

March 21, 2023

CD2023-0735
Attachment 3(A)

City of Calgary
via email: frank.frigo@calgary.ca

Attention: Frank Frigo, P.Eng,
Acting Manager, Environment
Climate & Environment

Subject: **Letter of Support**
The City of Calgary 2023 Stormwater Strategy

The Alberta Low Impact Development Partnership Society (ALIDP) is pleased to provide this Letter of Support for The City of Calgary 2023 Stormwater Strategy (Strategy).

The ALIDP is a non-profit society with a vision for *landscapes and land development to be in harmony*. Our members include consultants, government employees, academia, and allied non-profits covering the disciplines of engineering, landscape architecture, planning, ecology, and other allied competencies. We work to reduce barriers in policy and planning, to provide education and networking opportunities for industry, and to build confidence in practices through initiatives in research, demonstration and feasibility.

We are pleased to see the prominence of green infrastructure within a low-impact-development approach in the Strategy. Managing stormwater at the source with nature-based solutions including rain gardens, green roofs, rainwater harvesting and other resilient landscaping techniques along with interventions such as bioretention, bioswales and soil cells in the public realm will help the City to achieve resilient outcomes in the face of population growth, densification, and climate change.

Green infrastructure may not always be the cheapest solution in terms of capital cost, but pays dividends over the lifecycle in operations costs, rejuvenation costs, in the achievement of social and environmental objectives, and in reducing the need for and deferring the timing of upgrades of conventional infrastructure.

We are pleased to see partnerships identified as a key component in the Strategy. We sincerely hope that the City will recognize the power of partnerships and the monetary and social capital leveraging that they can provide in terms of, for example, knowledge sharing, consensus-building, program delivery, and engagement.

***Equipping Albertans to create vibrant, ecologically functional landscapes
within the built environment, through comprehensive stormwater management.***

The ALIDP will continue supporting Calgarians on a journey to a more resilient future and welcomes the Strategy and its implementation as an enabling component of that future.

Sincerely,



Leta van Duin, B.Sc.
Executive Director



April 4, 2023
Calgary City Council and City Administration
Calgary City Hall, 800 Macleod Trail SE,
Calgary, AB T2G 5E6

Re: *Letter of Support for City of Calgary 2023 Stormwater Management Strategy*

Dear Councillors and City Administration,

The Building Owners and Managers Association of Calgary (BOMA Calgary) represents the commercial real estate sector in Calgary and Southern Alberta which includes over 600 member companies and 200 million square feet of office, retail, industrial, and institutional space in the city of Calgary alone. Our members operate and maintain properties that house some of the most influential firms in Calgary, Alberta, and Canada.

We are writing this letter in support of the City of Calgary 2023 Stormwater Management Strategy presented by the Climate & Environment team. BOMA Calgary was happy to participate in the development of this strategy and we feel that it sets The City up for success in the short, medium and long terms. We also appreciate that the strategy encourages and provides an avenue for BOMA and its members to play an active role in future engagements. We are excited to continue to work with The City in order to further the strategy's progress.

We would like to congratulate administration on putting forward a holistic strategy for Council's consideration.

Sincerely,



Lloyd Suchet
Executive Director
BOMA Calgary

ISC: UNRESTRICTED



Bow River Basin Council
Spring Gardens Building D
Mail Code #64, Box 2100
Calgary, AB, T2P 2M5
www.brbc.ab.ca

CD2023-0735
Attachment 3(C)

17 April 2023

Calgary City Council
C/O Frank Frigo
800 Macleod Trail S.E.,

Calgary AB T2G 5E6

RE: Support for City of Calgary Stormwater Strategy

To Calgary City Council

The Bow River Basin Council (BRBC) is pleased to support The City of Calgary's 2023 Stormwater Strategy. The BRBC appreciates and supports the proactive approach of the City to manage stormwater as Calgary grows and our understanding of future needs is ever evolving. We believe that Stormwater Management is a critical component of watershed management for the Bow Basin and commend the City for its leadership towards resiliency for the future.

The Bow River Basin Council is a non-profit charity that works to convene and participate in science-based collaborations to produce information that informs watershed management. We also provide our members and partners opportunity to share knowledge and engage in solution seeking dialogue through our quarterly forums, workshops, and committee work. The Council is made up of over 400 members with over 700 active participants, representing the following categories: Municipal, Commercial/Industrial, Licensee, Non-profit/Academia, Regulatory/Administrative/First Nations, and Individual Public. One of eleven Watershed Advisory and Planning Councils (WPACs) in Alberta, the BRBC is mandated by the provincial government to provide an independent voice for watershed management and health under the Province's Water for Life strategy.

