



MCLENNAN ROSS LLP  
LEGAL COUNSEL

Our File Reference: 162612

**Gavin S. Fitch, Q.C.**  
Direct Line: (403) 303-9120  
e-mail: gfitc@mross.com

**Radha Singh, Assistant**  
Direct Line: (403) 303-9112  
e-mail: rsingh@mross.com

Fax: (403) 303-1668  
*PLEASE REPLY TO CALGARY OFFICE*

April 3, 2021

SENT BY EMAIL

Natural Resources Conservation Board  
19<sup>th</sup> Floor, 250 5<sup>th</sup> Street SW  
Calgary, AB T2P 0R4

**Attention: Laura Friend, Manager, Board Reviews**

Dear Ms. Friend:

**Re: Alberta Transportation - Springbank Off-stream Reservoir Project  
(SR1) - NRCB Application No. 1701**

Further to the above captioned matter, please find enclosed the response of Alberta Transportation to Undertaking #34 given by Mr. Hebert on March 30, 2021 (see Vol 7; pg. 1695; ln 4, Exhibit #385), responses of Alberta Transportation to Undertakings #44, 46, 47 and 48 given by Mr. Hebert on March 31, 2021 (see Vol 8; pg. 2111; ln. 8 and 19, Vol 8; pg. 2172; ln. 8, Vol 8; pg. 2173; ln. 17, and Vol 8; pg. 2175; ln. 13, Exhibit #395), and the responses of Alberta Transportation to Undertakings #49, 50, 51, 52, 53, 54, 55 and 56-59 given by Mr. Hebert on April 1, 2021 (see Vol 9; pg. 2259; ln. 20, Vol 9; pg. 2260; ln. 23, Vol 9; pg. 2263; ln. 8, pg. 2264; ln. 4, Vol 9; pg. 2266; ln. 23, Vol 9; pg. 2269; ln. 15, Vol 9; pg. 2280; ln. 13, and Vol 9; pg. 2421; ln. 7 and 18, pg. 2422; ln. 4 and 12, Exhibit #406).

Thank you.

Yours truly,

GAVIN S. FITCH, Q.C.

GSF/rs  
Enclosure

**Edmonton Office**

600 McLennan Ross Building  
12220 Stony Plain Road  
Edmonton, AB T5N 3Y4  
p. 780.482.9200  
f. 780.482.9100  
tf. 1.800.567.9200

**Calgary Office**

1900 Eau Claire Tower  
600 – 3<sup>rd</sup> Avenue SW  
Calgary, AB T2P 0G5  
p. 403.543.9120  
f. 403.543.9150  
tf. 1.888.543.9120

**Yellowknife Office**

301 Nunasi Building  
5109 – 48<sup>th</sup> Street  
Yellowknife, NT X1A 1N5  
p. 867.766.7677  
f. 867.766.7678  
tf. 1.888.836.6684

cc William Kennedy, General Counsel, Natural Resources Conservation Board  
Doug Rae, Rae and Company  
Sara Loudon, Rae and Company  
Richard Secord, Ackroyd LLP  
Ifeoma M. Okoye, Ackroyd LLP  
Ronald M. Kruhlak, Q.C., McLennan Ross LLP  
Michael Barbero, McLennan Ross LLP

