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## 1.1 Serious Issues with the Springbank Off-Stream Reservoir Project

### 1.1.1 Back-to-back floods/a semi-filled reservoir

Recently published maximum capacity of the SR1 reservoir indicated a 70.20 million cubic meter<sup>i</sup>. According to the designer, when a flow rate in the Elbow River exceeds 160 m<sup>3</sup> s., (even for a short while), water has to be diverted from the Elbow River to the SR1 reservoir, and the reservoir may become a” semi-filled”.

Based on the established protocol of emptying the reservoir, water has to remain there for 30 days or more (depending on the severity of the flood). Within this waiting period, if there was another wave of a flood water exceeding the reservoir’s designed maximum capacity, there is no other option but for the flood water to continue moving towards the City of Calgary, thus, flooding the City.

A similar scenario would arise in case of back-to-back full-sized floods occurring during the same season.

These real eventualities must be addressed before proceeding with the approval, considering the following facts:

- 1- The life time for most of the dams in Alberta has exceeded 50 years and some are reaching 100 years operating life.
- 2- In the known record, the flows in the Elbow River have 10 times exceeded 160 m<sup>3</sup> s.
- 3- It is against basic engineering practices to assume that during the 100 years period after building the SR1 our province wouldn’t experience a flood bigger than that of the 2013 which is the current design standard. The fact is records show that there have been two floods in Alberta 30% larger than the 2013.
- 4- Most scientists and experts predict next floods could be worse than previous ones, considering recent unprecedented events worldwide and the **climate change effect**.
- 5- We have witnessed the nature’s mayhem and the human tragedies in Quebec and Ontario last year,

- 6- The Director of Production and Maintenance with Hydro-Quebec, Simon Racicot, told reporters the dam at Chute Bell was built to withstand what he called a millennial flood. *“That means a flood that happens every 1,000 years”, then added: “Hydro workers discovered earlier in the day the millennial level of water had been reached. We are entering into an unknown zone right now, completely unknown”.*
- 7- There isn’t any precedent of a similar project built in Canada, which calls into question all the assumed safety levels.

## **1.2 More alarming issues with Springbank Off-Stream Storage Project**

The province of Alberta has not been immune to bad, or ill-conceived projects, the Swan Hills fiasco with \$285-million funding that was cancelled. At that time, former Alberta Premier Alison Redford told reporters, “We're not going to continue to push things if the private sector's telling us they don't make sense.”

Preliminary Design Reportii

According to this specific report prepared for: Alberta Transportation – Project Number 110773396. March 31, 2017, titled:

Submission No. 20171114 AT EIA-R To NRCB:

### **2.3 HAZARD CLASSIFICATION**

A dam breach inundation study **was completed** and is provided as Appendix C. This study evaluated potential failure scenarios and the consequences of failure of the Off-stream Storage Dam and the Diversion Structure as individual dams.

The Off-stream Storage Dam breach analysis results identify **thousands of residential and commercial properties within the inundation zone.** Based on the size of the population at risk a **Hazard Classification of “Extreme” is justified for the Off-stream Storage Dam.**

Failure of the Diversion Structure during a flood event would produce minimal increases in discharge and water surface elevation. **However, the breach wave caused by a failure of the Diversion Structure may carry concentrated debris that could damage Highway 22 which is located a short distance downstream. Based on the potential for significant**

**economic losses, a dam class of “High” is justified for the Diversion Structure.** Page 13

10.3.2 Design Objectives

The Dam and its appurtenances are designed as an **Extreme hazard facility** in accordance with CDA Guidelines and Alberta Dam and Canal Safety Guidelines. P.159

6.2 FIELD EXPLORATIONS

6.2.1 Completed Activities

The field program started on March 21, 2016 and **was completed on August 25, 2016.** The laboratory testing **was completed by December 2016.**

6.2.2 Supplementary Explorations (P.44)

- A. Some areas of the project site **were not available for equipment access** during the field exploration due to property access constraints.
- B. Additionally, the geotechnical fieldwork **occurred before the full development of the preliminary design.**
- C. As the design progressed, structures and features were revised, critical areas and added design drivers were identified, **and subsequent data gaps were noted.**
- D. While predictable soils occur at the site, **critical variations in the thicknesses and properties were determined to be significant.**
- E. Eleven borings are planned near the upstream toe of Dam between Stations 21+000 and 22+500. **Stantec was unable to access some of the area or make modifications to the drilling program** in order to complete the 2016 field exploration for the Dam. (The purpose of the borings is to confirm the depth to rock and the thickness of the glacio-lacustrine layer, and to determine **the presence of any materials different from current assumptions for the foundations soils** in this area).

