

## FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] Jennifer

Last name [required] Haverhals

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 10, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Draft Riley LAP

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

IPC Comments January 2025 v2.pdf

ATTACHMENT\_02\_FILENAME

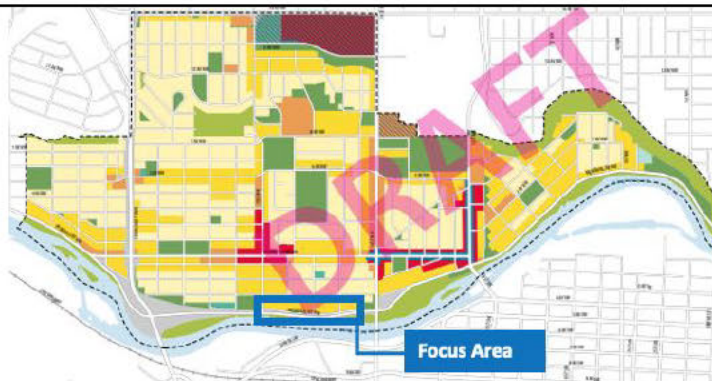
Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I have been a home owner and resident on Broadview Rd for nearly two decades in Westmount/Hillhurst which is part of the area covered in the Riley LAP.

Infrastructure & Planning Committee  
January 2025

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



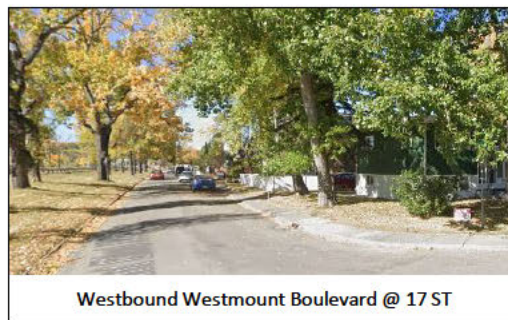
### REQUESTED AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:



- This area is separated by a treed median and a significant grade differential.
- There is no existing or feasible access to the river pathway system from this location;



- There is no existing or planned transit to this area;
  - Memorial Drive is a commuter roadway for non-local citywide traffic;
  - There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
  - At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).
  - This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible** along this stretch of Memorial Drive, unless the lane reversal was to be removed.
  - Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
  - The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate commuter traffic.
  - There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a





single one-direction residential roadway, and are separated by a treed median with grade-separation.

- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 4<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.
- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where existing residential exist.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing communities at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area**, which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we encourage The City to develop policy that focuses on reducing the city and taxpayers’ long-term



Creosote Facility @ Pumphouse Park

liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.

**3. Requested Amendment #3: Do not require one-side a Westmount Road to be rear-facing.**

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to nine residential blocks. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



**COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:**

**1. Substantial written and in-person feedback was not recorded and not considered in this Plan.**

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. **This feedback was not captured in any way in the What We Heard Report or What We Did Report**, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households.*** For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.



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First name [required] Jack

Last name [required] Scissons

How do you wish to attend?

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What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 8, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley Local Area Plan

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Thank you for this opportunity to write my comments on the Anthem proposed development site also known as the former CBC site. My wife and I lived across the lane from this site for many years. My comments are based on my 27 years of working in the City Planning Department. I do not support six storeys on Westmount Boulevard. Three stories should be the maximum height for this site. I agree that the Riley LAP should include policies addressing residential development on contaminated site as this site has creosote underground. I oppose commercial on this site. There are ample local commercial opportunities in walking distance at 19 Street and Kensington Road and at 14 Street and Kensington Road. The requirement for rear facing residential development on Westmount Boulevard should be removed as the existing houses are exclusively front facing. This site is unsuitable for medium to high density residential developments. There are many undeveloped LRT station sites that are more suited for the increased densities that City Council is promoting. Thank you. Jack Scissons MSW, RPP & MCIP (retired) [REDACTED]



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First name [required] Helen

Last name [required] Robertson

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ATTACHMENT\_01\_FILENAME                      Riley\_LAP\_Comments\_meeting\_10Jan25.pdf

ATTACHMENT\_02\_FILENAME

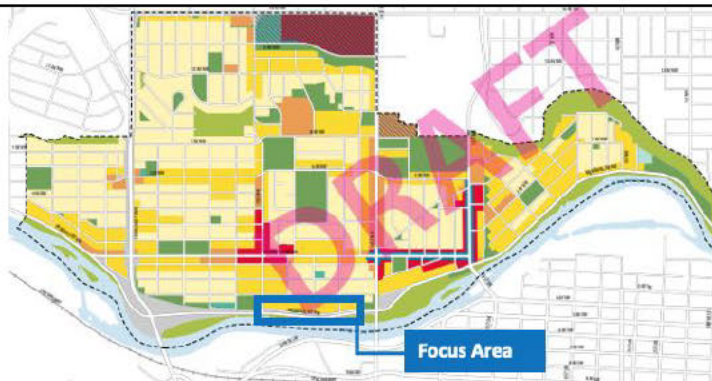
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Infrastructure & Planning Committee  
January 2025

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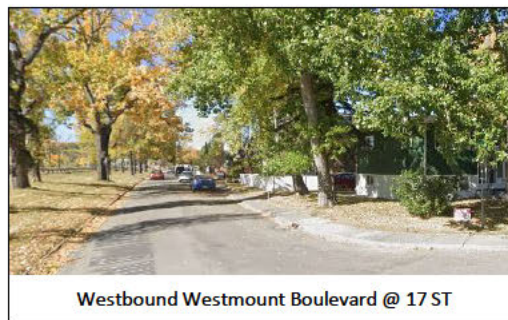
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Creosote Facility @ Pumphouse Park

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First name [required] Brady

Last name [required] Holland

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What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 10, 2025

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[required] - max 75 characters Anthem Properties Development

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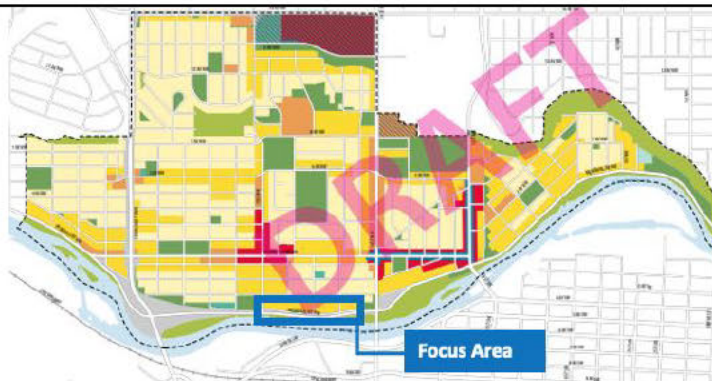


ATTACHMENT_01_FILENAME	IPC Comments January 2025 v2.pdf
ATTACHMENT_02_FILENAME	
Comments - please refrain from providing personal information in this field (maximum 2500 characters)	<p>Hi,</p> <p>Please see attached for comments and concerns that I would like addressed as a homeowner who will be directly impacted by the Anthem development on the CBC property.</p> <p>Thanks, Brady 1801 Broadview RD NW</p>

Infrastructure & Planning Committee  
January 2025

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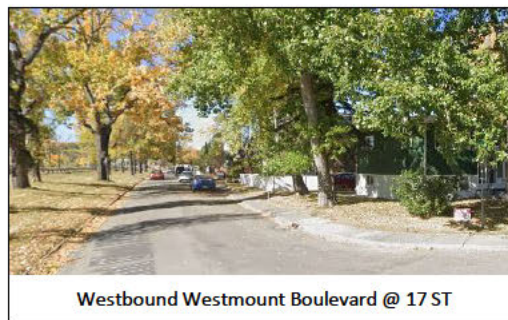
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Creosote Facility @ Pumphouse Park

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First name [required] Paula

Last name [required] Hirson

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 10, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Westmount Boulevard area plan be revised

Are you in favour or opposition of the issue? [required] In opposition



ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

IPC Comments January 2025 v2.pdf

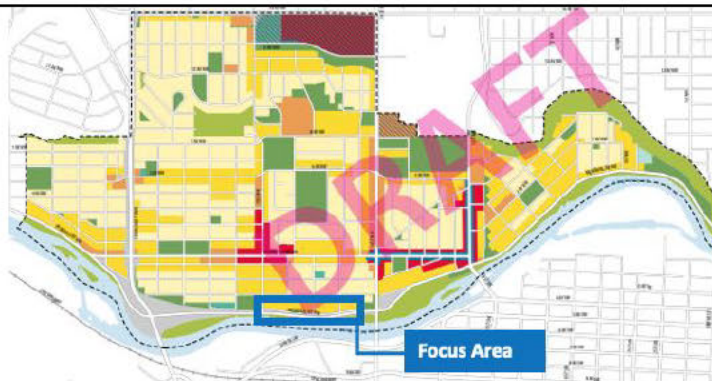
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Please see above attachment for comments for revision.

