

June 15, 2018

Canadian Environmental Assessment Agency
Canada Place, 9700 Jasper Avenue, Suite 1145
Edmonton, Alberta T5J 4C3
Delivered by email to CEAA.Springbank.ACEE@ceaa-acee.gc.ca

Re: Springbank Off-Stream Reservoir Environmental Impact Assessment

Dear sir or madam:

The Springbank Community Association is pleased to submit this letter regarding the Springbank Off-Stream Reservoir (SR1) Environmental Impact Assessment. We have the following points for consideration by Canadian Environmental Assessment Agency (“CEAA”).

All costs – economic, social, cultural, health and environmental should be considered, quantified and addressed in determining whether the SR1 is the right project for flood mitigation for the City of Calgary. We support flood mitigation efforts to protect the City of Calgary, but we table the question “Is there a better project that doesn’t cause undo harm to one community for the sole benefit of another?”

As proposed, the SR1 places the overwhelming majority of economic, social, health and environmental costs and burdens on one community (Springbank) and county (Rocky View County (“RVC”). Conversely, all the benefits accrue to the City of Calgary. Perhaps it is time to consider options that may provide an opportunity for all stakeholders to benefit.

Firstly, we are confident that the costs associated with SR1 project have not been fully evaluated. We expect and request that the project be fully transparent and inclusive of all costs, including the following:

1. **Ongoing Costs:** At this time, there is no estimation of costs for infrastructure repair, air and water quality testing, monitoring, and remediation following a flood event (and perhaps regular monitoring and testing on an ongoing basis due to possible health complications of a dry dam of this scale). An estimation of these and other ongoing costs is important to the economic realities of the SR1 vs. other alternatives.
2. **Springbank and RVC:** The current costing model completely ignores financial harm and burden imposed on both Springbank and RVC. This omission is striking. There are real, significant and long-term costs of this project that will be incurred by Springbank and RVC and to local businesses and taxpayers.
 - a. **Compensation to RVC for lost property tax revenue:** Compensation to RVC for explicit lost tax revenue on land expropriated and/or acquired for the dam has not been included in the project cost. RVC taxpayers will ultimately be responsible for the shortfall in tax revenue in perpetuity, effectively providing an ongoing subsidy to the City of Calgary for flood mitigation. RVC and the residents of Springbank should not be responsible for subsidizing the City of Calgary. Effectively, this results in a transfer of wealth from RVC and the residents of Springbank to the City of Calgary.

- b. **Compensation to Springbank and RVC for lost economic development potential:** Highly desirable and valuable land is indefinitely sterilized. This land is along the Trans-Canada Highway, near an airport and within 15 minutes of large city and financial centre. Furthermore, it is along the valuable east-west corridor between Calgary and Banff. This tract of land has tremendous development potential – in the hundreds of millions of dollars or more. Even theorizing a small development on this land over the long-run yields tens of millions of dollars of foregone taxes, levies, jobs and other economic activity in RVC. For example, a large-scale development underway just north of this site (Harmony – <https://liveinharmony.ca/>) will provide RVC with millions of dollars in property tax revenue annually. If the SR1 project proceeds, RVC’s autonomy and ability to develop this land is permanently and irreparably impaired. If the Government of Alberta is intent on moving ahead with this project, Springbank and RVC should be compensated for this significant lost future revenue and forgone opportunity.
- c. **Compensation to the community of Springbank for bearing social, health, and environmental risks.** This project will cause lives to be uprooted, businesses to be closed, adversely affected or relocated and residents to live with the consequences of flood events that will, at best, be highly disruptive. Many residents already feel marginalized by this project which is being imposed on RVC and Springbank seemingly without regard to the local impacts. This is not a conventional dam and so does not provide any benefit to the local community. If the Government of Alberta is intent on moving ahead with this project, it has an obligation to the residents and community of Springbank to provide meaningful and positive benefits.

