

July 5th, 2010

Re: Public Notice of 1346731 Alberta Ltd. O/A Sandy Cove Developments - Water Act Applications Dated June 15, 2010

To: Alberta Environment Regulatory Approvals Centre and associated staff

This is in response to the Public Notice referred to above for the Sandy Cove Development Water Act *application 00263840 "An approval to construct and maintain an outfall structure to Pine Lake that will convey storm water"*.

Please accept this letter from the Pine Lake Restoration Society as a formal Statement of Concern associated with this application.

Upon review of Alberta's Water Act and the Province's Water for Life Strategy there were many principles and goals found that compliment the primary goal of the Pine Lake Restoration Society which is to *"Promote and undertake the restoration of clean water that supports healthy fish and wildlife within Pine Lake and its watershed"*. Examples of these principles from the Alberta Water for Life strategy are included below:

- *Citizens, communities, industry and government must share responsibility for water management in Alberta and work together to improve conditions within their local watershed.*
- *Knowledge of Alberta's water supply and quality is the foundation for effective decision-making.*
- *Healthy aquatic ecosystems are vital to a high quality of life for Albertans and must be preserved.*
- *Groundwater and surface water quality must be preserved while pursuing economic and community development.*
- *The Government of Alberta, along with our partners, will manage Alberta's water infrastructure – both provincial and district-owned – for long-term sustainability.*

The Pine Lake Restoration Society is very concerned with the extensive use of old rail road ties in the very large retaining wall structure at the new Sandy Cove development. We are shocked that in this day a developer would in general consider using rail road ties as part of any land structure let alone doing this directly along side a major body of water. Certainly as a Society working hard to improve the water quality of Pine Lake we are deeply disappointed that neither Red Deer County or Alberta Environment were able to influence the use of alternate, more environmentally sustainable building materials.

In the application file referenced above Sandy Cove is requesting approval to construct and maintain an outfall structure to Pine Lake that will convey storm water collected on their property. Upon review of the design for this structure with Mr. Ryan Jones of Focus Corporation we understand that the collection and separation system is set up solely for the management of solids and oil/grit mixtures. With the extensive use of old rail road ties it is reasonable to assume given the very high water table that through storm water run off, creosote will migrate into the lake with the storm water vs into the ground. As such our concern is then that creosote will move towards the lake through the proposed storm water outlet without detection or ultimately management.

We also understand from our conversation with Mr. Jones that other cottage properties have used this practice in years past and that as such further use was not viewed as an issue by the developer. We as a society have learned much about best practices when living along side a body of water and have adjusted how we do things as we have learned. While we may not step back and push for removal of some of the historical small retaining wall systems at cottages around the lake it in no way seems to be a sustainable plan to add new large systems today when better more appropriate building materials are readily available.

We wish to emphasize one of the above principles within the Water for Life strategy; *“Groundwater and surface water quality must be preserved while pursuing economic and community development”*.

As a result of the significant amount of creosote contaminated rail road ties used on the Sandy Cove property, the Pine Lake Restoration Society is opposed to the collection of storm water on this property and ultimate outfall into Pine Lake without enhanced analysis or treatment.

Respectfully



Carol Moen
President, Pine Lake Restoration Society