- F. At the time of the 2016 geotechnical exploration, the general layout of the LLOW's **was assumed, however, specific details were not known.**
- G. Additional borings are required to provide the necessary **subsurface information coverage.**
- H. The Off-stream Storage Reservoir is absent of the “High” risk factors listed by the USBR; however, the infrequency of proposed operation and the inability to “**test fill**” are identified risks documented in the Project Risk Matrix. Given these expected “carried” risk factors, Stantec suggests a “**Significant**” rating for use in determination of evacuation criteria. (Page 175).
- I. A breach analysis of the Off-stream Storage Dam indicates that its failure would likely result in **loss of life** and **excessive** economic damages downstream **including the City of Calgary.** (Stantec, 2016). P.175

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*If the damages, losses and human suffering caused by the 2013 flood was considered a tragedy, the magnitude of destruction, losses and suffering that can be inflicted by the failure of the SR1 dam, which is proposed to be located just 15 km. away from the city of Calgary, would not be less than a “**major Catastrophic event**”.*

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### **1.3 December 18, 2020 report DID NOT address the main safety concerns**

The most recent report of December 18, 2020 in the document titled:

**“Comparison of SR1 interim Design Report (2017) and Preliminary Report (2020)”**

**DID NOT** address the main concerns mentioned above, as you can see in the following paragraphs:

## Reference: Comparison of SR1 Interim Design Report (2017) and Preliminary Design Report (2020)

This memorandum summarizes the revisions incorporated into the Final Preliminary Design Report (September 25, 2020) relative to the Draft Preliminary Design Report (March 31, 2017), also referred to as the Interim Design Report. The Preliminary Design for SR1 was completed through an iterative process that incorporated multiple rounds of geotechnical data collection, input from the future operator Alberta Environment and Parks and an external review process with the Project Review Board. Evolution of a project's design, including estimated construction costs, is standard as additional data becomes available, stakeholder outreach and regulatory compliance tasks are completed, and reviews from the client and operator are incorporated.

Notable changes from the Interim Design Report to the Final Preliminary Design Report (PDR) are summarized below. Some of these changes were also identified in the Introduction to Alberta Transportation's responses to Round 2 Natural Resources Conservation Board and Alberta Environment and Parks supplemental information requests filed on June 23, 2020.

### *Geotechnical Exploration and Laboratory Program*

- *2017 Interim Design Report:* The report included the results of the initial geotechnical exploration program that took place from March 21 to August 23, 2016 and included 135 boreholes and 20 cone penetration tests (CPTs).
- *2020 Final Preliminary Design Report:* Additional field work was performed over two mobilizations in 2018. This work included an additional 20 boreholes, CPTs and 14 test pits and trenches. This additional work was focused on the Debris Deflection Barrier, Low Level Outlet Works and Off-stream Storage Dam.

The only other technical issues that were mentioned in this report of December 18, 2020:

- Diversion Channel
- Off-stream Storage Dam Embankment<sup>iii</sup>

### *1.3.1 Winter 2020 Update Report on SRI*

The Springbank Off-stream Reservoir Winter 2020 Update<sup>iv</sup> mentioned (under: What is SR1?) that the off-stream reservoir would have a storage capacity of **70.2 m<sup>3</sup>**. Previous documents stated that the storage capacity is **77,771,000 m<sup>3</sup>**. This ongoing fluctuation generates serious doubts and does not inspire confidence in the design.

The reoccurring changes in the outlet channel design including the most recent complete redesign, shortly before the hearing date, does not convey a reasonable degree of assurance to the safety of this project and its components. Perhaps, the hearing date was scheduled prematurely.

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**Therefore, when the essential geotechnical tests supporting the presence of a suitable location and a bedrock to build a SAFE dam project cannot be obtained, THE SR1 PROJECT MUST BE REJECTED.**

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#### **1.4 History of failing projects and financial blunders in our province**

*Few examples from the past:*

From the late 90's onwards, projects such as the Novatel debacle, the Swan Hills debacle, and Alberta government trying to salvage a sinking shopping mall, (West Edmonton Mall), have cost the taxpayers billions of dollars.

#### **1.5 TsuuT'ina Nation Clean Water Immediate Challenges**

Under current economic circumstances, a prolonged pandemic, and a rising debt and deficit, the decision to hand \$32M over to the TsuuT'ina does not provide the best solution for their main concern regarding their groundwater.

