

August 19, 2015

Development Circulation Controller

**Planning, Development Assessment #8201
DP.Circ@calgary.ca**

Attn: Gareth Webster, File Manager

**Re: DP2015-2630
7137 16 Av SW
Proposed Stripping and Grading Plans - Trinity Hills**

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(Calgary Community Initiatives)

Advisor
George Stalker
(Calgary Parks)

Dear Mr. Webster,

Calgary River Valleys appreciates the opportunity to provide comments on the Application for Development Permit at the Trinity Hills site as submitted by Urban Systems. Members of Calgary River Valleys have reviewed the proposal and we ask that you consider the following observations and concerns.

In general, we note that slopes, springs, streams and wetlands all contribute to the diverse topography, rich vegetation and habitat offered by this site. The Area Structure Plan for the Canada Olympic Park and Adjacent Lands has placed considerable emphasis on these attributes. Council consideration of the proposed development of this site expended considerable time and effort in the evaluation of the ecological function of this area and ultimately several amendments to the Area Structure Plan were made to protect the wildlife habitat and corridors, connectivity of natural features and ecological functions, and to ensure environmentally sensitive transitions between the Paskapoo Slopes Natural Areas and the areas to be developed. As re-grading of these lands will have a significant impact on the ecological functionality of this site, the utmost care must be taken to ensure evaluation of this development permit upholds these policies.

In addition, we note that the application is dated as having been submitted on June 22, 2015. Given the application was submitted prior to Council approval of the Area Structure Plan, there is concern that important amendments have not been taken into consideration. These amendments will have an impact on the approach taken to stripping and grading of the site. The specific concerns noted below suggest that the policies of the approved Area Structure Plan have not been adequately addressed by this development permit application.



1. Ravine Crossing between The Village and The Gateway

Map 03A indicates a street crossing of the ravine with the provision of a culvert and an 80 metre span of back fill into the ravine in addition to the road width. This ravine in its current state includes Primary ESA's as identified in the Biophysical Study supporting the development application. This proposed crossing fills the ravine and while a culvert can address water flows, this ravine crossing effectively isolates the northerly Natural Area from the rest of the Paskapoo Slopes Natural Area. We view this approach to the ravine crossing to be contrary to the intent of Section 5.9.2 (1)(e) of the Area Structure Plan (see attached excerpts) which calls for the continuity of the watercourse and maintenance of ravine habitat where a road crosses any of the ravines in the Paskapoo Slopes Natural Area. The accommodation of natural functions and features of the stream and maintenance of the wildlife corridor is best met with the provision of a bridge. The bridge design should consider features that would encourage passage of wildlife under the bridge and provide optimal ravine habitat, including height and width of the structure, as well as conditions supporting vegetation such as sunlight and precipitation.

2. Water Act Approvals

Three sites are identified on Map 09 as requiring approvals under the Water Act. We are concerned that the buffer areas around the streams that are to be protected pending provincial approvals, particularly the two most easterly sites, are insufficient to afford appropriate protection in the event that approvals under the Water Act are not provided. We feel that a buffer of at least 30 metres on either side of the stream should be fenced off to protect these streams from stripping and grading pending a provincial decision.

In addition, we believe that all of the collection area impacting the flow of water into these streams should require Water Act approval before stripping and grading. Most of the water flow in the northern portion of the site will be affected by changes to and development of grade and surface conditions, permeability, etc. Waters which would normally flow into the lower ravines as surface or groundwater will be significantly changed in quantity and quality, therefore changing both quantity and quality of the flow in the natural streams.

3. Natural Water Flow Maintenance

Section 7.1.2 (5)(a) of the Area Structure Plan(see attached excerpts) requires that to maintain the ecological quality of ravines and associated ESAs, the drainage pattern of the site should not be significantly altered as a result of development. The proposed Stripping and Grading plan indicates that in fact the direction of water flow would be changed, in most cases diverted from the natural streams and ravines into stormwater management systems contrary to the Area Structure Plan policy.

