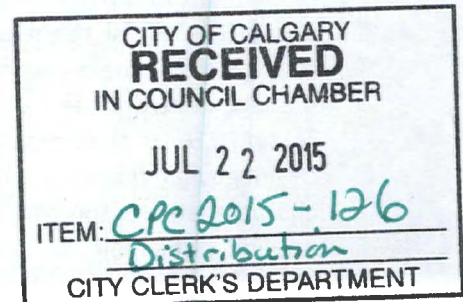


July 17, 2015



President
Steve Meadows

Vice President
Michael Kenny

Secretary
Bill Morrison

Treasurer
Dave McIver

Director
Muhan Guna

Director
Terry Klassen

Director
Hugh Magill

Director
Mike Murray

Director
Sarah Nevill

Advisor
Brian Pincott
(Calgary Councillor, Ward 11)

Advisor
Harpreet Sandhu
(Calgary Water Resources)

Advisor
Darrell Sargent
(Calgary City Wide Policy)

Advisor
Robin Sauvé
(Calgary Community Initiatives)

Advisor
George Stalker
(Calgary Parks)

Attn: His Worship the Mayor and
Members of City Council
The City of Calgary

**Re: HASKAYNE AREA STRUCTURE PLAN, BYLAW 27P2015
For Consideration by City Council of Agenda item 8.2
at Public Hearing commencing July 20, 2015**

The proposed Haskayne Community represents the entranceway of the Bow River into Calgary, a major river reservoir providing riparian and upland habitats, and a multitude of natural amenities including prairie streams, escarpment and mountain vistas, and recreational opportunities. It is also adjacent to a major drinking water source for the Calgary region. There is concern when development and intensified use is planned for lands that offer natural features and provide significant contributions to the area. However, an Area Structure Plan also represents an opportunity to conserve, protect and enhance the natural functionality and biodiversity potential of our river valleys.

Members of Calgary River Valleys have reviewed the proposed Haskayne Area Structure Plan and would appreciate your consideration of the following comments.

1. Process

The condensed process resulting from developer-funded Area Structure Plans (ASP) shortens the time frame available for study and consideration of findings. The proposed Area Structure Plan does clarify that the Plan is not to be interpreted as approval for land uses on any specific sites, noting that additional evaluation is to be conducted at the stage of future applications. However, upon approval of the Area Structure Plan, an *expectation* is created that lands will develop and uses will be allowed, and there will naturally be pressure and a tendency to find solutions to any future study findings that might otherwise restrict development. More in-depth study and consultation to determine the cumulative impacts of the proposed development including the Master Drainage Plan and Biophysical Impact Study, prior to the preparation of the Area Structure Plan, would better serve the decision-making process.

2. Master Drainage Plan/Hydrological Study

The West Regional Context Study approved by Council in 2010 has already identified the need to plan for these lands carefully, directing required study of a potential subsurface alluvial aquifer and its extent and relationship to the adjacent Bow River/Bearspaw Reservoir. Section 5.6 of the West Regional Context Study notes that, "The results of this study will be important in determining appropriate land uses for this area." To date, the required study has not been completed and therefore is not being taken into account in the decisions regarding land use



that would be made with the approval of this Area Structure Plan. Sections 2.3 and 6.6 of the Proposed Area Structure Plan acknowledge the sensitivity of the reservoir to pollutants resulting from urban development and recognize that development and stormwater impacts pose a level of risk to the quality, safety and cost of Calgary's drinking water system. We recognize that the proposed Plan directs by policy and intention statement, that stormwater management/drainage will be done in a sensitive and positive fashion. It is acknowledged that section 6.6.7 of the proposed Area Structure Plan does provide that the outputs of the Master Drainage Plan may require amendments to the Area Structure Plan. However, the unique characteristics of this site, specifically the potential presence of an aquifer and the immediate proximity of a major drinking water source for the City should suggest the need for evaluation of study results *before* Area Structure Plan approval.

