

February 2, 2021

Via online submission

Impact Assessment Agency of Canada
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**Re: Springbank Off-Stream Reservoir Project (Project)
Reference number: 80123
Calgary River Communities Action Group (CRCAG) and Flood Free Calgary (FFC) – Response to
January 4, 2021 Impact Assessment Agency of Canada (Agency) invitation for public comment
on the draft Environmental Assessment Report (EA Report) and the draft potential conditions**

CRCAG and FFC are writing in response to the Agency's invitation for public comments on the draft EA Report and the draft potential conditions for the Project.

Calgary River Communities Action Group and Flood Free Calgary

CRCAG is a non-partisan advocacy organization of approximately 1,000 members who were impacted by the June 2013 flood that devastated the city of Calgary. CRCAG's mandate and information about its efforts to advocate for upstream flood mitigation can be found at protectcalgary.com. Since its inaugural meeting in 2013, CRCAG has worked collaboratively with the municipal, provincial and federal governments to raise awareness of issues impacting its membership.

Launched in January 2018, FFC is a group of organizations, businesses and citizens that advocate for timely flood mitigation for Calgary. Mobilizing business and community leaders, the group seeks to keep Calgary's flood risk top of mind for policy makers and to be vocal advocates in support of critical flood mitigation infrastructure. More information can be found at floodfreecalgary.com.

Springbank Off-Stream Reservoir Project

The Project is located in the area of a natural basin 15 km west of Calgary in Rocky View County in the Province of Alberta. The Project is predominantly situated on private land that is used for ranching and agriculture. The off-stream reservoir is designed as a dry reservoir, only storing water temporarily when flood levels in the Elbow River exceed a certain level. The purpose of the Project is to help reduce the effects of future extreme floods on infrastructure, watercourses, and people in the city of Calgary and downstream communities. Put simply, the Project is about public safety and protection of families and businesses, as well as protection of the historical, cultural and recreational heart of Alberta's largest city.

CRCAG and FFC have reviewed the EA Report and draft potential conditions for the Project. The EA Report was prepared in consultation with numerous federal agencies (Environment and Climate Change Canada, Fisheries and Oceans Canada, Infrastructure Canada, Indigenous Services Canada, Health Canada, Natural Resources Canada, and Transport Canada) and informed by public and Indigenous consultation. Following an extensive technical review of potential environmental effects, the Agency has concluded that the Project is not likely to cause significant adverse environmental effects.

CRCAG and FFC submit that the Project is the right choice and only hope of timely and effective flood mitigation for Calgary and surrounding communities within the Elbow River watershed, which includes the majority of downtown Calgary.

As noted in the EA Report, the Elbow River flood of 2013 was a devastating event socially and economically. The city of Calgary is nearing the eighth anniversary of the most destructive flood in Canadian history. The flood of June 2013 caused billions of dollars of damage to city infrastructure and commercial and residential development, not to mention the considerable indirect, financial, social and environmental harm. It also must not be forgotten that lives were lost, and countless families displaced. Calgary citizens and businesses continue to be placed at risk each and every year that passes without effective upstream flood mitigation.

CRCAG and FFC are concerned that any delay in Project approval beyond the end of 2021 will delay construction of the Project and the ability to mitigate floods in 2023 and beyond. Without effective upstream flood mitigation, the Elbow River will continue to pose a threat of flooding. This is unacceptable for a city that is the economic engine of the province and significant contributor to the Canadian economy. CRCAG respectfully requests that:

- 1) the Agency does not recommend any conditions that would have the effect of delaying construction of the Project, and
- 2) the Minister of Environment and Climate Change Canada accepts the conclusion of the EA Report and recommendation of the Agency and, without delay, issues a decision statement indicating that the Project may proceed.

CRCAG and FFC thank the Agency for this opportunity to comment. Please do not hesitate to contact the undersigned should the Agency have any questions.

Yours truly,



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