



August 26, 2021

IREF Application #: 2021-13

Attention: Jordon Copping

Calgary Metropolitan Region Board
Suite 305, 602 11th Avenue SW
Calgary, Alberta, T2R 1J8
jcopping@calgarymetroregion.ca

SUBJECT: City of Calgary Challenge to CMRB Recommendation of Approval for Interim Regional Evaluation Framework Application 2021-13 Rocky View County: Bearspaw Area Structure Plan Amendment (Ascension Conceptual Scheme)

Dear Mr. Copping,

The City of Calgary (Calgary) has reviewed the Rocky View County (County) Bearspaw Area Structure Plan Amendment (proposed Plan), the Calgary Metropolitan Region Board's (CMRB) Administration Recommendation and Third Party Review. Calgary acknowledges the substantial progress was made with regards to proposed Plan's policy. However, significant growth is being proposed adjacent to Calgary that will generate increased use of infrastructure, services and facilities in Calgary and require upgrades. At present, there remain some outstanding technical issues and gaps that could create adverse impacts to regionally significant corridors, regional infrastructure, community facilities and services within Calgary, and the Calgary Metropolitan Region (Region). Calgary believes these are solvable, and is hoping that Rocky View County will support the necessary efforts to address outstanding technical matters.

In our review, the proposed Plan is not consistent with certain Principles, Objectives, and Policies of the Interim Growth Plan (IGP). As such, Calgary is challenging the proposed Plan to support a regional conversation about the proposal and to continue the work of good regional planning. The proposed Plan is not aligned to the IGP policy framework in a number of ways outlined below.

Location and context. The site is nearly half a section (113 hectares / 280 acres) in size. It is located immediately adjacent to Calgary's western boundary; southwest of the junction of Highway 1A and 12 Mile Coulee Road – a Calgary roadway. The lands are north of the Bow River and fall within the source watershed, upstream of Calgary's raw water intake.

The following areas are not consistent with the IGP:

1. Unresolved Transportation impacts

The proposed Plan's Transportation section has come a long way, and Calgary appreciates the addition of policies 7.1.1, 7.1.2 and 7.1.3. These are a good start, but are not yet sufficient enough on their own to protect the function of regional significant mobility corridors (IGP Objectives, 1.d.) such as Crowchild Trail. The City of Calgary does not concur with the findings of the Technical Impact

Assessment. More technical work is required to determine an appropriate intersection design for 12 Mile Coulee Road and Crowchild Trail (either a continuous flow intersection or interchange). Appropriate design and specific funding commitments should be developed by Rocky View County and discussed and agreed to with Calgary.

Additional upgrades are needed to support the proposed Plan. Some examples include widening of 12 Mile Coulee Road, and the 12 Mile Coulee roundabout. At present, there is no specific commitment or agreement from the County or developer to fund the required infrastructure, and no cross-jurisdictional agreement on the maintenance and operations for the proposed roundabout that overlaps the intermunicipal boundary. Stronger policy language (“shall” versus “may”) is needed to ensure updates to the Transportation Impact Assessment (TIA) and to make sure this is to the satisfaction of The City of Calgary, Rocky View County and Alberta Transportation (Ascension Conceptual Scheme policy 7.2.1). Without sufficient policy mechanisms and municipal agreements, 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.).

Transit

The proposed Plan is well situated to leverage transit and provide a community node. The City of Calgary acknowledges and appreciates the inclusion of policies to accommodate future transit service through road design and network connectivity. The Plan proposes urban style uses in very close proximity to Calgary’s Tuscany LRT station. There is no cost-sharing agreement and no mechanism for Ascension residents to pay for their use of the NW LRT and the Park and Ride. Further work should be done to coordinate transit service and cost sharing. Without mitigation measures in place, it is possible for a development of this scale, type and location to generate adverse impacts on infrastructure and services in Calgary (IGP Policy 3.2.3.a.).

2. Need for policies to protect the source watershed and source water supply

Calgary continues to have concerns with the proposed Plan and does not feel that previous issues have been sufficiently addressed by the applicant or RVC.

