



HOUSE OF COMMONS
CHAMBRE DES COMMUNES
CANADA

John Barlow
Member of Parliament
Foothills

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

RE : Springbank Off-Stream Reservoir Project – Consultation

To Whom it May Concern:

I welcome this opportunity to provide comment on the Springbank Off-Stream Reservoir Project (SR1) Environmental Impact Statement (EIS).

The massive infrastructure project proposed by the Alberta Government to divert flood water from the City of Calgary is located in my federal riding of Foothills. In my estimation, through numerous consultations with residents, landowners and Chief Crowfoot of Tsuu t'ina Nation, and reviewing the available literature, there are significant gaps in the information provided by Alberta Transportation to justify its location on privately-owned ranch and farmland.

Clearly, other flood mitigation options were not investigated sufficiently, including proposals at Mclean Creek and joint reservoir initiative in Kananaskis Country.

Residents, landowners, Rocky View County council and Tsuu t'ina First Nation all have serious concerns about the quality of data provided by Alberta Transportation concerning ungulates and grizzly bears, as well as the impact to neighbours.

I want to break down my letter into a few different priorities including Wildlife, Community, First Nations, Municipal and Impact.

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Impact

Initially, it was proposed the SR1 project would impact 3,800 acres of private land at a cost of \$370 million. Although construction has not started, the scope of the project has not been confirmed, a budget has not been finalized anticipated costs have ballooned to more than \$430 million and the Province has now stated it will expropriate as much as 6,800 acres for the dam project.

Clearly, this project has grown far beyond initial expectations in scope, cost and environmental impact.

Wildlife

They are extremely concerned the oversight and information provided by the Province is insufficient and almost certainly paints an inaccurate picture diminishing the negative impacts of SR1 on the land and wildlife.

At the May 22nd Community Consultation Open House, residents were told *"The Springbank Project will result in the loss of wildlife habitat. The area lost is primarily very low-moderate suitability habitat for ungulates."* (May 2018 - Board 13). Residents who live in the immediate area have contacted me to share they consider that statement to be "preposterous." They report hundreds of elk living in the footprint area for SR1 and it is an essential area during calving season. The SR1 area should be properly identified as a vital wildlife corridor and its importance should not be minimized or diminished by Alberta Transportation.

Residents were also updated in regards to grizzly bear populations at the May 22nd Public Information Session. In previous consultations, local residents expressed concern about the impact construction and operation of SR1 would have on the local grizzly population. At the information session, the proponents addressed the grizzly bear concerns by stating, *"The Springbank Project is located outside the Grizzly Bear Management Area (BMA5). The Springbank Project footprint will result in the loss of wildlife habitat, however, the area lost is primarily very low-moderate suitability habitat for grizzly bear. Higher suitability grizzly bear habitat occurs to the west of the Springbank Project."* While the Stantec report is correct the SR1 location falls outside BMA5, residents share there are several grizzly bears actively calling the SR1 lands home or using the area as a corridor. Many of these residents have lived on the land for generations and their local knowledge is not being considered. They reported to me 10 grizzlies were in the area in the spring of 2017, six grizzlies were moved out of the SR1 area in the fall of 2017. Residents argue the Government of Alberta moved the bears in the fall of 2017 only to manipulate their numbers in the context of SR1 concerns.

However, it only temporarily reduced the overall amount of bears in the SR1 Project Area because many of the bears have returned in the spring of 2018. It would appear in designating the region as “*very low-moderate suitability habitat for grizzly bear*” someone forgot to tell the bears because they have been observed by locals as being extremely interested in the habitat of the SR1 Project area.

The correlation of elk and grizzly populations are symbiotic. The grizzlies are drawn to the area as a result of the high concentration of elk. Regardless of the reason for their migration to the SR1 Project lands, grizzlies were recommended for *Threatened* status in Alberta in 2002 by researchers studying their population numbers. Although that status was denied by the government of the day, the grizzly bears’ status is “*May be at Risk*”¹. The number one recommendation, and considered “the most important action to be taken to conserve grizzly bears in Alberta” from the *Status of the Grizzly Bear (Ursus arctos) in Alberta: Update 2010* report is to “reduce human-caused grizzly bear mortality by changing the human-use of the landscape, including: 1a. Controlling access development and use, and other human activities in grizzly bear habitat.”¹

Maintaining this area as native rangeland is a proven, sound land use to protect critical grizzly bear and elk habitat.

Grizzly bears remain a species of concern in Alberta as the Province tries to manage and increase the grizzly population through their Grizzly Bear Recovery Plan and ongoing hunting bans on the species. While the SR1 area is not one of the four legislated areas of protected grizzly habitat in the province, we have a duty of responsibility to accurately understand landscape the bears are moving into and to protect those habitats while we complete an accurate population count. Local residents are adamant the numbers reported by Alberta Transportation do not accurately reflect their experience.

