

Calgary River Valleys champions and engages the public in the protection, appreciation and stewardship of Calgary's rivers, creeks, wetlands and watershed resources.

We are the voice of our rivers.

May 15, 2023

To: The Mayor and Calgary City Council

For Consideration at Public Hearing May 16, 2023: Agenda Item 7.2.13

Re File Number: LOC2020-0100, CPC2023-0295 Land Use Redesignation,
Logan Landing neighbourhood, within Ricardo Ranch ASP

Sent via email to: PublicSubmissions@Calgary.ca and via direct email

Calgary River Valleys' input on the proposed Land Use Redesignation for the proposed new community of Logan Landing within the Ricardo Ranch Area Structure Plan has been informed by our members and discussions with other environmental stewardship groups. We are signatories to an open letter dated May 9, 2023, submitted to Council on this matter by multiple environmental stewardship groups which outlined several concerns including the points below, with additional content provided as sub-points:

1. Development impacting Environmentally Significant Areas:

- a. This area has rare and important ecosystems that we as a society should protect, including some of Calgary's last remaining natural wetlands, and groundwater springs,
- b. The proposed development on the upper plateau will remove much of the groundwater that presently gravitates into the valley from the upper lands, and therefore will result in changes to vegetation on the south-facing slopes, and drying out of these lands,
- c. As a result of the change to the water flowing down and underneath the slopes, we expect de-stabilization of the slope will occur from a disruption in the balance of water distribution, with too much water in some areas and most areas being much drier,

2. Need for preservation of habitat for at-risk species:

- a. There are multiple species of birds, bats, and frogs, many of which are species at-risk as determined by the Province or the Federal government,
- b. This area also has the kind of habitat that would support other species that aren't classified as at-risk by the Province or Federal government, but which have been made nearly extinct within Calgary, such as the Western Meadowlark, and Sharp-tailed Grouse,

3. Smarter development is possible and required:

- a. Tools and expertise are available, and investment should be made to evaluate options to best protect this habitat, the native species that live there, and the native species that could live there,
- b. This is the opportunity for a development that will allow us to preserve and celebrate the biodiversity that we value,



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4. A Win-Win Proposal:

- A well-thought-out and purpose-designed plan would allow the sensitive habitat and species to be protected, the river to be able to access its floodplain, and the developer to still be able to build a vibrant, complete community that all can celebrate.

Below are additional comments from members of our organization, Calgary River Valleys:

