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**From:** Web NoReply  
**Sent:** Monday, March 4, 2024 10:14 AM  
**To:** City Council  
**Subject:** Email - Communication - Meghan Michelson - Saskatoon Freeway Planning Study – Phase 2 Endorsement - CK 6003-1  
**Attachments:** SPC Transportation March 5 2024.pdf; Swale-Watchers-March-03-2024.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged  
**Categories:** FILED

--- Replies to this email will go to [swalewatchers@gmail.com](mailto:swalewatchers@gmail.com) ---

Submitted on Monday, March 4, 2024 - 10:12

Submitted by user: [REDACTED]

Submitted values are:

**I have read and understand the above statements.:** Yes

**I do not want my comments placed on a public agenda. They will be shared with members of Council through their online repository.:** No

**I only want my comments shared with the Mayor or my Ward Councillor.:** No

**Date:** Monday, March 04, 2024

**To:** His Worship the Mayor and Members of City Council

**First Name:** Meghan

**Last Name:** Mickelson

**Email:** [swalewatchers@gmail.com](mailto:swalewatchers@gmail.com)

**I live outside of Saskatoon:** No

**Saskatoon Address and Ward:**

**Address:** [REDACTED] 2nd St E

**Ward:** Ward 6

**Name of the organization or agency you are representing (if applicable):** Swale Watchers

**What do you wish to do ?:** Submit Comments

**What meeting do you wish to speak/submit comments ? (if known)::** STANDING POLICY COMMITTEE ON TRANSPORTATION

**What agenda item do you wish to comment on?: 7.2.1**

**Comments:**

Candace Savage is also requestion to Speak on behalf of the Swale Watchers, communication can go to

[REDACTED]

**Attachments:**

**Will you be submitting a video to be vetted prior to council meeting?: No**



**March 3, 2024,**

**Swale Watchers:**

**Position Paper on the Saskatoon Freeway Phase 2 Functional Planning Study**

In the next few weeks, Saskatoon City Council will make a decision that will reverberate through seven generations and beyond, with potentially irreversible consequences.

**The Issue**

The provincial Ministry of Highways and Infrastructure has asked Saskatoon City Council to endorse the Functional Planning Study for Phase 2 of the proposed Saskatoon Freeway. This request is scheduled to go to the Standing Policy Committee on Transportation on March 5 before being forwarded to the full Council for a Yes or No vote on March 27.

The report on Phase 2 is contained in two documents that have just, belatedly, been released: Phase 2 Biological Assessment and Phase 2 Functional Design Report. Although the Ministry of Highways carried out consultations with designated stakeholders as the plan was being developed, these reports provide the first comprehensive overview of the completed design.

The plan for Phase 2 covers a 27-kilometer-long segment of divided highway that arcs around the eastern outskirts of the city and then swings west, through future neighbourhoods, toward a new bridge across the South Saskatchewan River. As the route cuts through the city, it will expand from its standard width of 4 lanes to **8 lanes (4 each way), where it crosses the Northeast Swale, and then to 10 lanes (5 each way) where it crosses the Small Swale**. The impact will extend beyond the travel lanes, as evident in the simulation of the proposed Freeway here:

<https://vimeo.com/648993683>. The plan also calls for a major interchange at the intersection with Central Avenue, between the two Swales.