Surface runoff and groundwater flows support the vegetation, habitat values, and natural contributions of the ravines and lower slopes. In an area such as this where natural areas are so

dependent on water flow, it is appropriate that a strategy be put in place to avoid, reduce or mitigate the potential negative impacts of the proposed development. Some of the change in the surface and groundwater regime is related to the elevations and the formations that arise from any stripping and grading plan. How will the impact of this final form be evaluated and requirements of section 7.1.2 (5)(a) the Area Structure Plan be enforced?

4. Protection of Native Vegetation Rare Plant Species

The Biophysical Inventory for this site identified rare plants within the developable area including the Little Bluestem and Sand grass. Section A.3.1 (2)(iii) of the Area Structure Plan (see attached excerpts) requires, and the proponent has committed to, relocating these from areas that will be disturbed to compatible sites within the Natural Area. For best survivability, the vegetation to be transplanted, particularly the rare species, needs to be identified and protected, and the appropriate receiving site should be identified and prepared as required before any stripping or grading occurs. We can identify nothing in the stripping and grading plan that addresses this requirement and ask that the City ensure that appropriate modifications be made to the stripping and grading plan.

5. Existing Excavation Activity

It is our understanding that there should be no disturbance of the watercourse next to the TransCanada Highway until there is approval under the Water Act. However we have observed that the TransCanada Highway work is already impacting that area and appears to have significantly disrupted the stream. We request that the City intervene to protect this stream. TransCanada Highway work has also resulted in other stripping and stockpiling on Trinity lands with no known approvals.

6. The Gateway Ravine

We note that the fill contours illustrated on Map 04A suggests that the watercourse and ravine feature will be filled to a depth of 15 metres (50 feet). Calgary River Valleys is on record as being opposed to the filling of this ravine and feel compelled to reiterate our concern for this lost opportunity to preserve a significant natural feature. Thoughtful integration of this ravine as a park with the Gateway development will serve to support and highlight the theme of the Gateway District as stated in the Area Structure Plan. This ravine feature offers visual relief from the built environment as experienced along the highway and from adjacent lands and could provide a visual Gateway enhancement.

Any development potential lost through the retention of the ravine could be transferred to adjacent lands.

7. Creek at Village and Town Centre

There is a significant permanently flowing watercourse between Village and Town Centre. There have been modifications to the stream, specifically hardscaping and piping that have reduced the ecological function of this stream and within the site have constricted the stream to a manhole and pipe system. We feel that there is an opportunity to improve the stream,

restoring its more natural characteristics and functions such that it would offer a valuable park amenity to the development. We note that the course of the daylighted stream would be almost entirely within the Municipal Reserve and Public Utility Lot and therefore would be under City management. We suggest that the City work with the developer to daylight the stream to the TransCanada Highway as a natural amenity. This opportunity should be considered as part of the Stripping and Grading Plan review. We believe efforts should be made to ensure that the nearby proposed stormwater facility will provide necessary management without sacrificing the opportunity for the natural stream corridor.

Thank you for the opportunity to provide comment. Calgary River Valleys is prepared to participate in future consultation processes related to this development. We would appreciate being advised on any further decision on this matter.

Sincerely,

Steve Meadows
President
Calgary River Valleys

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

Attachments: Area Structure Plan Excerpts

cc: CRV circulation

Referenced Excerpts from Area Structure Plan – Canada Olympic Park and Adjacent Lands, Approved by Calgary City Council July 27, 2015

Section 5.9.2 Subsection (1)(e)

“Where a road crosses any of the ravines in the Paskapoo Slopes Natural Area, the continuity of the watercourse and ravine habitat should be maintained. Consideration should be given to the most appropriate technique to maintain the ecological quality of the area.”

Section 7.1.2 Subsection (5)(a)

“To maintain the ecological quality of ravines and associated ESAs, the drainage pattern of the site should not be significantly altered as a result of development. Site specific geotechnical studies shall take this requirement into consideration, and shall be reviewed by the Approving Authority at such time as Outline Plan/Land Use Amendment application decisions are considered.

Section A.3.1 Subsection (2)

“Development of a site should

- (i) ensure that the maximum amount of existing natural vegetation is retained,
- (ii) be integrated with the existing natural vegetation, and
- (iii) Provide for the restoration of existing natural vegetation elsewhere on a site where such vegetation is removed to accommodate buildings or other forms of development.”