The TsuuT'ina Nation chief and council have published some details about that agreement, "The TsuuT'ina Nation has been able to negotiate a grant for \$32 million from the province of Alberta for, among other things, flood mitigation, restoration and prevention".

The Canadian Environmental Assessment Agency has issued a letter to the province, stating there are "deficiencies," including **groundwater impacts** during construction and how lands on the adjacent TsuuT'ina Nation will be affected once the reservoir is in full operation.

Primarily, the TsuuT'ina Nation has opposed the project, concerned it will be only metres from reserve land and could negatively impact sensitive treaty land both upstream and downstream of the project.

Tsuu T'ina Nation reserve Chief Roy Whitney recently stated that the majority of the residents still rely on **WELLS** or cisterns. (cistern is prone to contamination from mice or foliage).

Tsuu T'ina Nation has issued more than 11 "don't consume water and water boil advisory" in the past.

Other reports mentioned:

"Officials are urging residents to not consume anything from the tap and drink only bottled water." ... "It's unclear how long this disruption could last."



**Figure 1: Tsuut’ina Nation residents worry about water quality in wells.** Photo provided by GLOBAL NEWS on March 2, 2021

**That health issue has been going on before the proposed SR1 is constructed. This begs the question: Would the Tsuut’ina Nation be able to handle an added contamination to current wells, during, or after the construction of the SR1?**

It was also reported in the NATIONAL NEWS”v that the **\$1.74 billion** invested by the federal government for water infrastructure on First Nations hasn’t gone far enough.

In light of this \$1.74 billion figure, the \$32M, does not seem to be able to go far enough in mitigating floods (among other things), and providing a steady clean water for the residents of the Tsuu T’ina Nation.

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*There is not a known engineering remedy to deal with the groundwater problem except moving the project away from the potentially affected groundwater. If the claim that TsuuT’ina Nation’s groundwater can become contaminated during, or after the construction of the SR1, the project’s proponent will be held liable, possible court litigations, and taxpayers would be on the hock for many more millions of dollars.*

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According to Springbank Reservoir Update/Winter 2020:

*“Should wells outside the Project Development Area (PDA) be negatively affected by the project, the Government of Alberta is legally obligated to compensate for damages shown to have been caused by its activities and will entertain claims by landowners.”*

There are other options that are highly efficient and less costly, the “Tri-River Joint Reservoir of Alberta” (TRJR) is an option where a mega water bank can be established upstream the

Elbow River providing, among many other benefits, abundance of the cleanest water to be used for drinking (see Sec:1.6).

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*As demonstrated in this submission using the very documents provided by officials and scientists, the question now becomes: Who is willing to bear the onerous responsibility of answering to the residents of Alberta, and for that matter, to the nation, when that dam fails resulting in a catastrophic event that involves the loss of lives, environmental destruction and more billions of dollars?*

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## 1.6 STUDYING THE ALTERNATIVES, AND THE NEED FOR AN INNOVATIVE APPROACH

It is high time to take seriously the urgent need for a flood mitigation project that can conserve our most valuable water, prevent future floods and generate new revenues, particularly, after the recent setback of losing the Keystone project and the billions that were invested in it.

It was published, not long ago, *“California Water Futures Begin Trading Amid Fear of Scarcity... Water joined gold, oil and other commodities traded on Wall Street, highlighting worries that the life-sustaining natural resource may become scarce across more of the world”*.<sup>vi</sup>

In a recent report from the City of Calgary, dated February 26, 2021, it was mentioned:

“Through this analysis, it is clear that a single mitigation measure **is insufficient** to reduce flood risk to acceptable levels in Calgary.” Other measures such as barriers do not bring the level of flood protection to the required safety standards, according to city officials.

We can take solace in the fact that there are other options and the need for study of alternative means was requested by the Canadian Environmental Assessment Agency (CEAA).

On August 31, 2018, (CEAA) requested the Alberta provincial government to evaluate the Tri-River Joint Reservoir of Alberta and the Micro-Water Impounding Concept.

This, has never been done professionally as the case in other similar proposals such as the Springbank dry reservoir (SR1) or the Mclean Creek (MC1) proposal. See Figure1 below, illustrating several reports on the MC1.