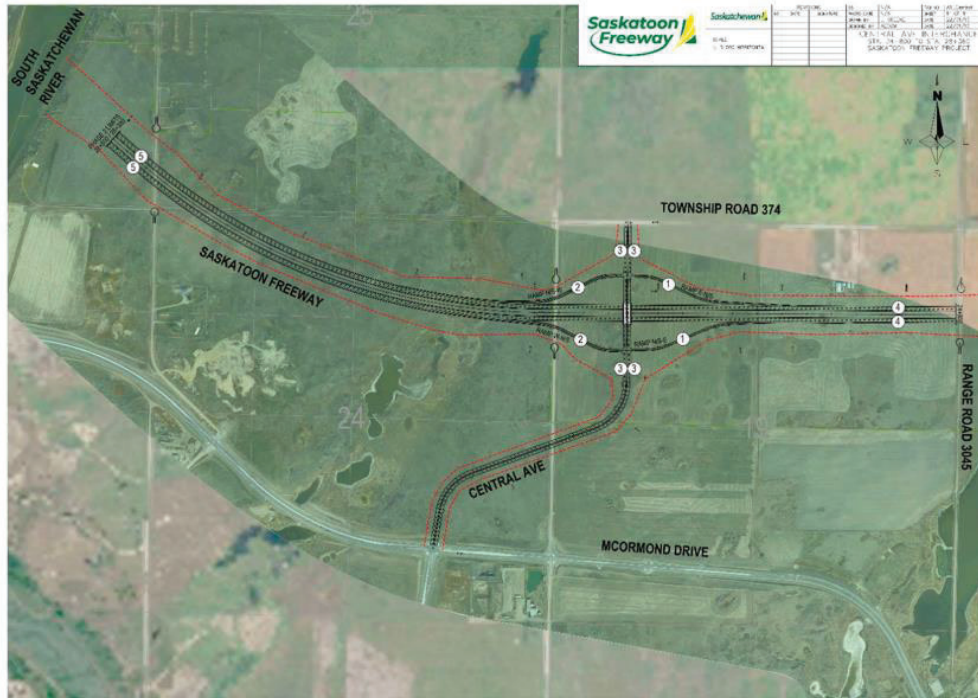


Figure 9.1: Central Avenue recommended interchange configuration

This map shows 8 lanes of traffic emerging from the Northeast Swale and 10 lanes across the Small Swale, with the Central Avenue interchange in-between. Phase 2 Report p. 175

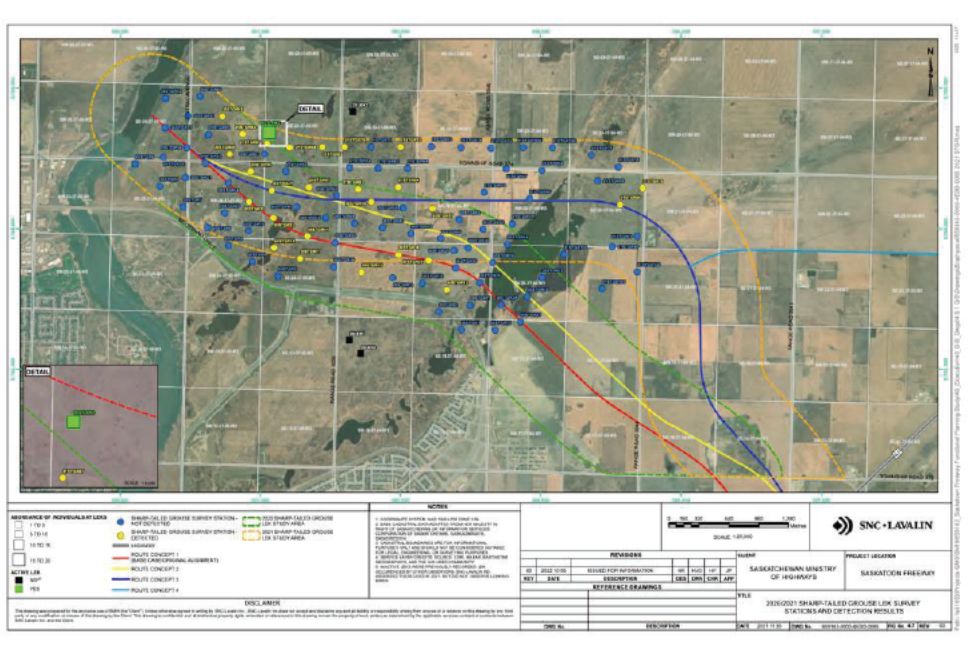
### The Northeast and Small Swales

The Northeast and Small Swales are unique and irreplaceable refuges for Nature and an asset for the people of Saskatoon. By the Ministry of Highway's own assessment, these ribbons of native grassland and natural wetlands support an astonishing abundance of life, including at least 36 species so severely threatened by habitat loss and other stressors elsewhere that they are listed as Species of Conservation Concern.<sup>1</sup> In other words, these are rare, threatened or endangered species at risk of extinction unless we protect their remaining habitat. Plants, insects, amphibians, birds and mammals—they all find a refuge in the Swales.

The Swales continue to be places of discovery and delight. Every time a new environmental survey is conducted, more species and species occurrences are found. The Biological Assessment just released by the Ministry of Highways documents the discovery of a sharp-tailed grouse lek, or dancing ground, an ecologically and culturally significant feature no one had known about before. The report also maps rare habitats—marl bogs—complete with their unique chemistry, hydrology and plants.<sup>2</sup> The Swales continue to surprise us with their diversity of habitats and their dazzling array of life forms.

