



May 31, 2018

Via E-mail: CEAA.Springbank.ACEE@ceaa-acee.gc.ca

Springbank Off-Stream Reservoir Project
Canadian Environmental Assessment Agency
Canada Place
9700 Jasper Avenue, Suite 1145
Edmonton, Alberta T5J 4C3

**Re: Springbank Off-Stream Reservoir Project – Invitation for Public Comments
Comments of Calgary River Communities Action Group
Reference number: 80123**

The Calgary River Communities Action Group (CRCAG) is writing in response to the Canadian Environmental Assessment Agency (CEAA) invitation for public comments regarding the Environmental Impact Statement (EIS) prepared for the Springbank Off-Stream Reservoir Project (Project).

The Calgary River Communities Action Group

CRCAG is a non-partisan advocacy organization of approximately 1,000 members who were impacted by the June 2013 flood that devastated the City of Calgary. CRCAG's mandate and information about its efforts to advocate for upstream flood mitigation can be found at www.protectcalgary.com. Since its inaugural meeting in 2013, CRCAG has worked collaboratively with the municipal, provincial and federal governments to raise awareness of issues impacting its membership.

Following are CRCAG's comments on the potential environmental effects of the Project and the proposed measures to prevent or mitigate those effects, as described in the summary of the EIS submitted by Alberta Transportation. CRCAG has reviewed the EIS and urges CEAA to recommend that the Minister of Environment and Climate Change (the Minister) decide that, taking into account the implementation of the proposed mitigation measures outlined in the EIS and EIS Summary, the Project is not likely to cause significant adverse environmental effects.

The Springbank Off-Stream Reservoir Project

The Project is located in the area of a natural basin 15 km west of Calgary in Rocky View County in the Province of Alberta. The Project is predominantly situated on private land that is used for ranching and agriculture. The off-stream reservoir is designed as a dry reservoir, only storing water temporarily when flood levels in the Elbow River exceed a certain level. The purpose of the Project is to help reduce the effects of future extreme floods on infrastructure, watercourses, and people in the City of Calgary and downstream communities. Put simply, the Project is about public safety and protection of families, and businesses, as well as protection of the historical, cultural and recreational heart of Alberta's largest city.

CRCAG notes that the Project was selected over other potential locations for flood mitigation after a rigorous selection process (see section 2.2.1, Volume 1, EIS). The other identified projects were rejected for various reasons, including geotechnical issues, capacity limitations, cost, and environmental impacts. The Project was specifically chosen over the McClean Creek option (MC1) because it is less expensive, presents lower environmental risk overall, can be delivered on a shorter timeline, and presents lower (environmental and safety) risk during construction. The EIS concludes that, overall, the assessment and scoring for the Project are “considerably more favourable” than for the proposed MC1 and that when social and recreational values enter into the equation, the evidence is “overwhelmingly” in favour of the Project from a cost, environmental and risk basis (page 3.18, EIS Summary).

Additionally, of importance to CRCAG members, the EIS highlights some of the following positive effects resulting from construction and operation of the Project:

- Expected improvements in downstream water quality in years during high-flood operations of the Project, with an expected 30% reduction in suspended sediments resulting from settling effects of the SR1 structure. During these high-flood events, the Project is expected to reduce suspended sediments and potentially improve quality and availability of drinking water for the City of Calgary during flood events (Page 6.21 & 6.99, EIS Summary)
- The Project is expected to have a positive impact on biodiversity in the Elbow River floodplain downstream of the diversion structure as the Project would reduce the extent of flooding from extreme events expected to be destructive to biodiversity in the Elbow River corridor (Page 6.58, EIS Summary)
- Construction of the Project would reduce the average annual damage of floods by \$28 million. Over an assumed 100-year operating life, the Project’s discounted benefits in terms of flood damage avoidance exceed its costs; and it is therefore expected to have a net economic benefit (Page 6.108, EIS Summary)

The Project is the right choice and only hope of timely and effective flood mitigation for Calgary and surrounding communities within the Elbow River watershed, which includes the majority of downtown Calgary.

Potential Environmental Effects and Proposed Mitigation

The more than 5500 page EIS filed by Alberta Transportation reflects a rigorous environmental effects assessment that fully satisfies the requirements of Alberta Environment and Parks (AEP), the Natural Resources Conservation Board (NRCB) and CEAA. It is based on sound science and conservative assumptions and thoroughly addresses the previous concerns raised by landowners and Indigenous groups.

