

TO: DWIGHT ODELEIN
QUILL LAKE SK

FROM: SASKATCHEWAN ALLIANCE FOR WATER SUSTAINABILITY

March 30, 2022

Dear Dwight:

Thank you for your email dated February 15, 2022. We have reviewed the 5 Acre Plan document provided. Following careful consideration and discussion by SAWS members, it was decided that we cannot support this 5 Acre Plan for the following reasons:

1. This Plan does not address the ongoing flooding at the Quill Lakes. This would send more water to the Quill Lakes and see an increase in flood waters based on the proposal.
2. This Plan does not address the downstream impacts of wetland drainage. Nor does it provide any ideas or suggestions that would lead to a reasonable foundation for the establishment of a Provincial Wetland Mitigation Policy.

According to the original 5 Acre Plan presented to SAWS several years ago, the plan was to restore all drained wetlands in the watershed that were greater than 5 acres as a way to significantly reduce inflows into the Quill Lakes. This assumption was based on the KGS Flood Mitigation Report, Pg 59, where it shows that drainage of wetlands >5 acres represent 73% of the volume of water that drains into the lakes. (<https://www.wsask.ca/wp-content/uploads/2021/03/Chapter-4-Pages-38-to-62.pdf>).

At that time, we understood that farmers were supportive of this plan and willing to restore those larger wetlands. Unfortunately, we have not seen this happen. Only 22 acres (WSA compliance report to SAWS) out of a total of about 88,000 drained acres (KGS report Pg 59) have been brought into compliance by WSA due to drainage complaints.

Since 2017 the Provincial Auditor noted that the Water Security Agency needs to develop policies around wetland retention and to mitigate the downstream impacts. (https://auditor.sk.ca/pub/publications/public_reports/2021/Volume_1/CH31%20--%20Water%20Security%20Agency%E2%80%9494Regulating%20Drainage.pdf) SAWS has been, and will continue to be supportive of wetland conservation and restoration as a way of addressing ongoing flooding, carbon sequestration and climate change adaptation, to ensure the success of our agricultural industry.

Upon review, we found several areas of concern in the Plan:

The Plan states:

1. **“The plan has 3 categories of wetlands for any new drainage”.**

Existing drainage has played and continues to play a significant role in the Quill Lakes flooding. By ignoring existing drainage and only focusing on new drainage, problems of ongoing flooding and financial hardship will continue to those ratepayers whose land is flooded.

Pg 83 of the KGS Flood Mitigation Report clearly states that closing drainage works would have a 38% reduction in inflows to the Quill Lakes, which is significant (<https://www.wsask.ca/wp-content/uploads/2021/03/Chapter-7-79-to-84.pdf>).

To be effective at reducing lake levels any plan must include existing drainage. As we said previously, we support restoring all existing drained wetlands 5 acres and larger in the watershed as a way to significantly reduce inflows to the Quill Lakes.

Currently WSA has a moratorium on licensing any new drainage into the Quill Lakes even though the lakes are still flooded. (<https://www.wsask.ca/wp-content/uploads/2021/03/FS-318-Responsible-Drainage-in-the-Quill-Lakes-Oct-31-2018.pdf>).

2. “0-3 acre wetlands can be managed without any offsets”.

While draining small wetlands may have a small effect on water levels at the Quill Lakes compared to draining larger ones, omitting small wetlands from the regulatory process, which includes engineering design and flood control, ignores the fact that even draining small wetlands can cause flooding impacts downstream. These impacts become even greater when hundreds of small wetlands are drained, causing localized flooding or damage roads downstream. There are tens of thousands of small wetlands in the watershed. If draining a 5-acre wetland needs to be offset, how is that different from draining two 2.5-acre wetlands? Does that volume of water not have the same impact on a farmer downstream? The cumulative impacts from draining hundreds of acres of small wetlands on those farmers and landowners downstream cannot be ignored.

We have recently learned that small temporary wetlands are critical to recharging ground water supplies, something that many rural residents and towns rely on for their drinking water. Dr Masaki Hayashi from the Department of Geoscience at the University of Calgary presented a lecture titled “Understanding the Role of Topographic Depressions in Prairie Ground Recharging”. We have attached this webinar for you: <https://youtu.be/mNzsuKtu9iw>

3. “Most of the wetlands in the 0-3 category and the 3-5 category are either drained or most likely never will be”.

