

November 26, 2015

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

Attention: His Worship Mayor Nenshi and Members of City Council

Re: Proposed Providence Area Structure Plan (ASP)

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. Please accept these comments on the proposed Providence Area Structure Plan that have been generated through discussions with our membership.

Members of the Calgary River Valleys who reviewed the proposed ASP do support a number of principles and policies set out in the proposed Providence ASP including the following examples:

- a) the aspiration of creating a Complete Community that offers a range of land uses, efficient transportation and transit, as well as the full range of community services and amenities,
- b) the use of an efficient grid network modified to minimize crossing of the Environment Open Space (EOS) Study Area,
- c) policies helping to protect dark skies.

The land addressed by the Providence Area Structure Plan includes three drainage basins and is characterized by an extensive system of wetlands covering 121 acres and a minimally developed surface drainage system suggesting that natural surface volume discharge from this area is very small. This complex system does create challenges for the development of an appropriate land use pattern and stormwater management that would best ensure the ongoing ecological function and maintenance of predevelopment hydrology. It is this complexity that gives rise to several questions or concerns:

1. Delineation of the Environmental Open Space Study Area.

The Environmental Open Space Study Area does appear to incorporate the Environmentally Significant Areas (ESAs) as well as at least the Class Three and above wetlands as identified in the Biophysical Inventory. There is concern however that given that the subject area is dominated by wetland complexes, delineation of the wetlands alone may be insufficient to protect their ecological relationship with and contribution to the health of the watershed. In areas with more defined watercourse and drainage patterns one can identify and buffer the water features. It is more difficult to understand and "manage" wetland complexes and linear depressions that convey surface and subsurface water between wetlands. In this situation the

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(Calgary Water Resources)

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Darrell Sargent
(Calgary City Wide Policy)

Advisor
Robin Sauvé
(Calgary Community Initiatives)

Advisor
George Stalker
(Calgary Parks)



delineation of the EOS Study Area boundaries would benefit from the results of a Master Drainage Plan. *These concerns may be better directed to the City's Wetland Policy and the manner in which this is addressed in the requirements for a BIA. Is there an opportunity to address this in comments on the new Framework?*

2. Changing Environmental Open Space Study Area Boundaries

Section 9.4.1 implies that where the Environmental Open Space (EOS) Study Area boundaries are adjusted, the policies of the adjacent Land Use Area apply without amendment to the maps within the ASP. While it might be reasonable to apply this policy to minor adjustments and refinements of the EOS Study Area boundaries, a policy should be added to clarify that significant adjustments or elimination of EOS Study Areas should be subject to an amendment to the ASP that would allow for notice and consultation.

3. Master Drainage Plan – Timing

It is noted that the City's Southwest Regional Policy Plan (2007) 7.8.1.(1) (a) directs that a Master Drainage Plan be completed as part of the Area Structure Plan preparation process. We understand that this document is not yet complete likely due to the aggressive timelines set for the completion of Developer Funded Area Structure Plans. Perhaps this is the driving force behind the change in policy as stated in Section 8.4 which now defers completion of the MDP to prior to approval of the ASP. Members of the Calgary River Valleys reviewing this ASP urge Council to reconsider this policy change and will be recommending revisions to the New Community Planning Guidebook and/or the proposed Ecological Inventory Framework that would ensure that Master Drainage Plans are complete and approved as a condition of Area Structure Plan approval so that they can inform the preparation of these important policy documents.

With respect to the MDP that is in process, we are pleased that City staff has indicated that they will make the findings available to CRV and offered the opportunity to provide input before the approval of the MDP. In particular we will be looking for geophysical and hydrological investigations that will give direction as to how stormwater infrastructure can mimic natural hydrological conditions to ensure the sustainability of natural wetlands as well as the rest of the hydrological cycle that will impact downstream watercourses.

We would also like to draw attention to a very large wetland just west of the ASP that has surface and perhaps subsurface connection to wetlands within the Providence area. An adequate stormwater management plan is required to give assurance that treatment of connected wetlands and the surrounding development will not negatively impact this large wetland. We understand that the connection between the wetland to the west and wetlands within the ASP is being monitored and that the area being studied by the Master Drainage Plan extends beyond the ASP boundaries in order to best understand hydrological connections with surrounding lands. Calgary River Valleys will be monitoring any land use amendments to see how these findings will be addressed.

5. Protection of Wildlife Corridors

How does the EOS Study Area address wildlife corridors within and beyond the Plan area? While the lands have been cultivated minimizing wildlife corridors, the green corridors offer an opportunity to re-establish these corridors. How will Green Corridors of Providence connect with Fish Creek Provincial Park? There appears to be a regional pathway that aligns with the Southwest Ring Road interchange. How will wildlife movement be accommodated? Is the EOS Study Area sufficiently wide and connected to allow for the reestablishment of these wildlife corridors as well as accommodate and support ecological function of wetlands, *and* public pathways? An assessment needs to be undertaken to determine if there are areas that should not be accessed and development designs that would discourage access as warranted by the sensitive characteristics of the feature. **Merged with Green Corridors section.**

7. EOS Crossings

Section 6.7.1 that allows for any additional EOS crossings with roads should be deleted. The street pattern looks to be sufficient and appears to have been designed to avoid EOS areas. Any additional roads should also avoid EOS crossings.

In summary, it is recommended that,

~~Calgary River Valleys members who reviewed this Area Structure Plan are pleased that the principles and policies support the creation of a Complete Community integrating a full complement of community services and amenities, paths and parks. Calgary River Valleys appreciates the opportunity to offer input on the proposed Providence Area Structure Plan and your consideration of these comments.~~

Sincerely,

Steve Meadows
President, Calgary River Valleys

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

cc: Jill Sonogo, Providence ASP Project Manager
CRV circulation