<sup>1</sup> Phase 2 Biological Assessment, p. ii

<sup>2</sup> Phase 2 Biological Assessment, p. 70



Below: Sharp-tailed grouse presence in yellow. New lek in green. Source: Phase 2 Biological Assessment, p. 27

In the Saskatoon region, less than five percent of the original, natural vegetation remains intact. Are we really prepared to lose even more habitat and to fragment these life-sustaining lands by driving 8 or 10 lanes of traffic through them? How will we recognize ourselves as prairie people if there is no prairie left?

It is difficult to overstate the value of the Swales to the City of Saskatoon. As green infrastructure, they purify air and water, sequester carbon, prevent floods and provide other services with an estimated value of more than \$2.36 million per year.<sup>3</sup> In addition, they support research, education, mental and physical health and cultural grounding and provide the city with a sense of place. If protected, the Swales could become the heart of the proposed Meewasin National Urban Park, bringing employment, opportunity and pride to Saskatoon residents.

In its past decisions, Saskatoon City Council has taken steps to protect the Swales from catastrophic harm. Special care was taken with the design of McOrmond Drive where it crosses the Northeast Swale (narrowing the roadway, reducing speeds, rounding the curbs), and Council recently established pre-development boundaries for both the Northeast and Small Swales as part of the planning for the proposed University Heights 3 neighbourhood.

In the reports on Phase 2 of the Freeway, the Ministry of Highways also, repeatedly, affirms the importance of protecting the Swales. For instance, a section headed *Phase 2 Specific Environmental Recommendations* notes that “The Northeast Swale and small swale [sic] are both ecologically sensitive features and important areas within the COS [City of Saskatoon].”<sup>4</sup> The report goes on to list the

<sup>3</sup> <https://swalewatchers.org/about/>

<sup>4</sup> Phase 2 Report p. 207

mitigations that “should be employed” to minimize impacts on these lands. The first entry on the list states, “The footprint of roadway [should be] reduced as much as possible through sensitive areas.” If a footprint of 8 to 10 lanes is the best that the proponents can do, one has to question the sincerity of their efforts to conserve these assets.

### **Damage Report**

In truth, whether 2 lanes or 10, a Freeway has no business slicing through a valued natural area. The Ministry of Highway’s reports on Phase 2 summarize some of the damage this project will cause:

All Concepts will impact the Northeast and Small Swale wetland complexes, uncultivated grasslands that support native prairie vegetation, cultivated land, as well as native prairie and riparian forest on the banks of the South Saskatchewan River....In addition to the loss of wildlife habitat within the project footprint, both [sic] concept options will impact wildlife through direct mortality (increased vehicle collisions and/or as a result of construction), reduced habitat connectivity, habitat fragmentation, and behavioral changes or habitat avoidance brought on by increased light and noise exposure....Species that are area sensitive, road avoidant, or at a high risk of mortality from roadkill are likely to be impacted by the proposed project. This includes SAR [federally listed Species at Risk] such as American badger, Baird’s sparrow (*Centronyx bairdii*), bobolink (*Dolichonyx oryzivorus*), and short-eared owl.

All Concepts will impact plant species diversity and community composition through ground disturbance, habitat fragmentation, edge effects, and landscape alteration. Roadside rights-of-way facilitate the spread of non-native plant species by acting as transmission corridors....Both [sic] proposed concepts may result in the direct loss of plant SOCC [Species of Conservation Concern] and their habitat....<sup>5</sup>

Those paragraphs deserve to be read slowly and repeatedly.

It is worth noting that highways and other busy urban roads also pose a risk to people living within 500 meters of them.<sup>6</sup> The Functional Plan for Phase 2 does not consider these harms, thereby ignoring the health of people who will live near to the Freeway in the future.

### **Risk Avoidance vs Risk Mitigation**

It is a core principle of Conservation Biology that preventing risk is always the preferred option, with mitigation—reducing risk to an acceptable level--as a poor, second choice.<sup>7</sup> In this case, the best option is obvious. Do not build the Freeway through the Swales.

