



Mayatan Lake Management Association
3-52212 Range Road 25
Parkland County, AB T7Y 2M3

September 23, 2024

RE: Feedback on Proposed Fertilizer Bylaw

Thank you for the opportunity to provide input on the Parkland County proposed Fertilizer Bylaw. The following is submitted on behalf of the Mayatan Lake Management Association.

MLMA Background

MLMA is a lake watershed management group. Our principal interest is the maintenance and/or improvement of the quality of lakes and lake watersheds, which are valuable resources in Parkland County. We are interested in preserving these environments for people's use and enjoyment now and into the future. Our organization believes development adjacent to lakes and other water bodies needs extra due diligence to attain these goals.

Over the past four years, MLMA has undertaken a study of water quality in over 70 lakes in Parkland County following standard scientific sampling and analysis methods. This information provides a strong foundation for understanding the effect of fertilizers and other sources of nutrients on water quality in Parkland County lakes.

Feedback on proposed Fertilizer Bylaw

We would like to applaud the Fertilizer Bylaw initiative by Parkland County. Many of the lakes in Parkland County are of the "pothole" variety. They have limited inflow and outflow and are thus not well flushed so that phosphorus that enters these lakes stays in place. Limiting the inflow of phosphorus, no matter the source, is vital. Fertilizers are known to be a significant source of phosphorus. There is ample scientific literature to support this point.

We are also supportive of the public hearing approach to allow residents to provide input on the proposed bylaw.

We have a number of questions and comments regarding the scope and content of the proposed bylaw.

1. The proposed bylaw is limited to excluding use of fertilizers in subdivisions. However, there are many residences within Parkland County adjacent to waterbodies which are not in subdivisions. Would it make sense to expand the scope of the bylaw to all residences within a certain distance of a waterbody rather than restricting the scope to subdivisions?
2. The proposed bylaw explicitly excludes agricultural lands, golf courses, horticultural businesses, and lands used for tree production. These are broad exemptions, each of which represents areas where fertilizers are heavily used. Can these exclusions be modified to restrict use of fertilizers within a certain proximity of waterbodies without significantly affecting the businesses involved?
3. The proposed bylaw exempts the use of "natural compost". What is the reasoning behind this exemption? Natural composts can contain the same chemical components as commercial fertilizers. Is the exemption related to comparative nutrient value?
4. The prohibition of the use of fertilizers in subdivisions is absolute. Are there exemptions that can be considered for minimal usage, for example the use of fertilizers on potted plants?
5. We would suggest some further minor edits to the proposed bylaw:
 - a. The title would be improved by changing "...by Waterbodies..." to "...near Waterbodies...". There are two places to make this change.
 - b. "council" should be capitalized in the first WHEREAS statement.
 - c. In Appendix A:
 - i. The term "depression/swamp" could be replaced by "wetland" which is a more common term (and is referenced in the definitions).
 - ii. The column "Municipal Address" could be moved to be the second column as it is the address of the Subdivision and not the Waterbody.
 - iii. The column "Name of Lake" could be changed to "Name of Waterbody" as different types of waterbodies are referenced.
 - iv. The column "Lake Description" would be more correctly titled "Waterbody Description". Then the four terms already defined in point 9 under Definitions could be used, i.e. "Lake", "Wetland", "Stream", and "River".
 - v. The term "Minor Creek" could be changed to "Unnamed Creek" and then defined as "Stream" under "Waterbody Description".
 - vi. The "Hamlet of Entwistle" is not on the North Saskatchewan River as listed.
 - vii. Re-sorting the list of subdivisions into alphabetical order would be helpful.

Thank you for the opportunity to provide input on the proposed Fertilizer Bylaw.

Best regards,



Walt Neilson
President, Mayatan Lake Management Association