

November 30, 2015

**Attn: Steven Snell**

Business and Policy Planner  
Parks, Planning and Development  
City of Calgary

**Re: Ecological Inventory Framework: Area Structure Plans Draft Version 2, Q4 2015**

Dear Mr. Snell,

We appreciate the opportunity to provide comment on the second draft of the Ecological Inventory Framework.

Members of Calgary River Valleys have reviewed the draft document and have the following questions and comments for your consideration.

**1. Copyright requirement: no reproduction without permission**

Concern was expressed that this type of statement should not be used in a public document. We should not inhibit the knowledge and dissemination of this work. If any restriction is put on its reproduction it could be that quotations should be correct in context and properly referenced. If there is concern that it may be used in a proprietary/for profit mode perhaps that should be addressed by a different statement.

**2. Manual Revision Notice**

Reference to use of the Environmental Inventory Framework for ASPs "only", should be deleted as it is identified other places in the Framework that it could apply to other planning processes.

**3. Introduction**

It would be appropriate to include an aspirational statement in the introduction referencing the value of protecting ecological features and function. For consistency, language from the Open Space Plan could be used here.

**4. Relationship of Ecological Inventory Report to the New Community Planning Guidebook and Area Structure Plan**

The proposed amendment to the New Community Planning Guidebook section 3.4.2 notes that the *Environmental Open Space (EOS) Study Area* depicted on the Local Area Plan (ASP) land use concept maps is identified using the ecological inventory data available at the time of the plan's adoption. Presumably this is the data resulting from the Ecological Inventory Report but we

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note that there is not a reference to the *EOS Study Area* in the Objectives of EI Framework. To clarify that the Ecological Inventory Report informs the Area Structure Plan, there should be specific reference to the EOS Study Area in the Objectives of the EI Report and throughout the Framework document as appropriate as well as a definition included in the Glossary Section of EOS Study Area. We would like to be able to have further discussion with you on this important matter.

**5. Purpose of EI Report**

Further to the above point, Section 1.1 should specifically indicate that the results of the EI Report generate, in addition to the objectives stated, the EOS Study Area as depicted in the ASP. In order to achieve the objective of transparency, one must be able to trace how the results and recommendations of the EI Report translate to determine EOS Study Area boundaries and inform the Area Structure Plan policies. The specific and potential components of the EOS Study Area need to be defined in this Framework and identified in the EI Report.

Clarification of Points 4 and 5 may be supported with the provision of one or more schematics.

**6. Hierarchy of Planning**

A description of the Regional Context Plan should be provided.

**7. Section 2.1 Process**

It is inferred only that Terms of Reference are set after a scoping meeting. The process does not mention Stakeholder input or Peer review which we suggest should be provided for at the Technical Review stage, but at least before completion.

**8. Section 2.3.2**

Some rewording is required here to match language used in the introductory paragraph with bullets, ie. change first bullet to read "identification and description of..." and adjust language in other bullets similarly.

**9. Section 2.3.3.**

CRV strongly agrees that the EI Report needs to be owned by the City and made available to the public for their information. The EI Report will be a critical source of information in the review of the proposed ASP. This raises issues regarding the timing of the release of the EI Report relative to the ASP. In order to achieve the objective of transparency, the public needs to be able to see how the EI Report informs the ASP. Therefore the EI Report must be available before or at least at the same time as the Open House for the ASP at Concept stage as the outcomes of the EI Report identify some of the key building blocks/limitations of the ASP. This requirement would ideally be included in the New Community Planning Guidebook. If it is not possible to make those changes before revisions to the Guidebook is document are considered by Council, the timing issues should somehow be addressed in this Framework.

**10. Section 3.2 Ecosystem and land cover Classification**

We support the requirement of section 3.2.1.2 that special ecological communities must be identified in this reporting. We wonder if there's a conflict with the direction in paragraph two that detailed plant community mapping will be required at BIA stage for Outline Plan submissions.

**11. Section 3.3 Water Resources**

There is concern that the ASP is not informed by a study of drainage elements and options. While the Outline Plan/Land Use Amendment stage is usually required to be informed by a Master Drainage Plan, the ASP which determines transportation options, utility options and the Environmental Open Space Study Area is not informed by any drainage study. How can we determine what we are going to develop or impact without the information that would be gleaned through such a study. This approach does not optimize the choices that could otherwise be available.

**12. Section 3.7**

With reference to Ecological Function, it is suggested that consideration be given to other natural functionalities in addition to the wildlife elements that are mentioned in the draft, including riparian/wetland complexes, vegetation communities etc.

**13. As a General Comment**

We appreciate that the intent of this framework is to offer some clarity. This is a complex process and consideration could be given to the use of simplified language, summary statements, schematics and flowcharts.

Thank you for the opportunity to provide comment on the draft. CRV would welcome the opportunity to further discuss these suggestions.

Sincerely,

Michael Kenny  
Chair, Biodiversity Advisory Committee  
Calgary River Valleys

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