The mitigative measures proposed by Highways include shifting part of the route to avoid open-water crossings of wetlands in the Northeast and Small Swale. This change was made based on a Multiple

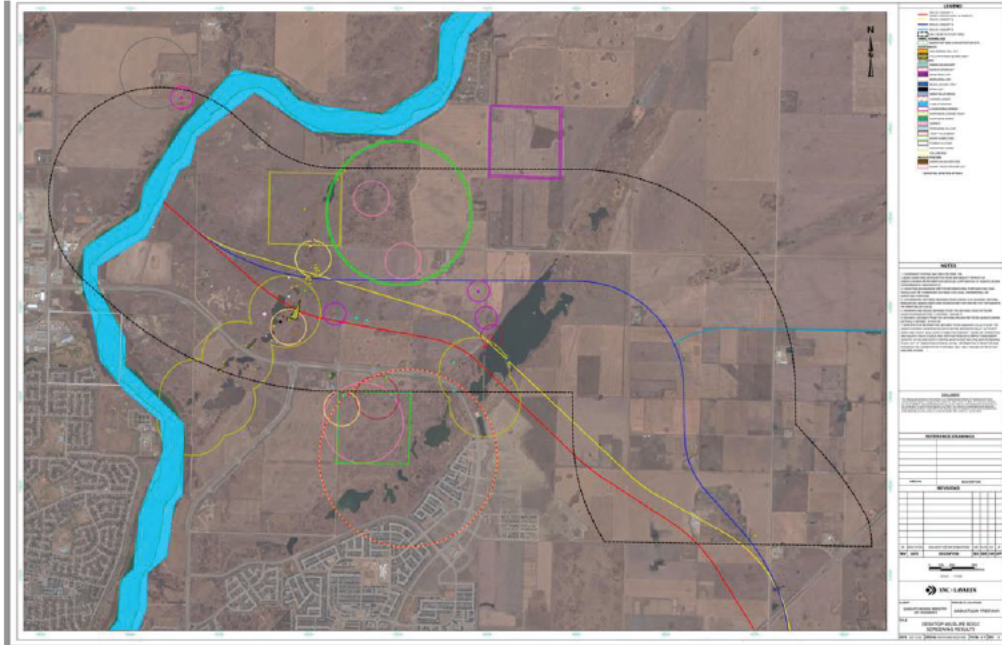
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<sup>5</sup> Phase 2 Biological Assessment p. 75

<sup>6</sup> <https://www.cmaj.ca/content/185/18/1557>

<sup>7</sup> The Mitigation Hierarchy. <https://www.forest-trends.org/bbop/bbop-key-concepts/mitigation-hierarchy/>

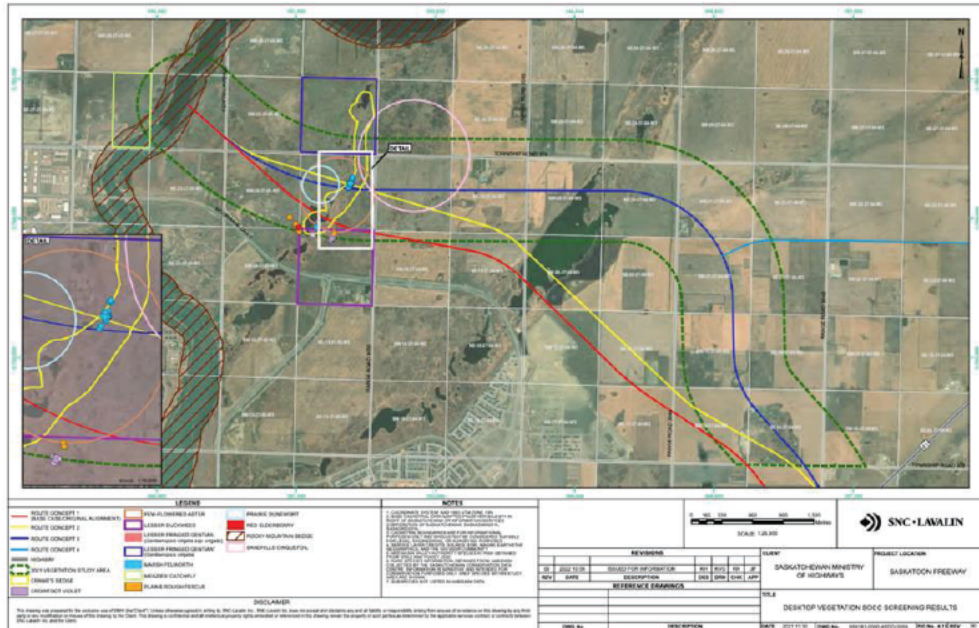
Account Evaluation using a discussion-based method described as “Estimate-Talk-Estimate.”<sup>8</sup> The report states that “A detailed quantitative MAE analysis was not used for the SFFPS [Saskatoon Freeway Functional Planning Study] because of uncertainties associated with the travel demand model assumptions: time horizon and population growth, employment growth, etc.” No evidence is presented to support the assertion that the revised route will actually reduce the environmental impact on the Northeast Swale or the Species of Concern that live there. Worryingly, however, the data does suggest that the change in route may put sensitive species and features in the Small Swale at increased risk.