The EIS concludes that, with the implementation of the proposed commitments and mitigation measures, adverse residual environmental effects of Project-related construction and operation are predicted to be not significant for all valued components¹. No significant cumulative effects were

¹ The valued components assessed were: air quality and climate, acoustic environment, hydrogeology, hydrology, surface water quality, aquatic ecology, terrain and soils, vegetation and wetlands, wildlife and biodiversity, land use and management, historical resources, traditional land and resource use, public health, infrastructure and services, and economy and employment.

predicted for any valued component. Proposed mitigation measures and follow-up monitoring program requirements are extensive, practical and based on the highest standards of practise.

While CRCAG is sympathetic to the concerns of the affected landowners, CRCAG respectfully submits that ensuring public safety and protection of property must be considered paramount. The EIS estimates suggest costs of \$1.9 billion dollars at risk in the City of Calgary in the event of another flood of the same magnitude as the 2013 flood. The safety and wellbeing of hundreds of thousands of people living and working in the City of Calgary is at risk each and every year that passes without flood mitigation. The public safety interests of the City of Calgary and its 1.2 million residents must be weighed against the interests of 19 landowners (all of whom will be fairly compensated). And the land used for the project will be set aside from future development while occupied by water possibly only a few days every 20 years.

With respect to the potential impact of the Project on Aboriginal and Treaty rights, it is clear from the EIS that Alberta Transportation has undertaken extensive consultation since 2014 with the identified Indigenous groups to share Project information and understand how the Project could impact their rights, interests and traditional uses. Alberta Transportation provided many opportunities for input, through face to face meetings, workshops, open houses, site visits, and funding for traditional land and resource use studies. Project timelines for resubmission of the EIS were extended to allow for further Indigenous engagement and opportunities for up-front review of the Project's technical studies. As far as potential impacts are concerned, given that the residual effects of the Project on traditional land and resource use are predicted to be not significant, no effects on potential or established Aboriginal or Treaty rights are expected. With respect to impacts on federal lands, the EIS points out that the closest point of the Project to the Tsuut'ina First Nation reserve is 930 meters (in the event of a 2013 flood) to 1,130 meters (during non-flood operation) and no backup of water onto the reserve is expected. In fact, the Project will provide flood protection for part of the Tsuut'ina reserve.

Conclusion

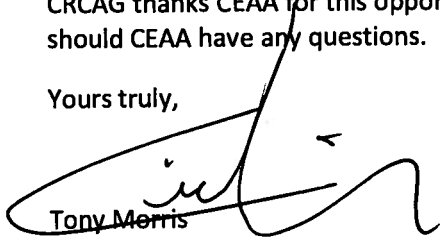
As the EIS notes, the Elbow River flood of 2013 was a devastating event socially and economically. The City of Calgary is nearing the fifth anniversary of one of the most destructive floods in Canadian history. The flood of June 2013 was the largest flood in the city since 1932, causing billions of dollars of damage to city infrastructure and commercial and residential development, not to mention the considerable indirect, financial, social and environmental harm. It also must not be forgotten that lives were lost, and countless families displaced. Calgary citizens and businesses continue to be placed at risk each and every year that passes without effective upstream flood mitigation.

The purpose of the Project is to help reduce the effects of future extreme floods on infrastructure, watercourses, and people in the City of Calgary and downstream communities. The EIS concludes that the Project will not likely result in significant adverse residual environmental effects. It also provides a comprehensive evaluation of Project alternatives and reinforces that the Project is the best, and lowest environmental impact, option for upstream flood mitigation on the Elbow River. This is critical public safety infrastructure that is supported by all levels of government.

CRCAG is concerned that any delay in Project approval beyond the end of 2018 will delay construction of the Project and the ability to mitigate floods in 2021 or beyond. Without effective upstream flood mitigation, the Elbow River will continue to pose a threat of flooding. This is unacceptable for a city that is the economic engine of the province and significant contributor to the Canadian economy. CRCAG respectfully requests that CEAA move quickly to prepare the draft Environmental Assessment Report and recommend that the Minister determine that the Project is not likely to cause significant adverse environmental effects.

CRCAG thanks CEAA for this opportunity to comment. Please do not hesitate to contact the undersigned should CEAA have any questions.

Yours truly,

A handwritten signature in black ink, appearing to read 'Tony Morris', is written over a horizontal line. The signature is stylized and includes a large loop on the left side.

Co-President

CALGARY RIVER COMMUNITIES ACTION GROUP

- cc: The Right Honourable Justin Trudeau, Prime Minister of Canada
The Honourable Rachel Notley, Premier of Alberta
His Worship Naheed Nenshi, Mayor of Calgary
The Honourable Brian Mason, Minister of Transportation, MLA for Edmonton-Highlands-Norwood
The Honourable Kathleen Ganley, Minister of Justice and Solicitor General, MLA Calgary-Buffalo
The Honourable Ron Liepert, MP Calgary-Signal Hill
The Honourable Kent Hehr, MP Calgary Centre