Infrastructure & Planning Committee  
January 2025

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



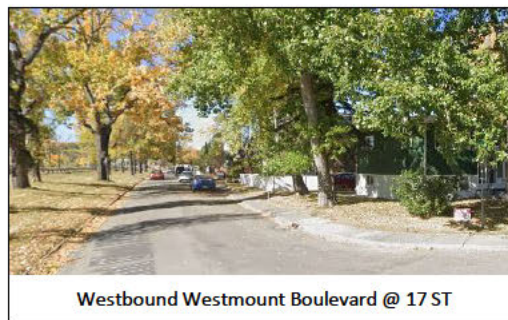
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1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:



- This area is separated by a treed median and a significant grade differential.
- There is no existing or feasible access to the river pathway system from this location;



- There is no existing or planned transit to this area;
  - Memorial Drive is a commuter roadway for non-local citywide traffic;
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- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).
  - This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible** along this stretch of Memorial Drive, unless the lane reversal was to be removed.
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First name [required] Will

Last name [required] Overend

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What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 8, 2025

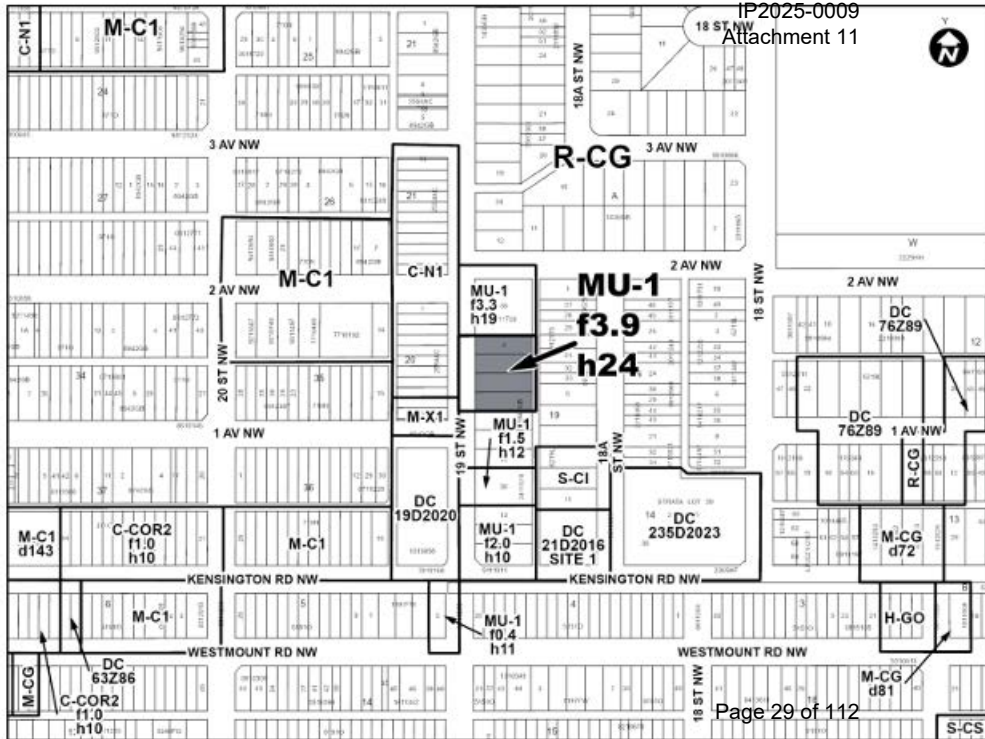
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[required] - max 75 characters Riley Communities Plan

Are you in favour or opposition of the issue? [required] In opposition



ATTACHMENT_01_FILENAME	image (1).png
ATTACHMENT_02_FILENAME	
Comments - please refrain from providing personal information in this field (maximum 2500 characters)	See attached. The building to the north was at 19 metres and the current land use is 19 metres. The middle three parcels are designated R-CG and the building height is 11 metres. The new development at the south part of the block is at 12 metres and the shopping centre at Kensington Road is at 10 metres. Across the alley immediately to the east is single family residential housing. There is no reason this land use should accommodate a six-floor building height given its surroundings. There is absolutely no rationale for six storeys. Please leave the height restriction on the east side of 19th Street NW unchanged.





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First name [required] helen

Last name [required] henderson

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[required] - max 75 characters Riley Park LAP

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ATTACHMENT\_01\_FILENAME      IPC Comments January 2025 v2 (1).pdf

ATTACHMENT\_02\_FILENAME

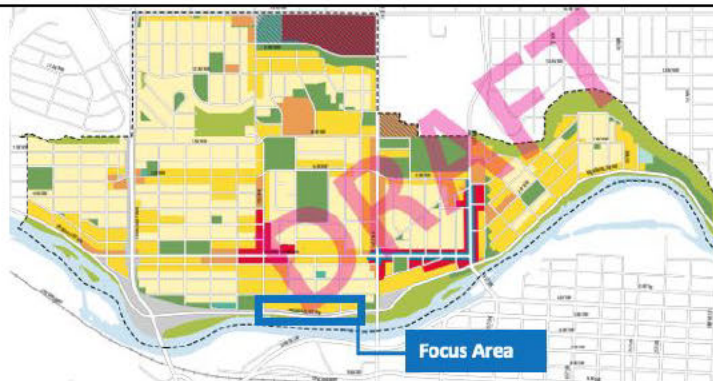
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Infrastructure & Planning Committee  
January 2025

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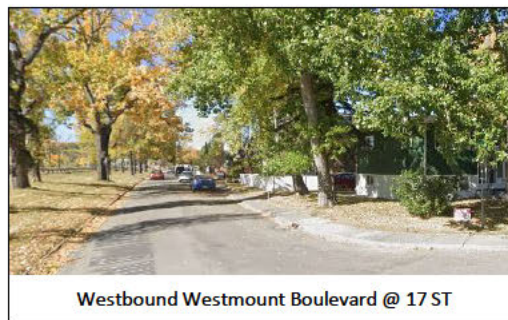
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First name [required] Roger

Last name [required] MacLeod

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ATTACHMENT\_01\_FILENAME

IPC Comments January 2025 v2.pdf

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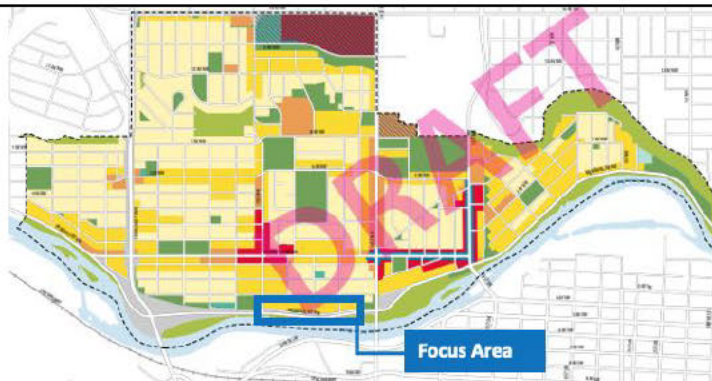
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Infrastructure & Planning Committee  
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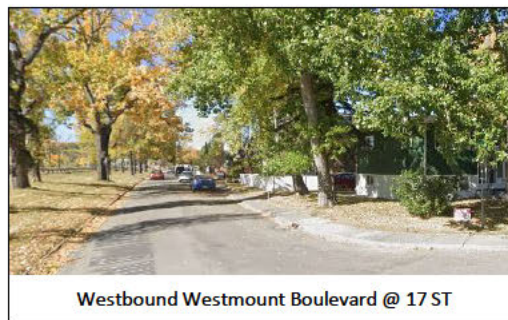
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- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).
  - This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible** along this stretch of Memorial Drive, unless the lane reversal was to be removed.
  - Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
  - The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate commuter traffic.
  - There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a





single one-direction residential roadway, and are separated by a treed median with grade-separation.

- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 4<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.
- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where existing residential exist.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing communities at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area**, which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we encourage The City to develop policy that focuses on reducing the city and taxpayers’ long-term



Creosote Facility @ Pumphouse Park

liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.

**3. Requested Amendment #3: Do not require one-side a Westmount Road to be rear-facing.**

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to nine residential blocks. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



**COMMENTS ON THE PUBLIC ENGAGEMENT PROCESS:**

**1. Substantial written and in-person feedback was not recorded and not considered in this Plan.**

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. **This feedback was not captured in any way in the What We Heard Report or What We Did Report**, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households.*** For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.



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ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required]	James
Last name [required]	Stirling
How do you wish to attend?	In-person
You may bring a support person should you require language or translator services. Do you plan on bringing a support person?	No
What meeting do you wish to comment on? [required]	Standing Policy Committee on Infrastructure and Planning
Date of meeting [required]	Jan 8, 2025
What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published <a href="#">here</a> .)	
[required] - max 75 characters	Riley Local Area Plan
Are you in favour or opposition of the issue? [required]	Neither

ATTACHMENT\_01\_FILENAME

RMP\_Westmount\_Calgary\_20Dec2024.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

The Plan should address development on contaminated sites and gaps in approvals and monitoring for the Westmount Boulevard area to protect public health and safety. According to the February 2024 publication by the Environmental Law Centre (ELC) – “The Regulation of Pollution and Contaminated Sites in Alberta”, building on contaminated land is complex, requires careful planning and often substantial remediation efforts. The Environmental Protection and Enhancement Act requires the person responsible for the substance to “take all reasonable measures” to repair, remedy and confine the effects of the substance, and to “remediate, manage, remove or otherwise dispose of the substance” and “restore the environment”. According to the ELC, remediation of contaminated sites “has been inhibited by an economic lens that is not found in either statutory or policy direction”. Fundamental to this issue “is the notion of time and delay, and the augmentation of risks and regulatory compliance responses that occur as time passes without remediation”. The regulations themselves “are mostly silent with respect to how risk management must be carried out and how it fits into the regulatory framework”. There are “no regulatory rules or expectations for long term monitoring and maintenance of mitigation and risk management systems”, “no financial assurances required when going this route despite the risk that these systems may fail” or “for the costs associated with monitoring these sites in perpetuity”. These observations apply in the proposed condominium development at the Westmount Boulevard site.

