



SUMMER VILLAGE OF SILVER BEACH

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January 31, 2024

Attention: Andrew Olsen, Junior Planner, Eins Development Consulting

Copies Josh Bishop, Reeve, County of Wetaskiwin
Scott MacDougall, CAO, County of Wetaskiwin
Mayor Don Oborowsky, Summer Village of Argentia Beach
Mayor Richard Tooke, Summer Village of Golden Days

Regarding: Comments Regarding – Parcels at Mulhurst Bay Area Structure Plan – N.E. ¼ Sec. 11, TWP. 47, RGE. 28, W.4th M.

Thank you for your letter of January 15, 2024 with information regarding your proposed development of these Parcels within the County of Wetaskiwin that abut the Summer Village of Silver Beach (SVSB). As development of these Parcels is currently governed by the Mulhurst Bay Crossing Area Structure Plan (2008) we understand you will be asking the County to rescind that Area Structure Plan and replace it with a new Area Structure Plan that you are preparing. We thank you for the opportunity to provide preliminary feedback and to ask questions respecting your proposed development.

As you know the SVSB is a separately governed Alberta municipality lying immediately west of the Parcels in question and it is the owner of the large undeveloped parcel that abuts your proposed development. Parts of the SVSB's undeveloped parcel are in a natural forested state. The balance of that parcel is in the 25th year of returning to their natural forested state. That parcel is and has historically been zoned Park. As such, but for the maintenance and possible extension of granular trails, there are no plans for it ever to be developed.

The following comments on your proposed development are informed by:

1. the Pigeon Lake North Intermunicipal Development Plan (March 2021) (IDP"), a statutory plan between the County of Wetaskiwin, the SVSB, and the Summer Villages of Argentia Beach and Golden Days;
2. SVSB's participation in an Intermunicipal Collaboration Framework (ICF) between the four IDP municipalities including membership in an Intermunicipal Collaboration Committee;
3. SVSB's membership in the Northeast Pigeon Lake Regional Services Commission (NEPL);
4. SVSB's Interest in a healthy Pigeon Lake and public shoreline/lake access;

5. the County's recently approved Municipal Development Plan (MDP);
6. the County's Pigeon Lake Watershed Area Concept Plan 2014 (ACP);
7. the County's Land Use Bylaw 2017 (LUB);
8. the existing Mulhurst Bay Crossing Area Structure Plan; and
9. the Pigeon Lake Watershed Management Plan 2018 (PLWMP), a non-statutory plan adopted by all 12 municipalities surrounding Pigeon Lake and endorsed by the four Maskwacis Cree Nations that share the Pigeon Lake Reserve 138A.

Finally, as limited detail is provided in your January 15 2024, letter (see attached), please consider the following comments as preliminary and subject to modification as more details are revealed.

Common Boundary, SVSB Public Reserve and Parks Provision for New ASP

1. SVSB wishes to limit activity on SVSB's parcel immediately to the west of your proposed development to the use of granular trails, the trail heads for which are off Silver Beach Road and 50 Avenue in Mulhurst Bay.
2. Consistent with the current Mulhurst Bay Crossing Areas structure Plan, SVSB requests that a 5' chain link fence be constructed along our common border to cut off any and all direct access to the SVSB's parcel for vehicles, off-road vehicles and pedestrians and to keep access to the existing trail heads.
3. The proposed new development should not rely upon or assume any new vehicle or pedestrian access to the Village other than from the existing trail heads or existing developed roads.
4. Consistent with the current Mulhurst Bay Crossing Area Structure Plan, SVSB requests that the proposed cottage and RV sites be separated from our common border by a Municipal Reserve strip of land.

5. SVSB notes that no lands within your proposed development have been designated as Municipal Reserve and the SVSB also expects that the County will require that your proposed development also have its own dedicated park land as per the *Municipal Government Act* so that the parks requirements for users of the proposed development are accommodated within the development and not the SVSB.

Drainage, Stormwater Management and Fertilizers

Two separate natural water courses drain the Parcels in question towards Pigeon Lake. Both pass through Park and reserve lands owned by the SVSB and then through private property within the SVSB before discharging into to the Lake. By removing forest cover on the Parcels, adding hard surfaces, and re-grading the site to eliminate standing water, unmanaged development can cause significantly increased peak volumes of seasonal and storm runoff. It can also increase turbidity and a serious decline in stormwater quality.

