



June 11, 2019

City of Calgary SPC for Utilities and Corporate Services (UCS)
-and- City of Calgary Members of Council
The City of Calgary
PO Box 2100, Station M
Calgary, AB
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Dear Members of SPC for Utilities and Corporate Services & Council:

Re: SPC-UCS – June 19, 2019 | Update of the Nose Creek Watershed Plan

BILD Calgary Region and NAIOP Calgary offer this letter with respect to the Update of the Nose Creek Watershed Plan to SPC-UCS being presented on June 19, 2019.

Both NAIOP and BILD wish to express our appreciation of the open and transparent manner in which the City represented by Water Resources has been working with industry with respect to the significant challenges of the volume control targets outlined in the 2008 Nose Creek Watershed Water Management Plan. It has been exemplary of the ability of industry and the City to work together to reach solutions collaboratively. It is important to make a clear distinction between the City itself on this engagement and the work they recommend in their report, and the overall Nose Creek Partnership as outlined below.

In 2008, the City of Calgary adopted the original 2007 Nose Creek Watershed Water Management Plan. The Plan outlined an approach for staged implementation of recommended volume control targets, which was intended to allow technology and industry best practices to develop and for stakeholders to adapt to more stringent volume runoff targets. At that time, and to this day, industry supports the overall objectives and intentions of both the current and draft updated Nose Creek Watershed Plan that is before you now.

However, we believe it is fair to say that both the City and industry recognize that the targets outlined in the 2007 Nose Creek Watershed Plan remain, for all practical intents and purposes, unattainable at this time. Targets were outlined for 2013 within the 2008 Nose Creek Watershed Plan, and in 2019 they remain infeasible (and in a commercial or industrial context, essentially impossible) to implement. Both industry and the City have acknowledged that advances in stormwater management techniques have evolved significantly, but current tools,

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science and implementation are not able to meet 2013 targets (never mind the 2017 targets outlined in the 2008 Nose Creek Plan).

In early 2018, the Nose Creek Partnership was requested by industry to re-engage on the Nose Creek Watershed update, however, the engagement by the Partnership was limited, and unfortunately appears to have been generally unproductive. Both NAIOP and BILD registered a number of concerns to the Partnership in June 2018 about the Nose Creek Watershed Update, including:

- No present ability to meet the runoff targets for 2013 or 2017 outlined in the Nose Creek Watershed plans, and no foreseeable ability to meet those targets even when deferred to 2021 technically as suggested by the updated Nose Creek plan;
- While new Greenfield residential communities can begin to work towards these targets given their residential nature that include regional large scale storm ponds and treatment systems. However, It is acknowledge by both the City and industry that these targets are simply unattainable for commercial, industrial or retail settings, and essentially impractical or unattainable for higher density residential or mixed use projects;
- There is limited to no detail in terms of monitoring or data to understand where we are at today, and where we can go from here;
- No clear or realistic implementation timelines; and,
- The significant and increasing number of “exemptions” processed due to the inability of the industry or the City to meet the targets outline.

In response to the feedback provided by BILD and NAIOP, the Partnership advised additional elements of flexibility were embedded into the Plan to enable municipalities to implement as per their context. While this added flexibility and The City’s interim approach helps to address the immediate concerns, Industry remains concerned that the targets as presented in the updated Plan remain unachievable and a deferral to 2021 is not enough to address the practical implementation challenges.

The interim approach utilizing the flexibility within the updated plan likely provides clarity to the industry while further technical study/modelling can advance, and notably provides the ability to obtain regulatory approvals measured against runoff control targets that are technically attainable with significant effort.

BILD and NAIOP continue to share the overall goal of stewardship of the Nose Creek watershed, and remain committed to continuing to work with the City (and hopefully the Partnership) to implement the recommendations related to the hydrologic/hydraulic modelling work and evaluating options to eliminate, reduce or mitigate the need for relaxations.

We look forward to continued collaboration with The City of Calgary as we work towards continuing to improve the environment and characteristics of Nose Creek within its urban watershed setting. Accordingly, while we cannot support the 2018 update to Nose Creek Watershed Water Management Plan as currently drafted due to its shortcomings in foreseeable

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practical implementation of the stormwater targets, we do support the City's efforts as noted below:

- New initiatives that are added to the Work Plan deliverables that have focus and resourcing allocated to determining an achievable way forward;
- Continued collaboration of City and Industry personnel providing definite benefits in finding solutions to issues identified via the Work Plan. The collective benefits of Industry and City working together significantly outweigh working in isolation and informal or irregular communication; and,
- Bringing an Industry perspective through Industry organizations ensures success and continuity on Work Plan initiatives together.

While we strongly support the City's individual work outlined in their report to SPC-UCS to work on solutions with industry, we remain concerned with the planned implementation of 2017 targets in 2021 as outlined in the Updated Plan, as we believe this it is important for policy and targets to be based on sound technical study and data and implementation should consider feasible, practical technical tools to achieve the targets.

Accordingly, we recognize that the 2018 Updated Nose Creek Watershed Water Management Plan is needed to provide The City flexibility to implement the interim approach within its regulatory authority. However, we feel that it is critical to complete the necessary technical study/modelling work and associated monitoring in order to meaningfully review the stormwater targets before the 2017 targets are reinstated (deferred to 2021 as per Table 2, page 26). We would request that SPC-UCS direct Administration to advance this work with the Partnership and industry engagement and to report back to Council through UCS with an update no later than Q3 2020, with the intent that a more thorough review and update of the Nose Creek Watershed Water Management Plan is undertaken with an emphasis on feasible and practical implementation with industry prior to 2021 target implementation.

Yours truly,

BILD Calgary Region



Brian R. Hahn
CEO

NAIOP Calgary



Chris Ollenberger, P. Eng.
Chair, Government Affairs Committee