



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

September 16, 2024

Alberta Environment and Protected Areas
Approvals Unit, 5th Floor, South Petroleum Plaza
9915 108 Street
Edmonton, Alberta, T5K 2G8
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Statement of Concern Re: Water Transfer from Bow River Irrigation District to Town of Cochrane

Dear Alberta Environment and Protected Areas,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide this Statement of Concern (SOC) on Application #: DAPP0083918 submitted by the Town of Cochrane on August 29, 2024, requesting the permanent transfer of 825 acre-feet (1,017,620 m³) of water under a license issued to Bow River Irrigation District (BRID). This application is to divert water from the Bow River through the works of Carseland-Bow River Headworks System at SW 32-021-25-W4M to Town of Cochrane's water intake at SW 04-026-04-W5M on the Bow River.

AWA is an Alberta-based conservation group with more than 7,500 members and supporters across Alberta, Canada, and around the world. AWA seeks the completion of a protected areas network in the province and is mandated to ensure the good stewardship of Alberta's public lands, waters, and biodiversity so future generations can enjoy the abundant benefits they provide.

Located in Calgary's community of Hillhurst, AWA's office (5-21-24-1 W5) is between the Town of Cochrane's water intake (32 km SE) and BRID's diversion point at the Carseland-Bow River Headworks System (52 km NW). Therefore, AWA is directly affected by the water transfer proposed under this application, as water diversions upstream can impact the quantity and quality of water downstream. In addition, transferring water further up the Bow River has implications for ecosystems and communities below the diversion point.

The Water License from which the water is to be transferred was issued within the Bow River Sub-Basin. The Government of Alberta closed this sub-basin to new Water Licenses in August 2006 when it was recognized that the Bow River — among the other main tributaries to the South Saskatchewan River Basin (SSRB) — was over allocated, with insufficient instream flows in some reaches.

The federal government recommends that 90 % of a river's natural flow should remain instream to maintain the ecological integrity and function of the aquatic ecosystems. The provincial government's threshold is slightly lower, at 85 % of a river's given volume. In 2023, the AEPA recorded the Bow River's natural flow at just over 2 billion m³. In contrast, licensed demand for water was ~2.3 billion. It is evident that the Bow River is not just overallocated, it is over consumed (Figure 1). This situation threatens the

long-term viability of the watershed and requires the implementation of all conservation measures to restore instream flows in the Bow River.

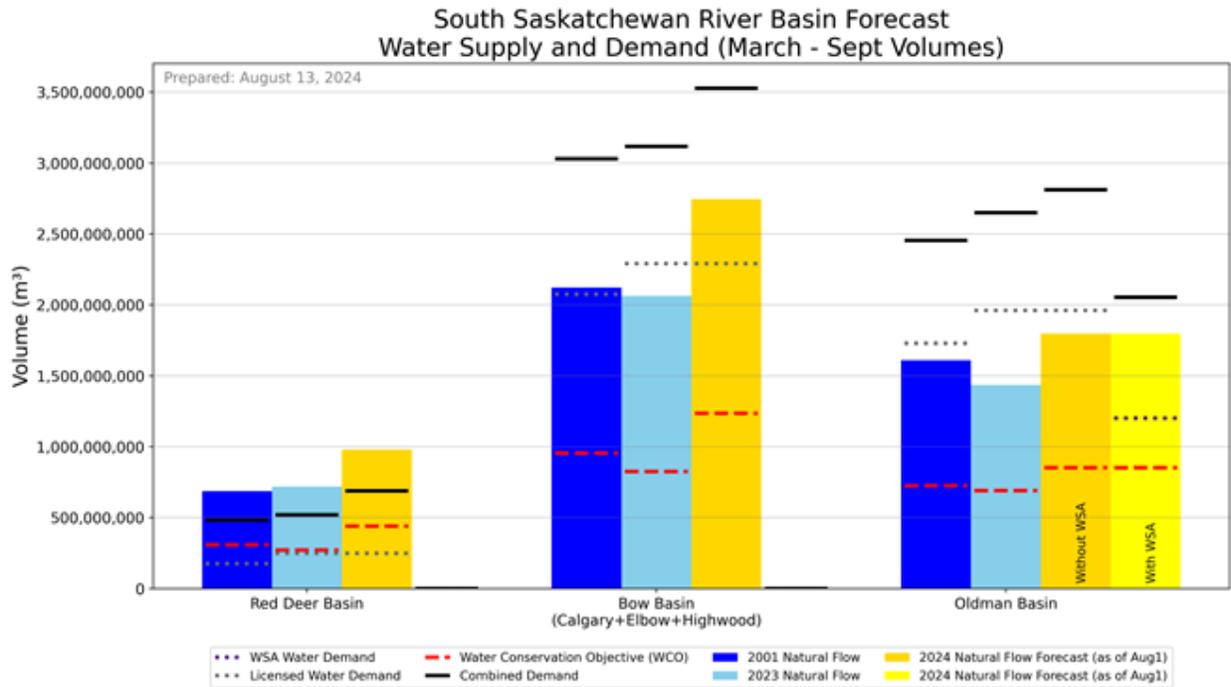


Figure 1: August 2024 Water Supply and Demand Chart. Provided upon request from Alberta Environment and Protected Areas. Natural flow represents the predicted flow at a station in the absence of significant human impacts upstream (e.g., reservoirs, diversions, etc.). Natural flow is an estimate of the baseline conditions and is used to determine whether diversion of water is within a water conservation objective (WCO).

As highlighted in the Auditor General’s July 2024 [Report](#) on Surface Water Management, the consequences of not taking action and failing to effectively implement water conservation measures could create “increases the risk of water shortages,” leading to “higher costs, shortages of goods, and an inability to meet future water needs for people, businesses, and the economy.”

Under Section 83 of the Water Act, the Director may withhold up to 101,762 cubic metres (10%) of the allocation of water being transferred. Any water withheld may be licensed to the provincial Government for protection of the aquatic environment or for implementation of a water conservation objective. Since water conservation objectives are not often met in the basins where they have been established, this water transfer provides an opportunity for the Director to ensure that some water is redirected towards the needs of aquatic ecosystems.

As one of the few legislative tools available to address overallocated basins, AWA requests that this power be exercised during this water license transfer and all future transfers within the SSRB. While the volume is seemingly a minor fraction of the natural flow, any water withheld for the purposes of maintaining ecological integrity is a step in the right direction and cumulative over time.

Thank you for considering our concerns.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION



Kennedy Halvorson
Conservation Specialist