The BRBC, as well as supporting this initiative, is interested in participating where it can, to achieve the outcomes for the strategy and help to ensure a resilient watershed for the future. We have participated in many partner feedback committee opportunities and have provided opportunities for The City of Calgary staff to present information and solicit feedback at our quarterly forums, workshops and working committee meetings throughout the year. These initiatives are of great interest to our membership who represent a wide spectrum of professional and knowledge-based interests in the Bow Basin. It is our belief that our members can contribute to leverage ideas, knowledge, and expertise to support the outcomes for The City of Calgary and the Bow Basin.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Murray", written in a cursive style.

Mike Murray
Executive Director
Bow River Basin Council
mmurray@brbc.ab.ca

Cows and Fish

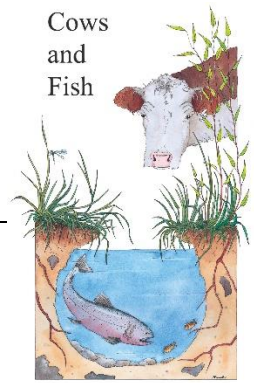
Alberta Riparian Habitat Management Society

c/o Alberta Beef Producers

165, 6815 - 8th Street NE
Calgary, Alberta
Canada T2E 7H7

CD2023-0735
Attachment 3(D)

Telephone (403) 818-1360
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March 20, 2023

Frank Frigo, P.Eng,
Acting Manager, Environment
Climate & Environment, City of Calgary
Water Centre, PO Box 2100, Station M, Calgary, AB, Canada T2P 2M5
Sent via email to: frank.frigo@calgary.ca

RE: The City of Calgary 2023 Stormwater Management Strategy, Letter of Support

Dear Mr. Frigo,

The Alberta Riparian Habitat Management Society (Cows and Fish) is pleased to provide this letter of support to accompany The City of Calgary's 2023 Stormwater Management Strategy (SWMS). The SWMS is aimed at tackling the massive challenges ahead for Calgary in the face of population growth, climate change stressors and negative cumulative impacts from a developed landscape to water quality, riparian health and public safety. It is understood that heavily urbanized areas like Calgary detrimentally contribute 10 to 20 times increased stormwater runoff which in turn has adverse impacts to stream erosion and water quality. Unmitigated stormwater can contribute significantly to higher concentrations of suspended solids, bacteria, nutrients, pesticides and metals in our waterways. Investment and innovation in stormwater management is thus critical to addressing these issues going forward.

The 2023 SWMS focuses on proactive, integrated approaches and a continued evolution of a broad suite of stormwater management tools. This includes broader use of 'green stormwater infrastructure' (e.g., stormwater wetlands, rain gardens, green roofs, naturalized spaces and bioswales) and the adoption of Low Impact Development (LID) features and planning strategies that prioritize natural infrastructure protection. We strongly support the need for a stormwater management strategy that incorporates a combination of grey and natural infrastructure on both private and public land. Natural infrastructure and 'green stormwater infrastructure' are strongly tied to meeting biodiversity conservation, habitat connectivity, riparian health, and natural space public health benefits. The 2023 SWMS promotes both retrofitting of existing infrastructure and incentive schemes to encourage improved stormwater management on private properties, acknowledging the need for shared responsibility on this issue.

Having a SWMS informed by evidence based data and which includes social, economic and environmental performance indicators is aligned with The City's triple-bottom-line approach to decision making.

Of keen interest to our organization is that the 2023 SWMS work in concert with The City's *Riparian Action Program*, *Wetland Policy*, *Biodiversity Policy*, the *Resilient Calgary Strategy* and related initiatives to prioritize and strengthen riparian setbacks and to enhance protection of ephemeral and intermittent natural watercourses and wetlands. It is estimated that 90% of pre-settlement wetlands in Calgary have been lost to development. Similarly, about a third of Calgary's major stream and river riparian areas have been fully developed, not accounting for the historical loss and development of countless small tributaries. Natural infrastructure solutions are highlighted as integral to meeting the goals of the SWMS, hopefully, reversing and proactively mitigating these historic negative trends. Tied to this are SWMS targets aimed at increasing riparian health city wide and establishing stormwater rate, volume and contaminant loading targets for the Bow River and tributaries.

In conclusion, we strongly promote Calgary City Council adoption of the 2023 SWMS. With support and ongoing investment, the SWMS will strengthen drought, flood and climate change resilience and support vibrant, healthy waterbodies and communities.

Thank you again for the opportunity to participate and input into this important initiative.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Hull', written in a cursive style.