The public engagement process is not trusted as one in which opinions are listened to, recorded, responded to and where merited, ideas actioned in a transparent way. Open House and online events, no matter how well intended, suffer a loss of credibility as a result, as an increasingly sceptical public lose faith and interest in engaging with the City’s staff through the engagement exercise. Unclear “rules of conduct” and lack of a “charter of rights and responsibilities” lends an ad-hoc feel to the exercise, despite the fact that the process has been widely adopted. Administration might consider an independently run engagement survey that allows for process improvements to be identified and adopted that both address public concerns and are seen to do so.



Date: December 20<sup>th</sup>, 2024

Mayor Jyoti Gondek  
Office of the Mayor  
The City of Calgary  
P.O. Box 2100, Station M  
Calgary, AB  
T2P 2M5

Delivered by e-mail: [Mayor@calgary.ca](mailto:Mayor@calgary.ca)  
Ward 7 Councillor Terry Wong, [Terry.Wong@calgary.ca](mailto:Terry.Wong@calgary.ca)

Dear Mayor Gondek and Councillor Wong,

**Risk Management Plan for Development at 1724 Westmount Boulevard NW, Calgary, AB**

Please find below my review of this proposed Risk Management Plan (RMP) <sup>(Ref. 1)</sup>. I'm an APEGA registered Professional Engineer (P.Eng) with expertise in complex oil and gas field development, regulatory process and environmental assessment from a background in subsurface reservoir modeling. I'm working on a pro bono basis in collaboration with the neighbourhood group of residents in opposition to the condominium development proposal. I have no property interests in the immediate area. I hope my detailed technical review (pp. 2-3) will assist you in the assessment of our group's concerns. In summary:

- i. 1724 Westmount Boulevard (the Site) is part of a complex regional dynamic system that the static hydrogeological Conceptual Site Model (CSM) does not adequately reconcile,
- ii. The Site developer's RMP focuses upon future residents of the proposed condominium development. It doesn't address current residents concerns for risk associated with construction of a vapour barrier system and possibly odorous gas venting operations,
- iii. Documented gaps in the Province's regulation of contaminated sites <sup>(Ref. 2)</sup> are exemplified in both the proposed Site development and Canada Creosote (CC) site. Risk is being driven by a failure to fully remediate the CC site. Alberta Environment & Protected Areas (AEPA) approach to monitoring and assessment is not well understood by residents, and appears to us overly reliant upon consultants' assessments. Efforts of neighbours to meet AEPA staff in person have been ignored, further undermining confidence in both this RMP, the development approval process as a whole and risk management of the CC site.

The residents support inner city development towards reducing urban sprawl and revitalization of urban cores. However the current Site proposal requires extensive excavation to accommodate condo buildings, associated below ground parking and services. In the context of an underutilized and contaminated CC site, we feel an unjust burden to accommodate residential density that by its nature simultaneously increases prospective environmental, health & safety (EH&S) risks upon residents that remain unaddressed in the RMP. We therefore request your assistance in facilitating our meeting AEPA and City staff toward satisfactory resolution of our concerns prior to issuance of development and other approval permits.

Sincerely,

James Stirling, P. Eng.

cc. Hon. Ric McIver, Minister of Municipal Affairs [minister.municipalaffairs@gov.ab.ca](mailto:minister.municipalaffairs@gov.ab.ca)  
cc. Dep. Minister, Environment & Protected Areas, Sherri Wilson [sherri.wilson@gov.ab.ca](mailto:sherri.wilson@gov.ab.ca)  
cc. Mr. Gurbir Nijjar, [Gurbir.Nijjar@calgary.ca](mailto:Gurbir.Nijjar@calgary.ca)  
cc. Ms. Becky Poschman, [caward7@calgary.ca](mailto:caward7@calgary.ca)

## 1. Hydrogeological Conceptual Site Model (CSM) and Contaminant Migration Assessment.

- a. **Failure of the engineered barrier wall to contain contamination at the Canada Creosote (CC) source site** <sup>(Ref. 1a)</sup> **offers lessons in appropriate use of hydrogeological CSM's to assess migration at Westmount Boulevard (the Site).** The CC site was in operation for forty years from 1923 to 1963. The contamination source, a dense non-aqueous phase liquid, DNAPL (i.e. creosote), remains only partly remediated today, 60 years after closure. Over that time, creosote has flowed under gravity, controlled by bedrock fractures in a generally northeast direction from the CC site to impact a wide area including north of the Bow River. Failure to contain contamination was, at its root, a result of over-simplification of complex physical processes governed by geology, contaminant and aquifer properties. The hydrogeological CSM for this Site is also over-simplified <sup>(Ref. 1b)</sup>.
- b. **Keystone's interpretations of data are on occasion imprecise, contradictory and confusing** <sup>(Ref. 1c)</sup>. Fluid communication pathways are extensive and complex. To infer that creosote stability might "*mitigate any further vertical migration*" <sup>(Ref. 1d)</sup> is not supportable. Sampling bias and modeling technique limit detailed interpretation of creosote fluid dynamics. Creosote and other Contaminants of Potential Concern (COPC) have moved from the CC site west, north and east into the Hillhurst area. This is likely governed, in part, by Bow river pressure head fluctuation and surficial aquifers influenced by seasonal variation in river flows and precipitation over many years after the CC site closure in 1963 <sup>(Ref. 1e)</sup>. Relying upon the groundwater alone may not constrain vertical migration of COPC's at the Site, <sup>(Ref. 1f)</sup> risks vapour leakage into condominium indoor air and so drives the recommendation to install a parkade sub slab engineered vapour barrier. This brings other, unacknowledged risks (see 2b).
- c. **Data gaps drive an oversimplification of the Site CSM.** For example, under-sampling in the area beyond the Site <sup>(Ref. 1g)</sup> and a sampling bias forced by the original building at the Site <sup>(Ref. 1h)</sup> biases the CSM. This bias likely creates an incomplete understanding of distribution of COPC's derived from the creosote source. COPC's such as petroleum aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) cannot be fully reconciled with creosote location <sup>(Ref. 1i)</sup> perhaps owing to the influence of pressure driven groundwater movement affecting low-density COPC distribution independently of high-density creosote. There is also scope for soil gases at site to be generated from volatilization of non-aqueous phase liquids (NAPL) and aerobic biodegradation of hydrocarbons.

## 2. Risk Assessment CSM and Risk Mitigation.

The Risk Assessment CSM focuses on the proposed condominium development at Site <sup>(Ref. 1j)</sup>

- a. **The risk assessment states** <sup>(Ref. 1k)</sup> **that if the Site owner attempted to remove the creosote onsite it would eventually be replaced from the up-gradient source i.e. the CC site.** Creosote contaminant exposure risk therefore remains for residents of the proposed condominium development until the CC site is fully remediated.
- b. **The principle risk is framed in terms of indoor air quality impacts of contaminant exposure to the proposed condominium development residents.** Although vertical attenuation of contaminants by the water table remaining above the depth of creosote is likely, it cannot be relied upon. Hydrocarbon-like odours have been detected in monitoring wells in the vicinity. An effort to trap gases could simultaneously concentrate odours that cannot currently be detected in the atmosphere due to dispersion and dilution the natural hydrogeology provides and that excavation for the purpose of condominium development risks disturbing.
- c. **The plan to vent any migrating gases to atmosphere may be a risk reduction to condo residents, but would represent a transfer of EH&S risk to the**



**neighbourhood's existing residents and users of the playpark and outdoor rink adjacent to the proposed development.** Odours associated with venting would also create a negative perception of the Hillhurst area as a whole.

- d. It is not clear how the Risk Management Plan (RMP) will address regulatory gaps.** The October 2024 RSC, "Record of Site Condition" (Appendix A) declaration is incomplete <sup>(Ref. 1l)</sup>. **RMP implementation** <sup>(Ref. 1m)</sup> **requires the Condominium Corporation be responsible for monitoring and reporting changes in site conditions. This should be AEPA's responsibility.**

## References:

- (1) "Report of Findings – Risk Management Plan for Development of 1724 Westmount Boulevard NW, Calgary, AB", prepared for Anthem Westmount Developments GP, Project No: 15177, October 2024.
  - a. "Figure 3-2 Canada Creosote Conceptual Model" (p.19)
  - b. "3. Conceptual Understanding... the hydrogeological CSM focuses on the DNAPL and associated dissolved groundwater plume identified within a fractured bedrock setting of ... the Paskapoo Formation." (p.15)
  - c. "3.6.2.4.2 Monitoring Results ... DNAPL thickness... measurements are generally decreasing at the Site... suggesting ... DNAPL has reached a point of stability... different sampling methodologies (make it) difficult to determine the absolute thickness decreases". (p.54)
  - d. "3.6.2.4.3 Delineation...the general decreases in DNAPL thickness across the impacted area ... would mitigate any further vertical migration" (p.55)
  - e. "3.3.1 Factors Influencing DNAPL Migration ... Temperature and fluid conductivity logs identified discrete zones of flowing groundwater in ... the bedrock ... represent both horizontal and sub-vertical pathways for potential DNAPL or dissolved phase COPC migration." (p.20)
  - f. Stating that 3.3.2 (p.20), 3.6.2.4.2 (p.55), 3.12.3.3 (p.80) 3.27 (p.85) the "DNAPL plume would continue to remain covered by the groundwater table" may not mitigate COPC migration at the Site.
  - g. "Figure 3-3 Regional Study Area and Development of Cross Sections" (p.22)
  - h. "Figure B1-2 to B1-5 Sample Location Plan" (Appendix B Figures)
  - i. "3.6.2.4.3 Delineation ... hydrocarbon-like odours ... observed in monitoring well" (p.55) , ... "3.6.2.1 Background of Creosote Contamination in the Surrounding Area". "drilling locations ringing the Site encountered concentrations of Polycyclic aromatic hydrocarbons (PAHs) consistent with creosote contamination... Tier 1 exceedances of F1, F2, F3, ethylbenzene and toluene were present in the area. Offsite soil contaminants of PAH were detected in wells to the west ... the north ... and to the east" (p.48)
  - j. "3. Conceptual Understanding ... the risk assessment primarily focuses on the assessment ... on the site scale rather than the regional scale." (p.15)
  - k. "3.6.9 Contaminant Susceptibility to Various Treatment or Destruction Options" (p. 61)
  - l. Appendix A0 Risk Management Information, 7.2 Key Progress of RMP
  - m. Implementation condition (8), "the new Site Owner ... must communicate with Alberta Environment to confirm site condition has not changed" (p.88)
- (2) [https://elc.ab.ca/wp-content/uploads/2024/02/The-Regulation-of-Contaminated-Sites-in-Alberta\\_.pdf](https://elc.ab.ca/wp-content/uploads/2024/02/The-Regulation-of-Contaminated-Sites-in-Alberta_.pdf)

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First name [required] Susan

Last name [required] Kober

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Jan 8, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Infrastructure and Planning Committee Wednesday, January 8, 2025, 9:30 a.m.

