



Naheed K. Nenshi, Mayor

August 1, 2021

IREF Application #: 2021-11

**Attention:** Jordon Copping

Calgary Metropolitan Region Board  
Suite 305, 602 11<sup>th</sup> Avenue SW  
Calgary, Alberta, T2R 1J8  
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**SUBJECT: City of Calgary Challenge to CMRB Recommendation of Approval for Interim Regional Evaluation Framework Application 2021-11 Rocky View County: Central Springbank Area Structure Plan Amendment (HWY 1 – Old Banff Coach Road Conceptual Scheme)**

Dear Mr. Copping,

The City of Calgary (Calgary) has reviewed the Rocky View County (County) Central Springbank Area Structure Plan Amendment (the proposed Plan), as well as the Calgary Metropolitan Region Board's (CMRB) Administration Recommendation and Third Party Review. Calgary acknowledges Rocky View County's efforts to address some issues identified with the proposal. However, the proposed Plan's outstanding issues could create adverse impacts to regionally significant corridors, regional infrastructure, community facilities and services within Calgary, and the region. Calgary believes these are solvable, and is hoping that Rocky View County will support additional efforts to address outstanding technical matters. In our view, the proposed Plan is inconsistent with the Interim Growth Plan (IGP), and as such, Calgary is challenging the Plan and providing the following rationale to support a more regional conversation about the proposal and its outstanding issues.

**The proposal is misaligned to the IGP policy framework in the following ways:**

In general, the Plan proposes a significant amount of growth that is seamless with development in Calgary and that will lead to required upgrades and increased usage of infrastructure and services in Calgary. Full build out of the Plan could impact the function of the transportation, servicing, and stormwater infrastructure in Calgary. At present, the technical studies are insufficient to understand the adverse impacts, and the changes made to the proposal are not enough to address the cumulative impacts of the County's proposed growth on Calgary services (including transit, recreation facilities, etc.). Until these are addressed, it is our view that the Proposal does not sufficiently protect the function of regionally significant mobility and transmission corridors (IGP objective 1.d.).

**1. Potential impact on City of Calgary services**

The proposed type, location and scale of growth will generate demand for community services and facilities in Calgary. The proposed conceptual scheme refers to amenities that are planned within the

City of Calgary boundaries, such as the neighbourhood activity centre, joint use site, optimized recreation facility / library and community association sites within the Neighbourhood B of Calgary's West View Area Structure Plan. This requires further collaboration and coordination of services between the City of Calgary and the County. At this time, the current policies in the implementation section do not provide specific guidance on how impacts will be addressed. The Conceptual Scheme policy 8.1.5 directs the review of impacts and potential cost-sharing, this does not cover all the impacts generated by the Proposal, such as community facilities. It would be appropriate for Rocky View County to arrange for municipal agreements to support their development proposal as per IGP Policy 3.4.2.1.e.

## **2. Unresolved Transportation impacts**

The proposed Plan does not have sufficient mitigation measures to address potential adverse impacts to regionally significant mobility corridors (IGP Policy 3.5.1.1 c.) such as Highway 1. At present, there are gaps in the network analysis and no specific commitment from the County to fund the needed mobility improvements (for example County, developer or identifying potential cost sharing opportunities between our jurisdictions). This could lead to downstream adverse impacts in Calgary.

The proposed Plan is well situated to leverage Transit but it does not sufficiently plan for it. Rather transit is left as an ambiguous and optional item ("should" it be proposed). However, planning for transit now ensures service can be implemented when required and brings the proposed Plan into alignment with the IGP. This would include the following specific policies:

- Promote integration of land-use and infrastructure planning (IGP Objective 1.a.)
- Provide community nodes, leverage transit (IGP Objective 1.c., 3.d.)
- Transit connections to employment areas (IGP Policy 3.4.5.2)

## **3. Need for policies to protect the source watershed and source water supply**

The proposed Plan focuses on drainage requirements but its stormwater discharge and site drainage is connected to drinking water sources for the region. Development and associated stormwater impacts pose a level of risk to the quality, safety and cost of Calgary's public drinking water system. As the development authority, Rocky View County has a responsibility to ensure that development decisions will not degrade drinking water sources, and to document how its decisions are supported by science, monitoring, data and modeling. At present, there is a lack of a clear overall policy framework committing the County to mitigating the adverse impacts that planning and development decisions will have on source water.

- Without these mitigation measures in place, the County will be unable to address impacts to regional infrastructure (IGP 3.5.2.1 c.) such as the Bearspaw Water Treatment Plant.
- Without clear provisions, it is uncertain how the County will manage risks to water quality, quantity, and drinking water sources (IGP Objective 2.a.) and protect source water quality (IGP, 3.2.3.a.).
- Policies in the Rocky View County – City of Calgary Intermunicipal Development Plan further support the protection of water. Policies 11.1.5 states that all development proposed in proximity to water bodies should be carefully evaluated for impacts on water quality of surface water, ground water and alluvial aquifers. Negative impacts should be mitigated.

## **4. Collaboration**


Calgary appreciated the progress that began to unfold at the March 11, 2021 meeting between Rocky View County, Calgary and the developer, and requested further consultation, plan amendments and agreements to resolve outstanding concerns with the proposal. Instead, Calgary received a late circulation of the proposal dated April 6, 2021 and revised technical documents on April 9 - only a

few days before the County Council public hearing on April 13, 2021. We were surprised by this approach because it did not leave sufficient time for intermunicipal discussions as per IDP 15.1.5. nor does it follow our IDP circulation timelines. Calgary requested a consideration of mediation in our expedited comment letter dated April 7, 2021 and then again in our mediation request on May 3, 2021 following 2<sup>nd</sup> reading. Our requests were not accommodated. On May 24, 2021 Rocky View County adopted a policy to review impacts suggested by Calgary. However, this does not address all the adverse impacts generated by the Proposal. Rocky View County referred the proposed Plan to the CMRB although there were outstanding concerns and mediation had not occurred.

In our view, the fore-shortened process did not support collaboration between our Administrations to create policies that address the impacts of the proposed development. We believe that effective collaboration and coordination between our municipalities, as outlined by IGP policy 3.2.2, is still needed so that we may resolve these issues.

In closing, we are concerned that the full implementation of the statutory plan would result in development that is not consistent with the Principles, Objectives, and Policies of the Interim Growth Plan. It would be helpful to see adverse impacts addressed at the Area Structure Plan level, policy controls to protect drinking water sources and regional infrastructure, mitigation measures to address adverse impacts to corridors, infrastructure, community facilities and services in Calgary, and intermunicipal agreements in place to support this. While Calgary is not able to support the Central Springbank Area Structure Plan Amendment, we are willing to discuss the proposed Plan, further review the associated technical documents, and work towards solutions that address our earlier identified issues. We hope that the County will step forward to partner on solutions.

Regards,



Naheed K. Nenshi  
Mayor of Calgary

**Cc:**

**Intergovernmental Affairs Committee, The City of Calgary**

Councillor Carra  
Councillor Chahal  
Councillor Demong  
Councillor Farkas  
Councillor Gondek  
Councillor Wooley

**CMRB Representatives, The City of Calgary**

Councillor Carra  
Councillor Chahal

**City of Calgary Administration**

Chris Arthurs, Acting Deputy City Manager, Deputy City Manager's Office  
Kelly Cote, Manager, Intergovernmental & Corporate Strategy  
Neil Younger, Senior Strategist, Intergovernmental & Corporate Strategy