



Honourable Stephen Crocker
Minister of Transportation and Works
P.O. Box 8700
St. John's NL, A1B 4J6

May 10th, 2019

Re: Leary's Brook Floodplain Development

Dear Minister Crocker,

Northeast Avalon ACAP urges you to reconsider the proposed development of a new mental health facility in the Leary's Brook floodplain. While this facility is very much needed and welcome, the proposed location is wholly inappropriate for development and threatens the ecological integrity of the Leary's-Rennies watershed in Pippy Park, and poses a severe flood-risk for residents downstream.

This area has experienced severe flooding in recent decades, including a major flood during Hurricane Igor in 2010. The [2014 CBCL Rennies River Catchment Stormwater Management Plan](#) noted the potential for "major public and private property damage" and estimated approximately 4,000 m² of river banks would need to be rehabilitated along the Rennies River and Leary's Brook system at a cost of nearly \$10 million. Climate change projections suggest the risk of severe storms and flooding are only expected to increase in the coming decades.

While a berm may reduce the risk of localized flooding, it is almost certain to increase flood damage downstream. Engineers have correctly suggested the berm would mitigate flood risks for the new facility. However, this also creates the effect of floodwater moving more quickly further along the system. This will result in an increased stream velocity as a result of channelization, increased erosion of the riverbanks, increased water levels, and increased frequency of flooding. Engineered flood mitigation is known to be a costly battle and always a losing one. Natural systems always provide the best flood controls and as climate change threats increase, we should be expanding floodplain areas through natural restoration rather than removing existing flood mitigation capacity.

Stream channelization has a number of negative ecological effects. It reduces species richness, abundance, diversity, and habitat. Channelization alters the structure and composition of the streambed, which is important for fish species that reside in this system. Considerable money and effort has been put into restoring wild Atlantic salmon

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populations in this river. Proceeding with this development will jeopardize decades of rehabilitation efforts and reduce the overall health of the watershed.

This proposal is also in direct violation of City of St. John's development regulations and our own provincial government's policies that state development should not occur in a floodplain. In this case, development is proposed within a flood plain, with known severe flood risks, and downstream property damage is almost certain. Section 6.04 project classifications under the [Policy for Floodplain Management](#) states that under no circumstances are institutional developments permitted in a flood plain.

The people who live and work in the Memorial University, Churchill Park, and Rennie's River areas have not been made fully aware of the ecological impacts, the increased potential for flood hazards, or the burden of flood-control costs associated with this development.

We advocate for a more sustainable design, that incorporates available science, the concerns of residents, and the concerns of the City of St. John's council and staff. There are alternative designs that could be considered. Constructing a parking garage on the existing Health Sciences property would reduce the overall construction footprint, create space for a new mental health facility, and vastly improve existing parking congestion.

We join the chorus of voices and urge you to halt any further development in the floodplain until you are able to engage stakeholders and create a solution that is sustainable, compliant, and legally justifiable.

Sincerely,

Nick White

Chair, Northeast Avalon ACAP

cc. Hon. Graham Letto, Minister of Municipal Affairs & Environment,
Hon. Gerry Byrne, Minister of Fisheries & Land Resources,
Mr. Sean Kelly, Chair Pippy Park Commission

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