

RESPONSE OF THE RURAL MUNICIPALITY OF SPRINGFIELD
TO THE
PROPOSED FLOODWAY EXPANSION ENVIRONMENTAL IMPACT
STATEMENT

We feel that there has been a worthwhile public input process and that a number of concerns expressed by the public have been incorporated through design changes. In particular we applaud the commitment to a four-lane bridge structure at PTH 15 and the decision not to deepen the floodway channel (particularly at the Bird's Hill area) in favour of widening the channel.

From the outset we have supported the expansion of the Red River Floodway and have recognized the need to provide significantly increased flood protection to the City of Winnipeg. Our concern has been that the process recognize and respect the legitimate interests of the residents of the R.M. of Springfield who host the Floodway channel for some 23 kilometers. In particular we have had concerns about traffic flow, drainage infrastructure, ground water and more recently proposed recreational uses and the potential for flooding at the community of Prairie Grove.

The public participation and review process generally have been compacted into a relatively short time frame and we are disappointed that to some extent our time was wasted participating in the pursuit of funding assistance which was apparently never available to local governments. This has been a particularly difficult harvest season and our farm community will not have a meaningful opportunity to respond to the E.I.S.; nor has it been generally available to members of the community; nor is it easily understood by lay persons without expert assistance.

GROUNDWATER

Particularly with respect to the potential impact and cumulative impact on ground water we are left with haunting concerns which we do not feel have been adequately addressed or are of as little impact as suggested in the E.I.S. Often our questions about the extent of the impact on groundwater and actual mitigation measures are met with the response: “the studies are not complete.” We respectfully submit that the need for a much more thorough investigation is indicated and that the flows of groundwater into the existing Floodway must be considered as part of the cumulative impact of this project.

On October 6, 2004 we received, from the MFEA, CD copies of the technical reports that underlie the EIS. As these are complex technical documents, outside expertise is required for review and analysis. Obviously, the opportunity to review and comment by the October 12, 2004 deadline is limited. We trust you will accommodate supplemental comments when the engineering reports have been fully assessed.

In a recent meeting with the MFEA, it was acknowledged that the current floodway is among the highest groundwater users in the Province (2000 gpm measured mid winter at the Dunning crossing). We understand that this may not be a licensed withdrawal of groundwater, and that there is no regular monitoring of the groundwater flow into the floodway.

We are concerned about the tendency within the EIS to treat groundwater issues as having local impact. Considering the inter-connectivity to the groundwater system in the Bird’s Hill vicinity, and the extent from which groundwater is drawn, groundwater must be treated as a regional concern and prioritized accordingly.

We are also concerned about the very narrow, restrictive approach taken regarding cumulative impacts. We question the basis of this interpretation and request that a broader definition which incorporates both current floodway impacts and future

municipal developments be established, then impacts should be re-evaluated on the basis of this definition.

The frequent response from the MFEA that issues are “not within our mandate” concerns us deeply. The delineation of a narrow scope of responsibility does nothing to address important environmental issues. It would seem that the expansion of the floodway provides an excellent opportunity to properly assess concerns that were created by the initial floodway construction, and to identify appropriate means, within the expansion project, to address these concerns. It also would build community confidence in the responsibility of the MFEA and their ability to deal with new impacts that will be created.

LAND DRAINAGE

The issue of land drainage is the subject of ongoing, and what we believe to be positive, discussions but it is not at this time completely resolved. We offer the following synopsis of where we believe the issue is at today.

Before the original floodway was constructed, there were a number of significant drains passing westward from the R. M. of Springfield area, eventually finding outlet to the Red River. These drains perform a critical function in terms of the agricultural drainage systems that rely on them. The floodway cut across these paths and the drains were made to outlet into the floodway. This provided the potential opportunity to create much more effective drainage outlets, and removed the impact of these drain flows on waterways through residential areas leading to the Red River. The drains connected to the floodway through hydraulic drop structures that lowered the drainage flows down into the floodway.

Presumably due to cost considerations, some of the major drains were diverted along the east side of the floodway and combined with flows from other drains before entering the floodway through a drop structure. There are therefore fewer outlet

structures than there are main drains approaching from the east. Such arrangements compromised the full advantage that the floodway offered as drainage outlet.