Exhibit List  
As at February 18, 2021

Exhibit #	Date	Name	Link (Some exhibits are downloadable only as the files are too large).
01	20150205	AEP EIA to AT re Revised Terms of Reference	<a href="https://www.nrcb.ca/download_document/2/83/8572/20150205-5-aepeia-to-at-re-revised-terms-of-reference">https://www.nrcb.ca/download_document/2/83/8572/20150205-5-aepeia-to-at-re-revised-terms-of-reference</a>
02	20160418	AT EIA to NRCB re Project Description	<a href="https://www.nrcb.ca/download_document/2/83/8604/20160418-at-eia-to-nrcb-re-project-description">https://www.nrcb.ca/download_document/2/83/8604/20160418-at-eia-to-nrcb-re-project-description</a>
03	20170919	AT EIA to NRCB re MC1 Vol 1	<a href="https://www.nrcb.ca/download_document/2/83/8640/20170919-at-eia-to-nrcb-re-mc1-vol-1">https://www.nrcb.ca/download_document/2/83/8640/20170919-at-eia-to-nrcb-re-mc1-vol-1</a>
04	20170919	AT EIA to NRCB re MC1 Vol 2	<a href="https://www.nrcb.ca/download_document/2/83/8646/20170919-at-eia-to-nrcb-re-mc1-vol-2">https://www.nrcb.ca/download_document/2/83/8646/20170919-at-eia-to-nrcb-re-mc1-vol-2</a>
05	20170919	AT EIA to NRCB re MC1 Vol 3	<a href="https://www.nrcb.ca/download_document/2/83/8648/20170919-at-eia-to-nrcb-re-mc1-vol-3">https://www.nrcb.ca/download_document/2/83/8648/20170919-at-eia-to-nrcb-re-mc1-vol-3</a>
06	20170919	AT EIA to NRCB re MC1 Vol 4	<a href="https://www.nrcb.ca/download_document/2/83/8642/20170919-at-eia-to-nrcb-re-mc1-vol-4">https://www.nrcb.ca/download_document/2/83/8642/20170919-at-eia-to-nrcb-re-mc1-vol-4</a>
07	20170919	AT EIA to NRCB re MC1 Vol 5	<a href="https://www.nrcb.ca/natural-resource-projects/natural-resource-projects-listing/83/springbank-off-stream-reservoir-project/documents/8650/20170919-at-eia-to-nrcb-re-mc1-vol-5">https://www.nrcb.ca/natural-resource-projects/natural-resource-projects-listing/83/springbank-off-stream-reservoir-project/documents/8650/20170919-at-eia-to-nrcb-re-mc1-vol-5</a>
08	20171102	AEP EIA to NRCB re Submission of Application and Application Fee [application resubmitted 20180326]	<a href="https://www.nrcb.ca/download_document/2/83/8612/20171102-aepeia-to-nrcb-re-submission-of-application-fee-and-eia-cover-letter">https://www.nrcb.ca/download_document/2/83/8612/20171102-aepeia-to-nrcb-re-submission-of-application-fee-and-eia-cover-letter</a>
09	20171106	NRCB EIA to AT re Joint Notice of Filing (NRCB + AEP)	<a href="https://www.nrcb.ca/download_document/2/83/8562/20171106-nrcb-eia-re-joint-notice-of-filing-nrcb-aepeia">https://www.nrcb.ca/download_document/2/83/8562/20171106-nrcb-eia-re-joint-notice-of-filing-nrcb-aepeia</a>
10	20171114	AT EIA-R to NRCB re Low Level Outlet Release Scenarios Memo Dated 20160912	<a href="https://www.nrcb.ca/download_document/2/83/9062/20171114-at-eia-r-to-nrcb-re-low-level-outlet-release-scenarios-memo-dated-20160912">https://www.nrcb.ca/download_document/2/83/9062/20171114-at-eia-r-to-nrcb-re-low-level-outlet-release-scenarios-memo-dated-20160912</a>
11	20171114	AT EIA-R to NRCB re Draft Probable Maximum Flood Analysis 20150807	<a href="https://www.nrcb.ca/download_document/2/83/9068/20171114-at-eia-r-to-nrcb-re-draft-probable-maximum-flood-analysis-20150807">https://www.nrcb.ca/download_document/2/83/9068/20171114-at-eia-r-to-nrcb-re-draft-probable-maximum-flood-analysis-20150807</a>

**Figure 2: 20210218 SR1 Exhibit List - Updated**

A feasibility study would normally take about 12 months, or, perhaps much less in the case of the Tri-River Joint Reservoir of Alberta (TRJR) solution, due to the considerable amount of research done on this alternative option.