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #34 RESPONSE OF ALBERTA TRANSPORTATION</b>	
<b>Reference</b>	Volume 7; March 30, 2021, Exhibit 385  Pg. 1695 / ln. 4
<b>Undertaking</b>	To advise if Alberta Transportation will conduct baseline testing of all water wells prior to construction and provide funding for water well testing for any west Rocky View residential location, commercial and agricultural operation who so choose at any point of the Project lifecycle from pre-construction through operations for the life of the Project. These reports will serve as the basis for any future claims by residents negatively impacted by SR1 and must be held on file. The proponent shall create a mechanism for landowners to submit these well reports, compensate them for the cost and provide a method for storing these well report files.
<b>Response</b>	<p>Alberta Transportation has developed a draft Groundwater Monitoring Plan; which was included in the response to the first round of provincial and federal information requests in July 2018 (Exhibit 111). The draft Groundwater Monitoring Plan establishes three tiers of monitoring:</p> <ul style="list-style-type: none"> <li>• Tier 1 being Project specific monitoring wells within, or near, the dam structure and diversion channel;</li> <li>• Tier 2 monitoring wells are also purpose-built wells installed (or to be installed) by Alberta Transportation within the local assessment area (LAA); and</li> <li>• Tier 3 monitoring wells will be primarily located in the broader regional assessment area (RAA), but are near the boundary of the LAA (i.e. maximum distance of Tier 3 wells from the LAA will be approximately 800 m).</li> </ul> <p>While Tier 1 and Tier 2 monitoring wells are, or will be, installed specifically for the Project, Tier 3 wells will be primarily made up of landowner’s domestic water wells.</p> <p>Alberta Transportation has been, and continues to be, committed to the monitoring of domestic water wells as part of the SR1 Project. Landowners within the Project Development Area (PDA) were previously invited to participate in the domestic water well testing program as part of the environmental impact assessment (EIA) process. In addition to the landowner’s domestic water wells that have already been monitored, and those already being considered as part of the</p>

groundwater monitoring plan noted above, Alberta Transportation is open to considering requests from landowners who are directly adjacent to the PDA and within the LAA (north of Elbow River), regarding collection of water level measurement and groundwater samples from their wells on a one time basis during the baseline phase of the Project (pre-construction).

Some of the landowner wells may be of particular value in the ongoing monitoring program due to their depth and/or position, and in such cases, Alberta Transportation may also extend an invitation to participate in the ongoing (long term) groundwater monitoring program.

All requests within these parameters will be considered on a case by case basis. Not all wells are suitable for monitoring based on their construction details, and wells that are in a current condition where opening/closing of the well could pose a risk to the well itself (e.g. corroded casing, seized wellhead) would not be disturbed. In such cases, a groundwater sample would be collected from a tap or hydrant and no water level measurement would be taken.

Considering Project effects on hydrogeology are not predicted to occur outside of the LAA, potentially affected landowners would be those located within the LAA.

With regard to an 'established mechanism to store the reports' all groundwater monitoring reports completed for the Project would be submitted to Alberta Environment and Parks. As a matter of course, submitted reports would be stored by the Government of Alberta and would be accessible to the public subject to the provisions of the [\*Freedom of Information and Protection of Privacy Act, RSA 2000, c. F-25.\*](#)

Alberta Transportation is prepared to discuss these matters with directly impacted and adjacent landowners.

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #44 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 8; March 31, 2021, Exhibit 395  Pg. 2111 / ln. 8 and 19
Undertaking	To advise whether the operation of the filtration system can be limited to dry or non-flood conditions. <ul style="list-style-type: none"> <li>• To advise of any restrictions that will make the design and installation of the filtration system not feasible.</li> </ul>
Response	<p>The Project as it is designed does not include a filtration system for weed seeds at the low-level outlet works. The primary purpose of the Project is to mitigate floods on Elbow River.</p> <p>A filter cannot be added to the low-level outlet for the following reasons:</p> <ul style="list-style-type: none"> <li>- Stormwater needs to freely pass through the low-level outlet works during dry operations.</li> <li>- A very fine filter medium or screen mesh would be needed to capture weed seeds. Adding such a filter at the low-level outlet would compromise the intended function of the low-level outlet structure during both dry operations and flood operations and would likely limit AEP’s ability to drain the reservoir. During dry operations, a filter would accumulate debris and sediment over an extended period and likely cause accumulation of sediment and debris within the low-level outlet works conduit. During flood operations, a filter would interfere with the hydraulic performance of the low-level outlet and could result in significant performance issues including drawdown rates and energy dissipation.</li> <li>- Maintenance of a weed seed filter on the low-level outlet works during operation would not be feasible without halting flow from the reservoir and replacing the screen material on a regular basis. This in turn would result in delayed releases of the reservoir and potential safety risks.</li> </ul>