Kathryn Hull,
Riparian Specialist, Calgary
Alberta Riparian Habitat Management Society ("Cows and Fish")



Calgary City Council
C/O Mr. Frank Frigo
800 Macleod Trail SE
Calgary, AB
T2G 5E6

May 4, 2023

To Calgary City Council,

The Nose Creek Watershed Partnership (NCWP) is pleased to provide this letter in support of The City of Calgary's 2023 Stormwater Strategy. The NCWP commends The City's ongoing work to manage stormwater as Calgary grows, and supports their vision that *promotes healthy, resilient communities, watercourses and waterbodies through proactive and collaborative stormwater management.*

The NCWP actively promotes sound stormwater management strategies to protect riparian areas and manage streamflows in the Nose Creek watershed to mitigate impacts of flood and drought, and improve water quality for water users and aquatic life. The City of Calgary's Stormwater Strategy will facilitate ongoing collaboration with communities within and upstream of Calgary's City Limits in the Nose Creek watershed and elsewhere.

Calgary's Stormwater Strategy is highly anticipated as the need for stormwater management in the Nose Creek watershed is increasingly essential alongside the rapid increase in development footprint in the watershed. This impact extends beyond the Nose Creek watershed boundary to downstream communities, water users and aquatic life in the Bow River basin. Innovative and effective stormwater management is critical to maintaining a healthy and resilient watershed that can contribute to flood and drought mitigation in existing and new communities.

Calgary's Stormwater Strategy intends to support collaborative solutions to stormwater management, with respect to municipal infrastructure, processes and jurisdiction. It calls for more and different levels of expertise and resources, including the use of runoff for irrigation, stormwater wetlands, and green and natural infrastructure. This effort aligns with the direction of the NCWP who are currently working collaboratively across multiple jurisdictions and with stakeholders to develop a model tool that can evaluate current conditions and assess stormwater management options to address the impacts of urban stormwater and rural runoff through adaptive and innovative solutions.

Adopting the 2023 Stormwater Strategy will increase watershed resiliency and ensure that there is capacity for development activities in the future. The NCWP continues to work in Partnership with The City of Calgary and looks forward to the positive impact the 2023 Stormwater Management Strategy will have on Nose Creek and West Nose Creek, and their respective wetlands, riparian areas, water quality and aquatic life for the betterment of the watershed's existing and future residents.

Sincerely,

A handwritten signature in black ink that reads "Clint Goodman".

Clint Goodman
NCWP Co-Chair, Airdrie

A handwritten signature in black ink that reads "Matt Chilakos".

Matt Chilakos
NCWP Co-Chair, Rocky View County



May 30, 2023

City of Calgary
P. O. Box 2100, Station "M"
Calgary, Alberta T2P 2M5

Attention: Members of the Community Development Committee

Dear Committee members:

RE: The City of Calgary 2023 Stormwater Management Strategy

BILD Calgary Region ("BILD") is a non-profit organization that has a membership base that includes all facets of residential home and commercial construction, including builders, renovators, developers, trades, suppliers, and professional companies involved in the building industry. We advocate for affordability, choice, and innovation in the building industry.

Thank you for engaging with BILD on the City of Calgary's 2023 Stormwater Management Strategy (the "Strategy") and for providing us with the opportunity to provide an assessment of the Strategy on behalf of our members. In connection with the Strategy, we would like to acknowledge the dedication and effort exhibited by Maggie Choi, Bert Van Duin, Frank Frigo, Megan Van Ham, Erica Yaholnitsky, Zhong Xiang, and City Administration in assembling the Strategy which builds upon key components of the 2005 Stormwater Management Strategy.

The City and Building and Land Development Industry, as well as Calgarians, will greatly benefit from a Strategy framework based on a holistic approach that ensures practical, affordable, and sustainable management of stormwater infrastructure for all Calgarians. Optimizing our stormwater management systems requires a comprehensive approach to ensure that all variables, details, targets, outcomes, and costs are considered.

Below we provide our feedback on the overall Strategy and its elements:

Pace of implementation

The Strategy sets short-term and long-term timelines over the duration of 17+ years. Our members have found the Strategy and desired goals and milestones to be ambitious. We understand that the Strategy is a high-level document that will require further collaboration between the City of Calgary and BILD. Accordingly, BILD and the City of Calgary have mutually agreed to review and monitor the progress of the Strategy on a yearly basis. In this regard, once the Strategy begins to be implemented, we strongly encourage the timelines and action plans to be collaboratively reviewed and adjusted on a yearly basis to ensure that the Strategy's cornerstones remain achievable and in alignment with other emerging City strategies and policies. We would also like to highlight that any progress made within the Strategy should be thoroughly reviewed to ensure its positive impact on affordability.

