

Columbia Shuswap Regional District
c/o Planning Department
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250.832.8194

RE: 3856 Squilax-Anglemont Rd Zoning Bylaw Amendment Application

To Whom it May Concern,

Franklin Engineering Ltd has been engaged by Craig Spooner (0742139 BC Ltd) for civil engineering, application processes and project coordination of his land development project at 3856 Squilax-Anglemont Rd. This property was subject to extreme fire damage during the 2023 wildfire and as such, has only one remaining mobile home unit on site. Before the fire, this property comprised of 15 mobile homes, an onsite well, one onsite wastewater management system which serviced 9 units and 4 smaller onsite wastewater management systems each with the ability to service two units.

It is understood by Franklin Engineering that the proposed development of this 9-acre property would see a potential full buildout of 36 mobile home units, 36 storage units, water servicing from an onsite well, and onsite wastewater management systems for wastewater disposal.

The purpose of this zoning bylaw amendment application is to update or change the wording utilized to describe a community sewer system. A community sewer system is currently defined as having a connection of 50 or more properties. The current bylaw states the maximum density of manufactured home spaces is 1 per ha, unless serviced by a community sewer system. By this definition, this 9-acre property can only have 3 mobile home units. With a maximum of 36 units in the proposed build out, if those units were considered to each be 'properties', a community sewer system by current definition still cannot be achieved.

Therefore, this application is to make an amendment to the MHP Bylaw to allow for the following:

- To keep the current onsite wastewater management system, which would continue to service 9 units.
- Allow for the addition of 14 smaller onsite wastewater management systems, each servicing two units.

The existing wastewater management system accounts for a significant amount of infrastructure on this site. Continuing to utilize this system would be the most environmentally friendly and cost-effective way to move forward.

With any new mobile home park that we participate in the development of, it is the standard to utilize one system per two units. The biggest reason for this method is to distribute the wastewater over the whole site instead of one concentrated area, allowing for optimal dilution. As well, this method keeps

the initial cost of installation down by allowing phasing of the builds. Another reason is for ease of maintenance as individual systems require less overall. If there is a problem with the system, it is easier to pinpoint the issue and it would only effect two units vs. the entire park.

Adding a second large system for 14 lots would require the loss of approximately 4 mobile home units. Two lot systems could easily be tucked along the property lines and between units, as per the attached site plan. This option for two large systems to service the site works but again, would not be our suggested professional opinion for optimal dilution of wastewater into the site soils.

The housing availability in this area is already critically low due to the wildfire and any additional housing could be utilized by existing residents who are waiting to build or who can no longer build because of land or insurance issues but wish to remain in the area. So far as we can surmise, the nearest active mobile home parks to this property would be in either Chase or Sorrento, a full 20-30 minutes away. There is one other MHP zoned property in Scotch Creek, however currently it looks to be unfinished. This leads us to believe that affordable housing options are scarce in the area. Allowing this mobile home park to expand to a full 36 units would help to offer Scotch Creek some much needing housing in a cost-effective manner.

Building a large community onsite wastewater treatment system that could service all 36 units would be both cost and time prohibitive. A system of that size would require an extensive application process to the Province via a Municipal Wastewater Registration (MRW). With this process, it is a minimum of 2-3 years before a system can be in place on site. As well, regular maintenance and operation fees of a system this size are thousands of dollars per month, which then must be passed to residents by way of additional pad rents.

Based on our extensive experience in wastewater management design in the Shuswap area, we feel this proposal is the best method of servicing this, or any mobile home park. We request on behalf of Craig Spooner (0742139 BC Ltd) that an amendment be made to the wording of 'community sewer system' that would allow for the continued use of the existing 9-unit wastewater system with the addition of up to 14 two-unit systems, built in phases, ensuring the mobile home park could expand to a full potential buildout of 36 units in a timely and cost effective manner.

If you have any questions regarding this application, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Mitchell'.

Samantha Mitchell
Project Manager, Franklin Engineering Ltd
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