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October 2, 2019

Hon. Greg Ottenbreit
Minister of Highways and Infrastructure
Room 322, Legislative Building
2405 Legislative Drive
Regina Saskatchewan
S4S 0B3

Dear Minister Ottenbreit,

We are writing to ask that you request your Ministry staff to give high priority to the importance of protecting the Northeast Swale between Saskatoon and Aberdeen as detailed planning is done on a perimeter highway route that will serve the Saskatoon area. The Saskatchewan Environmental Society would appreciate the opportunity to meet with you at your convenience to discuss this important matter in some depth.

A great deal has been learned about the importance of the Northeast Swale since a route for a perimeter highway was first proposed by your Ministry in 1999, albeit without a formal Environmental Assessment. We are of the view that this new knowledge, together with the significant cost and scope of such a development, justifies a formal re-evaluation of the project, including the route.

By way of background, the Northeast Swale is an ancient river channel that runs northeast from Peturrson's Ravine in Saskatoon to the Rural Municipality of Aberdeen. It is approximately 26 kilometres long and covers 2,800 hectares. As a diverse, connected network of native prairie, it provides very important ecological services. It represents one of the largest pieces of unbroken prairie/riparian/wetland in the Saskatoon region, along with patches of rare fescue grassland. There is a rare Marl Bog habitat at Peturrson's Ravine which supports rare plants. The Swale is incredibly diverse, with many new species of plants and animals being identified as research continues. There are over 200 plant species and more than 100 bird species. There are a variety of mammal, amphibian and insect species, including several species listed as threatened or endangered.

The Swale is of benefit in many ways to citizens of Saskatoon and area through the provision of green infrastructure and the potential of tourism, and those benefits are only just beginning to be understood. It is a natural filter for our air and water and offers protection against flooding. It is an important vehicle for carbon sequestration. Moreover, the Swale has enormous potential to offer economic benefits of education and recreation within an urban context.



In addition to local economic and environmental considerations, today's local planning processes need to take account of global trends that impact the natural environment, upon which we all depend. As you know biodiversity is in sharp decline at the global level and this in turn threatens human well-being. A recent United Nations report released by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) assessed biodiversity and ecosystem services at a global level and concluded that more than 85% of wetlands present worldwide in 1700 had been lost by the year 2000, and that one in eight species on Earth are threatened with extinction. It urged transformative policy change at both the local and global level in order to conserve nature. This provides added context for the importance of the Swale, which encompasses valuable wetlands, is home to endangered species, and represents incredible ecological biodiversity. With less than 5 per cent of Plains Rough Fescue grasslands remaining in the world, the Swale landscape provides unique value to both Saskatchewan and the global community. It deserves to be protected.

Both the Meewasin Valley Authority and the City of Saskatoon have recognized the incredible importance of the Swale from a natural and cultural heritage perspective. The City of Saskatoon is considering ways to provide long-term legal protection to the portion within the City's boundaries. Nevertheless, many changes connected to urban development and supporting infrastructure have impacted the area in the past eight years. It will be challenge to keep this portion of the Swale healthy given all the new subdivisions with associated infrastructure and many roadways

This makes it even harder to understand why the Saskatchewan Ministry of Highways and Infrastructure is still considering putting a major highway through the Swale. The decision to locate the route through the Swale was made twenty years ago, but a great deal has changed since 1999. The City of Saskatoon has built the Chief Mistawasis Bridge and the extension of Central Avenue and McOrmond Drive. The Saskatchewan Environmental Society is of the view that it is now worth considering placing the perimeter highway outside of the City of Saskatoon instead of embedding it within the City.

Our Society recommends that the Ministry of Highways and Infrastructure and the City of Saskatoon take the time to carefully re-examine, in a comprehensive way, the environmental and economic impacts of the proposed route, taking into account the impact on the neighbourhoods, the creation of greenhouse gas emissions, the impact on wetlands and the destruction of a valued natural area that the City has stated its intentions to designate for long-term protection.

Your Ministry staff say they are focussing only on the parameters of the Functional Study, and that the route has been agreed upon and is not up for discussion. The kind of re-evaluation we are recommending is a regional assessment of all human activities within the larger Swale, and their impact on ecological integrity and sustainability of the area. This major perimeter highway, including another bridge and numerous interchanges, meets three of six triggering criteria for determining if a proposed project is a significant "development" under the Saskatchewan Environmental Assessment Act. Therefore, the re-evaluation should involve not only your Ministry, but also the Ministry of Environment and the Department of Environmental Services in the City of Saskatoon. This kind of assessment needs to be done to provide the necessary context and basis for all decisions and design details associated with the proposed development.

A similar assessment of the type we are envisioning has been undertaken in the core area of the Great Sand Hills by the Ministry of Environment. The ecological integrity of the Great Sand Hills is under threat from a combination of natural gas well drilling and more importantly the road development



associated with it. A regional environmental assessment has helped to identify key areas of the Great Sand Hills that merit official protection.

Thank you for considering the concerns we are raising and for considering our request to meet with you.

Yours sincerely,

A handwritten signature in black ink that reads 'Peter Prebble'.

Peter Prebble, SES Board Member

A handwritten signature in blue ink that reads 'Bert Weichel'.

Bert Weichel, SES Board Member

A handwritten signature in black ink that reads 'Allyson Brady'.

Allyson Brady, SES Executive Director

cc: Hon Dustin Duncan, Minister Responsible for the Ministry of Environment