Tuesday, June 29, 2021

IREF Application #: 2021-04

Attention: Jordon Copping

Calgary Metropolitan Region Board
Suite 305, 602 11th 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 2021-04 Rocky View County: Municipal Development Plan**

Jordon!

Dear Mr. Copping,

The City of Calgary (Calgary) has reviewed the Rocky View County (County) Municipal Development Plan (the Plan), as well as the Calgary Metropolitan Region Board's (CMRB) Administration Recommendation and Third Party Review. The City of Calgary appreciates the County's efforts to strengthen the MDP's intermunicipal planning section with the addition of collaboration policies. While these best practices will support our future work together, they are not able to address current outstanding issues identified with the MDP. The proposed Plan is inconsistent with the Interim Growth Plan (IGP), and as such, Calgary is challenging the Plan and provides the following rationale:

Source Water Protection and Proper Service Provision

At present, the proposed MDP does not provide a policy framework committing the County to sufficiently mitigate the adverse impacts to regionally significant transmission infrastructure (IGP Policy 3.5.2.1 c.), such as the Bearspaw Water Treatment Plant. As the development authority, Rocky View County has a responsibility to ensure that planning and development decisions will not degrade the source water and document how its decisions are supported by science, monitoring, data and modeling, required in regulation. Without baseline surface water quality data, the Plan is unable to address the cumulative adverse impacts the proposed (and existing) development will have on drinking water sources. Without sufficient policies to protect source water quality and quantity (IGP 3.2.3), the Plan is not prepared to manage risks to drinking water sources (IGP Objective 2.a.).

The proposed Plan does not adequately integrate land-use and infrastructure planning (IGP principle 1.a.) as there remains a continued disconnect between piped servicing, urban type development and reliance on individual lot solutions to address water, wastewater and storm servicing. Without these and other key measures noted in our circulation responses, along with a strengthened alignment with higher order Provincial and Regional plans, the proposed Plan will create risks to major drinking water sources for the region.

Addressing adverse impacts

The proposed MDP has not sufficiently address adverse impacts on regional infrastructure, regionally significant corridors, and community services and facilities (IGP policy 3.2.3.d.) such as the Shane Homes YMCA at Rocky Ridge regional recreation facility in Calgary. Weak policies do not ensure the provision of community services and facilities (IGP objective 3.d.). The Plan supports potential cost-sharing agreements only for libraries (MDP policy 3.10.1.g.), but needs to include high-level policies that specifically support Area Structure Plans to explore cost-sharing for services and off-site infrastructure upgrades. The City of Calgary and Rocky View County do not have a global cost-sharing agreement in place to address these impacts. Responsibilities are deferred to local plans; an approach that does not identify the impacts of incremental growth and does not "ensure the provision or coordination of community services and facilities" as per IGP Objective 3.e.

Transportation Impacts

The proposed Plan does not adequately address transportation impacts on regional mobility corridors and infrastructure (IGP Policy 3.5.1.1 c.). The full build out of the Plan is anticipated to lead to significant adverse impacts on corridors such as Highway 1 east and west, HWY 8, HWY 2, Stoney Trail, Deerfoot Trail. However, there was no technical transportation study to consider the downstream impacts to the region. This gap that does not protect the function of regionally significant mobility corridors (IGP objective 1.d.).

Transit Provisions

The proposed Plan does not holistically address transit planning at a municipal scale. Itis not clear how an efficient and well-connected transit network could be leveraged to support community nodes, employment areas, and mobility choices (IGP principles 1.b., 3.d. & policy IGP 3.4.5.2.). The Plan does not contain policies that help to decide when/where to provide transit service, or that encourage transit-supportive land use, where appropriate. Instead it is deferred to "ASP/ Local Plan level", where it is unclear how transit is being accommodated or integrated with land-use (IGP objective 1.a.).

Integration and Efficient Use of Land and Regional Infrastructure

The proposed MDP does not provide enough policy guidance and controls to promote the integration of land-use and infrastructure planning (IGP objective 1.a.). It sets overall growth locations and "adaptable growth areas" with very few policies tying growth to servicing, in particular the logical extension of piped servicing.

The amount of growth that could be achieved through the full implementation of the land uses in the Plan is not clear. The Plan's gaps in policy and geodemographic data make it difficult to mitigate the adverse impacts of the proposed growth on the region (IGP 3.2.3.d.). Without stronger growth management policies requiring sequencing, or prioritizing, an overall dispersed or "leap-frog" pattern of growth could occur, which would not promote the efficient use of land and cost-effective development (IGP, Objective 3.a). In addition, there are inconsistencies between Planned / Future Planning Areas and actual ASPs in the process of approval, and Planned Areas shown where planning has not been conducted.

Collaboration to Coordinate

Given the outstanding issues to be addressed, Calgary requested additional consultation and mediation. The City first learned of the County's proposed growth concept through a circulation of the draft MDP though we previously requested dialogue at key milestones. In our view, the process did not leave enough time for intermunicipal discussions - a circulation requirement of the Rocky View County – City of Calgary Intermunicipal Development Plan (IDP) policy 15.1.5. It is also noted that the County voted to

rescind the previous tabling motion that would have allowed for further collaboration with adjacent municipalities and First Nations.

County Growth intrudes upon Calgary Growth Areas identified in IDP
The Plan proposes several policy intrusions for County growth within Calgary's Growth Area identified in the mutually agreed upon Rocky View – Calgary Intermunicipal Development Plan. This generates planning uncertainty and could lead to inefficient infrastructure planning. This enables premature development and fragmentation of Calgary's IDP Growth Areas, which is a significant barrier to Calgary being able to create comprehensively planned urban communities that can be sufficiently serviced after annexation. It is very difficult to integrate new urban development on previously-developed lands. This is not a sustainable approach to regional planning, and does not honour our IDP and 2006 Annexation Agreement to recognize growth corridors for both municipalities. We don't believe these actions *demonstrate collaboration to coordinate* as per IGP policy 3.2.2.

In closing, the Interim Regional Evaluation Framework states that "the Board must consider whether approval and full implementation of the statutory plan would result in development that is consistent with the Principles, Objectives, and Policies of the IGP." Calgary has identified areas where the Plan is not aligned to the IGP and that the rationale for approving the proposed Plan does not reflect the intent of the IGP and the IREF process.

"Municipal Development Plans are essential means of implementing the Interim Growth Plan"
While Calgary is not able to support the Municipal Development Plan, we are willing to discuss the amendments, 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
The City of Calgary

Cc: **Intergovernmental Affairs Committee, The City of Calgary**
Councillor Carra
Councillor Chahal
Councillor Demong
Councillor Farkas
Councillor Gondek
Councillor Wooley

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