We also acknowledge upon Council's acceptance of the Strategy, City Administration will begin work on the development of a detailed Implementation Plan for the Strategy, which will focus on identifying priorities, necessary resources, and other crucial factors for successful implementation of the Strategy.

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It would be extremely beneficial for the Implementation Plan to clearly outline actions and detailed evaluation standards that will ensure precise measurement of progress, in terms of affordability, equity, sustainability, and economic development for our stormwater systems and how the progress and measurement criteria would be considered and analyzed. We kindly request that Industry be engaged upon commencement of the Strategy's Implementation Plan, on more specific details regarding the proposed strategy's costs, funding, and actions, especially in terms of creating a clear path forward for enhancing the level of service and promoting equitable and sustainable development.

We would like to commend the Strategy outlining an opportunity for the City of Calgary to provide leadership by reviewing and streamlining their own internal approvals processes to ensure coordination and efficiency with respect to stormwater management.

Funding and City Budget

A transformed approach to stormwater management needs to align with the 2020 updated Municipal Development Plan, that City decision making policies should be financially sustainable, while protecting our natural environment and supporting a prosperous economy. Maintaining housing affordability, a key objective of the Municipal Development Plan, should also be a key objective and factor in how we approach stormwater management and in maintaining affordability through the Strategy's cornerstones.

BILD understands that the Strategy is intended to align with the City of Calgary budget cycle which takes place every four years; BILD looks forward to further and complete detail regarding the cost and affordability impacts for the upcoming City budget cycle and how the Strategy's plans and actions will be financed and/or funded. Prior to any changes in rate making, rate design, reallocation of cost recovery, or funding approach, BILD respectfully requests full engagement of Industry and the Public.

We understand from City Administration that many of the actions and tasks of the Strategy over the next 4 years are focused on better understanding the associated costs and trade off to enable better informed decision making. To better understand the associated costs and benefits of stormwater management, BILD proposes City Administration review and analyse resourcing efficiency for stormwater management, appropriate cost allocations for stormwater infrastructure, facilitate innovative technology, and explore how customers can reduce their impact on the public stormwater system and the watershed. The findings from this work and its impact on the stormwater management system should be included in future budgeting decisions. BILD looks forward to working with City Administration in reviewing the associated costs, benefits, and trade-offs with the implementation of the Strategy.

Technical Aspects

We note that Strategy focuses on utilizing Low Impact Development (“**LID**”) and notes that LID, is key to achieving the Strategy's goals of managing stormwater in highly urbanized areas where density is encouraged, and where opportunities for large-scale infrastructure, such as ponds, is limited or absent. If LID measures are utilized to reduce runoff volumes, City targets would need to be aligned with the measures that LID can achieve. Overall, there is potential for LID to be a valuable tool in promoting sustainable development, but there are several challenges that need to be addressed to increase its effectiveness and minimize or offset its impact on affordability prior to adoption.

The Strategy contemplates establishing stormwater rate, volume and contaminant loading targets to the Bow River and tributaries as a path to measuring progress. BILD notes that proposed targets must be realistic, feasible, affordable, and should consider post development conditions, including technologies and

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methods available to achieve those targets. It's important for the City of Calgary to recognize that setting targets may have adverse impacts on development and corresponding affordability for all built forms. BILD included similar comments in recent communication to Council regarding the Industrial Action Plan Strategy and the interim Nose Creek targets that were implemented in August 2022. It has been observed that these targets have been a challenge to achieve for certain land uses, including industrial use. Industrial land development is extremely sensitive to costs, and an increase of the stormwater rates would further hinder industrial growth in Calgary.

Addressing the challenges in stormwater management in Calgary is crucial to ensure a vibrant and prosperous residential, commercial, and industrial sector for Calgary. Calgary must be competitive and affordable in order to attract and maintain investors, increase jobs, and maintain or increase standards of living for Calgarians. We hope that the action items and goals outlined in the Strategy align harmoniously with the Municipal Development Plan and the Land Use Bylaw.

We trust that our feedback has been constructive and helpful. In the mutual interest of all parties, BILD supports the work of Administration on the Strategy and we kindly request Council to provide support and direction to Administration to bring timely closure of the implementation of the Strategy.

If you have any questions or comments, please do not hesitate to contact Mohamad Mohamad at m.mohamad@bildcr.com.

Thank you,



Brian R. Hahn
CEO, BILD Calgary Region

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