

July 9, 2015

Office of the City Clerk
The City of Calgary
700 Macleod Trail SE
P.O. Box 2100, Postal Station "M"
Calgary, Alberta
T2P 2M5

Attn: His Worship Mayor Nenshi and members of City Council

Re: Residual Sub-Area 6 and Canada Olympic Park Bylaw 121D2015, Bylaw 122D2105, Bylaw 123D2015, Bylaw 124D2015, Bylaw 125D2015, and Amendments to the Canada Olympic Park and Adjacent Lands Area Structure Plan Bylaw 25P2015

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(Calgary Parks)

The Paskapoo Slopes occupy a special place in the minds of citizens in west Calgary, if not the entire city. These lands have long been recognized as a significant landscape feature contributing to the visual continuity and aesthetic quality of the region. The Urban Park Master Plan also acknowledges the role of the Paskapoo Slopes in linking natural lands to the east (Edworthy Park, Lawrey Gardens, Douglas Fir Trail) with the area to the west of the city , so as to provide providing the important critical mass to support biodiversity and wildlife corridors. The City's Entranceway policies recognize the ability of the Paskapoo Slopes to also provide a majestic and iconic entryway into Calgary. The aesthetic, natural, and passive recreation attributes of the slopes makes these lands worthy of preservation for the enjoyment and well being of future generations.

Many Calgarians have voiced their concerns about future development plans for these lands. Some suggest that these lands would best be protected through public acquisition and management. Alternatively, much of the valued natural attributes could be preserved with development of a smaller footprint on lands that are normally



developable (not Municipal/Environmental Reserve lands) and in keeping with existing city policies and principles. The preparation of an Area Structure Plan for this area offers an opportunity to secure the unique and valuable attributes of these lands as a legacy for future generations.

Members of Calgary River Valleys, as part of the Joint Advisory Committee, have been involved in the discussions surrounding the preparation of the Area Structure Plan and Outline Plan. We ask your consideration of the following comments and concerns.

1. The inclusion of Environmental Reserve (ER) within the development is not appropriate and sets a precedent. Lands in the northern slopes that do qualify as Environmental Reserve are being traded off for the protection of lands that are not practically developable in the upper southern slopes. Also, we are told the development proposal includes having the City cede city owned land including Parcel A which has been zoned allowing only recreational use. Some of this land is an obvious candidate for Environmental Reserve and would add to the visual aesthetic on the Calgary entranceway.
2. The use of Municipal Reserve (MR) lands primarily to provide backslope to justify the development of the ridge areas (some of which would otherwise be ER lands) is not normal practice and is not acceptable. The Municipal Reserve dedication should be used for the protection of additional Environmentally Sensitive Area lands, to provide for a visual impact buffer along the highway, and to better provide for community lands for long term recreational opportunities.
3. It is noted that the Calgary Planning Commission has directed that concept plans to inform the development process should be included in Part Two of the Area Structure Plan and made available to the public prior to the Area Structure Plan (ASP) and Outline Plan being considered by Council. At the deadline for submission to Council, no illustrations have been provided to the public.
4. Section A 4.3 Part 1 Appendices of the proposed Area Structure Plan should be amended to clarify the requirement for submission of a Visual Impact Statement in conjunction with the Land Use Amendment application, without any option of deferring to the development stage. These lands have been identified as part of an Entranceway in the City's policy, Improving Calgary's

Entranceways, and the visual value of these specific lands acknowledged in the Urban Parks Master Plan.

5. It is noted that the terminology and tenor of the proposed revisions to Area Structure Plan appear to have diminished the importance of the wildlife habitat and biodiversity potential of the Paskapoo Slopes. As one example of the value of these lands, the most recent Biophysical Impact Assessment found many nesting pairs on the slopes among which 33 different species were identified of which 5 species are considered Species at Risk. The Guiding Principle of Conservation of the Environmentally Significant Lands (Section 3.1 of the existing Area Structure Plan) should be retained.
6. In order to maintain the biodiversity potential and long term sustainability of the Paskapoo Slopes, the Guiding Principles and Vision for the Future of the Area Structure Plan should identify the need to maintain and improve the biodiversity and habitat connectivity of the Paskapoo Slopes to Bow River lands to the east (Edworthy Park, Lawrey Gardens, Douglas Fir Trail).
7. Within the proposed Outline Plan are suggested land uses and developments that could be improved to allow maintenance or even increased intensity of use while at the same time reducing the footprint and improving the protection of Environmental Reserve and Environmentally Significant Lands. For example, in one of the proposed development nodes a proposed large retail operation primarily occupying surface parking could be converted to much more intense use including a parking structure.
8. It is recognized that development will mean that some Environmentally Significant Lands will be impacted. However, losing 20 acres of Environmental Reserve lands is far beyond what should be sacrificed and compromises the environmental functionality contributions of these lands to the larger natural area.
9. Calgary River Valleys is an original participant in the ImagineCALGARY process. There are elements agreed to through Imagine CALGARY which should be incorporated into any significant development plan to better ensure that the development area and existing adjacent communities will more closely experience the “complete communities” envisioned by 2036.

For the reasons noted above, the proposed Area Structure Plan and Outline Plan have not adequately met the standards expected for an area of this significance. In

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order that the proposed Area Structure Plan and proposed Outline Plan before Council can provide the value and legacy intended by visionary documents of Council including the Municipal Development Plan, the Urban Parks Master Plan, Improving Calgary's Entranceways, the Natural Area Management Plan, and the Calgary Biodiversity Strategy, these Plans should be tabled and referred back to Administration for further revisions.

Sincerely,

Steve Meadows, President, Calgary River Valleys

Bill Morrison , Chair, Watershed Policy and Planning Committee, Calgary River Valleys

c.c. CRV circulation