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Calgary River Valleys champions and engages the public in the protection, appreciation and stewardship of Calgary's rivers, creeks, wetlands and watershed resources.

We are the voice of our rivers.

October 14, 2015

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Attention: Calgary Planning Commission

Re: Draft Glacier Ridge Area Structure Plan (ASP)

Calgary River Valleys is pleased to have been provided the opportunity to meet with City staff to review the background materials and to have been circulated the final draft ASP for comment. Calgary River Valleys (CRV) as part of its mandate provides a platform for our members and partners to provide comments on development in the Calgary area.

While the Glacier Ridge area has been largely under agricultural use for a number of years, these lands offer a number of important ecological functions and unique landform features that demand thoughtful treatment. These include numerous streams and wetlands, and various groundwater seeps, six coulees, several bedrock outcrops and glacial erratic, and a variety of Species of Management Concern. The *Phase 3 Open Space Study: North Stoney Annexation Lands* and the *Nose Creek Watershed Water Management Plan* both highlight the sensitivity of the area and the ecological, social and economic impact of future development on downstream conditions. The incorporation of the principle of *Design with Nature* into the Glacier Ridge ASP is strongly supported. This site offers many natural attributes that can be a significant asset to the overall development if they are protected and even enhanced as appropriate.

The following comments have been generated through discussions with our membership and staff.

1. Of particular note is the proposal to transform a major portion of Symons Valley Road that currently runs very close to West Nose Creek to a regional pedestrian and cycle pathway offering protection of ecological function and wildlife corridor attributes of the creek and surrounding lands. This proposal that calls for the redirection of vehicular traffic and associated development to new streets away from the creek is critical to achieving the objectives of this plan. There is concern that there may be significant pressure to abandon this proposal in favour of increased development along an existing road. Section 5.3.6. identifies several criteria for the realization of this Plan objective. Council and City Administration are strongly urged to work to meet these provisions in advance of land use amendments.



2. In addition to and in support of this major feature of the ASP, is the inclusion of lands between the main branch of West Nose Creek to a tributary from the northeast in the Environmental Open Space (EOS) Study Area. This large study area will afford an opportunity to better assess this area at the Land Use Amendment/Outline Plan stage to determine the appropriate management of these lands ensuring long term ecological function as well as the accommodation of passive recreation opportunities and corridors. Once again, it is anticipated that there may be pressure to reduce this portion of the EOS study area in favour of development but Council is urged to ensure that it remains intact to ensure proper review.
3. Several documents would have been referenced in determining the boundary of the EOS Study Area that has been applied across the entire Glacier Ridge ASP. The *Environmental Reserve Setback Guidelines* call for a minimum of 30 metre setback along West Nose Creek depending on elements such as creek connected aquifers and riparian zones. The *Calgary Annexation Territory Study Phase 3 Open Space Study* (Section 7.4.1) suggests that in order to protect ecological function, including water quality and hydrology, that a protection corridor should encompass the entire floodplain and meander belt width of West Nose Creek, including oxbows and abandoned channels as well as the entire coulee system, riparian vegetation and steep slopes. The Glacier Ridge ASP also calls for compliance with The *Nose Creek Watershed Water Management Plan* (Section 8.5.2) that suggests that the riparian setback should be based on the greater of three criteria; the 1:100 floodplain, the meander belt (20X the bank) and the width of escarpments (lands having >15% slope) that lie adjacent to the meander belt and/or floodplain. The *Nose Creek/West Nose Creek Riparian Areas Mapping* illustrates several of these elements. The *Glacier Ridge ASP Biophysical Inventory* also ranks and identifies lands, coulees and watercourses with regard to their environmental sensitivity. While the scale and graphic nature of the Glacier Ridge Concept Map in the proposed ASP does not lend itself to accurate measurements, Calgary River Valleys members who reviewed the draft ASP are generally satisfied that the findings and recommendations of these various studies are reflected within the proposed EOS Study Area in the Glacier Ridge ASP.