Secondly, this project creates many losers – Springbank, Bragg Creek, Redwood Meadows, RVC and Tsuut’ina – and one winner – the City of Calgary. To our knowledge, none of these upstream communities are fully supportive of SR1. There are innumerable and as yet unknown negative environmental, health and social outcomes in the broader West Rocky View area. Uncertain outcomes range from wildlife and tourism to water and air quality. The following items should be addressed:

1. Will this project look like an industrial installation (size of an 8 story building, concrete components, chain link fences, do not enter signs) that will be a permanent scar in the community?
2. Are there going to be negative environmental consequences (dust, contaminants, allergens, water quality) that will impact the quality of life in Springbank? For instance, under-ground springs are common in aptly named Springbank, but their sources and destinations largely unknown. How will flood water impact these springs and will there be underground migration of flood water into local water wells?
3. What is the impact of a flood event, or even the existence of this large-scale project, on tourism and usage? Springbank Road is an active cycling corridor between Calgary and Bragg Creek with tremendous eco-tourism potential. This is a scenic, beautiful and diverse natural environment that will be forever changed.
4. Why is there a lack of consideration of the continued risk of fire and drought on other upstream communities that would be better served by an upstream flood mitigation solution that may also address these important risks?
5. What is the impact this large-scale project on Springbank’s history, culture and sense of community? These items are difficult to quantify, but that does not make them any less real.

Thirdly, alternative upstream options, such as MacLean Creek (“MC1”), have win/win outcomes and require serious consideration by the Alberta Government. Clearly, SR1 has not been the quick, easy solution that it was originally thought to be. Therefore, it is imperative that the Province of Alberta reconsider the alternatives, but with a more holistic consideration of all the risks, benefits and costs to all stakeholders. An upstream dam project, such as MC1, continues to provide flood protection for the City of Calgary but also provides numerous benefits to other stakeholders that SR1 does not.

1. Win for upstream communities and counties that will benefit from increased tourism and related development. An upstream project, such as MC1, that provides tangential recreation benefits and has the potential to be an economy booster to a town such as Bragg Creek.
2. Win for local farmers who may benefit from drought management. A conventional dam would provide irrigation options for area farmers and ranchers.
3. Win for the Bragg Creek & Kananaskis area with regard to fire protection. The necessity of accessible fire protection was illustrated in the past month with fires in the Bragg Creek area.
4. Win for other upstream communities, such as Bragg Creek, Redwood Meadows and the Tsuut’ina who will benefit from better flood mitigation.
5. Win for the province through increased tourism and recreation capacity (and related tax revenue). Adding another recreation destination has tremendous potential to benefit the area’s tourism industry along with residents of the City of Calgary, Springbank and central and southern Alberta (and elsewhere).
6. Win for the Province of Alberta, RVC and Springbank to capitalize on continued and long-term economic growth in the highly valuable Springbank area.

In summary, the SR1 project has a large price tag that does not truly reflect the immense hidden costs borne by the local community (Springbank) and county (RVC). Further, SR1 appears to be a large-scale experiment. Dry dams are uncommon and one can assume this is in part due to the lack of ancillary benefits provided beyond flood mitigation. Contrary to the hidden costs in SR1, other conventional dam projects under consideration, such as MC1, may provide concrete, positive benefits: drought management, flood mitigation, fire protection and hydro-electricity along with the beneficial economic impacts of tourism and recreation through parks, campgrounds, pathways and water sports.

Based on my discussions with Alberta Transportation, it appears that many issues outlined in this letter have not been adequately considered or quantified. It is clear that the explicit and implicit costs that Springbank and RVC will incur have been omitted. The people of Springbank and RVC deserve better. In fact, as Albertans, we should look for the best possible outcomes for all impacted stakeholders. Rather than the focus on getting this done quickly, let’s get it done right.

Sincerely,

Karin Hunter, CFA
President, Springbank Community Association

CC: Kim McKylor, Mark Kamachi, Kevin Hanson, Brian Mason, Rachel Notley, Alberta Transportation, Leela Aheer, Cam Westhead, Don’t Dam Springbank, Mayor Nenshi, Darrell Crowchild, Shannon Phillips, Greg Boehlke, Ricardo Miranda, Shae Anderson, Catherine McKenna