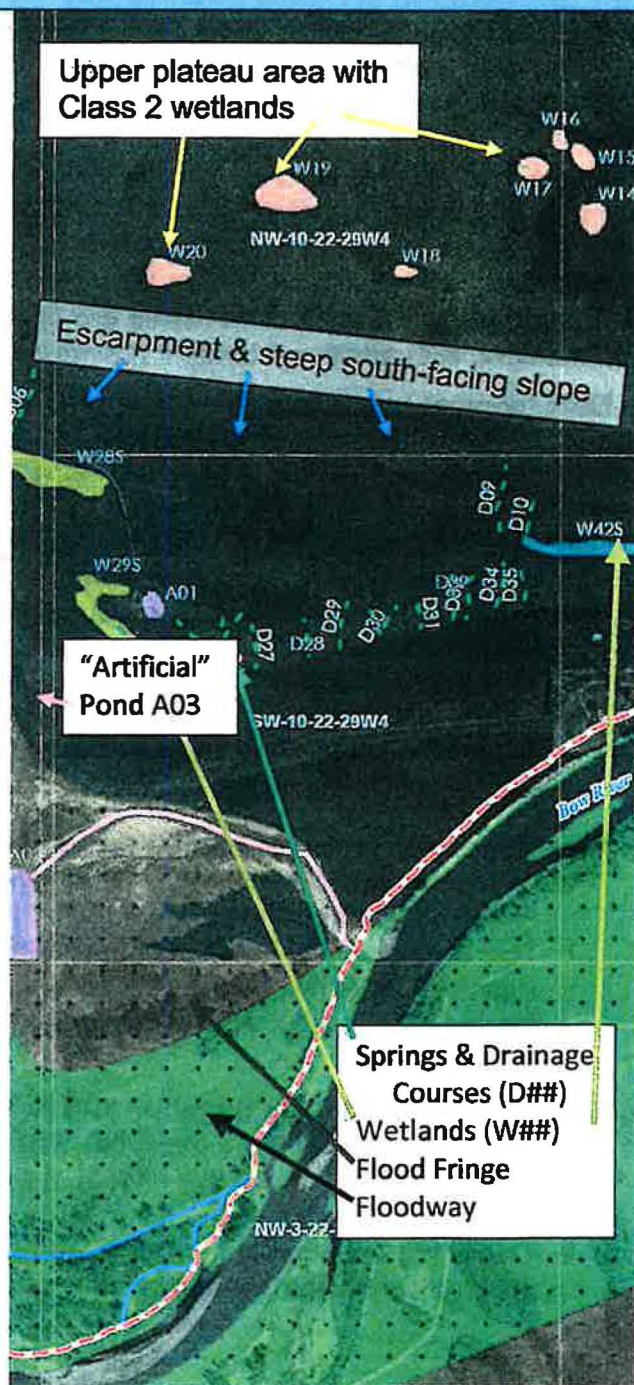
5. Positives of Plan

- We are pleased to see that the developer for Logan Landing has proposed to ensure no development occurs within the 200-year meander boundary for the Bow River. However, we would ask to ensure it is also outside the 1 in 200 year flood risk zone,
- We are also pleased to see the developer has planned to incorporate solar panels onto each home to be built in this area and install infrastructure for electric vehicle charging at these homes,
- We also appreciate the developer's stated plans to maintain the required building setback from the slopes at the edge of the escarpment,
- We understand this developer is proposing a higher density of housing in this area than has been built in other parts of the city in the past, and we understand the developer is investing in a design that will generally promote a high quality of life and neighbourhood.

6. Concern re Significant Alteration of Groundwater Flows

- The Ricardo Ranch Area Structure Plan (RRASP) Ecological Inventory 2018 states that in addition to flood water from the Bow River, the slope, and the flat valley bottom land "will also receive run off during times of heavy rainfall",
- There are also seeps and groundwater (streams below the soil surface) that emerge from the escarpment and flow

Logan Landing area, from Ecological Inventory



- down the slope to supply water to the wetlands and vegetation on the south-facing slope,
- c. We know that any development / building / infrastructure on the upper plateau will result in groundwater being put into pipes or similar infrastructure and will alter the infiltration of rain and snowmelt and its ability to recharge the groundwater and surface water flows below the upper plateau,
 - d. We believe it's necessary to develop and incorporate an innovative and comprehensive water management system for how stormwater / run-off / groundwater will be managed to best support the natural regime and biodiversity of the south-facing slope and the river's edge,
 - e. We believe Council has an opportunity to ensure the wetland slopes and the riparian (river-adjacent) area remain healthy by requiring the developer to use techniques, such as leaving some springs (and their source water from the land above) intact and not piped, using Low Impact Development stormwater management strategies like a stormwater kidney system, using permeable pavement or other techniques to allow water to infiltrate the ground to replenish the groundwater flow,
 - f. The "Artificial Pond (A03)" is fed by a fluvial channel (created by the Crown-owned river itself) from the Bow River and is drained by another fluvial channel back into the river; the pond was apparently created by a prior landowner, but contains river water, and these should all be considered part of the Bow River,
 - g. Although the Crown has not overtly claimed the "Artificial Pond (A03)", we understand this pond has been, for several decades, a part of the environment that supports the significant biodiversity in this area and it and the fluvial channels should all remain unchanged on the landscape (see picture below).