We understand that the Master Drainage Plan, as well as a Hydrogeological Study are underway and that completion of final reports for both studies is anticipated for the fourth quarter of 2016. The results of the Master Drainage Plan could have major implications for the development potential of these lands. There are many methods and processes to arrive at stormwater management, each of which will have different degrees of impact and benefit on ecological functions and may suggest significantly different land uses, infrastructure requirements, and development standards. Given the circumstances of these lands, the requirement for more study and the lack of decision on major elements of drainage, there is concern that land use decisions proposed by the plan will have undesirable impacts on natural areas and drinking water quality.

It is appropriate that the finalization of the Haskayne ASP be deferred until the proposed Land Use Concept map and policies can benefit from the results of these studies.

3. Environmental Open Space

The proposed Plan recognizes these lands as the "gateway to a regional system of parks" celebrating the linkage provided to the Haskayne Legacy Park and the Glenbow Ranch Provincial Park at the northwest end of the Plan Area. There is concern that the proposed Plan does not specifically address the requirement that the wildlife corridors should also connect with and serve the existing riverside parklands/natural areas to the south and east within the City. Incremental barriers and land use changes in past years have reduced the viability and threatened the biodiversity of our existing river valley natural areas. It is essential that at this opportunity we avoid any further reduction of wildlife corridor viability.

Concern has been raised that the width of the Environmental Open Space (EOS) Study Area adjacent to the river as identified in the proposed Plan, is insufficient, particularly where the EOS boundary is defined by the railway corridor where it is located close to the water's edge. In these areas, the Environmental Open Space Study Area should be extended beyond the rail corridor to the north and east to allow consideration of an appropriate wildlife corridor. The rail corridor is reason to widen and better manage the river corridor, not to further restrict it.

We are also concerned that the suggestion set out in Section 5.4. b) for a berm and acoustical wall along the railway, serves to exacerbate the concerns about an adequate wildlife corridor. The wall will serve as a barrier and will further reduce the effectiveness of the wildlife corridor. We note that this would conflict with Section 2.6.4 of the Municipal Development Plan that gives protection to and the highest priority in land use to unique and sensitive ecological areas.

Such a sound barrier, (berm and wall would combine to be 18 feet in height) would be an undesirable visual impact issue. We note that other residential neighbourhoods adjacent to rail lines in Calgary do not have such acoustical walls. If such mitigation of sound impacts is deemed to be necessary, it is suggested that the City consider other more benign and positive contributory solutions including for example, larger setbacks and/or berming plus heavily vegetated and treed buffers, relocating residential zoning, and design and building standards for sound protection.

We note as an aside that Section 5.4 contains inaccurate numbering for illustrative figures, and Figure 17, also called Figure 14 in 5.4.3.c), appears to have inaccurate minimum offset requirements for "all other uses including institutions, high-density residential etc."

Concern has been expressed that the rudimentary biophysical inventory provided for the Area Structure Plan preparation did not consider issues such as the long term potential to optimize the function of the river edge and setback area. As a consequence, significant contiguous areas along the river have been removed from the Environmental Open Space Study Area, apparently based upon their present uses and their disturbed state, disregarding their long-term multigenerational value. If these lands are *not* included in the Study Area, they may be approved for development in a Land Use Amendment application and the opportunity lost for their inclusion in a Reservoir Park.

We believe that this planning process presents a legacy opportunity to provide for a special Natural Area Park. This Area Structure Plan should ensure that a *generous* protective access and wildlife habitat and corridor setback should be established along the reservoir. We propose that this setback corridor be combined with Haskayne Park into a Major Natural Area Park as defined in the Natural Area Management Plan. As, and when possible, the reservoir itself should be incorporated as a part of this new Natural Area for management purposes. This is an opportunity for the Area Structure Plan to inform or direct the long-term multigenerational functionality of what should be a significant amenity.

We ask Council's consideration of these comments prior to decision on the Haskayne Area Structure Plan. We appreciate the opportunity to participate in the planning of this unique and highly valued reach of our river valleys.

Sincerely,

Steve Meadows
President, Calgary River Valleys

Bill Morrison
Chair, Watershed Policy and Planning
Committee, Calgary River Valleys

c.c. CRV circulation