Species of Conservation Concern, desktop study, with the proposed route in purple. Source: MHI

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<sup>8</sup> Phase 2 Report, p. 167



Plant Species of Conservation Concern, desktop study, with the proposed route in purple. Source: MHI

The other major mitigative measure proposed by Highways is the construction of engineered wildlife crossings, including two wildlife overpasses for large mammals.<sup>9</sup> Recent estimates from the government of British Columbia put the minimum price tag for an effective wildlife overpass at \$6.2 million.<sup>10</sup> Meanwhile, a wildlife crossing to span 10 lanes of traffic in Los Angeles is budgeted to come in at US\$87 million.<sup>11</sup> Is the Ministry of Highway's plan to build two of these structures based on real-world considerations?

The Phase 2 plan also calls for several culvert-style wildlife underpasses for small mammals, reptiles and amphibians. Because of the width of the Freeway through the Swales, the tunnels would be divided into two segments, with one culvert to take the animals halfway across the road and deliver them onto the median and another to direct them back underground to complete the crossing.<sup>12</sup> The effectiveness of this design is highly questionable.

In summary, the mitigation proposed by the Ministry of Highways is either financially out-of-reach or biologically unrealistic. Risk mitigation is intended to reduce the severity of damage to an acceptable level. The measures proposed by Highways fall far short of meeting this goal.

<sup>9</sup> Phase 2 Report, p. 212

<sup>10</sup> <https://www.cbc.ca/news/canada/calgary/wildlife-overpasses-banff-wildlife-mitigation-cost-study-british-columbia-1.6695994>.

<sup>11</sup> <https://www.cnn.com/2022/04/23/us/california-wildlife-crossing-scn-trnd/index.html>

<sup>12</sup> Phase 2 Report, pp. 212-213



**Sunk Cost Fallacy**

The Sunk Cost Fallacy is an emotion-driven error in thinking that results in bad decisions.<sup>13</sup> It occurs when a person or an organization remains loyal to a commitment in which it has invested in the past—even when it is clear that the future outcomes will be negative. The greater the past investment, the more difficult it is to make the break. It is clear that significant time, money and talent have been invested in planning for Phase 2 of the Freeway. But past expenditures are not a reason or an excuse for burdening the future with harmful consequences.

**Environmental Impact Assessment**

Under the Province of Saskatchewan’s Environmental Assessment Act, the Minister of Environment has the discretion to designate a project as a “development,” making it subject to an Environmental Impact Assessment. Among other criteria, the Act defines a “development” as “any project, operation or activity...which is likely to:

- influence any unique, rare, or endangered feature of the environment;
- substantially utilize any provincial resource, and in doing so, pre-empt the use, or potential use of that resource for any other purpose;
- cause widespread public concern because of potential environmental changes;<sup>14</sup>
- have a significant impact on the environment or necessitate a further development which is likely to have a significant impact on the environment.”<sup>15</sup>

To date, the province has refused to guarantee that an Environmental Impact Assessment of the Saskatoon Freeway will be conducted. As one of the largest infrastructure projects ever undertaken in Saskatchewan, this project clearly merits and requires this legally mandated consideration.

