
From: Web NoReply
Sent: Monday, February 5, 2024 3:21 PM
To: City Council
Subject: Email - Communication - Stewart Coles - Canadian Parks and Wilderness Society - Saskatoon Freeway Planning Study – Phase 2 Endorsement Request - CK 6003-1
Attachments: CPAWS-SK - SPC-Transportation - written submission to agenda item 7.2.2 - Saskatoon Freeway Project phase 2 - Feb 2024.pdf

Follow Up Flag: Follow up
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--- Replies to this email will go to scoles@cpaws.org ---

Submitted on Monday, February 5, 2024 - 15:20

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, February 05, 2024

To: His Worship the Mayor and Members of City Council

Pronouns: He/him/his

First Name: Stewart

Last Name: Coles

Phonetic spelling of first and/or last name: +1 0306 [REDACTED]

Email: scoles@cpaws.org

I live outside of Saskatoon: No

Saskatoon Address and Ward:

Address: 809 Avenue N South, Saskatoon

Ward: Ward 2

Name of the organization or agency you are representing (if applicable): Canadian Parks and Wilderness Society - Saskatchewan Chapter

What do you wish to do ?: Submit Comments

What meeting do you wish to speak/submit comments ? (if known):: STANDING POLICY COMMITTEE ON TRANSPORTATION Tuesday, February 06, 2024 at 2:00 p.m

What agenda item do you wish to comment on ?: 7.2.2 - Saskatoon Freeway Planning Study – Phase 2 Endorsement Request [TS2024-0205]

Comments:
See attached.

Attachments:

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

05 February 2024

His Worship the Mayor and Committee Members,

The Canadian Parks and Wilderness Society - Saskatchewan Chapter (CPAWS-SK) wrote to the Government of Saskatchewan and the City of Saskatoon back in July 2019 and February 2022. In these letters – see addendum 1 and 2 below – we raised concerns to the real potential for significant impact to critical habitat, at-risk species, and natural systems functions as a result of the proposed freeway project – notably its phase 2 alignment and design.

In respect of the more recent documentation attached to the public agenda for the *Standing Policy Committee on Transportation* we are concerned by the language of the *Endorsement Request* (Admin Report) that suggests *no evident advantages* exist to not endorsing the study (option 1) and similarly, *no evident disadvantages* to endorsing the study (option 2). This language shows a complete disregard for the clear impact this phase 2 alignment/design will likely have on the landscape, the areas inherent value from ecosystem services, and to the necessary conservation needed to effectively manage and protect this important ecosystem.

Other development in the area and preparations of infrastructure for University Heights 3 development has already fragmented the landscape. Numerous studies in the area have identified and acknowledged the need for wider and more detailed ecological studies, and noted the presence of numerous at-risk species, e.g. Northern Leopard Frog. City Council, back in February 2023, also supported and endorsed greater protection boundaries in and around the Small and NE Swale Complexes, suggesting an understanding and appreciation for the importance placed on this area of the city.

But we remain concerned that priorities around wetland management and broader conservation management is not being given the attention and consideration it needs and deserves, even with key policies and guidelines in place. There is some excellent work being undertaken by the city to manage its natural areas and in the process much of this work has identified the importance and risks associated with development in and around these important features. This city funded program and that of key policies and guidelines, i.e. Wetlands Policy, etc., should, therefore, play a more central and equitable role in informing the decision-making process.

We look to this committee and any recommendation that goes to council to ensure that these values are given the utmost consideration and priority. The opportunities and need of protecting this area are well documented, for which the natural areas work of the city is building upon. In addition, the ongoing and extensive work already undertaken by Meewasin and other organizations to explore the potential of a National Urban Park in and around Saskatoon remains a significant opportunity for the City of Saskatoon to work towards a holistic approach to conservation and showcase the region's environmental credentials.

Thank you for the opportunity to share our comments with this committee. Should you have any queries regarding these comments, please do not hesitate to contact me.

