

Parker Stormwater Management Facility and Trunk Storm Sewer Outlet Environmental Impact Study (EIS)

Document reviewed:

- 2017 Parker Stormwater Management Facility and Trunk Storm Sewer Outlet by Natural Resources Solution Inc.

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INTRODUCTION

This EIS should not be accepted until EEPAC's concerns are adequately addressed. EEPAC is of the opinion that the EIS was submitted without the Parker Stormwater Management (SWM) Facility and Trunk Storm Sewer Outlet's proposed design and does not address all required EIS considerations associated with the proposed infrastructure and evaluation of the potential adverse impacts on this water resources system functions and features by this undertaking

EEPAC is disappointed by the very limited review time allocated and requests that in order to be able to undertake a comprehensive review of EIS for a proposed infrastructure, all components related to evaluations of environmental/ecological potential impacts on the functionality/features of this system need to be provided to EEPAC.

The Impact Analysis of this EIS ignores the evaluation of:

- all water resources components for the proposed storm/drainage and SWM system; and
- the 2004 Dingman Creek Subwatershed Study Updates (DCSSU) recommended objective to improve the existing deficiencies and apply efforts to restore/reclaim deficient systems. Natural Resources Solution Inc., only reviewed the 1995 Dingman Creek Subwatershed Study, which was superseded by the 2004 Dingman Creek Subwatershed Study Updates.

RECOMMENDATION #1: Prior to accepting this EIS, shall be required to meet the main objectives of DCSSU, approved by City Council in relation to water resources/SWM, are to protect and restore/reclaim deficient and impacted systems and address and require further analysis prior to acceptance of the report. Impacts to the tributaries must be addressed and quantify the following:

- the hydrogeological assessment including water balance assessments (groundwater, and surface flows (under the minor and major flow conditions).
 - the slope stability conditions evaluations and required protections with a new storm outlet, potential dewatering detailed methodology and measures;
 - cumulative impact evaluations of major functions of environmental/ecological system of this watercourses that may be impacted by the proposed infrastructure discharges;
 - EIS is required to evaluate the potential impacts of the proposed infrastructure on the baseflows and during wet weather conditions, the recommended buffers size shall take into consideration the floodlines location for this watercourses; and
 - The report should address any potential impacts to groundwater by the proposed dewatering.
- **RECOMMENDATION #2:** Prior to accepting this EIS, shall be required to undertake a specific water quality/quantity and erosion control monitoring program under the pre (existing baseline conditions) and post construction conditions (including, but not be limited to, water quality basic chemistry and biological monitoring-BioMap). This matter requires further commentary/analysis prior to acceptance of the report.

RECOMMENDATION #3:

- A. The dewatering plan should include an Erosion Sediment Control Plan very robust plant that will protect this watercourse, as well as appropriate measures to ensure the watercourses are not impacted by the dewatering activities. The effectiveness of these measures should be evaluated consistent with the groundwater monitoring program. The dewatering disposal system should be identified.
- B. Post-construction/dewatering, groundwater quality sampling should be conducted again to ensure no change to the baseline conditions.

RECOMMENDATION #4:

The consultant has not provided the required technical, environmental/ecological evaluation and justifications to support 15 m buffers and evaluations of the cumulative impacts from this undertaking under post construction. The entire document is weak in dealing with post construction impacts and it is post development impacts that generally have negative impacts on water resources, aquatic conditions, flora and fauna. Prior to accepting this EIS, shall be required to undertake the above-noted analyses and provide justifications to reaffirm the size of the proposed buffer.

DR