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #46 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 8; March 31, 2021, Exhibit 395  Pg. 2172 / ln. 8
Undertaking	To advise if Alberta Transportation will agree to have as a condition of approval that it shall compensate all farmers with documented expenses for incremental weed control as a result of Project activities.
Response	<p>During construction and post-flood operations, Alberta Transportation and Alberta Environment and Parks will pro-actively manage the reservoir to limit opportunities for weed establishment and promptly control weeds to limit opportunities for dispersal to neighboring properties. Active weed management, for example periodic inspections evaluating locations for low to bare ground cover that could support weed, will be used when needed. A comprehensive weed management plan will be prepared prior to construction.</p> <p>Weed control will, at minimum follow the Alberta <i>Weed Control Act Regulations</i>, AR 125/2016. Monitoring of weeds will be part of construction and operations of the Project and monitoring plans will be developed pending Project approval. Alberta Transportation has advanced a number of monitoring plans, including the draft Vegetation and Wetland Monitoring and Revegetation Plan (Exhibit 217), and is committed to finalizing the draft plan with input from stakeholders, Indigenous groups and regulators. During construction, the contractor will implement appropriate weed control measures consistent with accepted weed management practices pursuant to Alberta Transportation’s <i>Civil Works Master Specifications for Construction of Provincial Water Management Projects, Section 01391 – Environmental Protection</i>.</p> <p>Weeds encountered on adjacent properties will be the responsibility of those landowners and Alberta Transportation will not compensate landowners for weed control.</p> <p>Complaints regarding weeds received during construction will be directed by the Community Liaison to the construction contractor. The construction contractor will describe the protocol for the receipt, response and documentation of complaints in its Environmental Construction Operations Plan (ECO Plan) (see Round 1 CEEA, Package 3 IR3-46). Complaints during Project operations will be directed by the Community Liaison to Alberta Environment and Parks</p>

	(AEP), who will investigate the complaint and if necessary (i.e. Project caused complaint), address the complaint.
--	--

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #47 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 8; March 31, 2021, Exhibit 395  Pg. 2173 / ln. 17
Undertaking	To advise if AT agrees to a condition of approval that would require Alberta Transportation to work with landowners, local stakeholders, including First Nations, in identifying additional biodiversity studies that should be done and undertake to do them.
Response	<p>In the draft Wildlife Mitigation and Monitoring Plan (WMMP) (Exhibit 125), Alberta Transportation has committed to completing pre-construction wildlife surveys to identify wildlife features (e.g., nests, dens) and appropriate site-specific mitigation will be developed following those surveys. Wildlife features identified with appropriate signage and/or fencing as established by a qualified wildlife biologist will be avoided during construction activities. As part of the draft WMMP, Alberta Transportation has proposed a remote camera monitoring program which will be used to determine the effectiveness of mitigation measures implemented. This monitoring program will provide data on wildlife species presence and how larger mammals (e.g., deer, elk) respond to Project structures such as the diversion channel.</p> <p>As on March 31, 2021 (Exhibit 395, page 2043, lines 9 to 12), Alberta Transportation's environmental assessment process includes engagement with stakeholders and Indigenous groups to inform the development of mitigation and monitoring plans. Alberta Transportation has advanced a number of monitoring plans, including the draft WMMP, and is committed to finalizing the draft WMMP with input from stakeholders, Indigenous groups and regulators. (Exhibit 395, page 2070, lines 2 to 5).</p> <p>Alberta Transportation understands that the request in this undertaking would be captured within the mitigation and monitoring plans proposed by Alberta Transportation. Alberta Transportation does not commit to completing additional biodiversity studies.</p>



**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #48 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 8; March 31, 2021, Exhibit 395 Pg. 2175 / ln. 13
Undertaking	To advise if Alberta Transportation will work with local stakeholders and First Nations in identifying what additional mitigation measures regarding surveys and inventories of wildlife and migratory birds and other habitats will be.
Response	<p>As stated previously (Exhibit 395, page 2043, lines 9 to 12), Alberta Transportation's environmental assessment process has included engagement with stakeholders and Indigenous groups to inform the development of mitigation and monitoring plans. Alberta Transportation has advanced a number of monitoring plans, including the draft Wildlife Mitigation and Monitoring Plan, and is committed to finalizing them with input from stakeholders, Indigenous groups and regulators. (Exhibit 395, page 2070, lines 2 to 5).</p> <p>As confirmed in the response to Undertaking #47, Alberta Transportation does not commit to completing additional surveys.</p>