Are you in favour or opposition of the issue? [required] In opposition



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Response to Riley Communities LAP - January 8 2025.docx

ATTACHMENT\_02\_FILENAME

Response to Riley Communities LAP - January 8 2025.pdf

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Letter of Objection to Riley Communities Local Area Plan

December 31, 2024

Infrastructure and Calgary Planning Commission  
800 Macleod Trail SE  
P.O. Box 2100, Station M  
Calgary, Alberta T2P 2M5

Teresa.goldstein@calgary.ca

Dear Chair and Members of Calgary Infrastructure and Planning Committee,

RE: Draft Riley Communities Local Area Plan  
Review scheduled for January 8, 2025

The Draft Riley Communities Local Area Plan was referred to Administration for a review of and to increase the development opportunities surrounding the LRT Stations located within the plan area.

However, there are fundamental concerns that have not been addressed within the existing Draft Riley Communities Local Area Plan. There is a disconnect between the land uses and density being proposed and the policies related to the Urban Forest and the Climate Risk mitigations.

I request the following policies be addressed given the inherent conflict with the proposed building forms, the density, and parcel coverage allowed with the land use districts applied to the parcels within the Riley Communities.

The following are examples of inconsistencies:

1. Page 16 speaks to the "Urban Forest" creating a mature tree canopy that consists of trees on both public and private lands. *Healthy tree canopies are critical to climate change mitigation and enhance community wellbeing.*

For example:

Policy 2.4.2 Climate Mitigation and Adaptation and Policy 2.4.2 Building Form and Building Design only refer to buildings.

The density and built form envisioned by the Local Area Plan will remove all trees on private lands as there is no space for trees to be placed let alone mature under the current and proposed land use designations.



Policy 2.2.3.2 Parks and Open Space refers to natural open spaces throughout the communities and existing recreational facilities. This will be the only areas for trees and there is a conflict with natural escarpment areas and sports fields. There is no mention of City boulevards as this is the only space left for trees.

Policy 2.4.2 Built Form policies relate to buildings and there is no mention of landscaping on parcels.

Policy 2.2.1 Urban Form Categories – Neighbourhood – states: *At all scales, redevelopment should consider existing context, parcel layout, building massing, and landscaping to sensitively integrate into the community.*

How can this policy ever be implemented with the rules of the R-CG land use district and the rules of the H-GO land use district being so permissive allowing for a very large and varied built forms and devoid of any reference to adjacent existing built forms.

2. Policy 2.3. Scale Transition speaks to: *Higher density development that shares a property line or lane with low density residential development should stepback the building where it interfaces with the lower density development. The stepback should provide a clear and distinct transition in scale between the two development types.*

While the principle of stepback is not the only factor that should be considered as there are issues with shadowing, overlooking and privacy to name only a few.

3. Policy 2.4.2.1 n. Site Design states the use of setbacks areas on private lands should be used to improve public spaces.

This is not possible as the front and side setback areas adjacent to a street will be filled with steps, window wells and private sidewalks. Only the public boulevard will be able to accommodate trees and that is questionable because of the location of public utilities and space.

4. Policy 2.4.2.3 e. Private Amenity Space states: *Private amenity spaces should: i. be adequately sized to accommodate furniture; ii. consider both sunlight and shade access; and, iii. provide weather protection to support year-round use.*

The amenity spaces will always be in a shadow because the R-CG and H-GO land use districts allow for a double row of buildings with only a 6.5 metres space between them. This space will always be in shade because of the orientation of the buildings. This policy cannot be achieved.

5. Policy 2.4.2.4 Landscape Design Policies provide for the transition spaces from public to private, landscape materials and water conservation.

The scale and site coverage of 60% for buildings does not include the hard surfaces to move throughout the development. There is minimal to no transition spaces in the front areas and there is no true green space within any parcel that will allow for meaningful tree planting and on-site water retention.

6. Policy 2.5.6.1 19<sup>th</sup> Street NW Community Corridor – provides policies for the redevelopment of this street that will 'enhance pedestrian experience'; See policy D, F & G

*Development that shares a property line or lane with parcels developed with single detached, semi-detached, or duplex residential development should step back the building above the third storey along the shared property line with the lower density development. e. Consolidation of parcels is encouraged for greater development potential, to provide for comprehensively planned development and avoid isolating parcels that would restrict the feasibility of redevelopment on adjacent properties. f. Development along 19 Street NW should exceed tree requirements outlined in the Land Use Bylaw to support an expanded tree canopy. g. Development fronting onto 19 Street NW should provide a well-defined street wall, a widened sidewalk, street trees, and contribute to an enhanced, pedestrian-oriented public spaces*

This will be very difficult to achieve when using land use districts that allow for permitted uses and the Administration cannot consider the other factors such as implementing these policies in their development permit decisions.

7. Policy 3.2.4 Climate Resilience states: *To support and expand the urban forest in the Riley Communities, the following should be considered: i. increase the amount of public trees and plantings in boulevards and on residential streets, ensuring sustainable planting infrastructure for the trees to become self sufficient in the planting area, including sufficient soil volume and characteristics, adequate moisture inputs and retention, and appropriate locations with sufficient setbacks or mitigation to protect from salt and underground utilities, particularly on arterial and commercial roads; ii. protect trees on public lands from all ground disturbance activities within 6 metres...*

This policy will be difficult to implement with the built form and parcel coverage allowed through the land use districts applied to the community.



I respectfully request a review of my concerns, and I request the members of the Infrastructure and Planning Committee forward to Riley Communities Local Area Plan to Administration to provide practical solutions that can be reviewed and implemented when redevelopment occurs in our community.

Respectfully submitted,

A solid black rectangular box used to redact the signature of the sender.

(signed electronically)

Susan J. Kober  
Resident of 2015 – 4 Avenue NW, Calgary, AB T2N 0N4

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First name [required] Neil

Last name [required] Campbell

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 8, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley LAP

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT_01_FILENAME	IPC Comments January 2025 v2.pdf
ATTACHMENT_02_FILENAME	Riley LAP Update from Ward 7.pdf
Comments - please refrain from providing personal information in this field (maximum 2500 characters)	Please see attached.



## Update on Riley Communities Local Area Plan

On October 16, 2024, the Riley Communities Local Area Plan was presented to the Infrastructure and Planning Committee (IPC). Following the Committee debate, a recommendation to refer the Plan back to Administration was passed. Council supported this recommendation on October 29, 2024.

The referral motion recommended the Riley Communities Local Area Plan project team to:

1. Prioritize greater density around Transit-oriented Development (TOD) sites within the Riley Communities Local Area Plan;
2. Focus on planning for growth and change that integrates multi-modal mobility and improved citizen experience of land use development that enables walkability, community connections, and integrated commercial and residential uses for all ages and abilities; and
3. Report back to the Infrastructure and Planning Committee by Q2 2025.

As a result, Administration is proposing the following amendments to the Plan:

- Expanded core and transition zones within the Lions Park and Sunnyside Light Rail Transit (LRT) Station Areas to ensure a range of connected housing options and forms in close proximity to transit.
- Identification of a SAIT / AUArts / Jubilee LRT Station Area as a third station area and modification to building scales within this portion of the Plan Area. These changes are designed to align with TOD best practices and realize a range of housing forms and better pedestrian and active mode connections to the station.
- Modifications to the proposed urban form categories and building scales within the Lions Park and Sunnyside LRT Transit Station Areas to better align to TOD best practices.
- New policies and improvement options that aim to:
  - Enhance access to station areas and create walkable, connected communities.
  - Promote high-quality urban design.
  - Support a mix of commercial and residential uses to meet Calgarians' changing needs.

To learn more about the proposed changes, visit [Engage - Riley Communities Local Area Plan](#)

## Ways to Become Informed

While Council did not direct additional engagement through this referral motion, residents of the Riley communities can learn more about the proposed changes to the Riley Communities Local Area Plan and ask questions at an upcoming in-person or online Conversation Series session.

Please note: **REGISTRATION IS REQUIRED FOR THESE EVENTS.**

## Virtual Sessions

- Thursday, December 12 from 12-1:30 p.m.
- Tuesday, December 17 from 11:30 a.m. -1 p.m.
- Wednesday, December 18 from 8-9:30 p.m.
- [REGISTER FOR A VIRTUAL EVENT HERE](#)

### In-Person Conversation Series

Location: Calgary Curling Club at 720 Third St. N.W.

- Monday, December 16
  - 1-1:50 p.m.
  - 2-2:50 p.m.
  - 3-3:50 p.m.
  - 5-5:50 p.m.
  - 6-6:50 p.m.
  - 7-7:50 p.m.
- [REGISTER FOR AN IN-PERSON SESSION HERE](#)

### Virtual Session with the Ward 7 Office

The Ward 7 office will be hosting a virtual session to discuss the changes that have been proposed by administration. The session will take place on Thursday, December 19<sup>th</sup> starting at 7:00pm via TEAMS.

