

ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

June 2, 2013

Matthew Ferris
Planning & Development Manager
780-785-3411
mferris@gov.lacsteanne.ab.ca

Diane Burtnick
Development Officer
780-785-3411
dburtnick@gov.lacsteanne.ab.ca

Hugh Wollis
Area Wildlife Biologist
Spruce Grove Office
Environment and Sustainable Resource Development
1st fl 250 Diamond Avenue
Spruce Grove, AB
T7X 4C7
hugh.wollis@gov.ab.ca

RE: Lac Ste. Anne County (Alberta), Files: 06REDST2012 & 07REDST2012 Vital Western Grebe Habitat Threatened

Dear Sirs and Madam:

It has come to our attention that an RV development proposal before the county of Lac Ste. Anne will be situated near the breeding and nesting habitat of Western Grebes at Lake Isle, Alberta. We believe the proposal will have negative impacts on important and environmentally significant areas.

Alberta Environment and Sustainable Resource Development (ESRD) lists Western Grebes as "Sensitive" and notes: "Locally distributed in the province; their gregarious nature make them vulnerable to nest disturbance, and other disturbances such as oil spills." Not only will these sensitive grebes be at risk from the proposed disturbance associated with the development; we believe other species may also be impacted.

The Land Use Bylaw for Lac Ste. Anne County states the following:

SECTION 40 LAKESHORE DEVELOPMENT - Development that, in the opinion of the Development Authority, will have an unreasonable adverse impact on lake water quality or lake area aesthetics shall be prohibited.

Please advise what the Development Authority opinion in this matter is.

The same Land Use Bylaw also includes the following policy:

LAC STE. ANNE COUNTY SECTION 600 POLICY 662-4

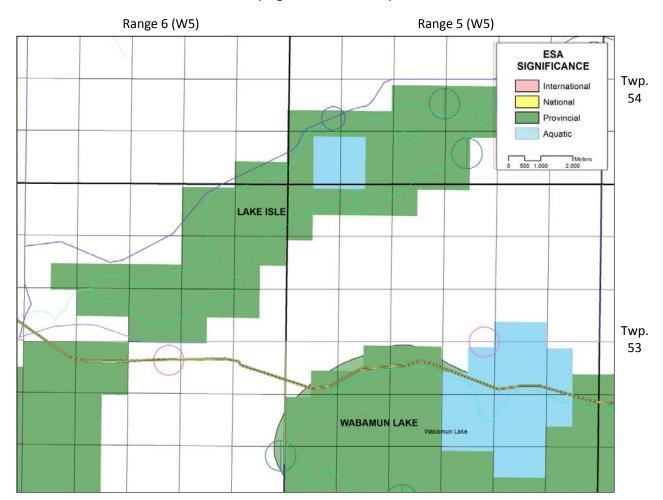
TITLE: Environmentally Significant Areas

LEGISLATIVE REFERENCE: APPROVAL/RESOLUTION NUMBER 1779-03, 289-11

DATE: December 19th, 2003 & March 2nd, 2011

PURPOSE: To facilitate the preservation of Environmentally Significant Lands within Lac Ste. Anne County through partnerships with like minded landowners, government agencies, and approved conservation organizations.

Lake Isle has been identified as provincially significant by Fiera Biological Consulting in its 2009 Environmentally Significant Area (ESA) study and part of it is an aquatic ESA (Fiera 2011). The following map of the area demonstrates these environmentally significant areas for your reference.



Can you inform us about any efforts that have been made to facilitate the preservation of this Environmentally Significant Area?

The Alberta Species at Risk Report No. 121, December 2008 states in the executive summary:

Further, while there have been slight to moderate increases of the number of western grebe nests at the three Stony Plain area lakes (Lake Isle, Lac Ste. Anne and Wabamun Lake), the total 2006 count was less than 50% of the 2003 total. This measured decline over the past six years, combined with the knowledge



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

that: 1) the majority of birds are breeding on just eight lakes; 2) some large historical western grebe colonies are no longer occupied; and 3) encroachment of human activities on existing habitat continues, is ample cause for concern over the long-term fate of western grebes in Alberta. (emphasis added)

Reading the report further confirms there is cause for great concern with the proposed development: There are two nesting sites (western island and an adjacent eastern island) on Lake Isle that have been used by western grebes since at least 2001. During some years, they use both islands (Hanus et al. 2002a); in 2005 they used only the western island (Berg and Wollis, *unpublished report*), and in 2006 we found 104 western grebe nests on the eastern island but none on the western island. Such behaviour demonstrates an ability to change nesting location between years, and may suggest resilience in the event that one nesting site is compromised. Lake Isle is the only one of the three breeding lakes in the Stony Plain area that has had an overall increase in population since 2001...

Threats facing populations include:

- Nest abandonment, or nest predation from crows and ring-billed gulls, following human disturbance;
- Widespread damage to nests and loss of eggs following natural storm events;
- Frequent waves from recreational boat traffic;
- Oil or other chemical spills from nearby transportation infrastructure (pipelines, highways, railroads etc.) pipelines or tanker trucks; and
- Drowning in commercial fishing nets.

... There are two critical points we can draw from these studies in Alberta. First, while large populations of grebes remain, they are concentrated in only a few colonies. Second, the largest few of these colonies are located in the northernmost portion of the species' range, where development near the colony has been minimal. Lack of historical data on lakes where grebes have occurred, or may have occurred and are no longer present, precludes definitive statements about causes of abandonment. However, we recommend steps be taken now to address those factors that can lead to disruption of grebes in colonies or possible colony abandonment. (emphasis added)

AWA is writing to register our serious concern with the proposed development. We would like to obtain a copy of any environmental impact assessment undertaken for this project and what factors will be considered in any decision to approve this RV Resort in prime wildlife habitat. We will appreciate your timely response.

Yours truly,
ALBERTA WILDERNESS ASSOCIATION

Christyann Olson, Executive Director

Christyan Olson