This can be highly impactful given that the stormwater exits through private properties within the SVSB with increased human contact. It also raises concerns about the ongoing health of the Pigeon Lake. Accordingly;

1. SVSB expects that the County will require that peak runoff flows exiting your proposed development be limited to predevelopment flows by the construction of appropriate stormwater infrastructure within your development.
2. SVSB also expects that the County will require that that stormwater infrastructure use low impact development (LID) or clean runoff strategies to reduce sediment load of the stormwater; strategies in keeping with those found at alidp.org, and plwa.ca web sites.
3. SVSB also expects that the County will require that construction sediment and erosion control measures be in place and monitored during all construction activities.
4. Given the closeness of this proposed development to Pigeon Lake, SVSB also requests that this proposed development adopt a fertilizer ban in keeping with the bans put in place by all 12 municipal jurisdictions surrounding the lake consistent with recommendations within of the Pigeon Lake Watershed Management Plan 2018.

Domestic Water

Groundwater is the likely source for potable water for your proposed development and any wells drilled on these Parcels would be into the same aquifer currently accessed by the residents of SVSB, who all have individual wells.

1. SVSB expects that the proposed development be conditional on having a groundwater supply study being conducted that concludes that the aquifer is sufficient to accommodate the existing users plus the future water demands of your proposed development.

Wastewater

The proposed development appears to have 12 new cottage sites and 78 RV / modular park lots, plus has two commercial strips of unknown density. Adding at least 92 (perhaps more) sewer connections within the proposed development would significantly increase the wastewater contribution to the Northeast Pigeon Lake Wastewater Commission (NEPL) system.

1. Because the proposed development would appear to be taking place within 1 kilometer of Pigeon Lake, the development falls within the "Lakes Policy Area Overlay" of the 2023 MDP (Section 16). With the lake overlay, the MDP states that:

"Where existing municipal systems exist, campgrounds shall be required to connect to those systems and pay for any required upgrades as required by the County." (16.3.14)

SVSB strongly supports mandatory connection of all new sites to the NEPL system. That would be consistent with the more stringent environmental and servicing standards applicable within the Pigeon Lake Area Overlay.

2. Indeed, given the natural drainage pattern for the Parcels in question, the SVSB could not support this proposed development if any of the cottage sites, RV/modular park lots, or commercial establishments cannot be or are not connected to the NEPL system.

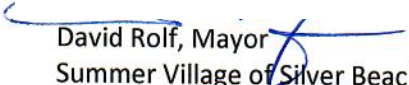
3. In the circumstances, the capital and operating costs of and inconvenience of providing private septic tanks for 92 plus sites in the proposed development poses too great a risk of sewage and greywater being accidentally discharged through the natural drainage channels through the SVSB and into the Lake.
4. That said, we understand that the existing NEPL system is constrained, that additional capacity may be unavailable and that, indeed, the existing system already experiences wet weather flow emergencies that surcharge the lines and lagoon and have caused occasional discharges into the Lake as well as basement backup. We also understand that the NEPL experiences significant costs for emergency pumping and trucking during those events. As a member municipality of the NEPL, SVSB would also expect the proposed development to pay its own way and that subsequent additional costs of the system's operation should be allocated to the new users within the proposed development.
5. RV park rules within the proposed development must also prohibit grey water release onto the ground.

Other General Concerns

1. Lake Access, Boat Trailer Parking, and Boat Storage: Some of the users of the additional 92 lots in the proposed development will have boats or want to access the lake. There is approximately 700 meters of public frontage along Pigeon Lake managed by the County of Wetaskiwin within the hamlet of Mulhurst Bay. How is the additional demand from this proposed development going to be managed? The answer to this question may be complicated because we understand that there are other proposed developments within the hamlet. Also, what boat and dock storage is being provided within or for the support of this proposed development?
2. ATV and UTV: SVSB has, within its Park and reserves granular trails that get abused by ATV users seeking off road locations. We experience significant damage and repair costs annually. ATV's are not allowed on County roads and are generally prohibited or unwelcome on private land. The proposed development and its users cannot assume that ATV use will be permitted or welcome on SVSB open space, trails or roadways.

Thank you again for providing us with this opportunity to comment on or ask questions about your proposed development. We look forward to learning more about your proposed development and the opportunity to share further comments.

Yours truly


David Rolf, Mayor
Summer Village of Silver Beach

Attachment: January 15 2024 letter of invitation