



November 19, 2020

Natural Resources Conservation Board
250 – 5 Street SW
Calgary, AB T2P 0R4
Attention: Laura Friend, Manager, Board Reviews
via Email: laura.friend@nrcb.ca

Dear Ms. Friend,

**Re: Alberta Transportation Springbank Off-Stream Reservoir Project (SR1)
NRCB Application No. 1701 - Notice of Pre-Hearing Conference
City of Calgary Statement of Intent to Participate & Summary of
Submission**

On behalf of The City of Calgary (The City), please accept this written submission indicating our intent to participate and formally intervene in the Natural Resource Conservation Board's (NRCB) December 2, 2020 pre-hearing conference and eventual hearing for the above-noted application. The City supports Alberta Transportation's application.

SR1 has significant implications for The City, as The City is responsible for the operation of public infrastructure in Calgary and enacting emergency response measures to ensure the safety of Calgarians during an event such as a flood on the Elbow River. At the hearing, the Board must determine whether SR1 is in the public interest. It is The City's position that SR1 is clearly in the public interest. As outlined below, flood mitigation is a high priority for The City and Calgarians. Failure to approve this project will set back flood mitigation efforts on the Elbow River potentially for decades as other options are re-examined and analyzed.

It has been seven years since the 2013 floods threatened public safety, resulted in loss of life, and caused widespread damage to private and public property throughout southern Alberta, including \$409 million in damages to The City's infrastructure alone. Without the regional flood mitigation provided by SR1, Canada's fourth largest city and the surrounding region will be exposed to large scale flood risk on the Elbow River, which could result in devastating impacts on the Calgary's central business district, numerous private dwellings, critical transportation corridors, historic social and cultural resources, and thousands of jobs. The City's assessment of potential climate change impacts also suggest that events on the scale of the 2013 floods could become more frequent and extreme, further emphasizing the need for flood mitigation on the Elbow River.



Since 2013, The City has undertaken numerous studies and analyses to better understand Calgary's flood risk and systematically develop a flood resilience strategy, including:

- Updating its hydrological information and river modelling, studying erosion and river morphology, and remapping Calgary's inundation extents with the latest engineering and scientific understanding;
- Updating the Government of Alberta's 2013 flood damage model with The City's latest hydrological information to have the most up-to-date understanding of its flood risk and total risk of damages in dollars;
- Undertaking a comprehensive flood mitigation measures assessment to determine the most flexible approach to reducing flood risk in Calgary, including a triple bottom line assessment of scenarios and options; and
- Analyzing a number of alternatives to the SR1 project such as McLean Creek, dredging the Glenmore Reservoir, creating a diversion tunnel from the Elbow River to the Bow River, and more.

Based on these analyses, The City has concluded that SR1 is a core element of flood resilience infrastructure for Calgary. SR1 is critical to The City's flood resilience strategy, ensuring The City can effectively enact its emergency response plans and mitigate flood damage from the Elbow River. Opportunities to build community mitigation in Calgary's city limits are limited due to the small size of the Elbow River, and SR1's location relative to Calgary makes it the most effective mitigation option to manage high flows on the Elbow River through Calgary during potential flood events.

The City's position is aligned with that of the applicant and their consultant, which reflects their significant work to date on mitigation options for the Elbow River. The City's detailed analysis also supports SR1 as being the most viable flood mitigation option on the Elbow River and agrees with the Applicant's assessment that other alternatives are not feasible. The City is prepared to speak to the entire scope of the proponent's application at the hearing as necessary.

As part of its hearing submission, The City will provide detailed information which will assist the Board in assessing the benefits of SR1, including:

- Evidence concerning the impacts of the 2013 flood;
- The City's flood resilience plan and flood damage model;
- Annotated inundation maps showing infrastructure and critical services at risk of flooding;
- The analysis undertaken by The City concluding that SR1 provides five-to-one benefit-cost return, and calculations supporting an estimated annual reduction in flood damages in Calgary of \$27M per year;
- Analysis of social and environmental impacts of SR1;

- Assessments of other mitigation options on the Elbow River; and
- Information on flood mitigation infrastructure built or under construction by The City and how it will work with a completed SR1.

Mr. Frank Frigo, P.Eng., Leader of Watershed Analysis, has been with The City for over 13 years will represent The City of Calgary at the pre-hearing conference. David Mercer will represent The City as its legal counsel.

The City requests that the hearing occur before May 1, 2021 to avoid when Calgary's seasonal flood risk is highest and ensure the availability of The City's presenters. The City anticipates it will be able to prepare its hearing submission and presentation no earlier than March 2021. Given the current situation due to COVID-19, The City is prepared to complete the hearing process online through the NRCB's preferred web conferencing service.

Sincerely,



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