

**From:**

[Laura Friend](#)

**Subject:**

Fw: Vital Flood Protection for our Bow Basin River Communities

**Date:**

January 22, 2020 12:34:43 PM

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Dear Ms. Friend:

This cc addressed to Ms. Heather Dent was returned for incorrect address, so I am forwarding it to you for your attention for inclusion in the NRCB "Comments" file. Thank you for any assistance you can give.

Sincerely,  
Noelle Read

**From:** David & Noelle Read

**Sent:** Wednesday, January 22, 2020 11:35 AM

**To:** Hon. Ric McIver

**Cc:** Premier Jason Kenney ; Hon. Jason Nixon ; Hon. Doug Schweitzer ; Ms. Miranda Rosin ; Hon. Prasad Panda ; Mr. Todd Loewen ; Mr. Drew Barnes ; Mr. Richard Gotfried, MLA ; Hon. Grant Hunter ; Prime Minister Trudeau ; Bob Benzen, MP ; Hon. John Barlow M.P. ; Stephanie Kusie, MP ; Hon. Jonathan Wilkinson ; Hon. Bill Blair ; Hon. Marie-Claude Bibeau ; Hon. Navdeep Bains ; Hon. Seamus O'Regan ; Hon. Catherine McKenna ; Cllr. Druh Farrell ; Cllr. Diane Colley-Urquhart ; Cllr. Peter DeMong ; Cllr. Jeromy Farkas ; Ms. Jennifer Howe ; Ms. Heather Dent ; Mr. Frank Boehres ; President CdnSociety for Civil Engineering ; Franco Terrazzano ; Save Calgary ; Canada Action ; Mr. William Adams ; Mr. Mac Van Wielingen ; Mr. Dave Filipchuk ; Ms. Nancy Southern ; Ms. Danielle Smith ; Mr. Bill Kaufman ; Mr. Rick Bell ; Lindsay Seewalt

**Subject:** Vital Flood Protection for our Bow Basin River Communities

Dear Minister McIver:

Thank you for your response to our email sent to Premier Kenney, dated October 1, 2019 regarding flood protection for our river communities and best management of our precious water resources. We had high hopes that our new government would recognize the vital need to protect most (if not all) of our river communities from another devastating disaster such as the 2013 flood and take a leadership role in investigating why, after five years and federal and provincial costs to taxpayers of possibly billions of dollars, the proposed Springbank Off-Stream Reservoir has been unable to receive Canadian Environmental Assessment or Natural Resources Conservation Board approvals.

Instead we heard that SR1 would still be built and that an 8000 page, second response to CEAA's Information Requests would be submitted. However, these 8000 pages submitted by Stantec, on behalf of Alberta Transportation (AT), the Proponent, still ignored vital questions and resulted in more Information Requests from CEAA. Critically important questions regarding Dam Safety, including the project's capacity to protect from a 2013 size flood and a Probable Maximum Flood, similar to those experienced in 1879 and 1897 (which were 30% larger than the estimated 2013 flood) have still not satisfactorily been answered.

This raises the question: Why has the Government of Alberta allowed billion(s) of taxpayer dollars to be spent on the SR1 "proposed project" #80123 when an official stamped, signed Initial Design Concept (IDC) has not yet been provided by Stantec Consulting Ltd., providing a Permit to Practice and giving certification by their Professional Engineer in charge of the

project? Stantec was awarded an untendered Advisory Consultant Contract by the Redford government, in haste presumably, after the 2013 flood for \$3.25 million for civil and environmental assessment services and \$70,000 for services and materials related to public information sessions. (Calgary Herald, June 17 2014, Page B4, James Wood). Why has the scope and cost authorized to Stantec been allowed to balloon to a massive and unchallenged amount at taxpayer expense? Who authorized further amounts to the \$3.25M in spite of Stantec never providing the necessary “Stamped, Signed IDC”? As of February 8, 2019 this Engineering, Permitting and Administration cost was reported as \$49.6 million dollars.