The floodway expansion necessitates the replacement of the drain outlet drop structures, except for that associated with the Cooks Creek Diversion. The diversion drainage channels on floodway property will be upgraded. With the experience gained from witnessing the function of the drainage system over the many years since the floodway was first constructed, it is wise now to review the situation and make whatever changes are warranted in the best interests of the economic benefit the agricultural drainage systems provide.

There are three issues for attention.

1. The **hydraulic capacities** of the new outlet structures and the diversion drains on floodway property;
2. The **invert elevations** (weir crest or culvert bottom elevations) of the new outlet structures and related infrastructure to provide allowance for future upgrading of the agricultural drains that may lower the bottom of the drains approaching the floodway;
3. The **locations** of the outlet structures in terms of possible changes in location that may be warranted to better serve drainage needs;

Hydraulic Capacities

For their own design purposes, the Floodway Expansion Authority (FEA) has determined that the hydraulic flow capacity of the outlet structures shall be based on calculated 1% return frequency flow (runoff flows equaled or exceeded once in 100 years on the long term average) and the diversion drains on floodway property shall be designed for 2% return frequency flow capacities (runoff flows equaled or exceeded once in 50 years on the long term average). Agricultural drain design traditionally corresponds to something more closely approaching 10 % return frequency flow. It follows that the

hydraulic capacity of the outlet structure is not an issue insofar as agricultural drainage needs are concerned.

Invert Elevations

The FEA has recognized the need to establish outlet structure elevations that will provide an allowance for future upgrading and lowering of the incoming agricultural drains. Stefanson Watershed Services (SWS) and Cochrane Engineering Group (CEG), on behalf of the Floodway East Side Drainage Plan Committee, has submitted to the FEA a proposal as to how to approach the matter of providing allowance for future drain bottom lowering in a way that is straightforward and minimizes cost. A definitive response from the FEA might not be forthcoming until they have contracted an engineering firm to carry out final floodway expansion design.

SWS and CGE will make a submission to the FEA as to the specific elevation allowances to be applied to the individual incoming agricultural drains. This has not yet been done.

Locations

The question of whether or not it is feasible or warranted to suggest any changes or additions to outlet structure locations has not yet been answered. SWS and CGE are currently dealing with this issue. A major obstacle to outlet structures at new locations is the presence of floodway spoil-banks that may have to be excavated through. Where the need for a new structure can be matched with a location where the spoil-bank is absent, such as along a highway or railway, the possibility of introducing such a structure is greatest. A meeting was held recently with representatives of the Department of Highways and Government Services to gain information as to the details of the plans for new crossing structures at PTH 15 and PTH 1 in order to evaluate whether or not new outlet structures might be compatible at these locations.

SWS and CEG will shortly present their findings to the committee to seek direction on whether or not any of the possible outlet location change proposals should be developed and submitted to the FEA.

RECREATION

Our resident's concerns about recreational use of the Floodway berms seem to have fallen on particularly deaf ears. This is not a highly technical issue and simply evidences the gulf between those in the City of Winnipeg who will benefit from the project and perceive a further benefit from the availability of recreational areas and those who live close to the Floodway who have for years put up with a complete absence of management responsibility applied to the Floodway right of way, the dumping of garbage and stolen vehicles along the right of way, the access allowed to off road vehicles using the right of way to access private properties, pit areas and other rights of way within the R.M., and an apparent complete disregard of the value of agricultural use of the Floodway right of way. Added to this are R.M. concerns about the cost of fire and emergency response services, and loss of tax base.

PRAIRIE GROVE

Recently it has come to our attention that the expanded Floodway project will cause flooding in the Prairie Grove area in a 700 year flood event. We recognize that there is compensation legislation to address artificial flooding but feel there should be a clear recognition in the EIS of the Prairie Grove circumstances. Further we would like to see a benefit cost analysis undertaken of flood protection measures that might be implemented and would hope that we would have the full co-operation of MFEA in providing excavated material for dyke construction and engineering assistance with project evaluation and completion.

CONCLUSION

It will be our intention to participate fully before, during and after the CEC hearing to ensure that all potential impacts are thoroughly investigated, considered and mitigated so that a worthwhile project will not result in unnecessary, onerous and costly negative impacts on the physical and socioeconomic environments in our community.

Respectfully submitted
The R.M. of Springfield.