



Pigeon Lake Watershed Lands

Part of our Lake's Defense System

June 16, 2022

Attention: Neal Sarnecki, Director of Planning and Economic Development, County of Wetaskiwin

Copies to: Rod Hawken, CAO, County of Wetaskiwin
PLWA Board of Directors
Pigeon Lake Watershed Management Plan Steering Committee

Regarding: File No. 295900 Comments on revisions to proposed Village West ASP

PLWA is pleased to provide comments on the revised Village West Area Structure Plan (ASP). We have carefully reviewed the revisions to proposed ASP documents provided in June 2022.

PLWA promotes responsible and responsive development that incorporates beneficial management practices for a healthy lake and watershed. It is important to keep in mind that community-wide concern for lake health puts this development and its development practices under the spotlight. The proponent will need to carefully address how this development will avoid harming the lake. Environmental Quality Guidelines for Alberta Surface Waters indicates that in water bodies "... nitrogen (total) and phosphorus concentrations should be maintained so as to prevent detrimental changes to algal and aquatic plant communities, aquatic biodiversity, oxygen levels, and recreational values." And in lakes specifically there can be "no increase in nitrogen and phosphorus over existing conditions."

In summary, PLWA appreciates that the revised ASP responded to some of the environmental considerations outlined in our submission on the ASP as set out in Winter of 2021 (attached). We feel, however, that the revised version of the ASP will not be sufficient to ensure there is no net increase in nutrients entering the lake, and post-development conditions will contribute to an increased intensity and frequency of algal blooms in Pigeon Lake. PLWA has summarized our request for changes below. If these considerations are not met, we ask that the proposed ASP be denied, and the existing Village West ASP (By-law 2005/16) preside.

PLWA Comments on the revised ASP

PLWA has noted and appreciates that the following considerations in the revised ASP:

1. Norris Creek Valley Natural Area

Entire Norris Creek Valley now designated as an environmental reserve, where the previous version of the ASP only protected half of the valley. Protection of the Norris Creek Valley with flood plain, steep valley side walls, tree cover and an intact riparian zone is very important in reducing nutrient flows to Pigeon Lake and maintaining diverse habitats. Municipal Reserves (MR) and intensive recreation land uses do not belong in the Norris Creek Valley.

2. Norris Creek Valley Top of Bank Setbacks

An enhanced natural buffer setback at the top-of-bank, was introduced. Increasing the set back from 6 to 10 meters of naturally vegetated cover to flank Norris Valley ER lands, provide vegetative filters, and separate adjacent recreational and commercial development from Norris Creek Valley Natural Area.

3. Upland Development and Pigeon Lake Enhanced Environmental Development Standards

Additional buffer was added to the revised ASP to help protect trees on the uplands.

PLWA CONSIDERATIONS

1. Pigeon Lake South Intermunicipal Development Plan (PLSIDP) Completion

Completion of the Pigeon Lake South Intermunicipal Development Plan with acknowledgement of the Pigeon Lake Watershed Management Plan and enhanced environmental measures outlined for developments of this nature to be incorporated. In addition, the ASP should not be approved without the completion of the PLSIDP. Intermunicipal and municipal policies guiding a development of this significance must meet current environmental standards and consider adjacent municipal land use policy.

2. Considerations From Pigeon Lake Municipalities

Address comments outlined by Pigeon Lake municipalities including considerations of lake and shoreline access restrictions and water quality measures.

3. Upland Development and Pigeon Lake Enhanced Environmental Development Standards

Given the proximity to Norris Creek and Pigeon Lake, we ask the developer and the County to adhere to the Government of Alberta [Environmental Quality Guidelines for Alberta Surface Waters](#) (Table 1.5, pg. 38) to ensure no net increase in nitrogen or phosphorus to Norris Creek and Pigeon Lake. Potential measures should include:

a. Native Forest Cover Retention Strategies: One or both of the following strategies should be introduced:

- i. Adopt larger lot formats which permit the trees to remain inside each lot
- ii. Retain bands of native forest that separate development zones in MR
Note: * Calculation for MR must be clarified. MR in the original village marketplace was deferred with the intention of adding the required reserve to the village west phase of the development. To address this deficiency, an additional 10 percent is required to be added to the new Village West development.

b. Low Impact Development and Clean Runoff: clean runoff strategies should be established in policy to improve surface water quality (e.g., introduce rain gardens, bioswales, protecting healthy tree stands, treatment of wetlands, etc.)

c. Pre-Release Treatment of Stormwater and Safe Discharge: stormwater management plans must include measures to limit peak discharge to predevelopment rates, stormwater quality goals such as nutrient mitigation strategies for treatment. PLWA would like a design from the developer for the conveyance of stormwater from top of

bank treatment facilities down the 6-9 meter valley wall to Norris Creek, in a manner that avoids erosion and sedimentation for Norris Creek.

d. Construction Sediment and Erosion Control: phosphorus often moves through the watershed attached to soil particles. We ask that the developer and the County of Wetaskiwin adopt a robust Sediment and Erosion control protocol for all phases of construction and development. An example guideline is found in the [Construction Section](#) of the Alberta Clean Runoff Action Guide

e. Cosmetic Fertilizer Prohibition: The County of Wetaskiwin has a fertilizer ban bylaw in place for the immediate shore of the lake. We recommend that the ban be extended to include the proposed ASP area.

f. Wastewater and Greywater: PLWA applauds that the ASP commits to a full tie-in to the regional wastewater system for the entire development. In addition, ensure that provisions are included in the ASP to address greywater. Greywater discharge should not be permitted onto the ground.

ENGAGEMENT AND PLANNING PROCESS

- Full regional engagement is required in keeping with the spirit of the current draft South Intermunicipal Development Plan.
- Responsiveness to regional concerns is required to ensure the ASP is appropriate for Pigeon Lake and its watershed.
- The ASP must be fully included and part of the forthcoming South Pigeon Lake Intermunicipal Development Plan
- PLWA requests to be included in any engagement process to ensure environmental considerations are clarified and incorporated in the final plan.

CONCLUSION

Once again, thank you for the opportunity to provide our comments on the proposed Village West ASP. The Pigeon Lake Watershed Association's comments are intended to give voice to the environmental concerns of the lake and watershed. Keep in mind that the social and economic health of the region is dependent on the health of the lake and watershed. The PLWA is available to participate in the planning process as deemed appropriate. Feel free to contact me at any time.

Yours truly,



Catherine Peirce
Executive Director
Pigeon Lake Watershed Association

Attachments:

PLWA Village West ASP Submission_20220211