

May 26, 2022

Compliance Promotion and Enforcement Unit
Impact Assessment Agency of Canada
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Reference: Springbank Off-Stream Reservoir Project – Condition 8.14 Submission

Alberta Transportation has made efforts to ensure the construction and operation of the Springbank Off-stream Reservoir Project (SR1) does not impact the current use of lands and resources for traditional purposes any more than necessary. Alberta Transportation provides the following information to fulfill Condition 8.14 of the *Decision Statement for the Springbank Off-stream Reservoir Project* (below):

- 8.14 *The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project to monitor:*

8.14.1 the effectiveness of progressive reclamation;

On April 14, 2022 Alberta Transportation submitted a *Vegetation and Wetland Mitigation, Monitoring and Revegetation Plan* to the Impact Assessment Agency of Canada (IAAC). The *Vegetation and Wetland Mitigation, Monitoring and Revegetation Plan* was developed to fulfill the requirements and regulatory condition, including 8.14.1, and contains monitoring requirements related to progressive reclamation of the project area during construction. Monitoring related to this plan will be incorporated into the annual report. The *Vegetation and Wetland Mitigation, Monitoring and Revegetation Plan* was provided to the Indigenous groups for review and comment on January 21, 2022, any comments received were incorporated into the submitted document.

8.14.2 the effectiveness of the Land Use Plan identified in condition 8.8 in supporting and prioritizing First Nation' practice of traditional activities within the project development area;

As described in the *Preliminary Approach for Monitoring and Evaluation of the Land Use Plan* document, plan outcomes will be monitored, evaluated and reported at regular intervals. This ensures that desired outcomes are achieved, and enables opportunities for plan updates or amendments to be made adapting to changing conditions or desired direction. This work will involve the First Nations Land Use Advisory Committee.

8.14.3 the effectiveness of the staging area identified in condition 8.9 and the adequacy of its size in supporting First Nation' practice of traditional activities within the project development area within five years of its implementation;

As described in the *Preliminary Approach for Monitoring and Evaluation of the Land Use Plan* document, the effectiveness of the staging area will be assessed within five years following implementation. This will include surveys, questionnaire and discussions with First Nations.

8.14.4 the effectiveness of the First Nation Land Use Advisory Committee in addressing views and information received pursuant to condition 8.11.4

As described in the *Preliminary Approach for Monitoring and Evaluation of the Land Use Plan* document, there is on-going evaluation of the effectiveness of the First Nation Land Use Advisory Committee to ensure the planning process continues to meet the needs of all participants. This is assessed through surveys, group discussions and one-on-one meetings. The planning team will continue to solicit feedback from the First Nations to ensure the advisory committee is effective and concerns are heard and addressed as appropriate.

8.14.5 that the availability and quality of resources for traditional use activities is as predicted in the environmental assessment.

Alberta Transportation has prepared a number of monitoring plans to confirm assumptions made in the environmental assessment. The various plans were developed taking into account the regulatory requirements, including Condition 8.14.5. Specific to resources for traditional use activities, this includes the following plans:

- *Archaeological and Heritage Management Plan*
 - Alberta Transportation prepared a table of contents for this plan which was provided to Indigenous groups September 14, 2021 for comment and a group meeting was held in fall 2021. Feedback has been received from Indigenous groups, stakeholders, and the public, and through supplemental regulatory information requests and the Project hearing. The Plan has incorporated regulatory approval decisions and conditions from the Natural Resources Conservation Board and the Impact Assessment Agency of Canada and have taken into account any feedback received to date from Indigenous groups, stakeholders, and the public. This plan was re-shared with Indigenous groups for on November 17, 2021 and provided to IAAC on November 18, 2021. Monitoring related to this plan will be incorporated into the annual report.
- *Fish Rescue and Fish Health Monitoring and Mitigation*
 - Alberta Transportation prepared a draft *Fish Rescue and Fish Health Monitoring and Mitigation* Plan (provided to Indigenous groups in July 2020). The draft plan was discussed with Indigenous groups during a group meeting September 17, 2020. The plan has incorporated regulatory approval decisions and conditions from the Natural Resources Conservation Board and the Impact Assessment Agency of Canada and has taken into account any feedback received to date from Indigenous groups, stakeholders, and the public. This plan was re-shared with Indigenous groups and provided to IAAC on December 15, 2021. Monitoring related to this plan will be incorporated into the annual report.
- *Vegetation and Wetland Mitigation, Monitoring and Revegetation Plan*
 - The draft *Vegetation and Wetland Mitigation, Monitoring and Revegetation Plan* was discussed with Indigenous groups during a group meetings in 2020 and feedback that

was received from Indigenous groups, stakeholders, and the public, and through supplemental regulatory information requests and the Project hearing were incorporated into the current version. The Plan has incorporated regulatory approval decisions and conditions from the Natural Resources Conservation Board and the Impact Assessment Agency of Canada. This plan was re-shared with Indigenous groups for review and comment on January 21, 2022, any comments received were incorporated into the document submitted to IAAC on April 14, 2022. Monitoring related to this plan will be incorporated into the annual report.

- *Wildlife Mitigation and Monitoring Plan*
 - The draft *Wildlife Mitigation and Monitoring Plan* was provided to Indigenous groups for review and comment in May 2020 and discussed during group meetings in Fall 2020 and 2021. The Plan has incorporated regulatory approval decisions and conditions from the Natural Resources Conservation Board and the Impact Assessment Agency of Canada and has taken into account any feedback received to date from Indigenous groups, stakeholders, and the public. This plan was re-shared with Indigenous groups on November 17, 2021 and provided to IAAC on November 18, 2021. Monitoring related to this plan will be incorporated into the annual report.

Should you have any questions pertaining to the information provided above and attached, please do not hesitate to contact the undersigned.

Respectfully,

Alberta Transportation

<Original signed by>

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Mark Svenson, P. Biol
Water Management Environmental Specialist
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Enclosure;

- Springbank Off-Stream Reservoir Preliminary Approach for Monitoring and Evaluation of the Land Use Plan