

## STATEMENT OF CONCERN

### Re: Application RA21045 - Greg Thalen and G&S Cattle Ltd.

**Filer:**

<b>Name:</b>	Brian Waterhouse, Mayor, Summer Village of Sundance Beach
<b>Contact Person (if different):</b>	June Boyda, Chief Administrative Officer
<b>Municipality:</b>	Summer Village of Sundance Beach
<b>Legal Land Description:</b>	
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The Summer Village of Sundance Beach hereby submits this Statement of Concern as an affected party to the proposed Confined Feeding Operation. Our Summer Village is on the shores of Pigeon Lake which is within 10 miles of the proposed CFO.

#### **Directly and adversely affected:**

The Summer Village is directly and adversely affected by the proposed CFO that will increase nutrient runoff into Pigeon Lake. This lake has already experienced harmful algal blooms from an excessive nutrient load. Pollutants entering and settling in the lake from runoff and streams increase the risks of fecal bacteria and cyanobacteria health advisories, loss of recreational activities, beach closures, and an unsafe environment for water recreation. There will also be the expected losses to local businesses, loss of biodiversity, and a compromised real estate market, all of which will directly affect our community.

#### **Claiming Directly Affected Party Status:**

The Summer Village and its near-shore rate payers have riparian and water diversion rights to Pigeon Lake which is within 10 miles downstream of the proposed CFO. The Summer Village will be adversely affected by the negative environmental impacts from the proposed CFO, as outlined above. Public health risks and the stability of the local economy are substantive. This statement of concern and supporting studies of Pigeon Lake, demonstrate the environmental impacts are reasonably expected to affect the Summer Village and its Residents.

**CFO Location:** NW 3-47-2 W5M, Wetaskiwin County

## CONCERN

There is a strong, lake-wide commitment to environmental protection of Pigeon Lake and its watershed.

The Summer Village is concerned that manure from an intensive 4000 beef-finishing confined feeding operation, spread over a relatively small area (16 quarter-sections), introduces a high risk for the community. We are concerned the proposed CFO will:

1. Adversely affect Pigeon Lake water quality including the increased frequency and intensity of harmful algal blooms, due to an influx of phosphorus and pollutant-laden surface runoff and ground water that flows from the CFO operation into a vulnerable Pigeon Lake.
2. Increase public health and safety risks in and around Pigeon Lake due to the increased presence of harmful algal blooms and bovine enterococcus which produce toxins and bacteria harmful to people and animals.
3. Adversely effect downstream conservation and recreational sites including Pigeon Lake Provincial Park, Zeiner Park, and 320 acres of conservation land around Tide Creek – spawning ground for fish.
4. Undermine prior regional and provincial efforts to mitigate nutrient release in the watershed and improve water quality in Pigeon Lake
5. Disregard the Alberta's Water for Life Action Plan, the Pigeon Lake Watershed Management Plan, as well as Municipal Regional and Statutory Plans

The proposed CFO application does not address water diversion based on the requirements of the Water Act and the impact of fugitive release of manure pollutants on resident and environmentally sensitive areas at Pigeon Lake including:

- An overload of nutrients inputs on the soil including nitrogen and phosphorus, and the
- Release of pathogens such as listeria, salmonella, E. coli, growth supplements, antibiotics and other chemicals.

All 12 municipalities around Pigeon Lake are impacted by the health of Pigeon Lake and its watershed. We worked together with the Pigeon Lake Watershed Association (PLWA) and the province to adopt and implement the [Pigeon Lake Watershed Management Plan](#). This Plan is a comprehensive, science-based strategy to protect the health of the lake, watershed, and community.

The Summer Village has incorporated the Pigeon Lake Watershed Management Plan recommendations in our Municipal Development Plan to benefit the long-term health and water quality of the Pigeon Lake Watershed. Other efforts include a ban on cosmetic lawn fertilizers to help achieve a net reduction in nutrient runoff and other voluntary community action initiatives of the Watershed Association.

The Summer Village reinforces the importance of protecting environmentally sensitive areas and our commitment to improving phosphorus management. Protecting groundwater for all of the neighbours, the creeks that run through the property, the spawning ground for fish in Tide Creek, and the conservation lands near the proposed CFOs is paramount.

## **CONCLUSION**

For consideration in Application RA21045, the Summer Village requests the NRCB Approver's review and inclusion of the following:

- The CFO Adverse Effects Background Report and Statement of Concern from the Pigeon Lake Watershed Association
- Reports from referral agencies including: Alberta Environment and Parks, Alberta Health Services, and Transportation that address issues concerning hydrology, nutrient loading, public health, fish and wildlife, land use and conservation
- Concerns outlined by individuals in the community
- Statutory consideration for environmentally sensitive areas as required under the Alberta Land Stewardship Act.

This proposed CFO will add a significant incremental nutrient load to Pigeon Lake and, based on accepted scientific research, these nutrients will cause an increase in harmful algae blooms, the consequences of which will pose a threat to the viability of our community.

We therefore request the Natural Resources Conservation Board to deny Application RA21045.