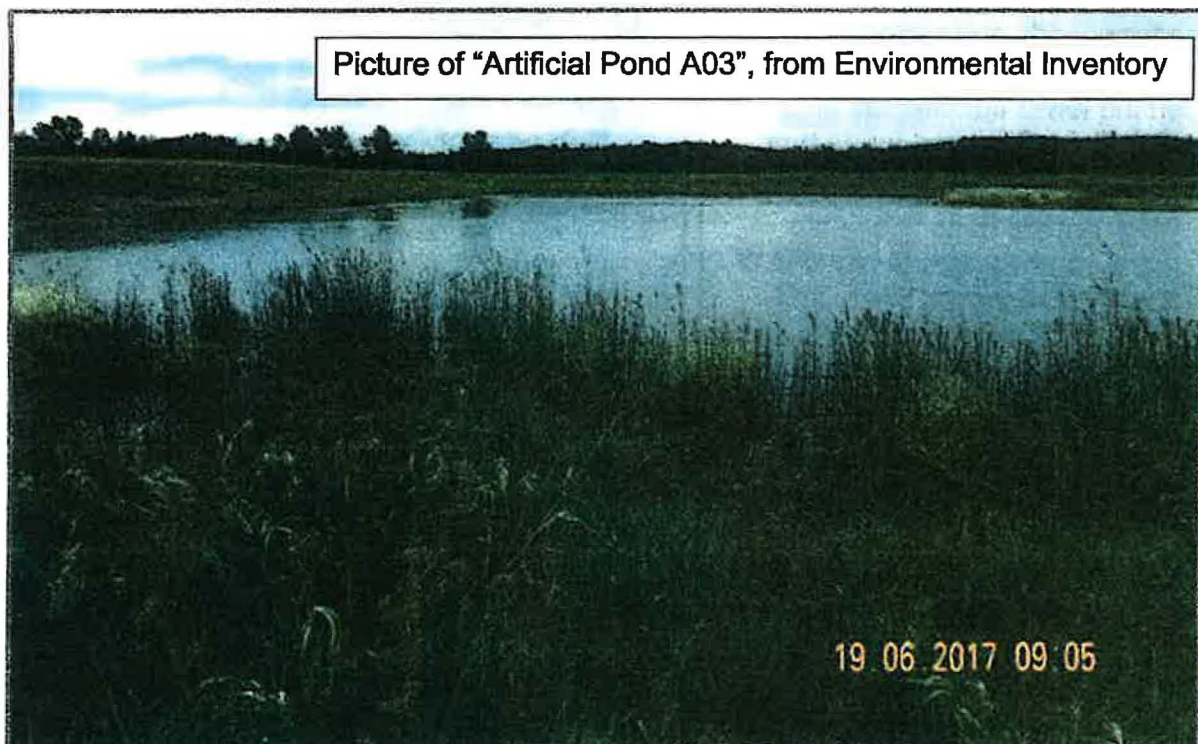


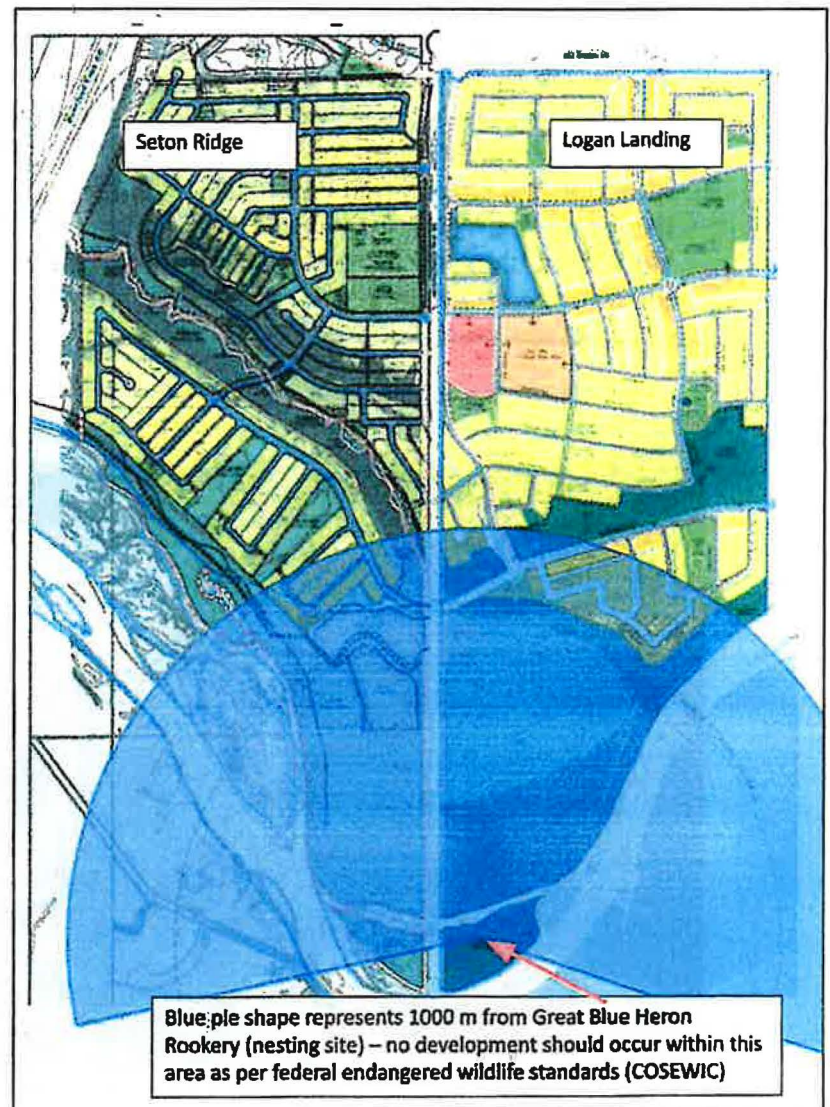
PHOTO 5.15: VIEW SOUTHEAST OF A03 SHOWING WATER AND WEEDY VEGETATION

7. Concern re Floodplain Alteration

- a. It is not clear to us where the developers for Logan Landing and the parcel to the west plan to deliver the stormwater from the stormwater infrastructure on the plateau above, and from the storm pond in Logan Landing north of Broadacres Drive; we are concerned that the Environmental Reserve lands in the slope and benchlands below the upper plateau will be disrupted and permanently altered to install stormwater infrastructure in that area, and an outfall into the Bow River,
- b. We are aware a Provincial policy on stormwater re-use is under consideration, and we believe the water from all storm ponds on this property should be re-used or discharged only after treatment, and without negatively impacting the Environmental Reserve lands in the valley;
- c. While we are pleased to see that the developer for Logan Landing has agreed to not build housing within the 200-year meander belt of the Bow River, it is not clear in the documentation we have seen whether this developer still plans to modify the Bow River's 1-in-200-year floodplain, as we understand has been proposed by the developer for Seton Ridge, the adjacent parcel to the west,
- d. We are advised that the developer of the parcel to the west has proposed to put 5 to 6 m of fill on top of the lower benchlands, in order to accommodate housing within the 1-in-5-year floodplain,