Yours sincerely,

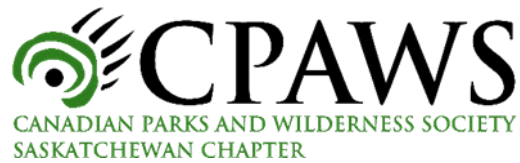
Stewart Coles

Interim Executive Director

Canadian Parks and Wilderness Society – Saskatchewan Chapter

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ADDENDUM 1



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Date: 26th February 2022

To: Geoff Meinert, Saskatoon Freeway Project Manager
Cc: Hon. Fred Bradshaw, Minister of Highways and Infrastructure
Hon. Warren Kaeding, Minister of Environment
Charlie Clark, Mayor of Saskatoon
Randy Donauer, City Councillor (Transportation)
Sarina Gersher, City Councillor (SEAC)
Mike Velonas, Meewasin Valley Authority
Erika Ritchie, NDP Opposition Critic for Environment
Matt Love, NDP Opposition Critic for Parks & Municipal Affairs

RE: Saskatoon Freeway Functional Planning Study: Phase 2 Public Information Session

The Canadian Parks and Wilderness Society - Saskatchewan Chapter (CPAWS-SK) wrote to the Government of Saskatchewan and the City of Saskatoon back in July 2019. In this letter – see addendum below – we raised concerns for the potential for significant impact to critical habitat and natural systems functions because of this proposed freeway project.

CPAWS-SK wishes to reiterate those concerns and provide further comment on more recent studies, proposals (including the National Urban Park feasibility study), and the broader concept of a cumulative impacts assessment.

LATEST STUDIES

The *'Habitat Evaluation of the Saskatoon Freeway Project Through the Northeast and Small Swale Complexes'* – an assessment completed by the Meewasin Valley Authority in 2020 – concluded the following:

"The area provides habitat for numerous Species at Risk and rare species and provides a wildlife corridor for large and small mammals between the South Saskatchewan River, the Northeast Swale and the Small Swale and within each Swale complex. The unique characteristics of the Small Swale complex requires additional study to better understand the habitat this area provides for flora and fauna as well as its larger contribution to habitat connectivity within the region."

While the latest alignment - concept 3 - for this freeway has moved further north and is suggestive of a lesser impact to key habitat, the findings of the MVA study (2020) identified important habitat through all three concepts and especially through this current/proposed alignment. To list a few areas of note from the MVA study – specifically, the new alignment through the Small Swale ecosystem - and the potential impact to important ecological and cultural features, 'Map 8' of the 2020 study records culturally significant records of Western Red Lily and a Bison Rubbing Stone in the general vicinity of the new alignment; 'Map 10' identifies rare Marsh Felwort; 'Map 15' identifies Rare Plant Complexes,

habitat suitable for Species at Risk Breeding Birds, and potential Breeding and Winter Habitat for Northern Leopard Frogs.

What the latest alignment is showing us is that the potential and likely impacts to these complexes remain high, and especially to the Small Swale and its connected habitat. The MVA report highlighted the need to better understand this ecosystem and we are yet to see any form of detailed assessment other than the continued examples at these information sessions of various design options. We also notice from the information session that the freeway through the swales area is set to be 5-lanes in each direction. The drawings and scale do not seem to show the greater impact of a wider road network through this area. It is noted that the 8th Street area will be 3-lanes in each direction (less than the 4-lane minimum proposed for the entire freeway network), yet the drawings depict a similar footprint for 4 extra lanes through the swales.

We, therefore, **seek clarification** on the representation and impact of these changes in design and greater footprint this northern phase 2 section clearly has. We remain concerned that the impact of a 10-lane highway – plus additional safety features and construction impacts widening this footprint even further – will be devastating to the surrounding ecosystem and have great consequences to its natural function, its ecosystem services, cultural value, and to critically important flora and fauna.

SNC Lavalin (2020) Report

A further report prepared by SNC-Lavalin (August 2020) seems limiting in scope, with priority for data gathering from a desktop review and rapid roadside and meandering assessments (roadside being the dominant assessment – only 2 meandering assessments in phase 2 (Appendix E)). It is noted in the report that the methods for this report were primarily used to “*develop recommendations for future survey work*” and thus, should not be seen as anything more than an initial basic screening report for the project, which excludes the entire Small and NE Swale area, due to this work being undertaken by the MVA. This report made some broad statements on the presence - or not - of SOCC species but based on the methods used and the key locations within the Small and NE Swales being assessed by the MVA (2020), it is difficult to glean any firm results from this study to effectively inform the adequacy and impact of this latest phase 2 alignment. Its recommendations and statements noted, for example, “*...most quarters have at least remnant habitat that could support rare vascular plant species*”, “*considerable habitat for amphibians and mammals*”, “*considerable habitat for nesting and breeding birds, including a diversity of habitat (large wetlands, tree stands, and remnant native prairie)*”, and more notable in terms of the usefulness of this study to inform this new alignment, is the many recommendations and references throughout this report that further studies will be required, or that data collection is still underway.

