uses in the LSW area? What other features of the Rural Cooperative zone do they desire that could not be accomplished by leaving the property as a Waterfront Area?
2. At the meeting, mention was made of an OMB hearing that disallowed an application from previous owners to build four cottages on the property. We believe it is important to understand fully the details surrounding this hearing and the extent to which the findings can be brought to bear on decisions concerning this application. Can the Township provide us with those details?
3. We understand that Mississippi Valley Conservation Authority will only be permitted to report on the natural hazards and regulated wetlands on the site due to Bill 23. Does the Township have a plan to retain an independent consultant to provide a report on natural heritage, lake protection and water quality matters?
4. The 2018 Official Plan was developed using an inclusive community-based process. It identifies Palmerston Lake as a Lake Trout Lake, and, unlike some others in the watershed, as 'under capacity". Can the Township provide us with the data sets that were used to determine that Palmerston Lake was under capacity in 2018? Years have passed since the Official Plan was approved and substantial development of lake front properties has occurred since that time. We have not located any information about the present risk status or carrying capacity of the lake. A solid understanding of the status of this sensitive lake in 2023 is critical before a fully informed decision can be made by Council. Is the Township aware of any current information that would assist in determining the carrying capacity at the present time?

5. The protection and enhancement of lake trout spawning beds is of a critical importance. Apart from lake carrying capacity, what measures can be used to assess the current state and associated risk to spawning beds at gravel point?

We would appreciate the opportunity to comment further on the application once we have answers to these questions.

Thank you for your consideration.

Yours truly,

Andrew Waywell
President
Palmerston Lake Association

Bruce Moore
President
North Frontenac Lake Association Alliance