- e. Filling in this area will permanently and seriously impact the sensitive ecosystem on the lower benchlands area and all the flora and fauna that rely on it; this will deny the Bow River access to its floodplain there, remove natural benefits of flooding processes there, and would raise the risk to lands and communities downstream from the increased high water.

8. Concern re Impacts to Calgary's Last Great Blue Heron Nesting Site

- a. We note that this developer (and the adjacent developer for Seton Ridge) is proposing to infringe on the 1000m setback from the Great Blue Heron nesting site adjacent to the Bow River, a



setback which is recommended by the nationally recognized Committee on the Status of Endangered Wildlife in Canada (COSEWIC),

- b. This infringement puts this “species of special concern” and other sensitive species that use the sloped grasslands and lower benchlands for their habitat, in jeopardy,
- c. We expect this neighbourhood will require as much as 10 years to build, with major industrial equipment such as pile-drivers, excavators, and graders which will create significant noise pollution for these iconic species, and as such, we believe the 1000m setback should be respected (see diagram on prior page),
- d. Once the neighbourhood is built, there is an ongoing risk to the Heron colony from dog walkers, cyclists, and other human use in this area, which will need to be restricted, especially at certain times in the Herons’ nesting, breeding, fledgling cycle,
- e. Calgary River Valleys would be pleased to participate in planning for how this special area can be preserved and protected, with signage, fencing, and viewing areas from outside the protection zone.

