

Environmental Law Centre

Comments on Proposed Special Areas Water Supply Project

Submitted by:
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Did you attend a meeting about the SAWSP? No.

Do you represent an organization with an interest in the SAWSP?

The Environmental Law Centre is an Edmonton-based non-profit organization that has a Province-wide mandate to pursue effective environmental law and policy.

Please provide the first 3 digits of your postal code: (e.g. T6H) T5J

The Purpose of the Water Diversion

- 1. Do you feel adequately informed about the need for the SAWSP, and the scale of the project's conveyance works?**

Yes.

Protection of the 'Natural Flow' of the Red Deer River

- 2. Is the effect of the SAWSP on the flow of the Red Deer River acceptable?**

For the time being. However, river levels are predicted to continue to drop in the years ahead. In future, SAWSP will be more difficult to justify, as demands on the Red Deer River intensify. The river is under increasing stress from climatic and other factors. It is not clear whether this forecast has been carefully considered in the SAWSP proposal. The investment of \$192 million plus annual maintenance costs would be a poor one if, as some predict, future levels of the Red Deer River cannot support the project.

The Effect of Other Water Users on the Red Deer River

- 3. Are you satisfied that existing water users on the Red Deer River will not be affected by the SAWSP?**

Again, this is a question of planning for increasing demand on a diminishing resource. The River may be able to support the SAWSP without affecting current users. In future, however, climatic and other variables will very likely make it impossible to meet all licensed requirements while protecting in-stream flow needs (as is currently the case in many southern rivers).

The Effect on the Red Deer River's Contribution to Apportionment

- 4. Is the effect of the SAWSP on the contribution of the Red Deer River to apportionment acceptable?**

Unsure.

Inter-Basin Transfer

- 5. Do you think it's appropriate to transfer surface water from the Red Deer River Basin into the Sounding Creek Basin (given the conditions described in the information provided)?**

No. Due to climatic changes much land in the Special Areas is no longer agriculturally viable. Records indicate that the past century has been one of the wettest on record. It is safe to predict that conditions in the Special Areas will continue to make agriculture increasingly marginal. Irrigation agriculture in the Special Areas is not a good, long-term investment of public funds.

Interbasin transfers are not acceptable as a general solution to water shortages. The Province should, instead, focus on preserving viable wetlands and agricultural lands in areas where water is readily available.

The issue of transfer of biota from the Red Deer to the Battle River has not been adequately addressed.

Economic Analysis

- 6. Do you think public investment in SAWSP is merited, given the estimated economic, social and environmental benefits?**

No. Given the initial and ongoing costs of the project, the funds would be better spent preserving viable agricultural lands and operations, and wetlands, elsewhere.

Environmental Considerations

- 7. Are you satisfied with the efforts to avoid negative environmental effects and to gain environmental benefits?**

Insufficient attention has been paid to the long-term effects on the Red Deer River given future projections for diminishing river flows.