



Sylvan Lake Watershed Stewardship Society

P.O. Box 9012 Sylvan Lake
Alberta, T4S 1S6

July 24, 2006

Hon. Minister Guy Boutilier
#423 Legislature Building
10800 – 97 Avenue
Edmonton, Alberta
T5K 2B6

Hon. Guy Boutilier

We wish to bring to your attention a matter of importance to Alberta's environment involving a pending development proposal called "Westend Landing" at Sylvan Lake, Alberta. The specific matter is a plan that would see the development of residential/recreational housing within a shoreline wetland complex. We believe that this development creates an unacceptable level of risk for Albertans. The development, depending on the final location of lots, has the potential to impact a Sylvan Lake water source, the lake's water quality, fisheries, and habitat values. These matters are of considerable public interest and require the scrutiny of your Ministry.

We are aware of your support for the environmental protection of Alberta's Sylvan Lake Jewel. Sylvan Lake's natural capital value currently supports a robust community and positive economic flows. The results of development decisions now and in the future will, in cumulative terms, determine whether the Natural Capital value and its associated economic flow can be sustained at Sylvan Lake.

Our concerns related to this specific development proposal are consistent with the direction set by Alberta's Water for Life Strategy and the goals associated with protection of Alberta's aquatic ecosystems and water quality.

We are familiar with the Water Act and the process related to Wetland Mitigation. In this case we strongly support that the appropriate course of action be "**AVOIDANCE**" of development of any kind within the graminoid fen and wooded swamp wetland complex as described by AXYS Environmental Consulting in its letter of recommendation dated March 15, 2005 to Lacombe County (entered as public record by Lacombe County council at a regular council meeting on March 22, 2005 a copy of which is attached for your reference).

In summary we believe it is clearly in Alberta's public interest that this entire wetland complex, which is a water source area facilitating sub surface water entry to Sylvan Lake, be designated as a "no development area." The wetland complex site is simply not an appropriate site for residential/recreational housing development. The potential level of risk and impact of such development is simply too high.

We believe that there is considerable economic reward available for the owner of this land via the designation of the entire wetland complex as an environmentally sensitive area along with the gifting of conservation easement. If ever there was one, this is a significant opportunity to test the use of the ecological gifting tool, along with its recently enhanced tax incentives, as a viable means of protecting our environment.

We request your Ministry's proactive involvement in this specific matter. Without leadership from Alberta Environment now, in resolving this matter, a high-risk residential development within a wetland complex along Sylvan Lake's shoreline will be developed.

We appreciate your continued leadership and diligence toward the protection of Alberta's aquatic ecosystems, water quality and water sources.

Sincerely,



Kent Williamson
President
Sylvan Lake Watershed Stewardship Society



**Environmental
Consulting Ltd**

SUITE 300, 805 – 8 AVENUE SW
CALGARY, ALBERTA CANADA
T2P 1H7

T: 403 269-5150
F: 403 269-5245
www.axys.net

March 15, 2005

Allan Williams
Manager of Planning Services
Lacombe County
RR3, Spruceville Rd. (Range Rd. 27-4)
Lacombe, AB T4L 2N3

Dear Allan;

Re: Westend Landing Field Visit

As you are aware, we visited the West End site with Jeff Hotchkiss last weekend, prior to finishing our Sylvan Lake report. Although it was not in the scope of our study to evaluate the implications of site-specific developments on the lake's integrity, the fen associated with the West End site has developed a considerable profile (rightly or wrongly), and is a contributing feature to the lake's water and nutrient balance. Therefore, the visit was undertaken to assist us in developing practical and effective management recommendations for the lake and drainage basin as a whole.

In fairness to the West End development, I have not included site-specific comments on the site in our report. The report simply provides a table that evaluates the apparent compliance of all six proposed developments with the immediate-term management recommendations that we have proposed for residential developments around the lake. However, I thought you may be interested in receiving comments on the West End property under separate cover to help you and the county with approval decisions.

The fen associated with the site is actually comprised of a wooded and graminoid fen (i.e., peat accumulating areas) and a wet wooded swamp (non-peat accumulating area). It would appear that the wetland complex may be larger than indicated in existing assessment documents, based on presence of wetland indicators (e.g., presence of standing water and *Calamagrostis canadensis*). I would like to emphasize that this wetland complex, because of its small area, is not a significant component of the lake's water balance. It is however, immediately adjacent to the lake, and both surface water and shallow groundwater flow through the complex and into the lake. Therefore, if nutrients associated with a development are introduced into the wetland, they will quickly find their way into the lake.

One of the management recommendations in our report is the requirement for a 30 m no-development easement around the boundaries of all wetlands, as well as creeks. The West End development has done a relatively good job of providing such an easement around most of the fen. However, several lots will clearly be developed on the wooded swamp. In fact the two houses already on site are apparently on pilings because of soil, wet ground conditions, suggesting that they are already bordering on the swamp. Fill will be required to support construction in this area, and a drainage channel has been proposed through the area to the lake to carry flows during snow melt or high precipitation events. This will accelerate the rate at which nutrients/sediments from lawns, pets, graveled areas etc. will enter the lake from the development. Therefore, to provide better protection for the lake, the

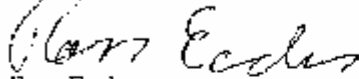
developer may want to consider the elimination of several lots planned for the swamp. In addition, the development is not proposing to install storm water ponds for controlling run-off and, instead is proposing to direct run-off into the wetland complex as a water polishing measure.

Given the close proximity of the development to the lake, storm water ponds would be a preferred option, as they provide an opportunity for water quality monitoring prior to release to the environment.

I hope these comments are useful. Please call with any questions.

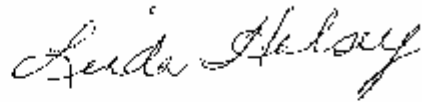
Sincerely,

AXYS Environmental Consulting Ltd.



Ross Eccles

Senior Vice President



Linda Halsey

Manager, Vegetation and Wetlands Division



Senior Vice President

Linda Halsey

Manager, Vegetation and Wetlands Division