This may be true for parts of the watershed where 90% of the wetlands have been drained but it is not true for the entire Quill Lakes Watershed. A 2021 drainage assessment report found that over 73% of the wetlands within the Quill Lakes watershed are intact. So, there are substantially more wetlands that could be drained causing more flooding. Draining more wetlands will just increase the volume of water drained into the Quill Lakes and make the flooding worse.

Also noted, in the report written for the Quill Lakes Watershed Association by Jim Warren PhD of Avoco Consulting states, “Golder (2015) estimates the cost to repair and upgrading municipal roads, highways and one rail line at \$79,000,000”. <https://quilllakeswatershed.com/wp-content/uploads/2018/11/Economic-Impacts-of-the-Quill-Lakes-Flooding-2012-2018.pdf>

4. “3-5 acre wetlands will need to be offset with existing habitat. This can be existing wetlands, bush or grass at a ratio of 3-1”.

5.

Wetlands, bush, and grass are all habitat but they function very differently. Replacing drained wetlands with bush or grass regardless of the offset ratio is like replacing your household stove with a refrigerator. Yes, they are both appliances but you can't roast a chicken or boil water in your refrigerator. In the spring when the snow melts or when there's a heavy rain wetlands store water, while draining them sends all that water downstream. Bush and grass do not store water, only wetlands do that. Wetlands are also an important part of native prairie biodiversity, as much as 80% of Saskatchewan's wildlife relies at least partly on the shelter and food found in areas such as wetlands, to survive <https://learningtheland.ca/sar/wetlands/>. Offsetting existing and new drainage by retaining or restoring wetlands at a ratio of 3-1 we could support. This is very similar to Manitoba's Wetland Policy which we also support.

The Citizens Environmental Alliance recently held a panel discussion on Prairie Wetland Conservation Policies with Amanda Cooper – Team Lead for Wetland Units in Alberta Environment and Parks and with David Hay – Acting Director with Drainage and water Rights Licensing Branch in Manitoba. This presentation compares what Manitoba and Alberta are doing to protect those downstream from flooding. We have attached the webinar for you: <https://youtu.be/lv5u1YXflm0>

6. “5 acre and larger wetlands will need land control to an adequate outlet and will need an acre for acre offset with other water of equal size”.

WSA’s current Ag Water Management Plan does recognize that drainage causes flooding and that it needs to be controlled and done responsibly. The 5 Acre Plan though would see draining more wetlands (on top of what is already existing) by keeping other existing wetlands as offsets. The end result is more drainage (not less), less storage in the watershed, and more water draining into the Quill Lakes. The Plan ignores the fact that drainage has downstream flooding impacts and the Quill Lakes are not an adequate outlet and remain flooded. Only if the new drainage of anything larger than 5ac was offset by restoring drained wetlands of equal size would it have neutral downstream flooding impacts to the Quill Lakes.

While we appreciate that 13 RM’S in the Quill Lakes basin have sent letters of support and 3 RM’S are sitting on the fence for the Plan, it’s important to recognize this is not about reducing red tape to make the licensing of drainage easier. It’s about offsetting downstream impacts and reducing the Quill Lakes flood. Drainage is a privilege and not a right and so it must be done responsibly with proper offsets and mitigation. Given that the Quill Lakes are not an adequate outlet, water needs to be stored in the landscape by restoring existing drained wetlands. It also requires offsetting any new drainage with a larger area restored until the Quill Lakes flood has been prevented. Only then can the unregulated drainage and the ongoing Quill Lakes flood be properly addressed.

We thank you for the opportunity to review the 5 Acre Plan (see attached). However, following our discussions, we have come to the decision that SAWS cannot support this Plan as presented.

We support working with the Universities of Saskatchewan or Regina to understand how prairie hydrology and drainage works – as research builds community confidence. (<https://www.producer.com/opinion/to-be-resilient-the-canadian-prairie-needs-lots-of-wetlands>).

To ensure transparency and open discussion we will be sharing this work with our community on Facebook and in our newsletters.

cc:: Krystal Tandler, Executive Director Agricultural Client Services, WSA
Dr. Peter R. Leavitt, Director, Institute of Environmental Change and Society
Dr. John Pomeroy, FRSC, Director, USask Centre for Hydrology
Chief Todd Peigan, Pasqua First Nations
Quill Lake Watershed - RM 276, RM 277, RM 279, RM 280, RM 307, RM 308, RM 309, RM 310, RM 338, RM 339, RM 367