- [JOIN THE MEETING HERE](#)
- Meeting ID: 214 653 363 805
- Passcode: G3hR9Tp2
- Dial in by phone: 1-587-318-3194
  - Code: 803617564#

### Ways to Participate

Members of the public can have to opportunities to participate in the public hearing process.

### Infrastructure & Planning Committee Public Hearing

The Riley Communities Local Area Plan will be presented to the Infrastructure & Planning Committee on Wednesday, January 8, 2025.

The Infrastructure & Planning Committee is a standing policy committee where members of the public can submit comments and/or speak during a public hearing. Public Submissions are due by Wednesday, January 1, 2025, at 12:00pm. To learn more about participating in a public hearing, please visit: <https://www.calgary.ca/council/meetings/public-hearing.html>

### Council Public Hearing

A date for the Council public hearing will be set following the Infrastructure & Planning Committee meeting.

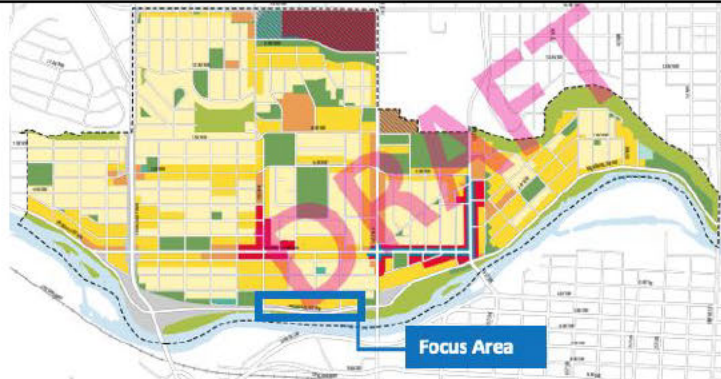
If you are unable to attend the virtual session hosted by Ward 7 or learn more about how you can participate in the public hearing process, please email your comments to Becky – [caward7@calgary.ca](mailto:caward7@calgary.ca)



Infrastructure & Planning Committee  
January 2025

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



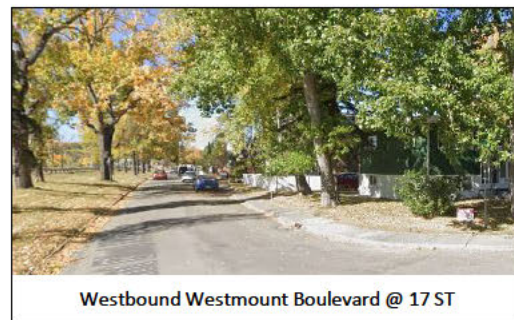
### REQUESTED AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:



- This area is separated by a treed median and a significant grade differential.
- There is no existing or feasible access to the river pathway system from this location;



- There is no existing or planned transit to this area;
  - Memorial Drive is a commuter roadway for non-local citywide traffic;
  - There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
  - At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).
  - This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible** along this stretch of Memorial Drive, unless the lane reversal was to be removed.
  - Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
  - The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate commuter traffic.
  - There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a





single one-direction residential roadway, and are separated by a treed median with grade-separation.

- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 4<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
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- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing communities at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area**, which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we encourage The City to develop policy that focuses on reducing the city and taxpayers’ long-term



Creosote Facility @ Pumphouse Park

liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.

**3. Requested Amendment #3: Do not require one-side a Westmount Road to be rear-facing.**

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**COMMENTS ON THE PUBLIC ENGAGEMENT PROCESS:**

**1. Substantial written and in-person feedback was not recorded and not considered in this Plan.**

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First name [required] Matthew

Last name [required] Keller

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 10, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley LAP

Are you in favour or opposition of the issue? [required] In opposition



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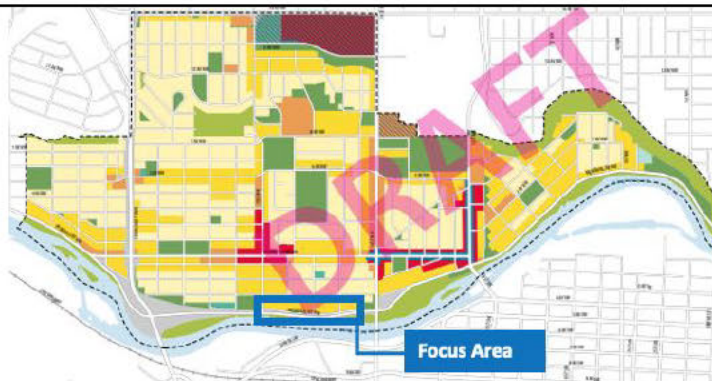
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Comments - please refrain from  
providing personal information in  
this field (maximum 2500  
characters)

Infrastructure & Planning Committee  
January 2025

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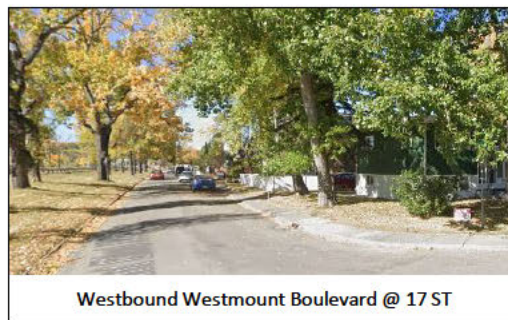
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First name [required] Vanessa

Last name [required] Fraser

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[required] - max 75 characters Riley LAP

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

IPC Comments January 2025 v2.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

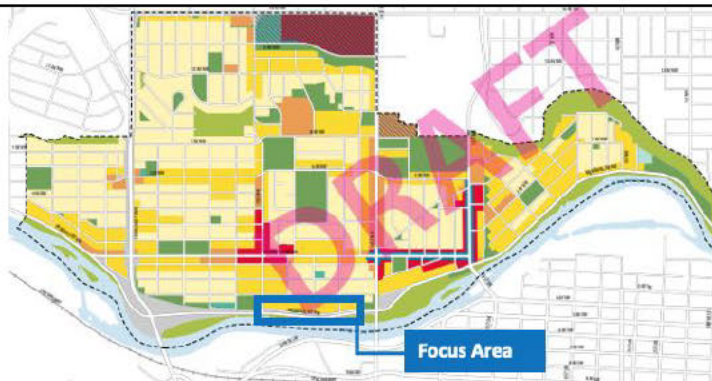
As a resident of Hillhurst, we are deeply concerned about the Anthem development site and the impact it will have on our community and quality of living. A development this size is not appropriate for this area for a number of reasons outlined in the attached. We appreciate your consideration of our concerns. Thank you



Infrastructure & Planning Committee  
January 2025

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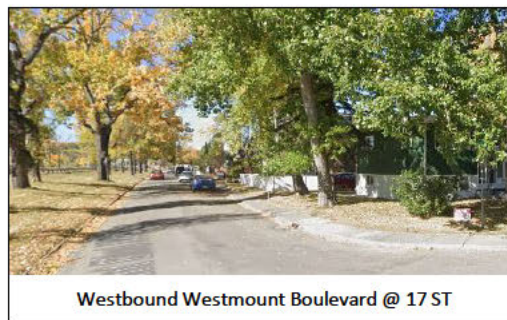
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First name [required] Paula

Last name [required] Hirson

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 8, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley Communities local area plan

Are you in favour or opposition of the issue? [required] In opposition





ATTACHMENT\_01\_FILENAME      IPC Comments January 2025 v2.pdf

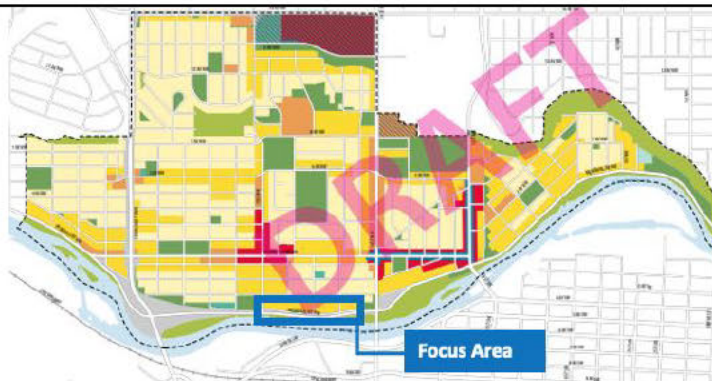
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Comments - please refrain from  
providing personal information in  
this field (maximum 2500  
characters)

Infrastructure & Planning Committee  
January 2025

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



### REQUESTED AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:



- This area is separated by a treed median and a significant grade differential.
- There is no existing or feasible access to the river pathway system from this location;



- There is no existing or planned transit to this area;
  - Memorial Drive is a commuter roadway for non-local citywide traffic;
  - There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
  - At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).
  - This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible** along this stretch of Memorial Drive, unless the lane reversal was to be removed.
  - Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
  - The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate commuter traffic.
  - There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a





single one-direction residential roadway, and are separated by a treed median with grade-separation.

- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 4<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
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Creosote Facility @ Pumphouse Park



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**3. Requested Amendment #3: Do not require one-side a Westmount Road to be rear-facing.**

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
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First name [required] Yves

Last name [required] Choiniere

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Date of meeting [required] Jan 8, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley Local Area Plan

Are you in favour or opposition of the issue? [required] In opposition



ATTACHMENT\_01\_FILENAME

CBC site redevelopment comments January 2025 v2.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

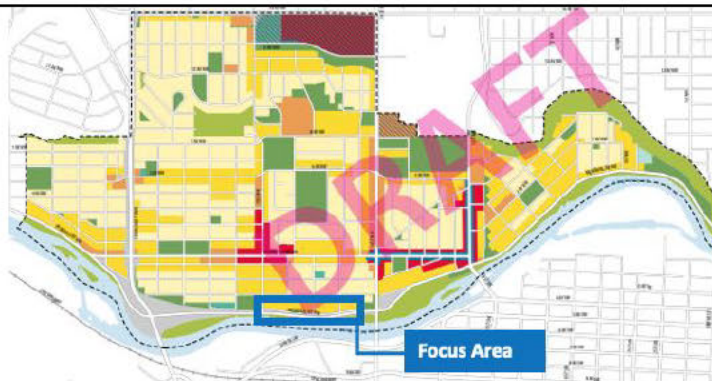
I am not in favour of the proposed plans and am requesting the following amendments:

1. That the Westmount Boulevard area, as shown as "focus area" in the attached document, be designated as Neighbourhood Local (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of "up-to 4 stories" (and not 6 stories as proposed).
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Infrastructure & Planning Committee  
January 2025

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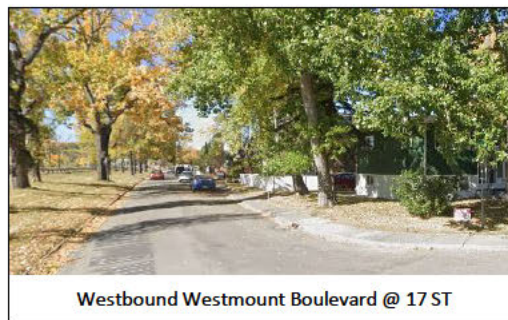
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First name [required] Jacqueline

Last name [required] Mootoo

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IPC Comments January 2025 v2.pdf

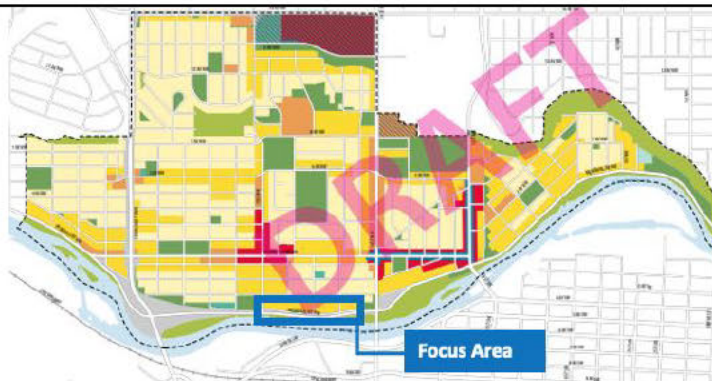
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Infrastructure & Planning Committee  
January 2025

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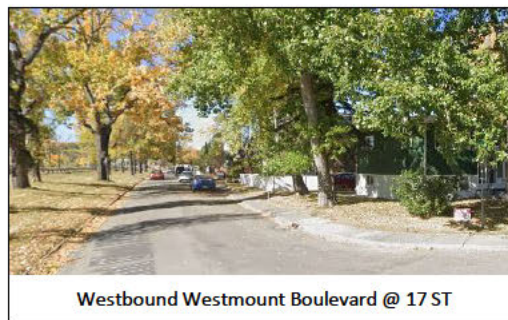
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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] Jason

Last name [required] Doornbos

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 8, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required] In opposition



ATTACHMENT\_01\_FILENAME

RMP\_Westmount\_Calgary\_20Dec2024.docx

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Good Morning. Please consider my comments in opposition to the Riley Communities Local Area Plan. My comments focus solely on the Development at 1724 Westmount Boulevard NW, Calgary, AB. I am a professional engineer in good standing with APEGA, and own a home which is adjacent to and sits directly North of 1724 Westmount Boulevard NW.

In support of my comments, I have attached a detailed letter from James Stirling, P.Eng. A professional member in good standing with APEGA who has knowledge and expertise in relation to the development of this site, specifically with regard to the creosote contamination of the soil and potential for adverse health effects to current residents, should the site be developed in a manner as proposed by the current version of the LAP.

Like many of the residents who own homes adjacent to and near the property, I have small children, and am deeply concerned about the risks to our and their health not only during the development of the site, but also due to venting of vapours once construction is complete. The LAP has not adequately considered and addressed the health risks to current residents, as supported by Mr. Stirling's letter. In addition, the impact of venting of creosote vapours caused by development of this site in the manner proposed by the current version of the LAP has not been demonstrated to be safe.

I request the Infrastructure & Planning Committee reject the current version of the LAP, and require the site at 1724 Westmount Boulevard NW, Calgary, AB be restricted to development which matches the scale of the current properties which are adjacent to the site as this has been demonstrated to not pose adverse health effects to local residents, while at the same time allowing for increased density and diversity of housing types within the neighborhood. Should the Infrastructure & Planning Committee decide to proceed with development as currently proposed in the LAP, I request the development of the site be restricted until an independent environmental impact assessment of the site is completed and published for resident consultation, which fully considers the health impact to current residents during and following construction.

Date: December 20<sup>th</sup>, 2024

Mayor Jyoti Gondek  
Office of the Mayor  
The City of Calgary  
P.O. Box 2100, Station M  
Calgary, AB  
T2P 2M5

Delivered by e-mail: [Mayor@calgary.ca](mailto:Mayor@calgary.ca)  
Ward 7 Councillor Terry Wong, [Terry.Wong@calgary.ca](mailto:Terry.Wong@calgary.ca)

Dear Mayor Gondek and Councillor Wong,

**Risk Management Plan for Development at 1724 Westmount Boulevard NW, Calgary, AB**

Please find below my review of this proposed Risk Management Plan (RMP) <sup>(Ref. 1)</sup>. I'm an APEGA registered Professional Engineer (P.Eng) with expertise in complex oil and gas field development, regulatory process and environmental assessment from a background in subsurface reservoir modeling. I'm working on a pro bono basis in collaboration with the neighbourhood group of residents in opposition to the condominium development proposal. I have no property interests in the immediate area. I hope my detailed technical review (pp. 2-3) will assist you in the assessment of our group's concerns. In summary:

- i. 1724 Westmount Boulevard (the Site) is part of a complex regional dynamic system that the static hydrogeological Conceptual Site Model (CSM) does not adequately reconcile,
- ii. The Site developer's RMP focuses upon future residents of the proposed condominium development. It doesn't address current residents concerns for risk associated with construction of a vapour barrier system and possibly odorous gas venting operations,
- iii. Documented gaps in the Province's regulation of contaminated sites <sup>(Ref. 2)</sup> are exemplified in both the proposed Site development and Canada Creosote (CC) site. Risk is being driven by a failure to fully remediate the CC site. Alberta Environment & Protected Areas (AEPA) approach to monitoring and assessment is not well understood by residents, and appears to us overly reliant upon consultants' assessments. Efforts of neighbours to meet AEPA staff in person have been ignored, further undermining confidence in both this RMP, the development approval process as a whole and risk management of the CC site.

The residents support inner city development towards reducing urban sprawl and revitalization of urban cores. However the current Site proposal requires extensive excavation to accommodate condo buildings, associated below ground parking and services. In the context of an underutilized and contaminated CC site, we feel an unjust burden to accommodate residential density that by its nature simultaneously increases prospective environmental, health & safety (EH&S) risks upon residents that remain unaddressed in the RMP. We therefore request your assistance in facilitating our meeting AEPA and City staff toward satisfactory resolution of our concerns prior to issuance of development and other approval permits.

Sincerely,  
*Original signed by*  
James Stirling, P. Eng.

cc. Hon. Ric McIver, Minister of Municipal Affairs [minister.municipalaffairs@gov.ab.ca](mailto:minister.municipalaffairs@gov.ab.ca)  
cc. Dep. Minister, Environment & Protected Areas, Sherri Wilson [sherri.wilson@gov.ab.ca](mailto:sherri.wilson@gov.ab.ca)  
cc. Mr. Gurbir Nijjar, [Gurbir.Nijjar@calgary.ca](mailto:Gurbir.Nijjar@calgary.ca)  
cc. Ms. Becky Poschman, [caward7@calgary.ca](mailto:caward7@calgary.ca)

**1. Hydrogeological Conceptual Site Model (CSM) and Contaminant Migration**



- a. **Failure of the engineered barrier wall to contain contamination at the Canada Creosote (CC) source site** <sup>(Ref. 1a)</sup> **offers lessons in appropriate use of hydrogeological CSM's to assess migration at Westmount Boulevard (the Site).** The CC site was in operation for forty years from 1923 to 1963. The contamination source, a dense non-aqueous phase liquid, DNAPL (i.e. creosote), remains only partly remediated today, 60 years after closure. Over that time, creosote has flowed under gravity, controlled by bedrock fractures in a generally northeast direction from the CC site to impact a wide area including north of the Bow River. Failure to contain contamination was, at its root, a result of over-simplification of complex physical processes governed by geology, contaminant and aquifer properties. The hydrogeological CSM for this Site is also over-simplified <sup>(Ref. 1b)</sup>.
- b. **Keystone's interpretations of data are on occasion imprecise, contradictory and confusing** <sup>(Ref. 1c)</sup>. Fluid communication pathways are extensive and complex. To infer that creosote stability might *"mitigate any further vertical migration"* <sup>(Ref. 1d)</sup> is not supportable. Sampling bias and modeling technique limit detailed interpretation of creosote fluid dynamics. Creosote and other Contaminants of Potential Concern (COPC) have moved from the CC site west, north and east into the Hillhurst area. This is likely governed, in part, by Bow river pressure head fluctuation and surficial aquifers influenced by seasonal variation in river flows and precipitation over many years after the CC site closure in 1963 <sup>(Ref. 1e)</sup>. Relying upon the groundwater alone may not constrain vertical migration of COPC's at the Site, <sup>(Ref. 1f)</sup> risks vapour leakage into condominium indoor air and so drives the recommendation to install a parkade sub slab engineered vapour barrier. This brings other, unacknowledged risks (see 2b).
- c. **Data gaps drive an oversimplification of the Site CSM.** For example, under-sampling in the area beyond the Site <sup>(Ref. 1g)</sup> and a sampling bias forced by the original building at the Site <sup>(Ref. 1h)</sup> biases the CSM. This bias likely creates an incomplete understanding of distribution of COPC's derived from the creosote source. COPC's such as petroleum aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) cannot be fully reconciled with creosote location <sup>(Ref. 1i)</sup> perhaps owing to the influence of pressure driven groundwater movement affecting low-density COPC distribution independently of high-density creosote. There is also scope for soil gases at site to be generated from volatilization of non-aqueous phase liquids (NAPL) and aerobic biodegradation of hydrocarbons.