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #49 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 9; April 1, 2021, Exhibit 406  Pg. 2259 / ln. 20
Undertaking	To advise if Alberta Transportation will commit to mitigate airborne dust within 24 hours of the issue or a complaint arising ( <b>see transcript for further description</b> )
Response	<p>Alberta Transportation has committed to mitigate, monitor and manage potential effects of the Project on air quality. Specifically, Alberta Transportation has drafted a comprehensive draft Air Quality Management Plan (AQMP) (Exhibit 218) that describes Project mitigation, ambient air quality and meteorological monitoring plans, and an adaptive management-based approach to minimize potential effects on air quality. Since the AQMP was drafted, Alberta Transportation has made two additional commitments</p> <ol style="list-style-type: none"> <li>1. Continuous PM2.5 construction monitoring at Calaway Park, when open; and</li> <li>2. Continuous TSP and PM2.5 post-flood monitoring at one location near the east Project Development Area boundary for 16 months after a flood event to facilitate the timely application of additional mitigation measures for fugitive dust.</li> </ol> <p>The draft AQMP is based on anticipated regulatory requirements for approvals and authorizations specific to the Project. The Plan will be finalized following additional consultation with regulators, Indigenous communities, and stakeholders and as anticipated in the approval conditions.</p> <p>As stated in oral evidence on March 31, 2021, Alberta Transportation has committed to ambient air quality monitoring near the Project Development Area following a flood, to measure impacts on air quality, and to adaptive management and the implementation of additional monitoring and mitigation as necessary if excessive TSP or PM 2.5 concentrations are measured (Exhibit 395, pg. 2066 ln. 14-24).</p> <p>Further, as previously indicated in response to Undertaking #32 (Exhibit 405), a Community Liaison will serve as point of contact with stakeholders and be able to provide interested parties information on air quality monitoring results. Alberta Transportation and Alberta Environment and Parks will implement the Community Liaison role during Project Construction and Operations, respectively.</p>

Complaints received during construction regarding dust and air quality will be directed by the Community Liaison to the construction contractor. Prior to construction, an Environmental Construction Operations Plan (ECO Plan) will be developed by the selected construction contractor using Alberta Transportation's ECO Plan framework. The ECO Plan will identify the mitigation measures for the potential environmental effects of construction, including the ambient air monitoring program and adaptive management techniques to control the generation of airborne dust. The ECO Plan will follow the requirements in Alberta Transportation's *Civil Works Master Specifications for Construction of Provincial Water Management Projects*.

Complaints during Project operations will be directed by the Community Liaison to Alberta Environment and Parks (AEP) team, who will investigate the complaint and where appropriate (i.e. fugitive dust is associated with Project emissions), mitigation will be implemented expeditiously. Further, as stated in oral evidence on April 1, 2021, as part of their operations and maintenance, AEP will be on site for the entire time during reservoir drainage. (Exhibit 406, pg. 2243; ln. 15-17)

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #50 RESPONSE OF ALBERTA TRANSPORTATION</b>	
<b>Reference</b>	Volume 9; April 1, 2021, Exhibit 406  Pg. 2260/ ln. 23
<b>Undertaking</b>	To advise if Alberta Transportation will commit to baseline monitoring to measure increases in insect activity and develop a mitigation plan for same.
<b>Response</b>	<p>An assessment on the effects of the Project on insect populations was not required under the Environmental Impact Assessment Terms of Reference. As such, Alberta Transportation has not assessed Project impacts on insect population but acknowledges the concern regarding mosquito activity following use of the reservoir. Alberta Transportation has communicated this concern to Alberta Environment and Parks for their consideration as part of their post-operation monitoring and mitigation plan.</p> <p>During operations, issues around potential increased insect activities (e.g. mosquito) can be raised with the Community Liaison (see response to Undertaking 32, Exhibit 404 and Exhibit 216). The Community Liaison will direct these issues to the operator, Alberta Environment and Parks team. AEP will investigate the complaint and if required, address the complaint.</p>

