

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 Nose Creek 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 draft Nose Creek Area Structure Plan.

Those CRV members who have reviewed the Nose Creek ASP found many aspects of the draft Plan to be commendable including the visions and principles which focused on creating a healthy and complete community. The ASP also includes intent statements suggesting that the creek corridor should be protected.

Of particular concern to those CRV members who reviewed the draft Nose Creek ASP is the limiting of the delineation of the Environmental Open Space (EOS) Study Area which is meant to inform how future development may occur. In addition, there is concern about the further fragmentation of a relatively functional reach of Nose Creek with the suggestion that road access to the proposed industrial corridor west of the QE Highway would cross the Nose Creek corridor.

The relatively intact watercourses and wetlands within the Nose Creek ASP provide an opportunity to maintain and increase biodiversity, connectivity and recreational opportunities in the northern part of the City as well as to address concerns related to the health of the watercourse. Referencing van Duin and Garcia (2006), the *North Stoney Annexation Lands Open Space Study* (pg 28) drew attention to the impact of Nose Creek on downstream water quality and watershed health noting that plans for major future urban developments are leading to concerns for the implications for the health of the watershed and risks to downstream environments and water users. *The Nose Creek Watershed Water Management Plan* NCWWMP (pg 38) also suggests that Nose Creek restoration should be a priority as future land use decisions are made. Cautious and thoughtful urban expansion on these lands offers an opportunity to minimize negative impacts and potentially improve downstream health.

It is noted that the EOS Study Area of the draft Nose Creek ASP has been drastically reduced from what was illustrated during the consultation process right up until the last Open House. It now seems to reflect only the *minimum* area that is expected to be protected from development through the identification of the Environmental Reserve rather than a broader

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study that would address the concerns and opportunities noted in the studies mentioned above.

Several documents would have been referenced in determining the EOS Study Area; the *Environmental Reserve Setback Guidelines*, the *Calgary Annexation Territory Study Phase 3 Open Space Study*, the *Nose Creek Watershed Water Management Plan*, the *Nose Creek/West Nose Creek Riparian Areas Mapping*, and the *Nose Creek Area Structure Plan Supplemental Biophysical Inventory*. A comparison of maps indicates that the setbacks recommended by the *Nose Creek Watershed Water Management Plan* have not been included the EOS Study Area. Excluded is at least one acute meander of the creek where Nose Creek and Wet Creek converge as well as the escarpment lands that run east of the creek, west of Deerfoot Trail and north of Stoney Trail. In addition, figure 4-14 of the draft *Nose Creek Area Structure Plan Supplemental Biophysical Inventory* illustrates that a significant portion of a block of land containing a large wetland south of Highway 566 as well as a significant portion of the lands east of the rail line include lands that rank high as Environmentally Significant Areas. The authors of the study recommend that these lands be subject to further study making them obvious for inclusion in the EOS Study Area. Except where these lands coincide with the riparian setbacks, these lands have also been excluded from the EOS Study Area boundary and instead are identified by an Industrial land use designation.

CRV members reviewing this draft ASP have indicated concerns that the proposed EOS Study Area boundary is insufficient to address:

- a) Opportunities to improve riparian health and downstream water quality. The *NCWWM Plan* suggests that Nose Creek restoration should be a priority as future land use decisions are made. The EOS Study Area needs to be sufficiently large to ensure that protection and enhancement opportunities are assessed for their full potential.
- b) The need for further study to identify critical habitats and movement corridors for sensitive flora and fauna outside the described EOS Study Area boundary and the accommodation of plant transplanting as may be required.
- c) Characteristics of the migrating channel and evolution of the floodplain. The boundaries of the study area should be sufficient to accommodate the natural changes in creek flow and associated flooding patterns over time.
- d) Adequate lands to accommodate riparian setback, wildlife corridor as well as active use of the proposed green corridor including pedestrian and cycle pathways. The proposed EOS boundary reflects physical attributes, floodplain and arbitrarily measured setbacks as per city policy for the protection of the watercourse itself. This delineation does not appear to have included consideration for the accommodation of native species and wildlife also utilizing this corridor *as well as* the addition of active use by the public. Accommodation of the ecological function of the creek, habitat, as well as public use would reasonably call for a more expansive Study Area.

The CRV review of the draft document suggests that the Environment Open Space Study area is insufficient and does not reflect the recommendations of studies that should inform the Area Structure Plan. **It is recommended that the EOS Study Area boundary be broadened to include all lands identified in the *Biophysical Inventory* as well as the *Nose Creek Watershed Water Management Plan* as requiring further study.** This criterion for delineation is in keeping with the approach used in the identification of the EOS Study Area in other Area Structure Plans. It is acknowledged that more detailed study will identify some lands within the study area as having development potential but the broader study area will allow for consideration of more comprehensive objectives reflective of the recommendations of studies referenced in this letter.

Further, we **recommend a study of how the development of those lands east of the creek could occur without the need for an access that would involve a creek corridor crossing resulting in further fragmentation of the riparian corridor.**

In summary, it is recommended that:

- 1. the EOS Study Area boundary be broadened to include all lands identified in the *Biophysical Inventory* as well as the *Nose Creek Watershed Water Management Plan* as requiring further study.**
- 2. a study of how the development of those lands east of the creek could occur without the need for an access that would involve a creek corridor crossing resulting in further fragmentation of the riparian corridor.**

Calgary River Valleys appreciates the opportunity to offer input on the proposed Nose Creek 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

c.c.: CRV circulation
Joyce Tang, Project Lead, City Planning team