Community

Camp Kiwanis is a summer camp operating close to the proposed SR1 Project. Operating since 1951, Camp Kiwanis has provided a camp experience to more than 11,000 under-privileged children since its inception. I am concerned about the language in the published information about the SR1 Project diminishing the impacts the SR1 Project will have on Camp Kiwanis. Alberta Transportation’s own maps show a large part of the land where Camp Kiwanis is situated will be lost as a result of the project. In addition, all of the camp’s access to the river, which is an integral part of the

¹ Status of the Grizzly Bear (*Ursus arctos*) in Alberta: Update 2010, Update prepared by Marco Festa-Bianchet, for the Government of Alberta and the Alberta Conservation Association

camp's education experience will be lost. Camp Kiwanis is located within an area the Province has designated for purchase of lands impacted by the SR1 Project. It is entirely likely losing a portion or all of their land will have a devastating impact to this camp that has had an immeasurable positive impact on thousands of young people in Calgary and surrounding area.

First Nations

The SR1 Project is located on or adjacent to the traditional territories of the Tsuut'ina First Nation. While there is some discrepancy about the distance to Tsuut'ina Nation within the report we cannot underestimate Tsuut'ina Nation's opposition to this project. I have spoken to Chief Crowchild several times on this issue and he shared his profound concerns with the impact the dam will have on the Nation's lands, including the Hamlet of Redwood Meadows and traditional lands used by members. In the event we see a failure of the dam to function properly a backup on the Elbow River will directly impact Redwood Meadows, Bragg Creek and lands owned by Tsuut'ina Nation. As a society, we have made immense strides in our effort to build a respectful, collegial relationship with Indigenous communities and ignoring the Chief and Council, and their community's concerns with SR1 is disrespectful and contrary to stated objectives of reconciliation.

According to my conversations with Chief Crowchild, he said the level of consultation has been woefully insufficient and Tsuut'ina Nation prefers the MC1 option as it will offer more protection with less negative impact to their communities.

Municipal

Local residents will also be severely impacted by the SR1 Project. While I understand tough decisions are often a balance of individual and collective rights, there is another option available on provincial land that would not impact the rights of any landowners while protecting several thousand more than the SR1 Project: McLean Creek (MC1).

While MC1 has been dismissed for several reasons, an objective reading of the quantitative data provided in Alberta Transportation's *Springbank Off-stream Reservoir Project* show there is little quantitative difference between the projects. In making the determination SR1 is less expensive than MC1, however, Alberta Transportation has grossly underestimated the costs associated with purchase of lands impacted by SR1 and the cost of delays associated with the heritage landowners, including Tsuut'ina Nation, defending their rights to their lands. In fact, the cost of SR1 has escalated substantially and is now estimated to be several million dollars more than MC1.

Residents, business owners and those who support them have identified several gaps in the information provided by Alberta Transportation causing them to question the quality of the report and are asking a deeper look into the benefits MC1 in contrast to SR1. They have shared their concerns of bias in the report seeming to skew the outcome in support of SR1 over MC1 despite several measurements in the *Springbank Off-stream Reservoir Project Environmental Impact Assessment* indicating an almost negligible distinction between the projects.

However, MC1 would include measures that would protect the communities of Bragg Creek, Redwood Meadows and Tsuu'tina Nation. On the balance of information provided, we must layer the impacts to people, businesses and wildlife into the decision.

Conclusion

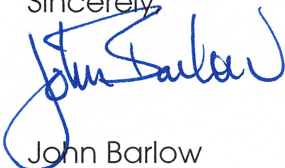
When combined with the escalating costs, timeline and environmental impact of SR1, especially related to landowner opposition, it is clear SR1 has been approved without sufficient, in depth assessment and analysis.

In comparison, MC1 also allows protection of Bragg Creek, Redwood Meadows, Tsuut'ina Nation and rural landowners, and may present new recreational and reclamation opportunities in lands already impacted by recreational use.

Therefore, when considering the growing cost, concerns raised by Tsuut'ina Nation and - most importantly - the escalating negative impact this project will have on wildlife habitat, native rangeland, waterways and the environment the assessment of SR1 has been insufficient and I encourage you to restart the environmental review process of the Springbank Dry Dam proposal.

Please do not hesitate to contact my office if you require any further information.

Sincerely,



John Barlow

CC: Hon. Catherine McKenna, Minister of Environment and Climate Change
Jonathan Wilkinson, Parliamentary Secretary to the Minister of Environment and Climate Change