We **support and recommend** that targeted species detection surveys – recommended in the SNC report – are undertaken at the earliest opportunity to best inform the impacts of this new alignment. Using the protected Northern Leopard Frog as an example here and as noted in the report, they “*will use wide varieties of wetland habitat for the varying stages of their lives, including differing habitat requirements for breeding, foraging, and overwintering*”. The species’ varying habitat requirements make it particularly susceptible to anthropogenic habitat change, thus habitat loss, habitat fragmentation, environmental contamination and increased incidence and severity of drought (linked to the unique hydrology of the Small Swale) are all threats. Northern Leopard Frogs depend on landscape complementation. The combined effects of drought and a lack of habitat may result in regional collapses. Repeated premature drying of ponds can lead to population extirpation - a significant risk with the Small Swale. As stated above, the species has a number of habitat requirements, notably, wintering habitat is water bodies (i.e., the Small Swale) and moist upland meadows, and native prairie during the summer, with riparian habitats facilitating dispersal and providing additional corridors for movement between habitats (https://www.sararegistry.gc.ca/virtual_sara/files/cosewic/sr_northern_leopard_frog_0809i_e.pdf).

As per 5.2.3 (Phase 2) of the SNC report, no specific mitigation measures are proposed until “*additional survey work is complete*”. Without any detail or additional survey work we question how we can provide an effective critique/assessment of the likely impacts of this phase 2 alignment on critical habitat and species. We welcome the opportunity to be pointed in the direction of this additional work or we **recommend** that this phase of the project determination is put on hold until adequate data is available for public scrutiny.

CUMULATIVE IMPACTS

With regards to the cumulative impacts of this proposal, again, we are yet to see any adequate assessment of its cumulative impacts. The MVA study very briefly highlighted the ongoing work with regards to the UH3 neighbourhood proposal, but it was not completed or made public in time to form part of any meaningful assessment. Considering this now public UH3 report (March 2021), it is clear there is the potential for significant impact the UH3 development alone could have on existing natural and native habitat, along with the disruptions to the functions of natural systems and the ecological services they continue to provide. We reiterate the need for more detailed ecological studies, including a cumulative impacts assessment, to ensure any proposed developments in this sensitive location avoid a likely significant effect. As it stands and without more detailed ecological data, **this proposal in its current form and location will have a likely significant effect on the integrity of the Small and NE Swales complexes and its surrounding, supporting and connected habitat.**

You state in your information session that “*because this area has not been extensively studied, we completed additional work in 2021 to identify potential habitat that may need to be protected*”. Firstly, we are concerned by the further acknowledgment of a lack of studies, yet we see these ambitions to finalize and secure alignment before this habitat has been properly studied and its findings shared. Your latest engagement email has already suggested “*when Phase 2 is finalized, the land needed for the freeway will be identified and protected*”. Secondly, we do not see this 2021 data detailed within this latest information session. We, therefore, **seek further clarification** on the status and nature of this “additional work”, why it does not form part of this engagement, and how this alignment could be ‘finalized’ and ‘protected’ before critically important cultural and ecological impacts are better understood.

OTHER PLANS & PROJECTS

In addition to the work being undertaken around multiple development proposals and plans in the area i.e., UH3, OCP, P4G etc., we are keen to understand the Government of Saskatchewan’s interest and/or support for a proposed National Urban Park (NUP) in Saskatoon. While only in its feasibility stage, there is City and Federal support to move this proposal forward and the process to start identifying boundaries and governance options for such a park is already underway, with recommendations due shortly. While a NUP through the main corridor of the river valley and City will not be hampered by these developments, the overarching objective of a NUP should be the ecological integrity of identified landscape/habitat features for ecological, recreational, and cultural benefits, including the protection – and potential restoration - of existing natural and native habitats and other natural systems that connect to the river and other important habitats like, for example, the Small and NE Swale complexes, West Swale, and Wanuskewin. The same questions are already being asked of other development proposals and how they will consider the boundaries and interaction with a NUP. It is critical the proposal of a NUP is not largely ignored by the numerous projects and plans for this quadrant of the city, and especially by the province’s interest in a 10-lane freeway through the area. The potential of a National Urban Park in Saskatoon is a game changer for the City of Saskatoon, the region, and Province. Its economic gains and prosperity for the region are significant and should be a leading factor in boundary considerations throughout key areas of the city, including the broader landscape of the Small and NE Swale complexes.