### ***1.6.1 Critical relevant facts***

- A) The world-renowned consulting firm, Deltares did not explicitly recommend the SR1 to be constructed, rather, they provided a comparison between SR1 and the McLean Creek (MC1) option.
- B) The AMEC consultant report: Southern Alberta Flood Recovery Task Force

-Flood Mitigation Measures for the Bow, Elbow and Oldman River Basins-

Volume 4 - Flood Mitigation Measures – Final -June 2014, provided the following:

“The MC1 concept as presented herein was developed, total flood storage requirement of **56,600 dam<sup>3</sup>**. P.6

Considering the project size presented in this conceptual design, a 2013 magnitude flood would **still result in residential damages along the Elbow River floodplain downstream of Glenmore...**”.

MC1 storage capacity is estimated at 56,600 dam<sup>3</sup>, SR1 is estimated at 70,20 dam<sup>3</sup>.

To our knowledge, there isn't a known impartial professional study done indicates that the MC1 can accommodate a volume of water equal or larger than 70.20 million cubic metres; nothing has been provided for evidence supporting this notion.

Four relevant critical facts:

- 1- The expert panel that was formed by the government of more than 50 members has estimated the volume of the 2013 flood as 100 m<sup>3</sup>.
- 2- Basic engineering design requires adding a margin of safety with an order of magnitude 25% – 50% larger than 100M m<sup>3</sup>.
- 3- Important issues of biodiversity or socio-economy were vaguely explained by both projects.
- 4- Both projects are designed to be located either in the midst of a populated area, or near a major city (Calgary).

Methodically, we have established that the reservoir capacity for the SR1 is insufficient to secure the required level of operational safety for a dam with an expected lifetime's service of more than 100 years. The MC1 proposal, which is a proposed dam on-stream, yet, has a reservoir capacity even smaller than the feeble SR1.

**This is undeniably high risk, dam's safety hazard, top concern for environment protection and public safety.** Therefore, it is a non-starter project for water conservation, forest fire suppression, or recreation facilities – accordingly, a proponent of the MC1 needs to provide a professional, nonbiased new information supporting a capacity of MC1 reservoir capable of carrying a volume equals/exceeds the required 100 m3.

### **1.7 blatant conflict of interest**

The consultant Stantec was instructed to evaluate the TRJR and the MWI alternative options. Stantec is the firm that is designing the SR1 and possibly the firm that would build it. This creates a case of conflict of interest when the firm is asked to evaluate alternative/competing projects. Normally, this type of study is done by an independent third party.

### **1.8 Renewable power generation**

It was reported on April 04, 2018: “Alberta opens bidding for more renewable power generation”, and Guy Lonechild, chief executive of the Regina-based First Nations Power Authority, said the program is a good opportunity for Aboriginal groups to play a larger role in the renewable energy field<sup>vii</sup>.

#### ***1.8.1 Water is life and it is the new “white gold”***

Considering the “Triple Whammy” challenge Alberta is facing, including the economic fallout from the global coronavirus and the subsequent future consequences, the urgent need to rebuild our economy and generate employment must include multiplying the outcome of a project to get the best return on the investment.

Most recently coal mining, an energy source, has been met with fierce opposition. The government is facing more Alberta towns asking for coal consultations and pause on exploration after easing coal mining rules.

### **1.9 A Timely Innovative and Comprehensive Water Solution**

The Tri-River Joint Reservoir is an innovative and comprehensive solution, based on the concept of “living with nature” It is designed to protect more than one community and more than one river against damaging floods. It would also yield a significant economic diversification for our province and provides for numerous direct and indirect benefits.

A White Paper on this proposal was submitted to the UNESCO-IHE (world renowned International Institute of Hydrology and Environmental Engineering). This organization recognized the promising potential and the tremendous possible benefits offered by this option, describing it as an innovative solution for flood mitigation and water management.

This project is vital to the SAFETY, the social and economic well-being of our residents.

More than 32 communities, including Calgary, Tsuu T'ina, and Siksika Nations have suffered from the 2013 flood.

As temperatures rise, an increased risk of forest fires, droughts and flooding is predicted by scientists. **Water is becoming our most vital resource** for multiple usages and for generating clean energy. The TRJR is the only proposed alternative project that provides:

- Comprehensive flood mitigation,
- Opportunity for economic diversification,
- Water in dealing with the ongoing drought conditions,
- Forest fire suppression,
- Industries, agriculture, as well as recreation needs,
- Secured drinking quality water and quantities for the present and the future generations,
- The most benefit/cost value and return on investment (ROI).

