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October 8, 2020

Township of Georgian Bay (TGB)
99 Lone Pine Road, Port Severn
Ontario L0K 1S0

Dear Mayor Koetsier and Members of Council,

Re: Brandy's Cove Yachting Centre Site Plan Amendment Application
Development Services Department REPORT 2020-064 and the previous
NOTICE of an AMENDMENT to a COMMERCIAL SITE PLAN AGREEMENT
File no. S20-06 from the September 14, 2020 TGB Planning Council meeting
(the amendment)

We are again writing with regard to this matter as we see that the Planning Council is being asked to consider approving this amendment on Tuesday Oct 13, 2020.

The reason that GBA is concerned is the potential for a severe negative impact on water quality in Severn Sound should the proposed sewage system on this site prove to be inadequate. We have reviewed the documentation in your Agenda package and pursued our own enquiries into this matter.

In addition to those set out in our letter of September 11, 2020 which is attached for reference purposes, we have a further concern about this amendment. We understand that the proposed sewage system has no provisions to process either phosphorous or nitrogen compounds and refer to the letter to Council from the Eastern Georgian Bay Protective Society of Oct 8, 2020 on this matter, also attached. Since the effluent will contain both these elements, and since:

- a substantive phosphorous discharge at this location would create the potential for algae growth in the Severn Sound, including blue green algae (cyanobacteria); and
- a substantive un-ionized nitrogen discharge could cause a very significant fish kill event;

we respectfully request that the following incomplete processes listed below, relating to peer reviews of the proposed sewage system, be finalized before any decision on the amendment is made by TGB.

1. On page 198 of the September 14, 2020 TGB Planning Council meeting agenda there is reference to Attachment 4: ***Gunnell Engineering Response to Peer Review.*** This document was not included in the agenda package and we understand that it has still not been provided. We respectfully suggest that a review by TGB staff of the response from the proponent's engineering consultant (Gunnell) to the Cambium Peer Review Report be completed.
2. We understand that the later Burnside peer review provided to TGB was sent to MECP for comment and that no reply has been received yet from MECP. Given that the Burnside review raised serious concerns about the adequacy of the proposed sewage system, we respectfully suggest that any decision on this matter await MECP's response and a review by TGB staff of MECP's comments.
3. We are unsure whether or not the Burnside peer review has also been sent to Gunnell Engineering for a response. If it has, then the same rationale as above applies regarding waiting for staff review of their response. If it has not, then we respectfully suggest it should be sent without delay.

Given that these matters address the key water quality environmental concerns, and given the serious consequences of proceeding with an inadequate sewage system, we would ask that you also please consider holding this matter over to a later council meeting to allow sufficient time for resolution of these outstanding matters, public comment and input on the above new information, and to properly consider all the implications.

We thank you for your consideration and look forward to hearing from you.

Yours sincerely,

Rupert Kindersley
Executive Director