CONCLUSION

It is very disappointing and concerning to see formal information sessions lacking in critically important studies, especially those related to ecological and cultural considerations, and when the MVA study, SNC report, and this information sessions suggests further work is required. We **recommend** that the determination of this alignment is postponed until all relevant and recommended studies have been undertaken and its findings made public.

As previously stated in my letter dated 18 July 2019, the greater conversation that should come from this is providing these important natural and native ecosystems the protection they deserve and ensuring we are leaders in the preservation of important environmental and cultural assets.

Should you have any queries regarding these comments, please do not hesitate to contact us.

Yours sincerely,

Stewart Coles

Conservation Program Manager

Canadian Parks and Wilderness Society – Saskatchewan Chapter

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ADDENDUM 2



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Date: 18 July 2019

Government of Saskatchewan

&

City of Saskatoon

To: Geoff Meinert, Saskatoon Freeway Project Manager
Cc: Hon. Lori Carr, Minister of Highways and Infrastructure
Hon. Dustin Duncan, Minister of Environment
Charlie Clark, Mayor of Saskatoon
Randy Donauer, City Councillor (Transportation)
Sarina Gersher, City Councillor (SEAC)

Re: Saskatoon Freeway Project

We write in respect of the Saskatoon Freeway Project, a 55km stretch of divided highway that in part is proposed to cut through the “*ecologically sensitive area*” (Saskatoon Freeway website) of the Swales in the north east quadrant of the City of Saskatoon.

The Canadian Parks and Wilderness Society - Saskatchewan Chapter (CPAWS-SK) raises concerns that in its current location this proposal has the potential to significantly impact critically important habitat. Native grasslands are among the most endangered ecosystems on the planet and here in Saskatchewan there has been a steady if not rapid decline of this increasingly rare habitat, seeing nearly 90 percent lost to the cumulative effects of development and the broader cultivation of land. With only fragments

of this habitat remaining across the prairies of Saskatchewan it is imperative we do all we can and that is necessary to cease any further degradation, loss and fragmentation of this critical habitat. **We encourage the Government of Saskatchewan and the City of Saskatoon to ensure major highway operations, residential developments and other associated infrastructure in this location are subject to the most stringent of environmental assessments and ensures, where critical habitat and at-risk species are identified, avoidance measures (first solution) and robust/long-term mitigation plans (last solution) are a requirement for any subsequent approval/decision.**

LACK OF ENVIRONMENTAL DATA

With a lack of any detailed environmental assessment prior to determining the Freeway's routing, CPAWS-SK is concerned decisions and endorsements are being made without the necessary information and without a complete and robust environmental assessment of the impact the Saskatoon Freeway could have on the ability of this ecosystem to naturally function and to its potential negative impact on important habitat and species, including Species at Risk. We are aware several minimal studies are being undertaken during this summer (2019). Yet we remain concerned the purpose, timing and detail of such studies will lead to inadequate data to determine the full extent of what is present across the area. This includes the potential limitations of the ecological assessment boundary and how this assessment would best inform on the project's wider impact and any subsequent mitigation plans. **We therefore seek further clarification on the extent of these studies and any additional research that will be used to best determine and inform the location of the freeway and its likely impact.**

Work already undertaken by the Meewasin Valley Authority (MVA) has identified numerous key species, notably Species at Risk (SAR) and Species of Conservation Concern (SOCC), within the broader area, highlighting the vital role this critical ecosystem is providing to the many species that rely on these rich mosaics of wetland, riparian and grassland habitats. A recently published article looking at the ecosystem services of the northeast Swale considers previous MVA assessments of the ecosystem which identified *"the planning and future development of adjacent residential neighbourhoods is an enduring threat, that will shrink and further impact the Swale"*¹. Considering these studies alone, including work undertaken by UoS PhD candidate Warrick Baijijus², who has identified current gaps in knowledge and outstanding concerns, a healthy and functioning ecosystem plays a pivotal role in providing positive benefits to society and biodiversity. It is concerning decisions have been and continue to be made on this ecosystem where *"there remains no serious discussion about the implications of climate change, biodiversity, or conservation in any of the studies to this point"* (Baijijus, 2019).

The Saskatoon Freeway website states, as part of its environmental considerations, *"through the functional planning study, the Ministry of Highways & Infrastructure will work closely with stakeholders to reduce or eliminate potential impact to this ecologically sensitive area."* Without access to the project's business case or any study or engagement plan addressing the economies of alternative routing, we are left to hypothesis as to what these economies truly mean. We therefore must question the above quote that looks to *"eliminate"* potential impacts. When we talk about the elimination of potential impacts it is with the intention that any negative impacts to an ecosystem could and should be avoided. We therefore remain concerned that no alternatives are being considered or presented.

