

Walter, Penny

Subject: FW: Form submission from: Write a Letter to Council
Attachments: swale_letter_to_council.docx

From: Web NoReply <web-noreply@Saskatoon.ca>
Sent: August 15, 2021 9:25 AM
To: City Council <City.Council@Saskatoon.ca>
Subject: Form submission from: Write a Letter to Council

--- Replies to this email will go to [REDACTED] ---

Submitted on Sunday, August 15, 2021 - 09:25

Submitted by user: [REDACTED]

Submitted values are:

Date Sunday, August 15, 2021

To His Worship the Mayor and Members of City Council

First Name Murray

Last Name Hidlebaugh

Phone Number [REDACTED]

Email [REDACTED]

Address Site [REDACTED]

City Saskatoon

Province Saskatchewan

Postal Code [REDACTED]

Name of the organization or agency you are representing (if applicable) none

Subject Wetland

Meeting (if known) Agenda item 6.2.1 August 16th meeting

Comments

I would speak to the letter if there is an opportunity to do so. My number is above as well as in the letter.

Attachments

[swale letter to council.docx](#)

Will you be submitting a video to be vetted prior to council meeting? No

Saskatoon, Sk.
Aug, 12, 2021

Saskatoon City Council

Dear Mayor and Council:

I am writing to ask City Council to support the request made by Colin Tennent, June 11, 2021, in his letter from the Meewasin Valley Authority (MVA) to Council with reference to the proposed development of the Swales. He notes:

The first step, before concept plans for the neighbourhood are submitted for any level of review, either internally to various City departments, or through Meewasin's development review process, should be to collaborate on establishing appropriate boundaries for the small swale and a revised north boundary for the Northeast Swale (recent evidence, including data from the UH3 Screening Report, indicate a need for this revision).

I think the merit in his proposal is that the process he has outlined does protect the integrity of a wetland, in this case the Swales, from irreversible damage as a result of encroachment by built development. I think his proposal is also consistent with the principles imbedded in the City's wetland policy. I encourage City Council to use it as a reference when deciding.

I am involved with University researchers looking for information related to the development of a comprehensive provincial wetland policy. During my search I found a reference to the City's wetland policy. This led to my contacting Community Services which led to a contact with the Environment Department. My research on urban wetlands also connected me with issues related to ways to conserve the Small Swale through a conservation easement agreement between City Council and the Meewasin Valley Authority (MVA).

I was aware from my discussions during the development of the Green Infrastructure Strategy, that the MVA was working closely with City to develop an Interconnected Green Network. I am a strong supporter of this. I also came across a copy of the Natural Capital Asset Valuation where Meewasin's data was used to support the evaluation of two sites. One of the sites was the Small Swale..

The information from the study is interesting. It calculates a high value for the Small Swale in its function as a wetland. However, when I looked at related information and sat in on community discussions related to the Swales it seemed evident that urban development in the area was going to take priority over wetland conservation/protection. There was no evidence that the numbers found in the Asset Valuation were taken into account. Some really "interesting" reasons were given as to why development plans needed to be done by **Saskatoon Land** before wetland boundaries for the Small Swale could be geo-referenced. Several of the discussions involved an outline of a need to have the Small Swale legally surveyed before it could be protected.

Colin, in his letter, captures my thoughts on the steps needed to be taken to protect the Swale. I did some research on why there seemed to be so little interest by **Saskatoon Land** to utilize the measured asset value of the Small Swale (from the pilot research) in making its recommendation to City Council to lay out the urban development plan first and then decide on the location of the Swale boundaries.

I find it difficult to follow how communication on wetland policy and natural asset assessment can work across the three separate sectors; as outlined in the City Organizational Chart on the City Web page, with two involved in wetland protection and one involved in land development. From reports I have read it appears, in relation to wetland protection, that the **Sustainability Division** assesses parcels of city owned land and prepares maps to protect sensitive wetlands and natural areas. This information goes to **Planning and Development (Community Services.) Planning and Development** staff then provide **Saskatoon**

Land with the wetland development policies that need to be addressed. It appears that **Saskatoon Land** then takes over and establishes a development plan that it presents to City Council. Based on my discussions related to the Swales and from reading Colin's letter it seems that **Saskatoon Land** makes the final land development decisions. There might be some requirement for **Saskatoon Land** to go back to **Planning** for approval to make a change such as how boundaries are determined on the wetland. However, there is no evidence that the **Sustainability Division** has any oversight or that they are able to brief City Council on issues related to wetland conservation as a result of development decisions by **Saskatoon Lands**.

I compliment the City Council's foresight in taking the lead in establishing a wetland policy and staffing the sectors with high level expertise. I think Council has a challenge on how to make a decision between two conflicting land-use values. **Saskatoon Land** presents the value based on estimated market price for development. The natural capital value of the wetlands is intangible. The *Natural Capital Asset Valuation* pilot project that the city undertook is designed to assign measurable values to its natural assets. The Small Swale, one of the sites chosen in the pilot, was found to have high value in its function as a wetland. Traditional accountants involved in doing the financial comparisons often have difficulty accepting dollar figures for assets they consider "soft". City Council might follow-up with *The Municipal Natural Assets Initiative* and with Mark Anielski, economist at the University of Alberta, to address this emerging field. Several Canadian City Councils are finding this to be very important in the decision making process on land-use and development.

I ask Council, based in Colin's letter, that immediate action be taken to authorize the appropriate City wetlands staff to work in collaboration with Meewasin Valley wetlands staff to establish a conservation easement, using georeferenced boundaries for the Small Swale, and establishing a revised north boundary for the Northeast Swale.