## 2. Risk Assessment CSM and Risk Mitigation.

The Risk Assessment CSM focuses on the proposed condominium development at Site <sup>(Ref. 1j)</sup>

- a. **The risk assessment states** <sup>(Ref. 1k)</sup> **that if the Site owner attempted to remove the creosote onsite it would eventually be replaced from the up-gradient source i.e. the CC site.** Creosote contaminant exposure risk therefore remains for residents of the proposed condominium development until the CC site is fully remediated.
- b. **The principle risk is framed in terms of indoor air quality impacts of contaminant exposure to the proposed condominium development residents.** Although vertical attenuation of contaminants by the water table remaining above the depth of creosote is likely, it cannot be relied upon. Hydrocarbon-like odours have been detected in monitoring wells in the vicinity. An effort to trap gases could simultaneously concentrate odours that cannot currently be detected in the atmosphere due to dispersion and dilution the natural hydrogeology provides and that excavation for the purpose of condominium development risks disturbing.
- c. **The plan to vent any migrating gases to atmosphere may be a risk reduction to condo residents, but would represent a transfer of EH&S risk to the neighbourhood's existing residents and users of the playpark and outdoor rink adjacent to the proposed development.** Odours associated with venting would also create a negative perception of the Hillhurst area as a whole.

- d. **It is not clear how the Risk Management Plan (RMP) will address regulatory gaps.** The October 2024 RSC, "Record of Site Condition" (Appendix A) declaration is incomplete (Ref. 1l). **RMP implementation (Ref. 1m) requires the Condominium Corporation be responsible for monitoring and reporting changes in site conditions. This should be AEPA's responsibility.**

## References:

- (1) "Report of Findings – Risk Management Plan for Development of 1724 Westmount Boulevard NW, Calgary, AB", prepared for Anthem Westmount Developments GP, Project No: 15177, October 2024.
- a. "Figure 3-2 Canada Creosote Conceptual Model" (p.19)
  - b. "3. Conceptual Understanding... the hydrogeological CSM focuses on the DNAPL and associated dissolved groundwater plume identified within a fractured bedrock setting of ... the Paskapoo Formation." (p.15)
  - c. "3.6.2.4.2 Monitoring Results ... DNAPL thickness... measurements are generally decreasing at the Site... suggesting ... DNAPL has reached a point of stability... different sampling methodologies (make it) difficult to determine the absolute thickness decreases". (p.54)
  - d. "3.6.2.4.3 Delineation...the general decreases in DNAPL thickness across the impacted area ... would mitigate any further vertical migration" (p.55)
  - e. "3.3.1 Factors Influencing DNAPL Migration ... Temperature and fluid conductivity logs identified discrete zones of flowing groundwater in ... the bedrock ... represent both horizontal and sub-vertical pathways for potential DNAPL or dissolved phase COPC migration." (p.20)
  - f. Stating that 3.3.2 (p.20), 3.6.2.4.2 (p.55), 3.12.3.3 (p.80) 3.27 (p.85) the "DNAPL plume would continue to remain covered by the groundwater table" may not mitigate COPC migration at the Site.
  - g. "Figure 3-3 Regional Study Area and Development of Cross Sections" (p.22)
  - h. "Figure B1-2 to B1-5 Sample Location Plan" (Appendix B Figures)
  - i. "3.6.2.4.3 Delineation ... hydrocarbon-like odours ... observed in monitoring well" (p.55) , ... "3.6.2.1 Background of Creosote Contamination in the Surrounding Area". "drilling locations ringing the Site encountered concentrations of Polycyclic aromatic hydrocarbons (PAHs) consistent with creosote contamination... Tier 1 exceedances of F1, F2, F3, ethylbenzene and toluene were present in the area. Offsite soil contaminants of PAH were detected in wells to the west ... the north ... and to the east" (p.48)
  - j. "3. Conceptual Understanding ... the risk assessment primarily focuses on the assessment ... on the site scale rather than the regional scale." (p.15)
  - k. "3.6.9 Contaminant Susceptibility to Various Treatment or Destruction Options" (p. 61)
  - l. Appendix A0 Risk Management Information, 7.2 Key Progress of RMP
  - m. Implementation condition (8), "the new Site Owner ... must communicate with Alberta Environment to confirm site condition has not changed" (p.88)
- (2) <https://elc.ab.ca/wp-content/uploads/2024/02/The-Regulation-of-Contaminated-Sites-in-Alberta .pdf>



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First name [required] Trevor

Last name [required] Downie

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[required] - max 75 characters Riley LAP

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ATTACHMENT\_01\_FILENAME

IPC Comments January 2025 v2.docx

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

hello, as a resident in the area, I fully agree with everything outlined in the attached. I think that the focus area (old CBC site) designated as a neighbourhood connector is perhaps the craziest. this is a one way street and in no way a connector street. on top of that, the neighbouring properties on westmount are all 2 stories, and not 4 stories, and won't be for a long time, this makes it improbable that this would be an appropriate blend of property styles within the community. the other large factors would be the creosote contamination concern, as well as the added traffic through the community. these thoughts are reflected in a large part of the neighbouring community.

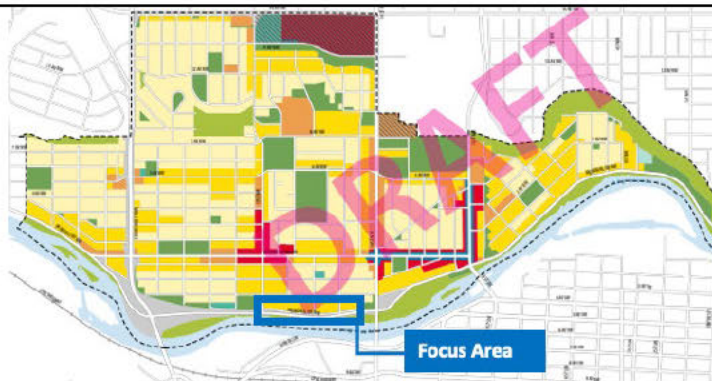
thank you,



Infrastructure & Planning Committee  
January 2025

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



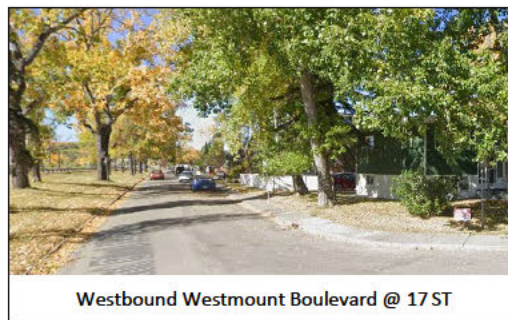
### REQUESTED AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

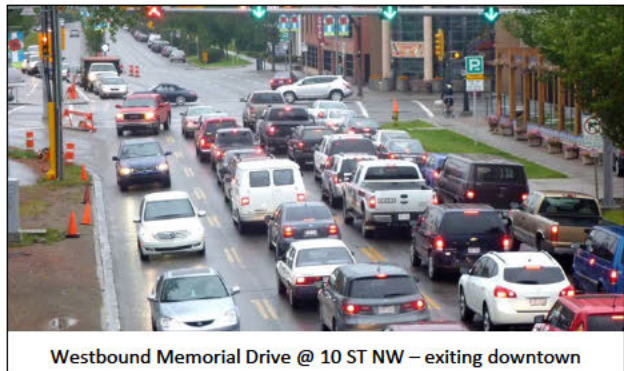
- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:



- This area is separated by a treed median and a significant grade differential.
- There is no existing or feasible access to the river pathway system from this location;



- There is no existing or planned transit to this area;
  - Memorial Drive is a commuter roadway for non-local citywide traffic;
  - There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
  - At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).
  - This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible along this stretch of Memorial Drive, unless the lane reversal was to be removed.**
  - Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
  - The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate commuter traffic.
  - There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a





single one-direction residential roadway, and are separated by a treed median with grade-separation.

- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 4<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.
- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where existing residential exist.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing communities at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area**, which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we encourage The City to develop policy that focuses on reducing the city and taxpayers’ long-term



Creosote Facility @ Pumphouse Park

liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.

**3. Requested Amendment #3: Do not require one-side a Westmount Road to be rear-facing.**

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to nine residential blocks. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



**COMMENTS ON THE PUBLIC ENGAGEMENT PROCESS:**

**1. Substantial written and in-person feedback was not recorded and not considered in this Plan.**

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. **This feedback was not captured in any way in the What We Heard Report or What We Did Report**, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households.*** For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.



