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Northeast Avalon ACAP Urges St. John's to Protect Galway Wetland

The area upon which the Galway development is occurring surrounds wetlands of the last remaining undeveloped waterway in the Waterford River watershed. It is also an area in which development was prohibited until exceptions were granted by St. John's City Council a few years back (see [190-metre amendment](#)).

The City of St. John's is considering designating a wetland here and we are urging them to use the available scientific [independent consultants report titled 'Wetland delineation and functional Assessment Study, Glencrest Development / Wetland \(Open Space\) Delineation'](#) (Stantec Consulting Ltd., 2013). This is a thorough report grounded in science and supported by on-the-ground research. It delineates an area approximately 79 hectares in size that is considered an important functioning wetland.

The developer has proposed an alternative and arbitrary 'Protected Natural Area' through a land exchange proposal with the City. This PNA does not reflect the actual wetland boundaries as delineated in the 2013 assessment and this proposal admits that "the objectives of preserving natural features (i.e. wetlands) value and function may not be achieved".

This proposal is not a like-for-like trade.

While a land exchange proposal was a positive step, the proposed swap is arbitrary and not based in science. Habitat compensation (saving one area when another gets impacted) is complex because not all habitats are equal. Wetland is typically compensated *with another wetland* at a ratio of 2:1 or greater, understanding that restored or created wetlands are not the same quality. While the developer has offered to exchange land, the ecological services provided will be of a much lower value.

There is no perfect or cheap replacement for a naturally functioning wetland.

We roughly estimate the value of the lost 11.9 hectares of wetland in terms of ecological services could be as much as \$470,000 per year. The maintenance costs of additional ongoing storm-water management systems must be considered. The City must also look after this greenspace area. The current natural wetland area freely services the entire South Brook / Waterford River watershed, helping manage the system while providing good habitat and clean water at the same time.

Northeast Avalon ACAP Inc.

360 Topsail Road Suite 103 ♦ P.O. Box 8732 ♦ St. John's, NL ♦ A1E 2B6
Telephone: (709) 726-9673 ♦ Email: info@naacap.ca ♦ Web: <http://www.naacap.ca>

Clearing and in-filling has already begun in some of parts of the wetland.

The developer has found a loophole that allows them to remove a wetland. This wetland was originally protected under the municipal 190 m restriction. **Having lifted those restrictions before amending the Municipal Plan, the City has an obligation to continue protecting this wetland in its entirety.** The Province still has no modern wetland policy, although there have recently been positive movements towards one with a province-wide wetland inventory.

We urge Council to accept the 2013 delineation for the Galway wetlands for the proposed amendment and to add the Galway wetland to the list of protected wetlands. While this natural boundary does not fit as well within the developer's current plan, **the 2013 delineation is consistent with other wetland areas below 190 metres** that are contained within the St. John's Municipal Plan and St. John's Development Regulations.

We applaud the City of St. John's for their leadership, ensuring that no development may proceed which may have a detrimental effect on our valuable wetlands. World Wetlands Day (celebrated annually on February 2 since 1971) just passed, but it's not too late to commemorate by protecting this wetland!

Sincerely,

Piers Evans

Project Coordinator
Northeast Avalon ACAP

Northeast Avalon Atlantic Coastal Action Program (NAACAP) is a non-profit community advocacy made up of a volunteer board. Formed in 1992 with the support of Environment Canada under the Atlantic Coastal Action Program, NAACAP has a long history of environmental research, advocacy, and action on issues affecting the quality of our natural resources with a particular emphasis on the watersheds and coastal areas of the Northeast Avalon Region.

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