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***THIS IS A GOLDEN OPPORTUNITY AND MUST NOT BE WASTED!***

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Any other recent claims that, there is another proposed project exists which can provide the same benefits, is purely a form of imitation, which, in a sense, is a form of flattery.

## **1.10 Summary and Conclusion**

### ***1.10.1 The NRCB Mandate***

The Natural Resources Conservation Board (NRCB) is an arms-length agency of the Government of Alberta. It was established in 1991 under the Natural Resources Conservation Board Act (NRCBA) to determine the public interest of proposed natural resource projects.

No one can predict the hearing's outcome. The outcome of the hearing can go either way, therefore, when considering the urgent need for flood mitigation and water conservation, the conventional wisdom dictates having a plan "B".

### ***1.10.2 Time lapse until final discission***

By the time the hearing committee finalize its decision (Ave. 4 months), in addition to the time needed for the provincial regulatory review and the federal process, plus, time needed to receive a reply to the supplementary applications that have been filed both provincially and federally (Fisheries Act), followed by the provincial cabinet approval, there will be

more than enough time to start the study of the alternative options, since all of the above have to take place before the project is given full regulatory approval.

### ***1.10.3 A watershed moment and a major turning point***

Many centuries ago, the ancient Egyptians built Pyramids that lasted and defied the ages. The SR1 could not possibly last a day if we were to receive back-to-back floods, or a flood equal or larger than that of 2013.

In our submissions, supporting this eventuality, we did not use any fallacious argument and presented the facts evidenced by documents and reports issued by the proponents and associate consultants.

### ***1.10.4 The hearing of March 22, 2021 is a historic moment in Alberta and for Albertans***

Our group comprises non-biased citizens, supported by thousands of Albertans, and we have “no stake in the game”. We have a deep and abiding love to our province and its potential. The kind of Alberta we will always fight for, the well-known altruistic and selfless people, who are motivated by wisdom and courage.

### ***1.10.5 It is a hearing, also, listening and understanding***

This hearing is not only an opportunity to find out if the SR1 is in the public interest, and ensuring good value for taxpayer money, but also it is a test of our mettle, talent, fortitude, ability and courage.

A test to show if we, as Albertans, are still the most generous and caring people in the country or, it is just about “self-interest”. A test to show if we are willing to make it about the “We” instead of the “Me”.

The golden days of high oil prices have gone, today we are living with a massive debt and deficit. There is no more “cash” left in the “coffer” to experiment with.

*“Only courageous hearts can endure the bitterness of truth.”*

— Michael Bassey Johnson —

We are calling upon everyone involved to summon courage and intelligence to resolve OUR today’s multiple challenges with the economy, the pandemic, mental health, and plan wisely for our current and future needs including flood mitigation and water shortage.

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*AT THIS TIME, THERE ARE MORE THAN 1000 PEOPLE HAVE ALREADY SIGNED A PETITION ASKING FOR AN ALTERNATIVE, AND THOUSANDS OF ALBERTANS ACROSS THE PROVINCE HAVE ATTENDED PRESENTATIONS ON THE TRJR OPTION AND REMAIN WAITING FOR THE GOVERNMENT TO CONDUCT A PROPER FEASIBILITY STUDY ON IT.*

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<sup>i</sup> [trans-springbank-off-stream-resevoir-update-winter-2020.pdf](#)

<sup>ii</sup> file:///C:/Users/Emile/AppData/Local/Temp/20171114\_AT\_EIA-R\_to\_NRCB\_re\_draft\_Preliminary\_Design\_Report\_dated\_20170331.pdf

<sup>iii</sup> [https://www.nrcb.ca/download\\_document/2/83/10662/20201218-at-sir-to-nrcb-re-preliminary-design-report-change-summary-memo](https://www.nrcb.ca/download_document/2/83/10662/20201218-at-sir-to-nrcb-re-preliminary-design-report-change-summary-memo)

<sup>iv</sup> [Springbank Off-stream Reservoir Update - Winter 2021 \(alberta.ca\)](#)

<sup>v</sup> <https://www.aptnnews.ca/national-news/water-plants-first-nations-water-pipes/>

<sup>vi</sup> <https://www.bloomberg.com/news/articles/2020-12-06/water-futures-to-start-trading-amid-growing-fears-of-scarcity>

<sup>vii</sup> <https://edmontonjournal.com/business/energy/alberta-opens-bidding-for-more-renewable-power-generation>