**Advice to City Council**

Based on our careful study of the documents, Swale Watchers have two urgent recommendations for Saskatoon City Council:

1. Given that the Biological Assessment and the Functional Planning Study for Phase 2 of the Saskatoon Freeway demonstrate that irreversible harm would befall the Northeast and Small Swales—two of Saskatoon’s most valuable and valued natural areas—if the project proceeds as planned, we urge you NOT to endorse the Functional Planning Study for Phase 2 of the Saskatoon Freeway.
2. Recognizing that the ultimate authority over where, when or if this project is completed lies with the province, rather than with the City of Saskatoon, we urge you to call on the Government of Saskatchewan to choose a route for the Saskatoon Freeway that does not intrude on the Swales and to guarantee that the project will be subject to a thorough, impartial Environmental Impact Assessment.

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<sup>13</sup> <https://thedecisionlab.com/biases/the-sunk-cost-fallacy>

<sup>14</sup> For evidence of the “widespread public concern,” please see the comments made during the Environment and Heritage panels of the official project engagement in Phase 2 Biological Assessment pp.184/1218 to 205/1218 and 266/1218 to 288/121

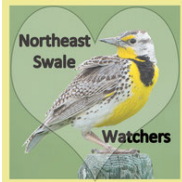
<sup>15</sup> Phase 2 Biological Assessment, p. 5

Respectfully submitted,  
Meghan Mickelson & Candace Savage  
Co-Chairs, Swale Watchers  
swalewatchers.org

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*This position paper is supported by:*





Statement by Swale Watchers to SPC Transportation, March 5, 2024

Speaker: Candace Savage

I hope you have had a chance to review our position paper on this issue, which is in your meeting package. It concludes with two recommendations directed to City Council:

1. We urge you not to endorse the Functional Planning Study for Phase 2 of the Saskatoon Freeway.
2. We urge you to call on the Government of Saskatchewan to choose a route for the Saskatoon Freeway that does not intrude on the Swales and to guarantee that the project will be subject to a thorough, impartial Environmental Impact Assessment.

Our position, including these recommendations, has been endorsed by the Saskatchewan Environmental Society, CPAWS Saskatchewan, Nature Saskatchewan, the Saskatoon Nature Society, Walking Saskatoon, Wild about Saskatoon, Climate Justice Saskatoon, the Saskatoon Climate Hub, Saskatoon Cycles, Saskatoon Unitarians, Living Sky Wildlife Rehabilitation, SOS Trees, Calling Lakes EcoMuseum, and the Friends of the Saskatoon Afforestation Areas Inc., as well as by the dozens of residents who have taken the time to write to you.

A *biodiversity hotspot* is defined as an area that contains a high level of species diversity, many endemic species (plants and animals not found anywhere else in the world) and a significant number of threatened or endangered species. As the Biological Assessment completed by SNC Lavalin for the Ministry of Highways makes clear, the Swales completely fulfill this definition. These relatively small areas are home to hundreds of species, including –according to the SNC Lavalin Assessment–an astonishing 289 kinds of native plants alone. In the midst of this exuberant diversity, the Assessment documents the presence of more than four dozen Species of Conservation Concern (36 types of “wildlife” and 13 kinds of plants)--species so rare overall that their survival is at risk. Yet the Swales provide them with refuge.

No thoughtful person would build a major freeway through ecosystems of this importance and productivity. Forward-looking decision-makers act to protect these kinds of miraculous – and vulnerable—places. They don’t toy with elaborate “mitigations” while continuing to inflict harm. As City Councillors you have shown us that you grasp the need to shield sensitive areas from high-impact developments. From your past decisions and from the intentions expressed in the Official Community Plan and other policies, it is clear that you have taken this understanding to heart.

The engineers at the Ministry of Highways understand this, too. They aren’t proposing to send eight lanes of traffic through the Northeast Swale because they think this ideal or ten lanes

through the Small Swale because they think that the diversity of life doesn't matter. Instead, they seem to sincerely believe that they don't have a choice. They have become captives of past decisions about where the Freeway should go and the one-and-only place to cross the river. Some of these decisions were made more than 20 years ago, and a lot has changed in the intervening decades.

Turning the page on a project like this is not to be taken lightly. But it is telling that the documents provided by the Ministry of Highways are full of reminders about still-to-be-obtained data, ongoing monitoring, pending referrals, unanswered questions. A required, pre-construction referral to the Heritage Conservation Board is lacking. A hydrologist who reviewed the drainage plan for us spoke of a need for "obtaining a substantial amount of additional lidar topography" -- a need for "some hydrological modelling," -- a need for "careful analysis of climate change scenarios." The project is still at a relatively early stage.

