December 8, 2021

Council for the Corporation of the Township of Minden Hills, 7 Milne St, Box 359, Minden, ON KOM 2KO

Re: PLOZA2021051 – Part Lot 19 &20 Concession 2 – Geographic Township of Minden 1297 Kashagawigamog Lake Road (also known as Post House)

Dear Councillors and Minden Hills staff,

Lake Kashagawigamog Organization (LKO) has concerns with the proposed re-zoning of 1297 Kashagawigamog Lake Road. We are appreciative of the recent renovations on the property, the replacement of the septic system and the concept of a new resort on the lake. We are aware that there has been a loss of resort style accommodation on the lake over the past number of years and that there would be benefit to the greater Minden Hills/Haliburton County community with a new resort. However, LKO's primary interest is preserving and improving the water quality of Lake Kashagawigamog for all users.

The Official Plan states in section 3.2.3.1.1.5 that council will not consider non-residential development on shorelines of lakes if the tile field is within 300 m of an at capacity lake. Kashagawigamog Lake is deemed an at capacity lake. From the drawings on the application, it appears that the septic system of this property is well within 300 m. Therefore, in our view, the application should be denied on this fact.

## Other considerations, if the application proceeds.

While the upgraded septic system is appreciated by LKO and the residents of Lake Kashagawigamog, the septic system permit application was submitted as a shoreline residential (SR) property. The septic system permit would therefore not have been evaluated as commercial (C2-E) property and would not reflect the changed resort usage. Is that permit adequate for the increased resort usage that a commercial zoning would require?

The Lake Impact Assessment predicts a reduction of phosphorus loading of 0.25 kg/year. That reduction does not justify the zoning change. It is difficult to believe that the increased occupancy will offset the improved system designed for shoreline residential usage. Sewage generated from commercial food service businesses is known to have higher fat, oil and grease content. This results in less effective removal of contaminants by the septic system. Also, chemical use in commercial kitchen dishwashing is greater than in residential kitchens. Chlorine and antibacterial agents in dishwashing detergents kill the bacteria that septic system efficiency depends upon. This property has very little elevation and drainage. It is at risk to flood, especially with climate change, which poses an increased risk of septic tile bed contamination to the lake environment.

In the supporting documentation, there is no mention of the water source for the property. What are short term and long term implications for the lake and aquifers?

We applaud the design to control the stormwater with porous parking and access surfaces and increased vegetation. However, are the number of parking spaces adequate? The proposed 17 spaces

plus 5 staff = 22 parking spaces assume that each bedroom comes with one car only. Overflow parking on Kashagawigamog Lake Rd is not acceptable, as this is a busy road in Ingoldsby.

The LKO is concerned about motorized boat traffic which are not addressed in the application. New high powered motorized boats are causing significant damage to shorelines and animal habitat. The proposal promotes non-motorized watercraft; however, there are no restrictions in place and the advertising material in fact shows such vessels. Any development agreement should restrict the number, and horsepower of vessels docked at this property.

The notice of this meeting calls for re-zoning from Shoreline Residential (SR) to General Commercial with exception (C2-E). General Commercial zoning is a broad sweeping zoning accommodating 34 future uses which would remain with this property in perpetuity. The supporting documents posted on the website discuss Recreational Commercial (C-3), which specifically apply to a resort. C-3 zoning accommodates 18 future uses. Why is C-3 zoning, with very limited future use, not being considered? Why is the application for C2-E being considered? LKO's concern is that this zoning change will remain with the property and that should the ownership or operational plan change, many other commercial uses could occur at 1297 Kashagawigamog Lake Road. Also, this would be a precedent setting change of zoning from shoreline residential to general commercial that could be applied to most properties on the lake.

If council chooses not to deny the application, the LKO would like to see council recommend that the Minden Hills planning department more fully study this proposal, and that a peer reviewed independent environmental assessment be completed with LKO's participation before council votes on this re-zoning application. We thank you for considering our zoning change concerns.

Leno J

Jan Gerrow,

For the Lake Kashagawigamog Organization

Cc: Mayor Brent Devolin <u>bdevolin@mindenhills.ca</u>

Deputy Mayor Lisa Schell <u>Ischell@mindenhills.ca</u>

Councillor At Large Ron Nesbitt rnesbitt@mindenhills.ca
Councillor Ward 1 Bob Carter bcarter@mindenhills.ca
Councillor Ward 1 Jennifer Hughey jhughey@mindenhills.ca
Councillor Ward 2 Pam Sayne psayne@mindenhills.ca
Councillor Ward 3 Jean Neville jneville@mindenhills.ca
CAO/Clerk Trisha McKibbin tmckibbin@mindenhills.ca

Chief Building Official Colin McKnight <a href="mailto:cmcknight@mindenhills.ca">cmcknight@mindenhills.ca</a>