O2

January 2, 2025

Infrastructure and Planning Committee

**Subject: Riley Communities Local Area Plan**

Dear Mayor and Council,

I am writing on behalf O2 Planning and Design Inc. (O2) to express our firm's support for the revised Riley Communities Local Area Plan that will be presented by administration at the January 8 meeting of the Infrastructure and Planning Committee.

Over the past decade, O2 has been very active in the area covered by the Riley Communities Local Area Plan. O2 has represented land owners and developers assisting them with over twenty development plans and successful land use approvals as well as working as a partner with the City of Calgary on public realm improvement projects such as Bow to Bluff. O2 currently is working with clients on active development projects in the plan area including Anthem's redevelopment of the former CBC site and the masterplan for the new owners of the Riley Park Village Site (former Grace Hospital). Given O2's past, current and anticipated future involvement in projects in the plan area our work will be guided by the policies of the Riley Communities Local Area Plan.

Throughout the administration's preparation of the LAP, O2 has been active in discussions with the administration project team. O2 would like to thank the administration team for their willingness to engage with us and to hear and consider our comments.

O2 is supportive of the proposed LAP because we believe that the plan establishes the framework for the future development of the plan area that prioritizes development and density in the areas that developers are most likely pursue and that will result in meaningful change in the plan area. O2 is particularly supportive of the revisions made to the LAP following the Council recommendation to refer the plan back to administration. O2 is specifically supportive of the following two proposed changes related to the Riley Park Village site:

- The inclusion of the SAIT / AUArts / Jubilee LRT Station Area as a third station area and the modification to building scales within this portion of the Plan Area.
- The addition of policy 2.2.4.b that reads "*should a new concept emerge for a Comprehensive Planning Site resulting from a submitted master plan, amendments to the Plan including Map 3: Urban Form and Map 4: Building Scale, should be made.*"

We suggest that these proposed changes provide policy guidance to allow for the Riley Park Village site to be developed in a transit adjacent appropriate manner informed by a comprehensively planned masterplan that the owner's development team will begin preparation of in the coming weeks. Although a significant amount of effort and engagement goes into preparing an LAP, O2 also believes that LAP policies cannot always capture the most appropriate development outcomes for specific sites. Therefore, amendments to the plan should be considered when presented with robust design rational to support an amendment.

O2 looks forward to continuing to work on transformational projects within the Riley Communities Plan area and recommends that Council support the proposed LAP as presented.

Sincerely,



Brian Horton, RPP MCIP  
Principal  
O2 Planning & Design Inc.

O2



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First name [required] Mark

Last name [required] Hardy

How do you wish to attend?

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Date of meeting [required] Jan 8, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley LAP

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

IPC Comments January 2025 v2.docx

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Hello! I would like to share the comments in the attached, and express my full agreement with them.  
the biggest concerns would be:  
the creosote contamination in the soil, and the effects on the neighbouring community  
the effect on traffic in the neighbourhood,  
and primarily the fact that the CBC site should be deemed as neighbourhood local instead of connector, based on the idea that westmount is a one way, non Main Street, unlike other streets (19th street, and Kensington road) which are correctly considered neighbourhood connectors.

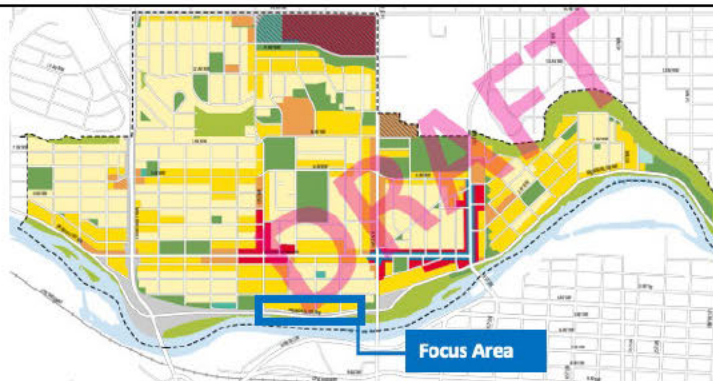
thanks,



Infrastructure & Planning Committee  
January 2025

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



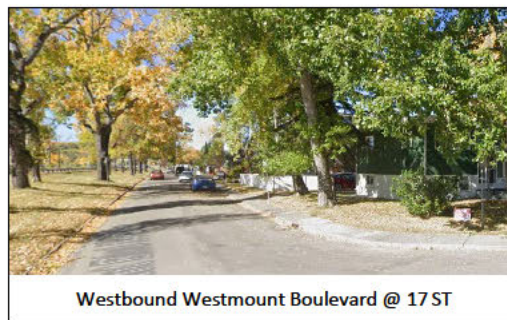
### REQUESTED AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

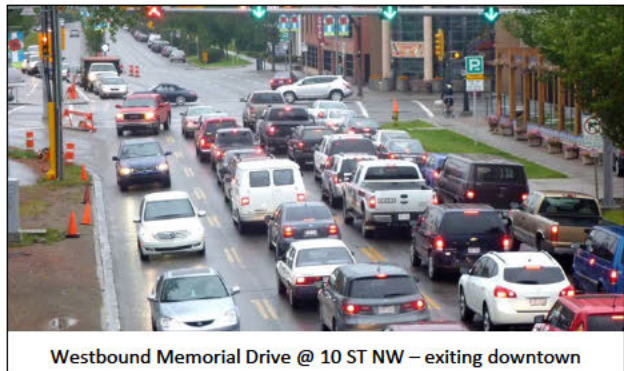
- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:



- This area is separated by a treed median and a significant grade differential.
- There is no existing or feasible access to the river pathway system from this location;



- There is no existing or planned transit to this area;
  - Memorial Drive is a commuter roadway for non-local citywide traffic;
  - There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
  - At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).
  - This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible along this stretch of Memorial Drive, unless the lane reversal was to be removed.**
  - Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
  - The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate commuter traffic.
  - There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a





single one-direction residential roadway, and are separated by a treed median with grade-separation.

- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 4<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.
- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where existing residential exist.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing communities at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area**, which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we encourage The City to develop policy that focuses on reducing the city and taxpayers’ long-term



Creosote Facility @ Pumphouse Park

liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.

**3. Requested Amendment #3: Do not require one-side a Westmount Road to be rear-facing.**

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to nine residential blocks. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



**COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:**

**1. Substantial written and in-person feedback was not recorded and not considered in this Plan.**

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. **This feedback was not captured in any way in the What We Heard Report or What We Did Report**, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households.*** For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.



FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

Personal information provided in submissions relating to matters before Council or Council Committees is collected under the authority of Bylaw 35M2017 and Section 33(c) of the *Freedom of Information and Protection of Privacy (FOIP) Act* of Alberta, and/or the Municipal Government Act (MGA) Section 636, for the purpose of receiving public participation in municipal decision-making and scheduling speakers for Council or Council Committee meetings. **Your name and comments will be made publicly available in the Council or Council Committee agenda and minutes.** If you have questions regarding the collection and use of your personal information, please contact City Clerk's Legislative Coordinator at 403-268-5861, or City Clerk's Office, 700 Macleod Trail S.E., P.O. Box 2100, Postal Station 'M' 8007, Calgary, Alberta, T2P 2M5.

Please note that your name and comments will be made publicly available in the Council or Council Committee agenda and minutes. Your e-mail address will not be included in the public record.

ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

The purpose of The City of Calgary is to make life better every day. To fully realize our purpose, we are committed to addressing racism and other forms of discrimination within our programs, policies, and services and eliminating barriers that impact the lives of Indigenous, Racialized, and other marginalized people. It is expected that participants will behave respectfully and treat everyone with dignity and respect to allow for conversations free from bias and prejudice.

First name [required] Jessica

Last name [required] Karpat

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Standing Policy Committee on Infrastructure and Planning

Date of meeting [required] Jan 8, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley Communities LAP

Are you in favour or opposition of the issue? [required] In favour



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ATTACHMENT\_02\_FILENAME

Comments - please refrain from  
providing personal information in  
this field (maximum 2500  
characters)



January 2, 2024

Calgary Infrastructure and Planning Committee  
Calgary City Hall  
800 Macleod Trail SE  
Calgary, AB T2G 5E6

**Re: Proposed Riley Local Area Plan (LAP) at IPC**

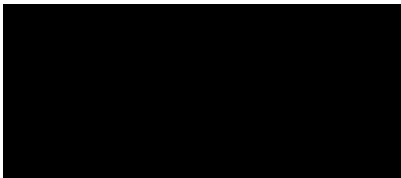
Dear Infrastructure and Planning Committee,

On behalf of our clients, we would like to express our sincere gratitude for The City's response to feedback from residents and industry following the IPC meeting on October 16, 2024. We had previously advocated for the removal of the modified building scale on the east side of 10th Street NW, north of Memorial Drive NW, specifically Policy 2.5.2.2.i (formerly Policy 2.5.2(k)) and Figure 13 from the draft Riley LAP. We are pleased to observe that the area where the policy applies has been modified to only include those buildings that have the potential for heritage designation. We believe this modification will increase the potential for growth and development on 10<sup>th</sup> Street NW and within an important Transit Station Area.

We support the draft Riley LAP. We are confident that this plan aligns with The City's objective of accommodating 50% of Calgary's future population growth within developed areas and fostering a more sustainable urban form by encouraging growth within The City and optimizing the utilization of existing land.

We would like to thank Administration for their dedicated efforts in creating this plan. We urge members of the Committee to vote in favor of the amended plan and forward it to Council for consideration. Thank you for your regard as you deliberate on the proposed Riley LAP.

Sincerely,



Jessica Karpat, MEDES, RPP, MCIP  
Principal – Planning, QuantumPlace Developments Ltd.