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #51 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 9; April 1, 2021, Exhibit 406  Pg. 2263 / ln. 8
Undertaking	To confirm that the Project operator or proposed independent authority will work with local residents in Rocky View County to monitor air quality with live readings at locations identified by the Springbank Community, including but not limited to, Range Road 33 near Springbank high school and soccer park, Elbow Valley Elementary School and Highway 8 areas (see transcript for further details)
Response	<p>Alberta Transportation has developed a draft Air Quality Management Plan (Exhibit 218) which describes mitigation and monitoring for several criteria air contaminants (CACs) identified as being of potential concern or importance to the Project.</p> <p>Alberta Transportation has committed to five monitoring stations during construction:</p> <ul style="list-style-type: none"> <li>• Three monitoring stations measuring TSP and PM<sub>2.5</sub> near the PDA boundary. Between the diversion channel and the dam, there will be 24-hour continuous wind and air quality monitoring for TSP and PM<sub>2.5</sub> at Station 1 and Station 2 along the haul road and at Station 3 near the borrow source area.</li> <li>• One monitoring station measuring PM<sub>2.5</sub> and NO<sub>2</sub> to evaluate public and community exposure during construction relative to both the Alberta Ambient Air Quality Objectives and Guidelines (AAAQO) and the Canada Ambient Air Quality Standards (CAAQS) at a monitoring location representative of area residences and nearby communities in the Project area. A potentially suitable location for this monitoring station to measure both NO<sub>2</sub> and PM<sub>2.5</sub> concentrations would be in Springbank, approximately 4.5 km east of Station 3, in a residential area. The final monitoring station location would be determined in consultation with regulatory agencies and stakeholders.</li> <li>• One monitoring station measuring PM<sub>2.5</sub> at Calaway Park during the period each year that the park is open to the public.</li> </ul>

As committed to by Alberta Transportation on March 31, 2021 during the opening statement (Exhibit 380), the Government of Alberta will conduct ambient monitoring after a flood event to monitor potential effects associated with windblown sediment. Monitoring for TSP and PM<sub>2.5</sub> at a location near the east Project development area (PDA) boundary will be conducted for 16 months after a flood event; that is, from the time of the flood event ending to the end of the fall season the following year. The ambient air quality monitoring location will be determined post-flood once sediment deposition areas are visible.

Further, as committed to by Alberta Transportation on April 1, 2021 in oral evidence, Alberta Transportation is open to establishing additional monitoring stations based on appropriate scientific and technical advice and has previously made certain commitments relative to sediment management, both monitoring, surveying and responding. (Exhibit 406, pg. 2262 ln. 13-25).

A Communication Plan will be developed prior to Project construction that outlines the means and procedures for communicating Project information, including air quality, during the different phases of the Project. The communication plan will be developed with information provided by stakeholders and Indigenous groups and finalized prior to construction of the Project. The plan will be in place prior to construction. The specific details of communicating air quality monitoring data will be developed as part of finalizing the draft Air Quality Management Plan (AQMP).

The draft AQMP is based on anticipated regulatory requirements for approvals and authorizations specific to the Project. The Plan will be finalized following additional consultation with regulators, Indigenous communities and stakeholders and as an anticipated in the approval conditions.

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #52 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 9; April 1, 2021, Exhibit 406 Pg. 2264 / ln. 4
Undertaking	For the Proponent to advise if it will create a mechanism to notify cyclists of reservoir operations that impact Springbank Road and air quality warnings (see transcript for further description).
Response	The combination of proposed mitigation, ambient air quality monitoring and adaptive management will ensure that effects of air quality and human health remain acceptable during Project construction and operations. A dedicated warning system for cyclists is not deemed to be necessary.