It is suggested that while the above noted studies address environmentally significant features and the identification of appropriate setbacks to offer protection of ecological function, they do not address the addition of pedestrian and/or cycle corridors. This is a particular concern for the lower order streams including the unnamed streams in the more eastern and western extremes of the ASP lands. It is therefore suggested a policy be added to section 4.2 of the Glacier Ridge ASP requiring that where the results of these various studies would suggest a setback of 40 metres or less, that an additional 10 metres be added to the Study area. This addition will ensure that further study can determine whether/how the pedestrian/cycle corridor can be accommodated while the ecological function of the feature is protected if not enhanced.

4. Proposed policy in Section 4.2 of the ASP calls for further study of street crossings of Green Corridors or natural areas at the Land Use Amendment/Outline Plan stage to minimize any change to natural conditions and ensure the use of the most appropriate techniques to maintain ecological quality. When the open fields are developed, wildlife corridors and biodiversity contribution for this district will be much more concentrated in the creek valleys. Therefore, this policy could be strengthened with inclusion of a requirement that in the case of creek crossings that the continuity of the watercourse and surrounding habitat be maintained and accommodation be made for wildlife friendly passage.
5. Proposed ASP policies also encourage land owners and the City to restore the native habitat of EOS Study Area to lands that were disturbed prior to the Outline Plan/Land Use Amendment stage. The *Nose Creek Watershed and Water Management Plan* (Section 8.7) notes that, “Restoration of Nose Creek and West Nose Creek should be a priority as future land use decisions are being made and further alteration of the creek is anticipated.” The *Biophysical Inventory* (Section 10.2) also points out that High ESAs will require special management practices to ensure negative impacts of urban development are reduced as much as possible. It would be advisable to augment the policies of section 4.2 to encourage the restoration and enhancement of ecological quality at every appropriate opportunity.
6. Calgary River Valleys members have been part of past planning and policy processes which have recommended and identified the importance of the West Nose Creek valley as a significant urban wildlife corridor. Despite some planning defaults and lost opportunities in past years, this corridor should provide support and critical mass for the natural areas in North Calgary such as Nose Hill Park and Nose Creek Parks. We note and support the signature statement of Section 4.1 stating that the valley provides opportunities for recreational amenities and pathway opportunities within the plan area and across North Calgary to Nose Creek. We recommend that section 4.1 of the ASP be amended to recognize the wildlife corridor contribution of this reach of West Nose Creek as part of the larger natural area corridor across North Calgary.
7. Reference to the use of *natural* stormwater management strategies in the Guiding Principles of the Plan should be reiterated in the implementing policies of Section 6.3. Where applicable and appropriate, design and development standards within developing areas should allow for maximization of opportunities for infiltration and natural overland flows to minimize runoff that otherwise have to be managed. This would also accommodate downstream land stability, vegetation and habitat that depend on *natural* groundwaters.
8. Appendix B Section B.2.3. of the North Regional Context (NRC) Study refers to a Master Drainage Plan that was being undertaken at the time and directed that each ASP within the

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NRC Study Area must undertake a more detailed study that must reference the Master Drainage Plan. Some members of Calgary River Valleys are concerned that while 6.3 of the Glacier Ridge ASP does require that a Master Drainage Plan must be approved prior the Outline Plan and Land Use Amendment stage, the ASP is now informing the Outline Plan without benefit of the Master Drainage Plan. It is further noted that Section 6.3 should be clarified to ensure that the reference to loading of the stream includes both water quantity and quality.

9. Those members of Calgary River Valleys who reviewed the Plan do note many positive aspects of the Glacier Ridge ASP that should be acknowledged and supported in future documents including but not limited to the protection of existing landscapes and views, use of adaptive grid street pattern, support of urban agriculture, and provisions for interface with natural areas.

Overall, Calgary River Valley members who reviewed this Plan are impressed by the way the Glacier Ridge ASP addressed a significant and challenging landscape and sought to retain and sensitively integrate natural attributes while striving to protect ecological function. We appreciate your consideration of these comments.

Sincerely,

Steve Meadows,
President, Calgary River Valleys

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

cc: Jordan Furness, Glacier Ridge ASP Project Manager
CRV circulation