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**Cc:** [info@dontdamnspringbank.org](mailto:info@dontdamnspringbank.org); [NRCB Info](#); [Laura Friend](#)  
**Subject:** Don't Dam Springbank  
**Date:** June 10, 2018 4:42:35 PM

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

Thank you for the opportunity to comment on the Springbank Off-Stream Reservoir Project Environmental Impact Statement (EIS).

The Project's environmental effects are significant and not justified in the circumstances. Alberta Transportation has failed to demonstrate how the environmental effects will be mitigated and failed to demonstrate that the Project is best means of carrying out flood mitigation for the Elbow River. The environmental report contains too many qualified statements to form a definitive assessment of the environmental impacts of the project.

I urge the Canadian Environmental Assessment Agency (CEAA) to consider the following significant environmental effects when conducting its environmental assessment:

1. The Project is permanent infrastructure. As a result, it should be subject to the highest level of review. Many of the Project's environmental effects are irreversible in light of the Project's permanence. These effects include the destruction and alteration of fish habitat and the loss of wetlands, which provide important habitat for migratory birds. Fish are of particular concern as the Elbow river is home to two species of concern, the Bull Trout and Cutthroat.
2. The Project will alter migratory bird habitat and increase their mortality risk.
3. The Project will result in the destruction and alteration of important fish habitat. It will also increase fish mortality through the destruction of habitat, increased sedimentation and stranding.
4. The Project will fragment important wildlife habitat. It will also drive wildlife away through construction-related sensory disturbance, including noise and light. The raising of Highway 22 by 6 metres will form a permanent barrier to wildlife movement.
5. The Project will increase sedimentation, which may have impacts on water quality in the area. The Project may also result in herbicide flowing into drinking water sources. Alberta Transportation says that the impacts are not significant because the water will not become non-potable. However, I urge CEAA to find that any negative impact to drinking water quality is a potential risk to human health and therefore significant.

The Environmental Impact Statement says that these and other environmental effects will be mitigated through mitigation plans which have not been presented to in this EIS. In my view, CEAA cannot find that this project is in the public interest without assessing such mitigation plans. I respectfully submit that CEAA must find that the Project's impacts are significant and unjustified in the absence of being shown any specific measures to avoid or mitigate the adverse impacts.

I am aware that Rocky View County has applied for its own flood mitigation project on the Elbow River at or near Bragg Creek. This project consists of approximately 4 kilometers of dykes on the Elbow River. Given the relatively small distance between the Springbank Off-Stream project and Rocky View County's Bragg Creek project, and the fact that they are on the same river, both of these projects should be assessed by CEAA as a single project. I am concerned that Alberta Transportation and Rocky View County are using project splitting (artificially characterizing a single project as two separate ones) to purposely understate the cumulative environmental impacts of the Bragg

Creek dykes and the Springbank Off-Stream project.

Further, I am aware through media reports that the Tsuut'ina Nation is opposed to the Springbank Off-Stream project for a number of reasons, including possible negative impacts to water resources. I think it is important that CEAA take the concerns of the Tsuut'ina Nation seriously.

There is an alternative means of implementing flood mitigation for the Elbow River – McLean Creek. The McLean Creek option is less expensive and would provide flood protection to more communities, including but not only downtown Calgary.

For the above reasons, I urge CEAA to find that the Springbank Offstream Project's significant environmental effects, as currently presented in the EIS, are not justified.

Thank you for your consideration of these comments.

Sincerely,

Diana Drewry

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Sent from my iPad