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #53 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	<p>Volume 9; April 1, 2021, Exhibit 406</p> <p>Pg. 2266 / ln. 23</p>
Undertaking	<p>To advise if Alberta Transportation will retain an expert on toxicology to determine the impacts of the post-flood sediment and floodwater quality considering the mortality of wildlife and plants within the reservoir and/or provide a written response relative to the sharing of those results</p>
Response	<p>Alberta Transportation is committed to monitoring biophysical conditions in the reservoir and Project Development Area following a flood through sediment sampling (Exhibit 138, pdf pg. 424 to 425), water quality monitoring (Exhibit 117), and benthic invertebrates and fish tissue sampling (Exhibit 164, pdf pg. 16). These monitoring commitments will be used to identify potential changes to the ecosystem, including potential effects on wildlife and fish. The results of these monitoring programs will allow for continued improvement through adaptive management.</p> <p>The following commitments have been made:</p> <ul style="list-style-type: none"> <li>• Project-related effects from water quality (including sediment concentrations in water) will be monitored by collecting water samples in the off-stream reservoir, low-level outlet channel, and Elbow River just prior to and during release of water from the reservoir. Additional water quality parameters (e.g., pH, total and dissolved metals, nutrients, methylmercury) will be sampled during flood operation and are outlined in greater detail in the Draft Surface Water Monitoring Plan (Exhibit 117)             <ul style="list-style-type: none"> <li>○ Monitoring results will be used to inform downstream water users and assist their water use and water treatment decisions.</li> <li>○ Monitoring results will also be used to detect project effects, including effects of sediment, on fish that are present in the reservoir, and fish that are located in the Elbow River downstream of the Project.</li> <li>○ The results of the water quality monitoring program will be shared with Alberta Environment and Parks (AEP), the City of Calgary, Fisheries and Oceans Canada (DFO), and the Impact Assessment Agency of Canada (IAAC).</li> </ul> </li> </ul>



- Monitoring results will also be posted on the Project website for members of the public and First Nations.
- Following each flood, an assessment of the deposited sediment will be undertaken. As part of the assessment, a risk analysis will be completed to determine subsequent actions and mitigations, which could include long term monitoring and, potentially, treatment and remediation, including the possible removal of contaminated sediment.
  - The results of this program can provide indication of potential impacts to wildlife near the reservoir as a result of flood operation of the project and provide opportunity for adaptive management.
  - Results will be shared with AEP, DFO and IAAC.
  - Results will be posted on the Project website for members of the public and First Nations.
- Fish tissue and benthic invertebrate sampling in the Elbow River will be conducted following a flood to determine tissue concentration values of total mercury, methylmercury, carbon-13 and nitrogen-15 stable isotopes. Results will be compared to baseline tissue samples collected in summer 2021.
  - The results of this program can provide indication of potential changes to the aquatic food web as a result of flood operation of the project.
  - Results will be shared with AEP, DFO and IAAC.
  - Results will be posted on the Project website for members of the public and First Nations.

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #54 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 9; April 1, 2021, Exhibit 406 Pg. 2269 / ln. 15
Undertaking	To provide an answer to the question: “How those costs [in Exhibit 100] and the benefit costs related to Exhibit 159, Table 49, PDF pg. 231 is not the same costs, just on an annualized basis.”
Response	Alberta Transportation has confirmed the following: <ul style="list-style-type: none"><li>• Exhibit 100, PDF page 7 of 14 presents estimated annual operating costs for SR1 of \$975,000 with a \$12 million capital cost every 10 years.</li><li>• Exhibit 159, PDF page 231 of 385 presents four tables of maintenance and obermeyer gate replacement costs.</li><li>• The costs presented in these two exhibits are not the same.</li><li>• The four tables of costs in Exhibit 159 were developed separately from the Exhibit 100 annual operating costs.</li><li>• Operational budgets for the Project will be determined by Alberta Environment and Parks following the construction of the Project.</li></ul>

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #55 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 9; April 1, 2021, Exhibit 406  Pg. 2280 / ln. 13
Undertaking	To advise if Alberta Transportation or Alberta Environment and Parks will carry an insurance policy for business interruption loss for stakeholders close by. <ul style="list-style-type: none"> <li>• If yes, can Calaway Park/Calalta Waterworks be named in that policy.</li> </ul>
Response	As stated in its opening statement on March 22, 2021 (Exhibit 349 pg. 52, ln. 10-25 and pg. 53, ln. 1-11) Alberta Transportation has made previous commitments to Calaway Park/Calalta Waterworks related to monitoring and mitigation with respect to impacts associated with the operation of the Project. Alberta Transportation has engaged in discussions directly with representatives of Calaway Park/Calalta Waterworks and confirmed its willingness to address their concerns, where possible. Specifically, Alberta Transportation committed to the following: <ul style="list-style-type: none"> <li>• Installing a dust monitoring station on Calalta’s property for the entire period of construction for the purpose of monitoring PM2.5 concentrations, which is the particle size most directly linked to the potential for health risk. The station will actively monitor during the period each year that Calaway Park is open to the public. Alberta Transportation agreed to share with Calalta all air quality monitoring results from that station.</li> <li>• In the event there are any exceedance of air quality objectives, Alberta Transportation will investigate the cause of those exceedances and if they are deemed to be associated with Project construction activities, will undertake appropriate mitigation actions. Alberta Transportation will report Project-related exceedances to both Calalta and the Regulators to ensure that any non-compliant events are remedied as quickly as possible.</li> <li>• Alberta Transportation is prepared to monitor and investigate any concerns that Calalta Waterworks may have with respect to identifiable impacts to its water intake system as a direct result</li> </ul>