**A Functional Plan is a decision-point in a long and expensive process. If we can see at this stage that the proposal is not optimal, this is the moment to say so.**

As Swale Watchers, we make no claim to being experts on economic forecasting. But we can't help noticing that growth in our region is now centered around a tri-city area that includes Saskatoon and the RM of Corman Park, together with Martensville and Warman – the two fastest growing communities in the province. If the purpose of the Freeway is to support economic activity, a more northerly route for the Freeway, perhaps linking into other recent investments in highway infrastructure, might be advantageous for all partners. This would also have the benefit, from our point of view, of reducing pressure on the Northeast Swale and sparing the Small Swale from harm.

Is this an alternative that the City and its partners have investigated? Perhaps your admin could do some digging on this question and report back to you.

In summary, we believe there are compelling reasons to give this issue continued thought. Please do not endorse the Phase 2 report.

Respectfully submitted,

Meghan Mickelson

Candace Savage

Co-chairs

Swale Watchers

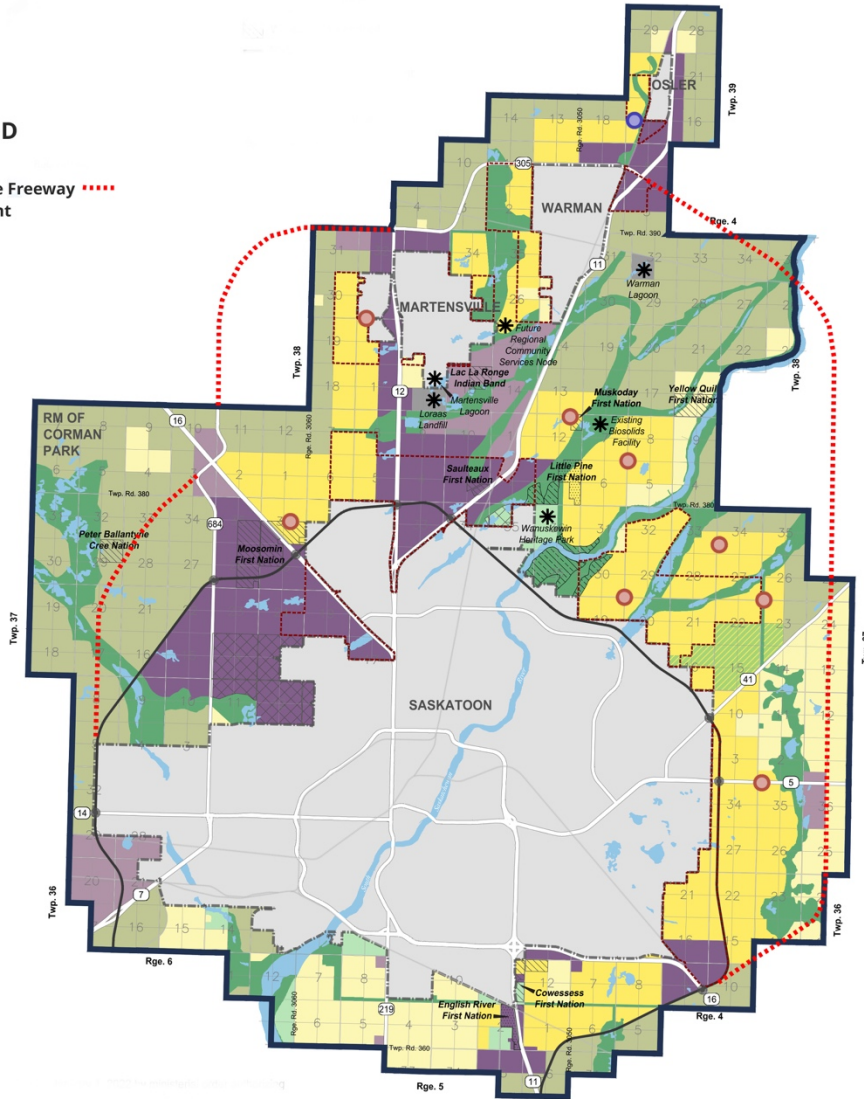
<https://swalewatchers.org/>

# Saskatoon Regional Perimeter Highway

## Alternate Vision to Support Regional Growth

### LEGEND

Alternate Freeway Alignment .....



Base map source: Saskatoon North Partnership for Growth, 2023 June 3, *District Land Use Map*.

March 2024