We are further concerned to hear that the City of Saskatoon and the RM of Corman Park have endorsed this project through the Swales before a comprehensive ecological assessment has been undertaken.

¹ A GIS-based model of ecosystem services for the Northeast Swale in Saskatoon, Saskatchewan - Spatial Knowledge and Information Canada, 2019, 7(1), 4, RONG SHEN, HONGHAO YU, ET AL - <http://ceur-ws.org/Vol-2323/SKI-Canada-2019-7-1-4.pdf>

² Comprehending Swale Ecosystems: Research Synthesis and Analysis, Warrick Baijijus, 2019 - <https://artsandscience.usask.ca/news/articles/3737/> [Nature needs space New USask report makes recommendations t](#)

We would certainly like to better understand the City of Saskatoon's position on this project, especially in relation to the relevant environmental policies and further processes to be considered.

While we welcome any intention to reduce and eliminate potential impacts to this ecological sensitive area, without a comprehensive ecological assessment and mitigation plan there remains a likelihood of harm to this critical habitat as a result of this project. **Therefore, the direct loss, degradation and fragmentation of wetland, riparian and grassland habitat remains of critical concern to CPAWS-SK.**

CONCLUSION

Our urban environments are not immune to the effects of climate change. We place ourselves at even greater risk to the effects of climate change when we degrade, fragment and eliminate important natural spaces. Municipalities are clearly engaged in the need to develop a response in the form of policy and strategy to address their role, impact, and solutions to this very real and pressing issue. The Federal government has also underlined the pressures our urban and wilderness environments are experiencing by declaring a climate emergency, and Canada alone is already reporting higher than normal warming compared to other parts of the world.

We have separately acknowledged work under way on an 'offset scheme' by the province to address GHG emissions and have provided concise comments centred on the need for nature-based solutions. This would see the protection and better management of forests, wetlands and grasslands by governments as the ideal solution. Nature-based solutions offer a valuable and overdue strategy for combating climate change while protecting the province's unique biodiversity, for which the Swales represent a strong and robust example of this solution.

With the implications of a major development proposal through the Swales, it is essential that the long-term interests of grassland, wetland and riparian habitat and their associated species, including species at risk, are a priority consideration for the Government of Saskatchewan and municipalities in the decision-making process. Whilst economic development in our province is necessary, the unnecessary degradation, loss, disturbance and fragmentation of one of the most endangered ecosystems on the planet is not. We see this project as having the potential to negatively impacting critical native grassland habitat, important wetland and riparian habitat and their key species. We feel there must be a decisive voice when it comes to tackling climate change and biodiversity loss from all levels of government in Saskatchewan on this matter.

We see the prioritization and protection of this ecosystem as critical for its value to broader climate action, to society as an important cultural and natural space, and to the species that make it the ecologically and culturally important area it is and has been for thousands of years. We would suggest there is significant value (social, cultural, economic, environmental) to be harnessed from the long-term protection of this natural ecosystem for the benefit of all.

With only 11.8% of Canada's land and freshwater protected as of Spring 2019 – less than 10% in Saskatchewan – as part of the internationally agreed 17% protection target by 2020, it is abundantly clear – we can and should be protecting much more. “...*Its achievement will require the collective contribution of federal, provincial and territorial governments, Indigenous organizations, municipalities and local governments, non-profit organizations and the private sector*” (CCIUCN)³ to adequately meet this target and to continue in the same vane towards the milestone CPAWS advocates to protecting 30% of land and freshwater by 2030⁴.

³ IUCN Canadian Committee (CCIUCN), Pathway to Canada Target 1 - <https://cc-iucn.ca/category/pathway-to-canada-target-1/>

⁴ Canadian Parks and Wilderness Society (CPAWS), July 17, 2019 - https://cpaws.org/cpaws-calls-for-urgent-and-ambitious-action-to-tackle-canadas-nature-emergency/?fbclid=IwAR3qcoKvIS96nlmz-euemyjE3C4DeEe2emelKcpWYg_M5eg3K7Vb-Q9TjZo

The greater conversation that should come from this is providing this important ecosystem the protection it deserves and ensuring we are leaders in environmental protection and the fight against climate change. Should you have any queries regarding these comments, please do not hesitate to contact us.

Yours sincerely,

Stewart Coles

Manager of Operations and Programs (southern region)

Canadian Parks and Wilderness Society – Saskatchewan Chapter

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