



MANITOBA ECO-NETWORK

Third Floor, 303 Portage Ave. Winnipeg, Manitoba R3B 2B4
Ph: (204) 947-6511 Fx: (204) 989-8476 info@mbeconetwork.org www.mbeconetwork.org

Honourable Christine Melnick
Minister of Water Stewardship

August 28, 2007

Honourable Stan Struthers
Minister of Conservation

Honourable Steve Ashton
Minister of Intergovernmental Affairs

Dear Ministers:

It was brought to our attention that a potential subdivision in the RM of Park may impact the water quality of Lake Imrie, which in 1985, was characterized as being borderline eutrophic.

According to *Manitoba's Water Protection Handbook*, cottage development, which often removes rocks, trees and other natural vegetation, to build structures and/or pathways or provide access with a dock, can result in shoreline erosion. Excessive wave action created by using power boats and personal water craft close to the shoreline also causes erosion. Water quality deteriorates when the shoreline is eroded and the addition of soil and plant material to surface water increases the amount of nutrients in the water, leading to algae growth. This deterioration is compounded with the construction of a road to service the cottage area and the potential use of lawn and garden chemical fertilizers and pesticides on individual lots. The *Handbook* recommends that vegetative buffers of trees, shrubs and grasses should extend 30 to 50 metres from the shoreline to provide water quality protection.

In a May 16, 2006 letter, addressed to Ms. Tracey Braun (Director of Licensing and Environmental Approvals) and carbon copied to the Minister's of Conservation and Water Stewardship, we identified the need to classify cottage subdivisions and major riparian zone disturbances as developments under the *Classes of Development Regulation* (MR 164/88) as these types of developments take place in environmentally pristine areas and along side water bodies on the riparian zone. We have resubmitted the letter as an attachment for your perusal and remind you that we have not received a response to our concerns.

What is also troublesome in this process is that the Municipal Board on April 30th and June 25th, 2007 overstepped its jurisdiction by dismissing the only quasi-environmental assessment in the area - that being the *1985 Lake Study*. The municipal board and regional planner are not experts in environmental assessment, yet they subjectively make their ruling and recommendation based on environmental matters.

As the Minister of Intergovernmental Affairs has the authority to reject this subdivision, we suggest that he exercise this discretion. Should the developer further proceed with the proposal, we ask the Minister of Conservation to deem this project as a development under the *Environment Act* and subject it to environmental assessment.

Sincerely

Glen Koroluk
Water Caucus Coordinator