Another, and perhaps the second most important question needing an answer by CEEA: if SR1 is not feasible, what Alternative Solutions are available? CEEA requested, in June 2019, that the Tri-River Joint Reservoir of Alberta (TRJR) and the Micro-Watershed Impounding (MWI) proposals receive further study as follows: “Evaluate whether the Tri-River Joint Reservoir of Alberta and the Micro-Watershed Impounding Concept are feasible alternative means of meeting the Project’s purpose. Consider potential environmental effects of each alternative in this evaluation.” In the 8000 page submission provided in response to these requests, a few paragraphs were provided by AT consultant/author Stantec, giving their blatantly biased ‘opinions’ which were not supported by any actual study, nor were those who worked to develop those Alternative Solutions actually consulted with directly. This disregard for the assessment process, as well as for the many dedicated Albertans who have sought Alternatives and voiced their numerous and well stated concerns over SR1, is disgraceful and irresponsible. If respected, credible and dedicated professionals, such as those usually engaged for such studies, had been engaged in June 2019 to fulfill the CEEA directive on Alternative Solutions, we could be close to receiving their reports, which would require the study of conditions over four seasons to provide the necessary information.

In the years since 2013 the public have continually been told that the Springbank Off-Stream Reservoir project was chosen by the ‘experts’ in three different governments. However, our research has failed to find any evidence of this. The first major study conducted by the Flood Recovery Task Force, comprised of fifty experts across the Bow River Basin, who worked for a year before providing their report at the Water Collaborative Meeting on September 17, 2015 stated (page 117/127): “Dry dams are a massive and expensive undertaking with many complexities: full safety standards, possibly gated spillways and culvert operations, debris management, ongoing MAINTENANCE AND MANAGEMENT, and river function impacts. There was little support by participants for dry dams, even in the Elbow River system where this type of infrastructure may play the greatest role in reducing flood flows for Calgary. The many environmental, social and economic factors and RISKS associated with dry dams need to be understood and assessed in a detailed and comparative cost-benefit analysis”. Clearly, this does not assert a strong recommendation for SR1; the Report (page 2) summarized: “A prudent approach requires comparative assessments of EVERY option, and an evaluation of the effects of the options in combination prior to committing significant resources to something that could prove counterproductive and perhaps more damaging than doing nothing in some cases”.

Were the recommended “comparative assessments of every option” ever conducted? We know that for the Tri-River Joint Reservoir of Alberta, it was not. This proposal was presented to Premier Notley and Environment Minister Phillips in July 2015 for consideration. They forwarded it to Mr. Andrew Wilson, Director, Strategic Integration and Projects, Resilience and Mitigation Branch, ESRD for study. TRJR was summarily rejected for reasons that showed no true consideration had been given to it, and all further efforts to obtain an

evaluation were ignored. After the election of the new UCP government further efforts were made to obtain a feasibility study for TRJR and they again resulted in a letter from the new Environment Minister to contact the same Mr. Wilson who had refused to obtain a proper evaluation previously. What credentials (or even authority) does Mr. Wilson have to evaluate a water project of such importance to the future safety and prosperity of our Province?

From the CEAA submissions publicly available, we see that the Micro-Watershed Impounding (MWI) proposal was summarily dismissed just as the TRJR was. CEAA documentation shows that both proposals start with examining the Alpine Mountain snow and storm precipitation watershed as the foundation for developing a flood mitigation Initial Design Concept. These projects would provide the necessary protection from the inundation and destructive current surge that occurred in 2013 and destroyed thousands of camping sites, riverside day recreation sites, upstream roads, bridges, hiking trails, hundreds of camp toilets, fire pits with log storage debris, and hundreds of garbage storage containers. Without upstream protection, such as the TRJR and/or MWI proposals would provide, ALL of this polluting material and debris will be transported to the SR1 Diversion Canal and into the Off-Stream Reservoir, where contaminants can accumulate and incubate until after the flood resides (presuming of course, that it could contain it in the first place).

We informed Premier Notley and Minister Phillips that correspondence had been received from the Prime Minister's Office and the Minister of Public Safety and Emergency Preparedness recommending that TRJR be submitted for Federal Funding grants. Our correspondence was again referred by them to Mr. Wilson who advised us: "Your email refers to Federal funding. Alberta Environment and Parks is aware of the various funding programs and is working with other departments of the Government of Alberta to ensure the Province accesses and uses those funds in the optimal manner. Projects submitted or supported by the Government of Alberta are, and will be, those projects which provide the most value to Albertans and which are considered likely to succeed in the competitive processes imposed by the various funding sources".

Albertans are proud of their reputation for overcoming obstacles and getting things done. Yet, when hard-working citizens see a problem and devote their professional expertise and years of VOLUNTARY work to produce such solutions, they are treated in this dismissive, disrespectful and shameful manner by our decision makers and bureaucrats. Our province was thriving when devastated by the 2013 flood. In today's economy, how would we withstand the social and economic havoc another similar or larger flood would inflict? Why are our voices for an upstream, comprehensive and inclusive solution not being heard?