In the longer-term I propose that Council up-date its wetland policy and continue its initiatives in the Green Plan by supporting expanded investment in naturalized parks and wetland retention. (3.4 of Wetland Policy.) Included in the review would be the area of Natural Capital Asset Valuation. The city has already invested in a solid environmental foundation on which to build.

Council has the final authority to protect the swales. The data indicates these are high quality wetlands. The research indicates that wetlands are becoming increasingly valuable for temperature modification, for carbon sequestration, and for the mental health of citizens. The value of a city that protects its natural assets is increased both because it is a place where people want to live and do business, as well as a place where people want to visit and to emulate. This is a long term investment in the best interest of all the citizens. Land developers are interested in maximizing profit. Environmental considerations, as far as developers are concerned, are usually based on government regulations. From my perspective, while the swales are the immediate consideration from, Council has an increasingly important role in protecting the entire urban environment. It is challenging politically but I hope Council decides the rewards are worth the risks.

Thank you for your time and I would appreciate an opportunity to speak to it if possible.

Sincerely
Murray Hidlebaugh
306-934-6907

P.S. I did an analysis of the Saskatoon wetland policy to try to assess its efficacy in protecting high value wetlands. In an effort to present my findings as transparently as possible I have used selected content from the policy manual that informed my observations. This is in the appendix on pages 3- 4. MH

Appendix

City Wetland Policy 2013 (Selected Excerpts)

1. PURPOSE

1.2 To provide guidance to landowners, developers and City of Saskatoon (City) staff on achieving responsible integration of wetlands into the urban environment.

Observation, MH: My thought is that on city owned land the City Council would make the final decision on development plans based on recommendations from staff. It appears staff from Saskatoon Land make the final decision on land-use with advisory input from Planning. It would be useful to have it stated clearly in the policy who has the final decision making authority on city owned land-use plans for development.

3.2 Wetland Mitigation Plan

a) A Wetland Mitigation Plan:

i. is required by the City as an integral part of any Area Concept Plan or Area Concept Plan Amendment that has the potential to impact wetlands identified as Preserve, Manage 1 and Manage 2 according to the functional assessment categories as identified in the City's Wetland Inventory; and

Observation, MH: I haven't been able to find the wetland inventory. However an inventory is very important. I think it would be useful posted on the web page. The Small Swale, based on the information from the pilot project, shows it has significant functional value. It would appear its preservation should have a higher priority in the decision making by City Council than I have heard at the meetings. I think Colin's letter also reflects my concern about development automatically taking precedent over conservation.

ii. may, at the discretion of the Planning and Development Branch and in consultation with the Environmental Services Branch, be required for any other development proposal that requires City approval, including the development of civic facilities and infrastructure, and any public or private utilities, if the development has the potential to impact wetlands identified as Preserve, Manage 1 and Manage 2 according to the functional assessment categories as identified in the City's Wetland Inventory.

Observation, MH: I see this in policy but when I asked at a public meeting how the decision making system worked it appeared to me Planning and Development Branch and Environmental Services were considered more as advisory to Saskatoon Land than having any authority to enforce wetland conservation policy.

3.4 Wetland Management

a) Retained wetlands, including Constructed Wetlands and associated riparian areas should normally be integrated into the City's parks system and managed as Naturalized Parks.

Observation, MH: I agree. This is similar to the structure Calgary has set up to manage their wetland policy. I think Parks, with adequate resources, can play a key role in wetland conservation. However, I think "including Constructed Wetlands" needs to be reviewed. The research indicates that wetlands can be restored in the existing location but constructing wetlands has been shown to be ineffective.

4. RESPONSIBILITIES

4.1 General Manager, Community Services Department – shall be responsible for:

- a) Administering this Policy and recommending updates to this Policy;
- b) Maintaining, and developing where necessary, a wetlands inventory and functional assessment for all growth areas of the city;
- c) Ensuring incorporation of this Policy in the Official Community Plan and other statutory documents;
- d) Reviewing and approving Wetland Mitigation Plans in conjunction with the administrative review of any Area Concept Plans or other development proposal where required;
- e) Undertaking and maintaining Servicing Agreements to ensure appropriate compensatory mitigation measures are taken.

Observation, MH: This is interesting. I am unaware of any wetland mitigation plans as noted in d). At meetings I attended I have never heard any discussion on environment in general or wetland in particular being part of Community Services. I think it is a good area to have planning under though.

4.4 Planning and Operations Committee – shall be responsible for:

- a) Reviewing proposed policies and policy revisions and referring such policies to City Council for approval.

Observation, MH: This seems to be problematic in that it appears this committee can work on its own and decide whether or not it has to undertake any consultation with anyone. There might be a procedures manual that covers this in some detail but I would think that collaboration protocols should be more clearly defined in policy.

4.5 City Council – shall be responsible for:

- a) Reviewing and approving any proposed policies and policy revisions as recommended by the Planning and Operations Committee.

Observation, MH: I agree with a). It would be useful if Council would share the criteria they use when assessing proposed policy and/or revisions. And it would be useful to have clarity on how the feedback through the various Customer- Facing and Strategic Partners involved with wetland issues actually works. For example, when a development plan is presented by Saskatoon Lands to City Council for approval if the directors from the Planning and Development Branch and Environmental Services also formally signed off on it Council would have assurance the there was agreement by all sectors concerned.