



Sylvan Lake Watershed Stewardship Society

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

August 14, 2007

Submission to Lacombe County
Input to Draft MDP

Council and Administration:

The Sylvan Lake Watershed Stewardship Society is most concerned about the stewardship, protection and sustainability of the many values that Sylvan Lake provides to the local community, Albertans and Canadians. The Society welcomes this opportunity to provide input to Lacombe County's Draft MDP.

Historically, and prior to 1995, the Province of Alberta had taken a very cautious approach to risk management and protection of its few, but highly valued, recreational lakes. In keeping with this approach, Regional Planning Authorities ensured planning and policy development was aimed at maximizing the value and protection of lake resources for all Albertans. This included regional planning for the Sylvan Lake watershed. In 1995, the Provincial government disbanded the Regional Planning Authorities and entrusted municipal governments with stewardship over land use and the related development decisions.

Understanding the risks associated with independent development actions, and the unique and vulnerable nature of water bodies, Alberta's Land Use Policy provided municipal governments with valuable guidance. This guidance is set out in Provincial Land Use Policy section 3.1:

Municipalities are encouraged to expand inter-municipal planning efforts to address common planning issues, especially where valued natural features are of interest to more than one municipality and where the possible effect of development transcends municipal boundaries.

With respect to the proposed MDP, we make the following observations and comments:

- The land use district of "High Density Lakeshore" creates a very aggressive "development" focused future within the Sylvan Lake watershed. Without doubt, this change will increase risk to many of the Sylvan Lake values currently enjoyed by its community of users
- The plan appears to interpret "public interest" as purely an "access" issue. In fact, increased access and riparian shoreline development creates significant risk to the sustainability of many natural and social values presently provided by Sylvan Lake
- The plan fails to consider and address the cumulative effects of development upon: water quality, biodiversity, conservation of natural vegetation and preservation of rural character and open spaces

- The plan does not contemplate dealing with such water-based issues as the noise, congestion and pollution that results from high levels of boating activity
- The plan directs high density development at Sylvan Lake but provides only moderate density to Gull and Buffalo Lake
- There are many lake watershed issues that are not within the sole jurisdiction of any single municipality, and from a perspective of accountability to Albertans and Canadians, these issues should not only be well planned, but must be planned collectively
- A new Land Use Policy Framework for Alberta is in the final stage of preparation. This policy framework is inclusive of issues related to lake stewardship and conservation, as well as improved decision making processes
- There are many new tools that will assist Alberta's municipal governments with stewardship and conservation in high pressure - high value development areas. These tools include site-based/regional planning, use of tradable development permits and conservation easements to preserve areas of high environmental value
- The Provincial government has focused tremendous time and energy on the Water for Life Strategy. This strategy is intended to address protection of aquatic ecosystems and water quality. Planning protocols for managing riparian areas and cumulative effects are now ready for implementation

Considering the foregoing observations, we provide these comments:

- The Society believes that stewardship of Sylvan Lake can only be served by the use of a collective planning effort, with stakeholders of the lake addressing the many issues that must be planned in a responsible and collective manner
- We ask that Lacombe County remove those sections of its draft MDP that creates a new high density land use district around Sylvan Lake, until collective agreements have been made on the many issues that fall beyond the jurisdiction of Lacombe County but that have impact on the whole of the Sylvan Lake watershed
- We ask that all stakeholders assume shared responsibility for a planned future at Sylvan Lake, and to not make independent, risk generating decisions outside of a collective framework that lead to an uncertain outcome
- We are asking our Provincial and Federal governments, along with all 8 municipalities of the watershed to engage in collective, site-based planning with respect to the issues that are **common to all but governed by many**
- Further we believe that stewardship of the Sylvan Lake watershed and Lacombe County's MDP will both benefit as a result of new and pending Land Use and Water for Life Policy Guidance – we recommend that Lacombe County wait until its release

We would like to focus attention on the fact that approval of residential and associated infrastructure development for over 250 near-shore homes has recently been granted in the watershed. Some of the development approved by Lacombe County involve construction upon and within the bounds of permanent wetlands that recharge water supply to the lake; an important riparian area that provides buffering against pollutants. This same area

contains high value wildlife habitat. As well, the development proposes to discharge storm water directly into the lake. County approval was granted knowingly in spite of scientifically supported recommendations to refrain from development in this wetland area. Without question, independent actions and stewardship standards such as this, presents an unnecessary, high-risk environment to an extremely valuable public resource.

In summary, the Society is respectful of the fact that Lacombe County is exposed to significant pressure from the business interests intending to quickly capture the Sylvan Lake market opportunity. We realize that this pressure will increase in the short term as the introduction of a new land use policy development standards is anticipated.

We urge Lacombe County to take leadership toward a collective plan focused on sustaining the watershed's many values for Albertans and Canadians, rather than facilitating the delivery of maximum short-term value to a few business interests.

On behalf of the Board of Directors, and Executive Committee of the Society, I thank you for the opportunity given here this evening to present our input to the Draft MDP.

Sincerely,



Kim Schmitt
Vice President
Sylvan Lake Watershed Stewardship Society

Appendix I follows

CC: Hon. Ed Stelmach, Premier
Hon. Rob Renner, Minister, Alberta Environment
Hon. Ted Morton, Minister, SRD
Hon. Ray Danyluk, Minister, Municipal Affairs & Housing
Hon. Luke Ouellette, MLA Innisfail-Sylvan Lake
Ty Lund, MLA Rocky Mountain House
David Helmer, Alberta Environment, Central Region
Barry Cole, SRD, Red Deer
Elizabeth Patreau, Dept Fisheries & Oceans
Reeve & Council, Lacombe County
Reeve & Council, Red Deer County
Mayor & Council, Town of Sylvan Lake
Mayor & Council, Summer Village of Norglenwold
Mayor & Council, Summer Village of Jarvis Bay
Mayor & Council, Summer Village of Half Moon Bay
Mayor & Council, Summer Village of Birchcliff
Mayor & Council, Summer Village of Sunbreaker Cove

Appendix I

The following are cited as a partial list of specific issues that **must** be planned collectively:

- i. Water Quality – currently the desirable meso-eutrophic status
- ii. Environment quality, monitoring and managing cumulative effects using environmental management tools and agreements
- iii. Protection of the natural shoreline of the lake
- iv. Fisheries, wildlife and waterfowl habitat asset management
- v. Infrastructure planning and construction - risks and impacts
- vi. Lake recreational capacity – management, regulation and enforcement
- vii. Traffic/transportation/infrastructure
- viii. Safety and Fire response
- ix. Sewer, water and aquifer management
- x. Power and gas utilities
- xi. Social/Community – Quality of Life
- xii. Education
- xiii. Hospital and ambulance
- xiv. Public lake access rather than access directed at private development
- xv. Agricultural pollution and Beneficial Management Practices
- xvi. Oil and Gas extraction, infrastructure impacts, pollution risks, best management practices