Three main areas of concern with the Ascension Conceptual Scheme:

a) Lack of source water protection policy in the Conceptual Scheme

The proposed Plan’s stormwater discharge and site drainage is connected to drinking water sources in the region. Stormwater impacts may pose a level of risk to the quality, safety and cost of Calgary’s public drinking water system. Calgary requests that specific policy statements be included in the proposed Plan to protect water quality in the Bearspaw Reservoir for drinking water purposes, and to commit to understanding the existing source water quality and the impact the development will have at full build out. This may include the ongoing water quality monitoring over time to ensure the development is not negatively impacting source water quality. Without clear policy controls, 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.).

b) There is no reference to the Bearspaw Tri-Lateral Agreement Consensus Report and no commitment to source water protection. The report was approved by County Council and is meant to provide the applicant with the intended direction Calgary expects to see from RVC

when development is occurring in the area. The proposed Plan should specifically reflect the goals, principles, and intent in the Consensus report.

- c) Ascension proposes to use a natural drainage course to convey stormwater. However, it is unclear how the proposed Plan will manage stormwater that drains off-site. Calgary does not support the use of City infrastructure to manage stormwater runoff for the lands in question. Additional information is required for Calgary to determine the impact of stormwater quality and quantity flowing across City lands and into the Bow River upstream of Bearspaw Reservoir. Calgary is requesting a cumulative effects assessment to determine impact to water quality. This will help RVC inform potential mitigation strategies for the full build out of the proposed Plan and better integrate land-use and infrastructure planning (IGP Objective 1.a.).

RVC has a desire and responsibility to ensure that land use decisions do not have a negative impact on water quality and the environment. This responsibility is clearly defined in the South Saskatchewan Regional Plan, Calgary Metropolitan Region Growth Plan, Alberta Environment and Parks and related Council policies. The lands in question have a high vulnerability to contaminants quickly reaching the Bow River due to runoff. Spills and other accidental releases would likely enter watercourses or connected aquifers if not contained within a few hours. This requires prompt action to effectively mitigate risks and address impacts to drinking water sources, water service and regional infrastructure (IGP 3.5.2.1 c.) such as the Bearspaw Water Treatment Plant.

RVC's decisions should be supported by science, monitoring, data and modeling. A clear overall policy framework is needed committing RVC to mitigating the adverse impacts that planning and development decisions will have on source water. Calgary would strongly suggest that additional dialogue is required prior to RVC advancing plan approval.

3. Cost-sharing agreements between Rocky View and Calgary

The proposed Plan intends increased population in the County through urban style development, along the border of Calgary but only identifies passive recreational amenities (e.g., trails, parks and open spaces). This is likely to generate demand for indoor community services and facilities in Calgary. Additionally, there is a need to consider in a larger context the long-term capital requirements and the effects of cumulative population growth from the conceptual scheme and other proposed projects in the area. Further collaboration and coordination of services is required between Calgary and RVC. At this time, neither the current policies in the implementation section of the Conceptual Scheme nor the amendment to the ASP, provide specific guidance on how impacts will be addressed. The proposed Policy 12.1.2 directs the review of impacts and potential cost-sharing; however this does not cover all the impacts generated by the proposed Plan, 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.

4. Collaboration

The City of Calgary continues to have concern with the proposed Ascension Conceptual Scheme and does not think that previous issues have been sufficiently addressed by the applicant or RVC. To resolve outstanding issues with the proposal, Calgary requested further collaborative meetings in our intermunicipal circulation comment letters dated January 13 and April 9, 2021. On May 12, 2021 prior to second reading, Calgary continued to request collaborative meetings and that RVC and Calgary utilize the provisions outlined within IDP section 15.3 Resolution of Intermunicipal

Matters. The circulation provisions in our IDP call for RVC to provide sufficient time for intermunicipal discussions (IDP Policy 15.1.5.). To date, RVC has not provided sufficient time to resolve the outstanding issues and did not follow our IDP policies and protocol. In our view, this does not demonstrate collaboration or coordination in regards to this conceptual scheme as per IGP policy 3.2.2.

Calgary anticipated that further intermunicipal collaborations, further studies, and municipal agreements, could have addressed Calgary's concerns. Rocky View County has referred the proposed Plan to the CMRB with outstanding issues. Calgary is puzzled by the approach to ignore these requests to late in the process. In our view, the shortened process did not support our Administration's requests to address the impacts of the proposed development. We believe that effective collaboration and coordination between our municipalities is still needed to 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 Interim Growth Plan. It would be helpful to see the proposed Plan address adverse impacts through mitigation measures, provide policy controls to protect drinking water sources and establish intermunicipal agreements to support the development. At present, Calgary is not able to support the Bearspaw Area Structure Plan Amendment, though 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,



For

Chris Arthurs
General Manager, Deputy City Manager's Office
The City of Calgary

Cc: Intergovernmental Affairs Committee, The City of Calgary

Mayor Nenshi
Councillor Carra
Councillor Chahal
Councillor Demong
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