9. Concern re Impacts to Other Wildlife Species

- a. As outlined in the joint letter we signed, in addition to the Great Blue Heron nesting site, the ecological inventory document for the RRASP found that the grasslands and wetlands within the area support many species, including the following (which indicates this area is a healthy ecosystem):
 - Colonies of Bank Swallows which are a severely threatened species and which nest in the slope below the upper plateau,
 - Songbirds such as Eastern Kingbird, Common Yellowthroat, Baird’s sparrow, all listed as Sensitive under the provincial Wildlife Act, which nest in the wetlands and grasslands in this area,
 - Birds of prey such as Osprey, Kestrel, Prairie Falcon, and Bald Eagles,
 - Other migratory birds such as Trumpeter Swans,
 - Amphibians such as Boreal Chorus Frogs and Wood Frogs,
 - Bats, including the endangered Little Brown Myotis as well as several other species considered at-risk in Alberta that are sensitive to habitat loss and use riparian habitat for both foraging and roosting,
- b. As stated previously, this area also has the kind of habitat that is capable of supporting other species that aren’t classified as at-risk by the Province or Federal government, but which have been made nearly extinct locally due to development within their habitat, such as the Western Meadowlark, and Sharp-tailed Grouse,
- c. Important habitat for all these species will be lost if the development proceeds without special provisions to protect the river valley, the escarpment, and the wildlife corridor,
- d. We are concerned that drawing awareness to this incredibly special location may result in it being over-run by people and their pets, which will cause excessive stress to sensitive wildlife species and the habitat they rely on for survival, and therefore, special care needs to be taken in developing and maintaining a habitat preservation plan, with fencing, signage, and enforcement,
- e. Before those measures are put into place, the longer-term ideal of viewing areas from the perimeter, possibly conducted tours in the off-season, should be postponed,

- f. Protecting the areas below the upper plateau represents a spectacular opportunity to both contribute to the natural functions of this area and to raise awareness of the regional biodiversity that can live in Calgary if the habitat is protected.

10. Summary

It is our position this Land Use Amendment and Outline Plan can be approved but only with significant changes, including:

- a. A detailed plan for managing groundwater to optimize the land stability and habitat along the slopes and in the river valley, must be created before a final development plan is approved,
- b. No development should occur:
 - i. Below the upper plateau, so as to remain in compliance with the Municipal Development Plan, 2.3.4, Policy d) regarding protecting and enhancing escarpments for public open space, and
 - ii. Within the Bow River's 1 in 200-year flood zone, or within 200 metres of the Ordinary High Water Mark as defined in Section 17 of the Surveys Act of Alberta, **whichever is greater**, in order to ensure preservation of an adequate wildlife corridor, and
 - iii. Within the COSEWIC standard of 1000m from the Heron Rookery (nesting site), and
 - iv. Within the required setbacks from nesting sites of any at-risk bird species, and
- c. **A protection plan for the at-risk and sensitive species and their habitat must be in place before any activity occurs that would be disruptive, including stripping and grading, or public access to this site.**

This proposal represents an opportunity for City Council to better protect the river valley and south-facing slope below the upper plateau of the subject site, and thereby better ensure protection of habitat for various sensitive and threatened species, as well as the overall river ecosystem health. The planning, execution, and management of this unique property should be superior to natural area management undertaken in Calgary prior to now.

The quality of the habitat and varied biodiversity within it, including species at risk, in the Ricardo Ranch area suggests that the City should request involvement from the Province of Alberta, or other agencies, private or otherwise, such as Non-Governmental Organizations, to best protect the eventual reserve lands along the slope and river valley portion of Logan Landing and the adjacent sites.

Sincerely,

Bill Morrison, President
Calgary River Valleys
cc: CRV Board & Circulation

Great Blue Heron Rookery