	<p>of the release of waters from the reservoir once the Project is constructed and operating.</p> <p>Alberta Transportation considers that these commitments reasonably address the concerns and it is not contemplating the specific insurance coverage requested.</p>
--	---

**Springbank Off-stream Reservoir Project (SR1) – NRCB Application No. 1701**

<b>UNDERTAKING #56-59 RESPONSE OF ALBERTA TRANSPORTATION</b>	
Reference	Volume 9; April 1, 2021, Exhibit 406  Pg. 2421 / Ins. 7 and 18; Pg. 2422 / Ins. 4 and 12
Undertaking	<ol style="list-style-type: none"> <li>1. In Alberta Transportation’s opening statement on Topic 5 and again in the course of cross-examination, Alberta Transportation represented to the Board that the entire Highway 22 is currently designated as a High Load Corridor. Given the response to the undertaking noted above, does Alberta Transportation wish to correct its evidence? If not, can Alberta Transportation reconcile its previous evidence with the answer to the undertaking?</li> <li>2. On what basis was the segment of Highway 22 between Highway 1 and Highway 8 proposed to become a High Load Corridor?</li> <li>3. If the segment of Highway 22 between Highway 1 and 8 was proposed as a future High Load Corridor in 2017-2018, why has not this segment been designated yet?</li> <li>4. What will trigger this portion of Highway 22 becoming in-service as a High Load Corridor, and when is this expected to occur?</li> <li>5. Has there been instances where highways have been proposed to become a High Load Corridor, but have not ultimately been designated as such?</li> </ol>
Response	<ol style="list-style-type: none"> <li>1. Currently Highway 22 is a designated High Load Corridor (HLC), north of Highway 1A. We appreciate the clarification requested, but this route adjacent to SR1 has been recommended as a core route as part of the HLC. As such, for planning purposes, any new structures proposed on that route would need to be designed to meet the requirements. The establishment of HLC’s is a multi-year process as there are numerous issues and parties to engage. As a core route, the space between the road and any wildlife overpass would need to be 9 metres, which would result in a substantial structure and would be challenging to pursue.</li> </ol> <p>It is important to note that the diversion channel will create a wildlife underpass which will serve to facilitate wildlife</p>

movement across Highway 22 as was presented to the Stoney Nakoda Nations in a presentation on February 22, 2019 (Exhibit 131, pdf pg. 233). As such, Alberta Transportation did not contemplate a wildlife overpass in the Project plans. See map here: <https://www.alberta.ca/assets/documents/trans-proposed-high-load-corridor-map.pdf>

2. Industry was looking for a more direct HLC route on the south-west side of Calgary; as current routes required them to go east around Calgary through Chestermere and Airdrie.
3. The section from Hwy 549 to Hwy 8 is nearing completion to becoming a designated HLC. The department is currently working with utility providers to finish work on raising and/or moving power lines.
4. As noted above, the process to establish the route is a multi-year process. It can take a number of years to finalize an HLC as there are many factors to consider; for example, funding, need and, utility lines. The section from Hwy 1A to Hwy 8 has 10 power lines. As a result, Alberta Transportation is unable to provide an exact timeline for when this portion of Highway 22 will become in-service as an HLC.
5. HLCs can take years once proposed to go through the process of being reviewed and approved. If concerns are raised, the proposal may require further discussion with stakeholders.