\$180 billion was available to provinces under the "Investing in Canada Plan" designed to promote infrastructure that will create good, well-paying jobs that can help the middle class grow and prosper. The "Disaster Mitigation and Adaptation Fund" is a \$2 billion national program designed to help communities better withstand current and future risks of natural hazards. It seems that certain projects submitted, such as SR1 and the Green Line, have many drawbacks which have prevented them from receiving approvals. Newspapers later reported Federal Infrastructure funds were not being accessed by the provinces. This indicates that the large Equalization Payments sent to Ottawa by hard-working Albertans cannot be returned because our Provincial government is not capable of choosing a project "considered likely to succeed in the competitive processes imposed by the various funding sources".

Correspondence received from the Prime Minister's office stated: "I would encourage you to submit your proposal to the Province of Alberta so that it may determine whether the Tri-

River Joint Reservoir project should be prioritized for funding consideration under the “Investing in Canada Plan”. But our provincial decision makers still refuse to obtain a credible and professional feasibility study of TRJR or the MWI as directed by CEAA and instead pour even more hard-earned taxpayer funds into the unsafe, environmentally destructive and fiscally imprudent SR1 proposal.

How much has the SR1 proposal cost to date?

- What was the cost of the Flood Recovery Task Force? The Task Force who worked for a year to provide their Report, which stated “this project clearly showed that a systemic, watershed-based approach is essential.”
- What has been the cost for the hours spent by the experts at the Canadian Environmental Assessment Agency, the Natural Resources Conservation Board, Department of Environment and Climate Change, Natural Resources Canada, Fisheries and Oceans, Health Canada, Transport Canada, and Alberta Environment and Parks, to review the submissions of thousands of pages of Environmental Impact Statement reports from AT/Stantec? Reports which still cannot answer crucial questions, and have lead to further queries?
- National Research Council of Canada Model of SR1: \$800,000
- What has been billed by Stantec and their subsidiaries for the work relating to SR1? Civil Works Cost Opinion at February 8, 2019 provides an amount of \$49.6 million dollars. How accurate is this amount?
- How much were the court costs for AT/Government of AB to object when the landowners took them to court to demand a full environmental assessment of SR1? \$300,000.00?
- What has been the cost of the studies and work done by various government departments and the City of Calgary for other flood mitigation projects *that would not be required* if sophisticated, upstream water management infrastructure, such as TRJR or MWI, had been studied and found to be viable?
- Federal CEAA Grants we are aware of for Intervener Participant Funding to three landowners and fourteen First Nations (some as far away as Montana and British Columbia): \$930,048.05
- Purchase of land required for SR1 – \$140 million dollars, plus court costs for expropriation if necessary.

SR1 was reputedly chosen by the “experts” from three provincial governments (and the City of Calgary Council) based on being “lowest cost” and accomplished in the fastest timeframe. Yet Albertans who live in the Bow River Basin still face the threat of disastrous spring flooding, and our government continues to pour money into a project that is not supported by the majority of affected Albertans; a proposal that has failed, after five long years, to produce the necessary Initial Design Concept or to receive safety or environmental approvals. No meaningful Alternative Solutions, as required by CEAA and demanded by Albertans, have been conducted. The only Alternative to receive a professional, independent study was chosen by Alberta Transportation/Stantec (the McLean Creek Dam), which they knew to be inferior to SR1 because it would have even less available capacity than SR1.

We call on this Government to accept responsibility for this massive blunder, call a halt to SR1 and undertake credible feasibility studies of actual, reasonable and purposeful Alternative Solutions which would protect our many vulnerable river communities. Put a stop to the wasting of Billions of taxpayer dollars on an inferior project that currently cannot answer immediate dam safety, public safety and environmental safety questions; a project that would not protect Calgary from a flood similar to the one in 2013 flood.

We join with the Rocky View County Council, citizens who have provided signed letters to MLA Rosin, and the 1066 supporters who have signed the petition (referenced below) to request that a proper, diligent and professional feasibility study, conducted by a well-respected and qualified assessment firm, be commissioned as soon as possible on studying the Alternative Means required by CEAA. We believe that Albertans can provide the province with the best in flood protection and water conservation and management if given the opportunity and support of their governments.

For more information:

[www.preventingalbertafloods.ca](http://www.preventingalbertafloods.ca)

[www.change.org/p/premier-of-alberta-and-minister-of-the-environment](http://www.change.org/p/premier-of-alberta-and-minister-of-the-environment)

Sincerely,

David & Noelle Read – Comprehensive Flood and Water Management Council.